Planning Inspectorate

SCOPING OPINION:

Proposed East West Rail

Case Reference: TR040012

Adopted by the Planning Inspectorate (on behalf of the Secretary of State) pursuant to Regulation 10 of The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017

12 February 2025

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1. INTRODUCTION

1.1.1 On 02 January 2025, the Planning Inspectorate (the Inspectorate) received an application for a Scoping Opinion from East West Railway Limited (the applicant) under regulation 10 of The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (The EIA Regulations) for the proposed East West Rail (the proposed development). The applicant notified the Secretary of State (SoS) under regulation 8(1)(b) of those regulations that they propose to provide an Environmental Statement (ES) in respect of the proposed development and by virtue of regulation 6(2)(a), the proposed development is 'EIA development'.

1.1.2 The applicant provided the necessary information to inform a request under EIA regulation 10(3) in the form of a Scoping Report, available from:

https://national-infrastructure-consenting.planninginspectorate.gov.uk/projects/TR040012/documents

1.1.3 This document is the Scoping Opinion (the Opinion) adopted by the Inspectorate on behalf of the SoS. This Opinion is made on the basis of the information provided in the Scoping Report, reflecting the proposed development as currently described by the applicant. This Opinion should be read in conjunction with the applicant's Scoping Report.

1.1.4 The Inspectorate has set out in the following sections of this Opinion where it has / has not agreed to scope out certain aspects / matters on the basis of the information provided as part of the Scoping Report. The Inspectorate is content that the receipt of this Scoping Opinion should not prevent the applicant from subsequently agreeing with the relevant consultation bodies to scope such aspects / matters out of the ES, where further evidence has been provided to justify this approach. However, in order to demonstrate that the aspects / matters have been appropriately addressed, the ES should explain the reasoning for scoping them out and justify the approach taken.

1.1.5 Before adopting this Opinion, the Inspectorate has consulted the 'consultation bodies' listed in appendix 1 in accordance with EIA regulation 10(6). A list of those consultation bodies who replied within the statutory timeframe (along with copies of their comments) is provided in appendix 2. These comments have been taken into account in the preparation of this Opinion.

1.1.6 The Inspectorate has published a series of advice pages, including Advice Note 7: *Environmental Impact Assessment: Preliminary Environmental Information, Screening and Scoping* (AN7). AN7 and its annexes provide guidance on EIA processes during the pre-application stages and advice to support applicants in the preparation of their ES.

1.1.7 Applicants should have particular regard to the standing advice in AN7, alongside other advice notes on the Planning Act 2008 (PA2008) process, available from:

https://www.gov.uk/government/collections/national-infrastructure-planning-advice-notes

1.1.8 This Opinion should not be construed as implying that the Inspectorate agrees with the information or comments provided by the applicant in their request for an opinion from the Inspectorate. In particular, comments from the Inspectorate in this Opinion are without prejudice to any later decisions taken (e.g. on formal submission of the application) that any development identified by the applicant is necessarily to be treated as part of a Nationally Significant Infrastructure Project (NSIP) or associated development or development that does not require development consent.

2. OVERARCHING COMMENTS

2.1 Description of the Proposed Development

(Scoping Report Section NA)

ID	Ref	Description	Inspectorate's comments
2.1.1	Throughout scoping report	Lighting	The need for lighting is referred to through the Scoping Report and method statements and effects from lighting will be assessed. The ES should include details of lighting systems and effects on both human and ecological receptors, and measures taken to avoid or minimise lighting impacts.
2.1.2	3.3.10 of the scoping report	Car parking	The Scoping Report states that a new multi-storey car park will be constructed at Bedford station. The ES should provide more details regarding the scale of this car park and assess for any likely significant effects, for example, landscape and visual effects.
2.1.3	Table 4 of the water resources method statement	Piling	Reference to subsurface works including piling is only referred to in the water resources method statement. The ES should include details of methods to be used, expected duration and timing of such activities. The ES should assess any potential impacts from these activities on receptors sensitive to changes in vibration where significant effects are likely to occur.
2.1.4	Paragraph 4.1.6 of the scoping report	Design flexibility	The Inspectorate notes the Applicant's intention to apply a 'Rochdale Envelope' approach to maintain flexibility within the design of the proposed development. The Inspectorate expects that at the point an application is made, the description of the proposed development will be sufficiently detailed to include the design, size, capacity and locations of the different elements of the Proposed Development or where details are not yet known, will set out the assumptions applied to the assessment in relation to these aspects. This should include confirmation of route options, level crossings and locations of new stations. Where flexibility is sought, the ES should clearly set out and justify the maximum design parameters that would apply for each option assessed and how these have been used to inform an adequate assessment in the ES.

ID	Ref	Description	Inspectorate's comments
2.1.5	Paragraph 2.4.14 and section 3 of the Scoping Report	Freight services	The Scoping Report states that the applicant will continue to develop the proposal considering potential freight demand and requirements for non-passenger services. Section 3 includes some information about the potential maximum number of freight services on some but not all sections of the proposed railway. The ES should include a clear description of freight services, on a worst-case basis, that are planned to use the proposed development, including frequency, type and sections of the route. Any likely significant effects arising should be assessed and described in the ES.
2.1.6	Paragraph 2.5.11 of the Scoping Report	Construction interface with existing railway	The Scoping Report states that construction of the proposed development would interface with and impact several sections of the existing railway and stations, and that works would be planned to allow for continued safe access or otherwise may be undertaken outside station hours. The ES should set out any assumptions that have been made about how these interfaces would be managed and implications for relevant assessments, for example the likely construction hours, frequency and location of overnight working, or expected changes to existing passenger services. Any likely significant effects arising from the interface of construction with the existing railway should be assessed and described in the ES.
2.1.7	Paragraph 2.5.2 of the scoping report	Construction compounds	The Scoping Report states that the proposed development would require a number of main and satellite construction compounds, the location of these is not provided in the scoping report. To ensure a robust assessment of likely significant effects, the ES should provide details regarding the number, location and dimensions of construction compounds and the potential for adverse effects on aspects included in the ES.
2.1.8	Section 3 of the Scoping Report	Building parameters	The Scoping Report states that several new buildings are proposed, including new and relocated railway stations. It provides a relatively high level description of the locations under consideration but no details about likely dimensions or appearance.

ID	Ref	Description	Inspectorate's comments
			At the point of application, the description of the physical characteristics of new buildings forming part of the proposed development should be sufficiently developed to include further details regarding design, size and location. This should include the footprint and heights of permanent structures. This should be supported (as necessary) by figures, cross sections and drawings that are clearly and appropriately referenced. The applicant should make effort to fix the siting of each component and reduce uncertainty where feasible; where this is not possible, the applicant should provide justification and ensure that the ES assesses a worst-case scenario adopting a parameters based approach.
2.1.9	Paragraph 4.1.7 of the Scoping Report	Component upgrade or replacement	The Scoping Report states that there is no intention to decommission the proposed development and it is more likely that upgrades would be undertaken including maintenance and replacement of some components. However, limited detail is presented about what this might comprise. The Inspectorate advises that the ES should include a description of the expected maintenance and replacement activities over the operational life of the proposed development. Where detail is unknown, parameters should be set that enable an assessment of the worst-case scenario for relevant aspects of the ES, including carbon, material resources and waste, and associated matters such as transport movements, air quality and noise.
2.1.10	Section 7.2 of the LVMS	Impact sources	The ES should assess impacts arising from closure of existing stations in the Fenny Stratford to Kempston route section, if this option is taken forward or optionality for it remains in the DCO application.
2.1.11	Section 9.2 of the LVMS	Design principles	The Scoping Report identifies several principles that it states would be incorporated into the design of the proposed development. Any design or embedded measures proposed to avoid or reduce significant adverse effects should be described in the ES and demonstrably secured in the DCO.

2.2 EIA Methodology and Scope of Assessment

ID	Ref	Description	Inspectorate's comments
2.2.1	NA	Legibility	Method statements are not included in the table of contents which makes the scoping report difficult to navigate. The Scoping Report includes method statements as separate documents, it is not possible to easily search using page or paragraph numbers. The same follows for figures, for instance, six figures are titled 'Figure 1'. There are also occurrences where chapters and document are referred to but are not included in the scoping report and of abbreviations used without being included in a glossary. The Inspectorate advises that in order to aide easy navigation, the ES should be set out in a clear and logical order with a full and correct contents list. Any supporting technical chapters should be clearly referenced. The Applicant is advised to follow the guidance on the preparation and submission of application documents which may be accessed using the following link: https://www.gov.uk/guidance/nationally-significant-infrastructure-projects-advice-on-the-preparation-and-submission-of-application-documents#order-of-application-information-and-file-indexing
2.2.2	NA	Aspects to be scoped in or scoped out	In some instances matters to be scoped in or out of the assessment are discussed in both the Scoping Report and in method statements and again in supporting appendices. This can lead to over complication and inconsistency. For example, Section 6.11 of the Scoping Report (water resources) contains Table 19 which sets out the scope of the assessment which includes matters to be scoped in or out. The water resources

ID	Ref	Description	Inspectorate's comments
			method statement includes Table 19: summary of scope of water resources assessment, and Table 10 in Appendix A: Aspects and matters proposed to be scoped out. These often use slightly differing wording for the description of assessment item and are not consistent between all three tables on the items to be scoped out. The ES should clearly set out the scope of the assessment for each aspect being assessed and ensure that if this information is provided in more than one location, that the information provided is consistent.
2.2.3	Paragraph 4.1.7 of the Scoping Report	Decommissioning	The Applicant proposes to scope decommissioning out of the assessment on the basis that there is currently no intention to decommission the Project at any point in the future as the project lifespan is over 100 years. The Inspectorate agrees that decommissioning can be scoped out of the ES on that basis that a high-level summary of potential effects for each environmental topic is provided within the ES. The Inspectorate expects this to include a description of likely methods for decommissioning.
2.2.4	NA	Register of environmental actions and commitments (REAC)	The Scoping Report states that a REAC will be delivered alongside the ES and Code of Construction Practice. The REAC must clearly explain how actions are to be secured and delivered and cross refer to where these matters are discussed in the ES.
2.2.5	Section 4.5 of the Scoping Report	Cumulative effects assessment	Section 4.5 of the Scoping Report sets out the approach to the cumulative effects assessment. The Applicant should make effort to agree the plans and projects included in the cumulative effects assessment with relevant consultation bodies. It is noted that cumulative effects are not included in separate aspect chapters and therefore it is assumed that cumulative effects for all aspects will be scoped into the ES.

ID	Ref	Description	Inspectorate's comments
2.2.6	Appendix A of the Scoping Report	Assessment of alternatives	Appendix A of the Scoping Report refers to the 15 assessment factors used to refine the long list of route options, however these do not appear to be provided. Where the assessment of alternatives utilises a series of criteria for selection, these should be given in the ES, as well as any methodology for the use of these to refine alternative options.
2.2.7	Chapter 7 of the Scoping Report	Other assessments	Chapter 7 of the Scoping Report provides information regarding other assessments which are outside the scope of EIA. These are: • Biodiversity Net Gain • Habitats Regulations Assessment • Equality impact assessment • Flood risk assessment • Water framework directive • Arboriculture Where there may be linkages between these assessments and EIA aspects, such as biodiversity, communities and water resources, references should be clearly set out in the ES.
2.2.8	Table 25 of the scoping report	Scheme wide and global effects	The structure of the ES provided in Table 25 includes a number of aspects that the Scoping Report considers relevant to scheme wide effects, which also have individual assessments within the eight route sections. The ES should clearly present effects of the proposed development as a whole rather than those identified for individual sections of the route.
2.2.9	N/A	Transboundary	The Inspectorate on behalf of the SoS has considered the proposed development and concludes that the proposed development is unlikely to have a significant effect either alone or cumulatively on the environment

ID	Ref	Description	Inspectorate's comments
			in a European Economic Area State. In reaching this conclusion the Inspectorate has identified and considered the proposed development's likely impacts including consideration of potential pathways and the extent, magnitude, probability, duration, frequency and reversibility of the impacts. The Inspectorate considers that the likelihood of transboundary effects resulting from the proposed development is so low that it does not warrant the issue of a detailed transboundary screening. However, this position will remain under review and will have regard to any new or materially different information coming to light which may alter that decision. Note: The SoS' duty under regulation 32 of the 2017 EIA Regulations continues throughout the application process. The Inspectorate's screening of transboundary issues is based on the relevant considerations specified in the annex to its Advice Page 'Nationally Significant Infrastructure Projects: Advice on Transboundary Impacts and Process', links for which can be found in paragraph 1.0.7 above.

3. ENVIRONMENTAL ASPECT COMMENTS

3.1 Agriculture and soils

(Scoping Report Section 6.2 and the Agriculture and Soils Method Statement)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.1.1	NA	NA	No matters have been proposed to be scoped out of the assessment

ID	Ref	Description	Inspectorate's comments
3.1.2	Paragraph 5.5.1 of the agriculture and soils method statement (ASMS)	Future baseline	The ASMS indicates that where planning permissions have been granted (outside of the proposed development) that would turn agricultural land to built form, these areas would be omitted or downgraded from the assessment. The ES should provide further clarity on this, as it is possible that depending on the location of these permissions, EWR may acquire this land as part of the proposed development, and if the granted planning permissions had not been implemented at this point, the land would still be agricultural in nature and the built form to be constructed would be an impact as a result of the EWR construction.
3.1.3	Table 3 of the ASMS	Loss of grants	The ASMS refers use of the Woodland Grant Scheme 1, 2 and 3 dataset from Defra. However, the Inspectorate is unclear if the loss of grants or other income is to be considered within the assessment to agricultural holdings, as paragraph 11.1.3 refers to financial compensation measures being outside the scope of the ES. The ES should ensure to provide clarity on which matters from the identified baseline are to be considered within the assessments.
3.1.4	NA	Agricultural land	The ES should contain a clear tabulation of the areas of land in each Best Most Versatile (BMV) classification to be temporarily or permanently lost as a result of the proposed

ID	Ref	Description	Inspectorate's comments
			development, with reference to accompanying map(s) depicting the grades. Specific justification for the use of the land by grade should be provided. Consideration should be given to the use of BMV land in the applicant's discussion of alternatives.

3.2 Air Quality

(Scoping Report Section 6.3 and the Air Quality Method Statement)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.2.1	Table 10 of the Scoping Report and Table 31 of the air quality method statement (AQMS)	Emission to air from operational phase diesel passenger trains	The Inspectorate considers that the specific design and timescales of electrification (either partial or full) of the EWR line are not known at this point. As detailed below, diesel train may be a source of PM2.5 as a result of combustion engines. Therefore, the Inspectorate is not in agreement that emissions to air from operational diesel passenger trains can be scoped out of further assessment.
3.2.2	Table 10 of the Scoping Report and Table 31 of the AQMS	Emission to air from any proposed combustion sources (e.g., for heating and cooling of facilities) during the operational phase	On the basis that the applicant intends to establish an energy strategy that eliminates the use of combustion sources for meeting the heating and cooling requirements of facilities, the Inspectorate is in agreement that emissions to air from any proposed combustion sources during operation can be scoped out of further assessment. The ES should however detail the energy strategy proposed.
3.2.3	Table 10 of the Scoping Report	Emissions to air from construction plant and nonroad mobile machinery (NRMM)	The Inspectorate considers that the information provided at paragraph 7.2.7 of the AQMS in relation to NRMM emissions requires, given the potential scale and duration of construction works, requires the ES to consider an assessment of emissions from NRMM.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
	and Table 31 of the AQMS		The Inspectorate also note that the applicant acknowledges that the intention to scope this matter out will be kept under review as more details of the construction phase are known. The Inspectorate is therefore not in agreement at present to scope out emissions from NRMM during construction.
3.2.4	Table 10 of the Scoping Report and Table 31 of the AQMS	Effects from odour – all project phases	On the basis that the nature of the operational activity (operation of a passenger and freight railway) would not give rise to emissions of odours at a scale likely to cause significant effects, and the limited potential for sources of odour during the construction phase (which would be controlled by measures in the COCP), the Inspectorate is in agreement that effects from odour at all project phases can be scoped out of further assessment.
3.2.5	Section 7 of the AQMS	Assessment of particulate matter	The applicant's attention is drawn to the Defra advice 'PM2.5 Targets: Interim Planning Guidance'. The ES should explain how key sources of air pollution within the proposed development have, as a minimum, been identified and how action has been taken to minimise emissions of $PM_{2.5}$ (including from combustion engines used to power trains) or its precursors.

ID	Ref	Description	Inspectorate's comments
3.2.6	Section 4.2 of the AQMS	Baseline surveys	The Inspectorate wishes to draw the applicant's attention to a number of responses from local authorities and parish councils relating to concerns over the geographic coverage and specific compounds monitored during the baseline surveys undertaken to date. The ES must ensure to present a robust baseline of the proposed development, with reference to the location and sensitivity of specified receptors.

ID	Ref	Description	Inspectorate's comments
3.2.7	Section 8.1 of the AQMS	Potential for damage cost calculations	The Scoping Report does not refer to the considerations for the potential for damage cost calculations as a mitigation method. The ES should detail how the proposed development has considered this or any other financial contributions required towards mitigation measures undertaken by others such as local authorities.
3.2.8	NA	Assessment of diversions to traffic during the construction phase	The ES should include details of how it has considered the requirement for the diversion of traffic during road closures associated with the construction phase, and the air quality impacts of this traffic on the planned diversion routes.

3.3 Communities

(Scoping Report Section 6.4 and the Communities Method Statement)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.3.1	Table 11 of the Scoping Report and Table 8 of the communities method statement (CMS)	Temporary land requirement affecting non-habitable residential property, e.g. gardens, garages, parking spaces – all project phases	The Scoping Report provides a justification for scoping this matter out as the applicant considers that these land uses will not affect the abilities of the main dwellings to be habitable, and that where required, mitigation will be identified to individual landowners (outside of the EIA process). The Inspectorate is in agreement to scope this matter out of further assessment.
3.3.2	Table 11 of the Scoping Report and Table 8 of the CMS	Changes in demand for public services – all project phases Public services and infrastructure provision for construction workers and permanent workforce – all project phases Impacts on emergency services – all project phases	The Scoping Report provides a justification for scoping this matter out as the applicant considers that the required construction and operational roles are likely to be filled by individuals within a commuting distance, and any effects of transport, including to emergency services, are addressed in other specific assessments such as a transport assessment. The Inspectorate is therefore in agreement to scope this matter out of further assessment. The ES should also detail what is considered to be a public service.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.3.3	Table 11 of the Scoping Report and Table 8 of the CMS	Accessibility as it relates to those with needs covered by the Equalities Act 2010 – all project phases	On the basis of the Scoping Report indicating that this potential effect is to be considered outside of the ES in the Equalities Impact Assessment, which has a method statement provided as part of the Scoping Report, the Inspectorate is in agreement that this matter can be scoped out of further assessment.
3.3.4	Table 11 of the Scoping Report and Table 8 of the CMS	Creation of future demand for housing/and employment sites (including over-site development) – all project phases	The Inspectorate is in agreement that the creation of future demand for housing and / or employment sites (including over-site development) is not within the remit of the proposed development and can therefore be scoped out of further assessment.
3.3.5	Table 11 of the Scoping Report and Table 8 of the CMS	Safety and security – all project phases	The Scoping Report provides a justification for scoping this matter out as the applicant considers that site security arrangements will be in line with the requirements set out relevant legislation and appropriate levels of security (personnel/CCTV) will be provided. Furthermore, appropriate levels of security (personnel/CCTV) will be implemented during the operational phase. The Inspectorate is therefore in agreement to scope this matter out of further assessment.

ID	Ref	Description	Inspectorate's comments
3.3.6	N/A	N/A	N/A

3.4 Human Health

(Scoping Report Section 6.4)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.4.1	NA	NA	No matters have been proposed to be scoped out of the assessment

ID	Ref	Description	Inspectorate's comments
3.4.2	Section 9 of the human health method statement	Requirement for a Health Impact Assessment (HIA)	The Scoping Report does not contain a specific methodology relating to the potential requirement for reporting effects in the form of a HIA. The ES should either include a HIA (with reference to the requirements for this detailed by a number of statutory consultees) or provide a justification within the methodology of why a specific HIA is not required.

3.5 Electro-magnetic interference

(Scoping Report Section 6.5)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.5.1	Table 12 of the scoping report	Electric and magnetic fields (EMF) affecting electrical systems - all areas beyond 5m of the centre line except where the public can get closer than 5m to live overhead lines Potential to cause harmful effects in the human body through EMF - all areas beyond 5m of the centre line except where the public can get closer than 5m to live overhead lines Creation of induced voltages in metallic infrastructure	The Inspectorate considers that the wording given throughout Scoping Report section 6.5 is ambiguous as to what is proposed to be assessed. For example, it is not clear why electrical systems (first row of table 12) have a justification to scope out relating to human health, when human health is a separate line. It is also not clear how the receptors identified in paragraph 6.5.8 fit into the categories of either electrical systems (first row of table 12) or metallic infrastructure (3rd row of table 12). It is also not clear how the study areas given in paragraph 6.5.8 of up to 1km relate to the assessments only proposing to assess an area of 10 metres from the project centreline. As such, at present the Inspectorate considers that there is insufficient clarity of information provided in order to agree to scope out EMF from further assessment.
3.5.2	Table 12 of the scoping report	Effects on wildlife	On the basis of the information provided within paragraph 6.5.17 relating to International Commission on Non-Ionizing Radiation Protection (ICNIRP) guidelines and published studies relating to limited effects on wildlife from EMF, the Inspectorate is in agreement that an assessment of effects to wildlife from EMF can be scoped out of further assessment. The applicant may wish to provide a reference to the published studies as supporting evidence.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.5.3	Table 12 of the Scoping Report	All temporary effects during construction effects	On the basis that the construction phase will introduce limited sources of EMF, the Inspectorate is in agreement that an assessment of effects from the construction phase can be scoped out of further assessment in relation to EMF.

ID	Ref	Description	Inspectorate's comments
3.5.4	NA	NA	NA

3.6 Land quality

(Scoping Report Section 6.6 and the Land Quality Method Statement)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.6.1	Table 14 of the Scoping Report and Table 26 of the land quality method statement (LQMS)	Geodiversity – temporary construction effects – all route areas	On the basis that where a receptor is present, the assessment of geodiversity is to be considered as a permanent effect, the Inspectorate is in agreement that an assessment of temporary effects to geodiversity receptors can be scoped out of further assessment.
3.6.2	Table 14 of the Scoping Report and Table 26 of the LQMS	Geodiversity – permanent and operational effects – all route areas except for Comberton to Shelford	On the basis of the baseline information presented which indicates that geodiversity receptors are only present in Comberton to Shelford, the Inspectorate is in agreement that an assessment of permanent effect to geodiversity can be scoped out for further assessment for all other route areas.
3.6.3	Table 14 of the Scoping Report and Table 26 of the LQMS	Land contamination – temporary construction effects– all route areas	The Scoping Report refers to the previous and ongoing provision of desk based (preliminary risk) assessments which are to be used to inform further investigation works. On the basis of these pre-existing assessments, and the outline commitments provide in relation to further investigation, remediation and validation, the Inspectorate is in agreement that an assessment of land contamination during construction work can be scoped out of the ES.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			The ES should however signpost to where these assessments have been provided as part of the DCO application.
3.6.4	Table 14 of the Scoping Report and Table 26 of the LQMS	Land contamination - permanent and operational effects– all route areas	On the basis of the operational nature of the scheme (a railway primarily operated by electrification in the long term), and proposed design related mitigation, the Inspectorate is in agreement that operational effects can be scoped out of further assessment.

ID	Ref	Description	Inspectorate's comments
3.6.5	Section 4 of the LQMS	Baseline - data which will inform the ES	The Inspectorate notes throughout the Scoping Report chapter that the baseline is to be in part informed by existing and proposed preliminary risk assessments, and ground investigation currently being undertaken. However further ground investigation is proposed after the DCO submission (as per paragraph 11.2.1 of the LQMS). The ES should clearly identify any outstanding data proposed to be collected and any existing data gaps and subsequent assumptions and limitations, particularly in relation to where this is proposed to inform further assessment such as the detailed quantitative risk assessment referred to in paragraph 4.3.1 of the LQMS.
3.6.6	Paragraph 5.2.4 of the LQMS	Description of baseline environment and / or receptors	Paragraph 5.2.4 refers to "a groundwater dependent terrestrial ecosystem" however does not provide the name or description. The ES should clearly describe all relevant baseline receptors and features, and where possible present these on an accompanying figure.
3.6.7	Table 21 of the LQMS	Impact pathway of introduction of pollutants	The information provided in the first row of table 21 appears to contradict the statement in paragraph 1.1.6 of the LQMS which states that the impact pathway of the introduction of new materials or contaminants during both the construction stage and completed

ID	Ref	Description	Inspectorate's comments
			development stage of the proposed development is to be assessed within the water resources chapter. The ES should ensure to provide clarity on where the assessment of receptors is presented.
3.6.8	NA	Land stability and other geotechnical risks	The Inspectorate notes that land stability (and therefore geotechnical risks) are included as a section in the COCP, however limited reference is made within the Scoping Report as to how potential risks / hazards from geotechnical works or existing geotechnical features will be assessed. The ES should signpost to where these assessments have been provided as part of the DCO application.

3.7 Socio-economics

(Scoping Report Section 6.7 and the Socio-economic Method Statement)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.7.1	Table 15 of the scoping report and paragraph 7.2.1 of the socio economics method statement (SEMS)	Operational employment generation	The Inspectorate agrees that this matter can be scoped out of the ES on the basis that operation and maintenance of the Proposed Development would generate a limited number of additional jobs and is therefore unlikely to give rise to any significant effects with respect to this matter
3.7.2	Table 15 of the scoping report and paragraph 7.2.1 of the SEMS	Increased demand for accommodation and community facilities due to an influx of workers	Table 10 of the Scoping Report explains that it is anticipated that the majority of the construction work force will reside in the settlements along the route and would therefore travel from their normal residence on a daily basis. The Scoping Report adds that due to the long linear nature of the proposed development and that the construction will be carried out on a section by section basis, the workforce would be in locations which are commutable to the construction works. On the basis of the reasoning set out in Table 10, the Inspectorate agrees to scope this matter out.
3.7.3	Table 15 of the scoping report and	Tourism	Table 10 of the Scoping Report explains that due to the long linear nature of the proposed development, and that the construction phase will be carried out in sections, it is not expected that significant impacts on the tourism industry would occur. The Scoping Report explains that a business assessment will be undertaken which will consider tourism

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
	paragraph 7.2.1 of the SEMS		industries along the route of the proposed development. The Inspectorate agrees to scope this matter out, however if the business assessment identifies significant effects. There should be reported in the ES.
3.7.4	Table 15 of the scoping report and paragraph 7.2.1 of the SEMS	Crime and safety – construction and operation	The Scoping Report states that site security during construction will follow requirements set out in the Construction (Design and Management) Regulations 2015. Fencing will be in place during construction and CCTV will be in use. During operation, staff members and CCTV will be in use and other mechanisms such as controlled car park access, barriers, lighting and fencing will be used. The Inspectorate agrees that effects on crime and safety during construction and operation are unlikely to be significant and may be scoped out.

ID	Ref	Description	Inspectorate's comments
3.7.5	NA	NA	NA

3.8 Sound, noise and vibration

(Scoping Report Section 6.8 and the Sound, Noise and Vibration Method Statement)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.8.1	Table 16 of the Scoping Report and paragraph 7.2.4 of the sound, noise and vibration method statement (SNVMS).	Temporary ground-borne vibration from construction road traffic	The Scoping Report seeks to scope this matter out, stating that provided that road surfaces are maintained to be free of irregularities, in accordance with the Code of Construction Practice, therefore no significant effects are anticipated. However, no details are provided of the locations of roads to be used for construction traffic or locations of construction compounds and their relation to sensitive receptors. Therefore, it is not possible to understand the location of potential vibration sensitive receptors in relation to the construction traffic activities of the proposed development. The Inspectorate considers that the ES should provide details of the roads to be used for construction traffic, including to and from construction compounds. The ES should include an assessment for temporary ground borne vibration from construction road traffic where significant effects are likely.
3.8.2	Table 16 and paragraph 6.8.21 of the Scoping Report	Permanent ground-borne vibration from operational traffic	Paragraph 6.8.21 of the Scoping Report states that impact from vibration caused by vehicles using a road is recommended to be scoped out within DMRB LA 111 but does not provide context of the reasoning behind this. The proposed development will involve the construction of new roads and as yet, the design is not yet final. At this stage, the Inspectorate does not agree to scope this matter out and considers that the ES should assess impacts from vibration where new roads are to be located in proximity to sensitive receptors.
3.8.3	Table 16 and paragraph 6.8.22 of	Temporary and permanent airborne noise due to	Reasoning for scoping this matter out is explained as owing to safety requirements, where use of horn or audible devices would be necessary. Use of these would be limited and of short duration. Furthermore, horns and audible devices are not allowed to be used between midnight and 6am with the exception of emergencies.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
	the Scoping Report	horn/audible warning devices	The Inspectorate agrees to scope this matter out.

ID	Ref	Description	Inspectorate's comments
3.8.4	Paragraph 5.4.1 of the SNVMS	Noise Important Areas (NIA)	NIAs are referred to in relation to the Bedford section of the proposed development. The ES should explain how the noise assessment has taken into account the NIAs which are present and how adverse effects have been avoided.
3.8.5	Table 2 of the SNVMS	Study areas	A series of study areas are set out in Table 2, however no justification has been provided for these. The ES should explain why certain study areas have been used. The applicant's attention is drawn to South Cambridgeshire District Council's comments (appendix 2 of this opinion) in this regard.
3.8.6	Section 5 of the SNVMS	Baseline	The SNVMS provides baseline information for each of the eight route sections. The information currently provided is rather vague, such as 'many residential receptors' and 'close proximity'. The ES should be more specific with regards to the number of receptors who may be affected and their location from the order limits. Human, ecological and other areas such as amenity space, recreational parks and other non-residential spaces should be assessed in the ES.
3.8.7	Paragraph 9.1.4 of the SNVMS	Methodology	The SNVMS explains the methodology used for the noise assessment, by identifying the lowest observed effect level, the significant observed effect level and the unacceptable adverse effect level. It states that the equivalent approach will be taken to assess effects from vibration. However, the methodology for vibration is not set out. This should be included within the ES.
3.8.8	NA	Methodology	Where the construction programme includes activities in the aquatic environment that have the potential to impact aquatic species, the ES should assess underwater noise and vibration impacts on underwater receptors where significant effects are likely to occur.

ID	Ref	Description	Inspectorate's comments
3.8.9	Table 5 of the SNVMS	Methodology	Table 5 of the SNVMS outlines the approach to be undertaken for assessing impacts from noise and vibration on human receptors. The ES should also clearly explain the approach undertaken for assessing impacts on ecological receptors. The methodology used to assess effects should be agreed where possible with stakeholder, see comments from Cambridgeshire County Council (Appendix 2) in this regard.

3.9 Traffic and transport (journeys and access)

(Scoping Report Section 6.9 and the Traffic and Transport Method Statement)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.9.1	Table 17 of the Scoping Report, Table 31 and Appendix A of the traffic and transport method statement (TTMS)	Temporary effects on road safety – during construction	The TTMS explains that all new or upgraded highway mitigation must adhere to relevant design standards with regards to Road Safety Audit and will also be included in the Transport Assessment. Therefore, this matter is not considered further in the ES. The Inspectorate considers that as road safety will be managed through road safety audits, it can be scoped out of the ES.
3.9.2	Table 17 of the Scoping Report, Table 32 and Appendix A of the TTMS.	Permanent effects on road safety - during operation	The TTMS explains that all new or upgraded highway mitigation must adhere to relevant design standards with regards to Road Safety Audit and will also be included in the Transport Assessment. Therefore, this matter is not considered further in the ES. The Inspectorate considers that as road safety will be managed through road safety audits, it can be scoped out of the ES.
3.9.3	Table 17 of the Scoping Report, Table 32 and Appendix A of the and TTMS	Permanent effects from operation on vehicle occupants from increase in maintenance vehicle	It is anticipated that maintenance would only generate low number of vehicle movements each month for regular servicing. Furthermore, maintenance takes place off peak where possible and therefore significant effects are likely to occur. The Inspectorate agrees that this matter can be scoped out.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		movements on highway	
3.9.4	Table 17 of the Scoping Report, Table 32 and Appendix A of the TTMS	Permanent effects from operation on railway users from change in provision of rail services (for passengers) due to closure for maintenance	The TTMS explains that maintenance activities are unlikely to result in significant effects on railway users as maintenance is either undertaken off peak or planned in advance to avoid disruption. On this basis, the Inspectorate agrees to scope this matter out.

ID	Ref	Description	Inspectorate's comments
3.9.5	Paragraphs 4.2.1, 4.2.2 and 4.2.5 of the TTMS	Baseline	The survey data relied upon is stated to be from 2023 and 2024. The TTMS states that the locations of surveys will be made available, however the Inspectorate considers that the ES should provide details of the number, duration and location of all traffic surveys which have informed the assessment.
3.9.6	Section 5.2 of the TTMS	Reference to figures	A number of figures are referred to in the TTMS, however none of the figures match with the references provided. For example, paragraph 5.2.1 of the TTMS refers to Figure 27 of the scoping report figures being of Route Section 1, Oxford to Bletchley. However, in the scoping report figure, Figure 27 is sheet 25 of 27 of the draft order limits. The same applies for figure of non-motorised users. The ES should ensure that all cross references to supporting plans, figures or document are correct.

3.10 Biodiversity

(Scoping Report Section 6.10 and the Biodiversity Method Statement)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.10.1	Table 7 of the biodiversity method statement (BMS)	Lighting	Table 7 states that effects from lighting during construction and operation will be scoped in for the following – birds, otters, bats, badger and dormouse (Oxford to Bedford section). The Inspectorate considers that effects on lighting on invertebrates should also be assessed.
3.10.2	Table 18 of the Scoping Report and Table 9 of BMS	Ancient woodland	Table 18 of the Scoping Report and Table 9 of the BMS shows that ancient woodland is intended the be scoped out for the following route sections: • Fenny Stratford to Kempston • Bedford • Roxton to east of St Neots • Comberton to Shelford • Cambridge. It is noted that the Scoping Report relies on Natural England's Ancient Woodland Inventory to identify ancient and veteran trees within the study area. Ancient woodlands smaller than 2 hectares are unlikely to appear on these inventories. The Inspectorate therefore does not currently agree to scoping ancient woodland out for these sections and advises that the ES should assess likely significant effects on all relevant ancient woodland receptors; seek to avoid direct impacts on ancient woodland and veteran trees; and ensure that there is no increase in fragmentation of these habitats.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.10.3	Table 9 of BMS	Hazel dormouse	Table 9 of the Scoping Report shows that hazel dormouse is intending the be scoped out for the following route sections: • Bedford • Clapham Green to Colesden • Roxton to east of St Neots • Croxton to Toft • Comberton to Shelford • Cambridge. In the absence of information such as evidence demonstrating clear agreement with relevant statutory bodies, the Inspectorate is not in a position to agree to scope dormouse from the assessment. Accordingly, the ES should include an assessment of hazel dormouse or the information referred to demonstrating agreement with the relevant consultation bodies and the absence of a LSE. With reference to point 6.9.1 above, where further assessment is undertaken, this should include impacts from lighting.
3.10.4	Paragraph 4.3.5 and 5.9.3 of BMS	Reptiles	Paragraph 4.3.5 of the biodiversity method statement states that further field surveys for reptiles were scoped out as based on previous survey data that land within the boundary of the proposed development was considered likely to support low populations of common reptile species only. Evidence to the dates and locations of previous survey efforts are not documented in the Scoping Report. Paragraph 5.9.3 states that a section of Hobson's Brook and Hobson's Conduit are designated as a City Wildlife Site and is known to support reptiles. In the absence of information such as evidence demonstrating clear agreement with relevant statutory bodies, the Inspectorate is not in a position to agree to scope these matters from the assessment. Accordingly, the ES should include an assessment of reptiles or the information referred to demonstrating agreement with the relevant consultation bodies and the absence of a LSE.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.10.5	Paragraph 4.3.2 and 8.1.2 of the BMS	Great crested newts	The applicant intends to offset the effects of the proposed development on great crested newts (GCN) by obtaining a licence through the Natural England District Level Licensing (DLL) scheme. The Inspectorate understands that the DLL approach includes strategic area assessment and the identification of risk zones and strategic opportunity area maps. The ES should include information to demonstrate whether the proposed development is located within a risk zone for GCN. If the applicant enters into the DLL scheme, NE will undertake an impact assessment and inform the applicant whether their scheme is within one of the amber risk zones and therefore whether the proposed development is likely to have a significant effect on GCN. The outcome of this assessment will be documented on an Impact Assessment and Conservation Payment Certificate (IACPC). The IACPC can be used to provide additional detail to inform the findings in the ES, including information on the proposed development's impact on GCN and the appropriate compensation required. The applicant's attention is drawn to comments from Cambridgeshire County Council (appendix 2 of this opinion) in this regard.

ID	Ref	Description	Inspectorate's comments
3.10.6	Table 5 of the Scoping Report	Study areas: European sites and statutory designated sites	Table 5 of the Scoping Report states that the study area for European sites and statutory designated sites will be land within the order limits and an additional survey area of 2km. No justification is provided for a 2km study area and the supporting text in the scoping report appears to identify some designated sites beyond a 2km radius. The ES should clearly define and justify the study area, based on the Zone of Influence (ZoI) from the proposed development and the potential effect pathways to designated sites. Agreement of the study area should be sought with stakeholders where possible. The ES should ensure that all designated sites are identified in the ES. The applicant's attention is drawn to comments from South Cambridgeshire District Council, Cambridge

ID	Ref	Description	Inspectorate's comments
			City Council and Little and Great Eversden Parish Council (Appendix 2 of this opinion) in this regard.
3.10.7	Table 5 of the Scoping Report	Study area - non designated sites.	Table 5 of the Scoping Report states that the study area for non-designated sites will be land within the order limits and an additional survey area of 250m. No justification is provided for a 250m study area. The ES should clearly define and justify the study area, based on the ZoI from the proposed development and the potential effect pathways to non- designated sites. The ES should ensure that all non-designated sites are identified in the ES. The applicant's attention is drawn to Cambridge City Council's comments (Appendix 2 of this opinion) in this regard.
3.10.8	Table 5 of the Scoping Report	Protected and notable species	Table 5 of the Scoping Report states that the study area for protected and notable species will be land within the draft Order Limits plus an additional search area of 2km. The search area was extended to 5km for birds, 10km for fish (including migratory species) and 7km for bats to inform the habitat suitability modelling (extended to 10km of the SAC). No justification is provided for a 2km study area and it is not clear which SAC is being referred to. The ES should clearly define and justify the study area, based on the ZoI from the proposed development and the potential effect pathways to protected and notable species. The ES should provide details of the species of birds, fish and bats which it is expanding the assessment for.
3.10.9	Table 5 of the Scoping Report	Scheduled invasive non-native species	Table 5 of the Scoping Report states that the study area for invasive non-native species is land within the draft Order Limits plus an additional search area of 250m. No justification is provided for a 250m study area. The ES should clearly define and justify the study area, based on the ZoI from the proposed development and the potential effect pathways from which INNS could be mobilised.

ID	Ref	Description	Inspectorate's comments
3.10.10	Table 6 of the Scoping Report	Study Area	Table 6 of the Scoping Report provides the study area related to the ecological surveys. No justification has been provided for any of the study areas intended to be used. The ES should clearly define and justify the study area, based on the ZoI from the proposed development and the potential effect pathways on the species which are being assessed.
3.10.11	5.7.3 of method statement – flood risk	Amphibians	Paragraph 5.7.3 of the flood risk method statement refers to there being a significant number of ponds being present in the study area, yet there are no references in the Scoping Report to amphibians (other than great crested newt). The ES should include an assessment for amphibians where significant effects are likely.
3.10.12	Paragraph 7.3.4 of the Scoping Report and Table 8 of the biodiversity method statement	Habitat loss and habitat fragmentation	Habitat loss and fragmentation is referred to in the Scoping Report and biodiversity method statement but this appears to only relate to Habitats Regulations Assessment. The Inspectorate considers that any likely significant effects resulting from loss of habitat or fragmentation of habitat should be assessed and reported in the ES.
3.10.13	Paragraph 5.3.8 of the biodiversity method statement	Bechstein bat	The scoping report identifies a number of bat species which were confirmed as being present in surveys undertaken up to 2018. The ES should ensure that all protected species are identified such as Bechsteins bat, and any necessary mitigation measures agreed with relevant consultees. The applicant's attention is drawn to Buckinghamshire Council's comments (appendix 2 of this opinion) in this regard.
3.10.14	Table 6 of the BMS	Wintering birds	The scoping report states that surveys will be undertaken for breeding and non-breeding birds. The ES should clarify what is considered to be 'non-breeding' as this could refer to migratory birds and birds on passage. Surveys for wintering birds should be undertaken to inform the ES.

ID	Ref	Description	Inspectorate's comments
3.10.15	Paragraph 6.13.19 of the Scoping Report	Arboricultural surveys	The applicant's attention is drawn to Buckinghamshire Council's comments (appendix 2 of this opinion) regarding changes to BS5837:2012 Trees in relation to design, demolition and construction. The survey method should be informed by current guidance, or the ES should otherwise justify any departures.
3.10.16	NA	Other notable mammals such as brown, hedgehog and harvest mouse – construction and operation (including. maintenance)	The Scoping Report refers to riparian mammals but does not refer to other notable mammal species such as brown hare, hedgehog and harvest mouse. An assessment of effects on these species as a result of the proposed development should be included within the ES where significant effects may occur.
3.10.17	NA	Figures	The Scoping Report identifies ecological features that will be assessed and reported in the ES, for example, designated sites, but no supporting plans are provided. The ES should include plans which clearly show the order limits and the locations of European, statutory designated and non-designated sites in relation to the order limits.
3.10.18	NA	Confidential Annexes	Public bodies have a responsibility to avoid releasing environmental information that could bring about harm to sensitive or vulnerable ecological features. Specific survey and assessment data relating to the presence and locations of species such as badgers, rare birds and plants that could be subject to disturbance, damage, persecution, or commercial exploitation resulting from publication of the information, should be provided in the ES as a confidential annex. All other assessment information should be included in an ES chapter, as normal, with a placeholder explaining that a confidential annex has been submitted to the Inspectorate and may be made available subject to request.

3.11 Water resources

(Scoping Report Section 6.11 and the water resources method statement)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.11.1	Table 19 of the Scoping Report and Table 9 and Table 10 of the water resources method statement (WRMS)	Groundwater and surface water receptors - effects from changes in service pattern, changes in train speeds, station closures. Operational phase.	This matter is proposed to be scoped out on the basis that the impacts would not be transmissible to water environment receptors. The Inspectorate agrees that this matter may be scoped out.
3.11.2	Table 19 of the Scoping Report and Table 9 and Table 10 of the WRMS	Groundwater and surface water receptors - changes to water quality due to changes in traffic movements arising from alterations to the road network All areas for groundwater and hydro-morphology. Operational phase.	Table 19 states that this refers to changes in water quality for ground water and surface water receptors, whereas Table 9 of the WRMS states that changes in water quality is scoped in for surface water. No impacts are identified for groundwater and hydrology and therefore the applicant is seeking to scope this out. No specific reasoning is provided to support scoping this matter out, and its is not clear from Table 10 whether any reasoning provided there also apply to this matter. The Inspectorate does not currently agree to scope this matter out. Clear reasoning should be provided in the ES as to why significant effects on these receptors is unlikely to occur.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.11.3	Table 19 of the Scoping Report and Table 10 of the WRMS	Groundwater and surface water receptors - changes in surface water and groundwater quality and groundwater quantity from highway underpasses during operation	The WRMS explains that works during the operational phase are discrete in nature and would have a low zone of impact. On this basis, the Inspectorate agrees this may be scoped out.
3.11.4	Table 19 of the Scoping Report and Table 10 of the WRMS	Groundwater receptors - Unproductive aquifers All areas for all aspects of the water environment	The WRMS states that whilst there may be potential for sub surface construction activities to result in impacts of large magnitude in scale, the sensitivity of the receptor would limit the significance of any effect as to be negligible. On this basis, the Inspectorate agrees this may be scoped out.
3.11.5	Table 19 of the Scoping Report and Table 10 of the WRMS	Surface water receptors not hydraulically connected to the proposed development	It is explained in the WRMS that in the absence of a pathway for effect, no significant effects are likely. The Inspectorate agrees with this and agrees to scope this matter out.
3.11.6	Table 19 of the Scoping Report and Table 10 of the WRMS	Groundwater receptors not hydraulically connected to the proposed development	It is explained in the WRMS that in the absence of a pathway for effect, no significant effects are likely. The Inspectorate agrees with this and agrees to scope this matter out.
3.11.7	Table 19 of the Scoping Report	Groundwater and surface water receptors - maintenance activities	The Scoping Report states that maintenance activities are unlikely to have a measurable impact on the water environment, especially where best practice is followed. The Inspectorate is in agreement that this matter may be scoped out.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.11.8	Table 9 and Table 10 of the WRMS	Effects on groundwater and hydromorphology from level crossing closure for highways and Public Rights of Way. Operational phase.	This matter is proposed to be scoped out on the basis that the impacts would not be transmissible to water environment receptors. Table 9 states that effects from changes in traffic movements arising from alterations to the road network (for example level crossing closures) will be scoped in with regards to changes in water quality during operation. The Inspectorate agrees that this matter may be scoped out.
3.11.9	Table 10 of the WRMS	Effects from internal and external station modifications.	The WRMS explains there would be no pathway for effects from any internal modifications. With regards to external modifications whilst pathways may exist, works are anticipated to be modest in nature and can be managed through the design process. The Inspectorate agrees to scope out effects from internal and external modifications.
3.11.10	Table 10 of the WRMS	Track maintenance and associated activities	The WRMS explains that as the nature of works are expected to be infrequent and combined with standard operating procedures for maintenance activities being followed, there are no likely significant effects. The Inspectorate agrees to scope this matter out.

ID	Ref	Description	Inspectorate's comments
3.11.11	Paragraph 5.4.4 and Table 2 of the land quality	Surface water features	Key surface water features within 250m of the order limits are identified as being the Great Ouse River. Mention is also made of isolated ponds, land drains, lakes, a reservoir and minor watercourses which are located adjacent or crossing the Project. Table 2 of the WRMS refers to 'several ponds' and then explains this is circa 100 ponds. The ES should explain how the water features

ID	Ref	Description	Inspectorate's comments
	method statement		may be affected by the proposed development and should provide plans showing the location of surface water features relative to the order limits.
3.11.12	Paragraphs 3.1.6 and 3.3.1 of the Scoping Report	New ponds	The Scoping Report refers to the need for new and larger drainage ponds and also to the need for new balancing ponds. The ES should provide detail of the location and extent of any new water features which are required for the proposed development and any consequential impacts these new features may result in.

3.12 Historic environment

(Scoping Report Section 6.12 and Historic Environment Method Statement)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.12.1	Table 20 of the Scoping Report and Table 7 of the Historic Environment Method Statement (HEMS)	Effects to Registered Parks and Gardens at Roxton to east of St Neots and Comberton to Shelford	The Inspectorate agrees that if there are no Registered Parks and Gardens in the final study areas for these route sections of the proposed development, then effects are not likely to occur to these assets and as such they can be scoped out of further assessment.

ID	Ref	Description	Inspectorate's comments
3.12.2	Sections 5 and 6.12 of the Scoping Report	Mitigation	Where significant impacts to heritage assets cannot be avoided, the ES should identify any additional mitigation that could be implemented. The applicant's attention is drawn to Historic England's comments (appendix 2 of this opinion) in this regard.
3.12.3	Sections 4, and 6.12 of the Scoping Report and sections 4, 5 and 9.2 of the HEMS	Surveys	The Scoping Report refers to non-intrusive and intrusive survey work to inform ES baseline being ongoing. The HEMS states the number of archaeological surveys previously completed along the proposed development route although it is not stated if these were for the proposed development or related to other projects, and limited description of the findings is provided. Further survey work would be carried out to inform the baseline but the scope and location of such work is not specified. The Inspectorate advises that effort should be made to agree the scope, location and method of survey work with relevant consultation bodies, and the level of agreement

ID	Ref	Description	Inspectorate's comments
			should be evidenced in the ES. The survey effort should be sufficient to establish a robust baseline The ES should report on survey outcomes as part of the baseline description. Consideration should be given to undertaking geoarchaeological assessment as part of the phase 1 ground investigation to provide for greater reliability and confidence in conclusions.
3.12.4	Section 6.12 of the Scoping Report and sections 4.3 and 9.3 of the HEMS	Study area	The Scoping report states that baseline data would be gathered for assets within a buffer informed by a zone of theoretical visibility (ZTV). At scoping, a study area of 1km from the order limits for designated assets and 500m from the order limits for non-designated assets has been used but a ZTV has not yet been produced. It is proposed that a high-level review of heritage assets found during baseline data gathering would be carried out to group and highlight areas of focus or screen out assets that will evidently not be impacted. Buffers would be used to refine the area, such as consideration of the type of works in a location or use of landscaping mitigation. The Inspectorate advises that effort should be made to agree the final study area(s) used in assessment with relevant consultation bodies. In the absence of ZTV analysis, it is unclear if the 1km and 500m is a sufficient extent for identifying potential likely significant effects to setting and the Inspectorate advises that a wider study area should be used until further evidence is available to inform study area selection. The approach to establishing the study area(s), including any differentiation in how it is applied along the proposed development route, should be explained in the ES. It should be clear how any buffers relied on to narrow study area(s) would be secured by the DCO. The potential zone of influence for archaeological sites susceptible to impacts from changes to the water environment should be identified and used to inform the study area for assessment of this impact pathway. The applicant's attention is drawn to Historic England's comments (appendix 2 of this Opinion) in this regard.
3.12.5	Section 6.12 of the Scoping Report and	Effect significance	The Scoping Report states that a specific criterion would be developed using Historic England guidance to support a qualitative assessment in the ES to inform identification of the level of harm caused to the historic environment and individual heritage assets.

ID	Ref	Description	Inspectorate's comments
	section 9 of the HEMS		The Inspectorate welcomes this approach and advises that effort should be made to agree the criterion with relevant consultation bodies. It should also be clear in the ES at what level an effect is determined to be significant in EIA terms.
3.12.6	Section 6.12 of the Scoping Report	Impact types and sources	In addition to the potential impact pathways listed at paragraph 6.12.5 of the Scoping Report, the ES should consider effects that could arise from damage to or preservation of archaeological and palaeo-environmental remains from changes to the local water environment including because of soil compaction, drainage network change and dewatering activity. The applicant's attention is drawn to Historic England's comments (appendix 2 of this Opinion) and its recommendation to consult its guidance Preserving Archaeological Remains (2016).
3.12.7	Sections 5 and 9 of the HEMS	Baseline description and asset value	The ES should include an accurate description of the baseline, and details of all assets scoped into the assessment. In this regard, the applicant's attention is drawn to the comments of Buckinghamshire Council, Central Bedfordshire Council and Historic England (appendix 2 of this Opinion), which identify omissions and errors. It should explain how a high or medium heritage value has been assigned to non-designated archaeological assets scoped into the assessment in line with the criteria in table 3 of the HEMS, and the level of agreement reached with relevant consultation bodies, noting Historic England's advice that some assets may be directly associated with designated heritage assets and of comparable value.
3.12.8	Section 5 of the HEMS	Locally listed buildings	For several route sections it is stated that there is no register of locally listed buildings but non-designated heritage assets would be present in the study area. Important non-designated heritage assets should be identified and described in the ES, for example through further survey work, reference to local historic environment records (HER) and other sources identified by relevant consultation bodies including local authorities.
3.12.9	Section 8 of the HEMS	Potential station closures and impacts to associated buildings	Section 8 of the HEMS states that where a station may be closed, for example at Fenny Stratford, buildings associated with the historic station site (such as the Grade II listed Station House) may have heritage value eroded or lost from setting change. It is

ID	Ref	Description	Inspectorate's comments
			not stated if these buildings would become redundant, form part of the proposed development or otherwise have an alternative use. This should be clarified in the ES. The ES should set out the implications for affected station buildings that are designated or non-designated heritage assets on a worst-case basis for each option in the DCO application, and asses any likely significant effects arising.
3.12.10	Table 3 of the HEMS	Conservation areas	Table 3 of the HEMS states that most conservation areas would be categorised as medium heritage value. Given that conservation areas are nationally designated, the Inspectorate advises that they should be categorised as high heritage value, or the ES should explain with supporting information and evidence of agreement with relevant consultation bodies why it is appropriate to assign a medium heritage value.
3.12.11	NA	Viewpoints and visualisations	The Inspectorate advises that effort should be made to agree with relevant consultation bodies a list of viewpoints for photomontages to inform the assessment of setting impacts to heritage assets scoped into the assessment.
3.12.12	NA	Figures	The ES should include figures that show the locations of designated and non-designated heritage assets scoped into the assessment.

3.13 Landscape and visual

(Scoping Report Section 6.13 and Landscape and Visual Method Statement)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.13.1	NA	NA	No matters have been proposed to be scoped out of the assessment.

ID	Ref	Description	Inspectorate's comments
3.13.2	Section 6.13 of the Scoping Report and sections 4.1 and 4.4 of the Landscape and Visual Method Statement (LVMS)	Study area	The Scoping Report proposes a study area of 2km from the order limits where the proposed development passes through rural landscape or 750m from the order limits in predominately urban areas, due to existing buildings limiting longer views. The Inspectorate advises that in the absence of detailed parameters for the proposed development and ZTV analysis, it is unclear if the proposed study area(s) would be sufficient to identify likely significant effects arising. It is also unclear of the study area includes construction traffic routes. The final study area(s) should be based on the potential zone of influence (ZoI) for likely significant effects, informed by site visits and ZTV analysis. Effort should be made to agree the final study area(s) with relevant consultation bodies. If the ES differentiates study area extent by location, it should explain the basis on which a location is determined to be rural or urban and indicate how these have been applied on a figure.
3.13.3	Paragraph 6.13.15 of the Scoping Report	Highways or utilities' diversions	The Inspectorate is unclear what the Scoping Report means by stating that the study area would be extended where changes to highways or utilities take place more than 2km from the order limits. Based on the information in section 3 of the Scoping Report, the Inspectorate understands that highways and utilities' diversions would form part of the proposed development and be located within the order limits. This should be clarified in the ES. For the avoidance of doubt, this Opinion is based on the understanding that

ID	Ref	Description	Inspectorate's comments
			the landscape and visual assessment will include consideration of likely significant effects arising from such diversions.
3.13.4	Paragraph 6.13.26 of the Scoping Report and section 5.2 of the LVMS	Night-time effects	A qualitative assessment of night-time landscape and visual effects is proposed. It is stated that a quantitative assessment of illumination levels would not be provided but a lighting impact assessment would be used to inform the baseline. The ES should set out the method for assessment of night-time effects and how change from the baseline conditions has been determined in the absence of quantitative assessment. Effort should be made to agree the method with relevant consultation bodies.
3.13.5	Section 4.2 of the LVMS	Surveys	The Scoping Report describes the ongoing survey effort but does not specify survey locations or extents, or methods being used (other than for arboriculture). Hedgerow surveys are separately proposed as part of the biodiversity scope. The Inspectorate advises that the survey effort must be sufficient to enable a robust baseline from which to undertake assessment. Effort should be made to agree the scope and method of surveys with relevant consultation bodies.
3.13.6	Section 4.3 of the LVMS	Temporal scope	The Inspectorate advises that the ES should describe any likely significant effects at Year 15 of operation of the proposed development in both winter and summer.
3.13.7	Section 5.2 of the LVMS	Townscape baseline	The Scoping Report states that existing studies would be used to inform the baseline and assessment of townscape character areas in Cambridge and Oxford, although these are dated 2002 and 2015 respectively. The applicant's attention is drawn to South Cambridgeshire District Council's comments (appendix 2 of this Opinion), which identify additional data sources providing more up-to-date information. Effort should be made to agree with the relevant local authority the approach to establishing the townscape character baseline for Bedford in the absence of a townscape character assessment.

ID	Ref	Description	Inspectorate's comments
3.13.8	Section 6.3 of the LVMS	Future baseline	The Scoping Report sets out a generic statement about climate change but does not explain how this would affect the future baseline for landscape and visual receptors in the absence of the proposed development. The ES should outline the likely evolution of the baseline for these receptors without the proposed development as far as natural changes can be assessed based on available information and scientific knowledge.
3.13.9	Sections 9.3 and 12.1 of the LVMS	Tree and hedgerow removal and reinstatement	The Scoping Report states that the assessment would assume all vegetation in the construction boundary is removed and that all woodland, trees and hedgerow removed on land temporarily occupied during construction would be replaced. Elsewhere, it states that the assessment would assume measures in a proposed CoCP would be implemented as a minimum, including tree protection in tree protection areas. The Inspectorate advises that the ES should provide a consistent description of assumptions made in the assessment, and that any measures relied upon on in reaching conclusions should be described and demonstrably secured in the ES.
3.13.10	Section 10 of the LVMS	Effect significance	Where professional judgment is used to determine effect significance if the matrix (table 17) allows for 2 potential outcomes, the ES should set out how the conclusion was reached referring to any relevant guidance.
3.13.11	Section 12.1 of the LVMS	Residential visual amenity assessment	The Scoping Report states that a residential visual amenity assessment (RVAA) would not be carried out. It does not provide a justification. In line with guidance, the requirement for a RVAA is generally dependent on the outcome of a landscape and visual impact assessment (LVIA). In the absence of LVIA conclusions, it is unclear what justification there is for not undertaking a RVAA. The need or otherwise for an RVAA should be justified based on the conclusions of the LVIA presented in the ES and agreed with the relevant consultation bodies.
3.13.12	Section 12.1 of the LVMS	Planting maturity	The Scoping Report states that the assessment would assume that by Year 15 of operation of the proposed development, planting would reach a level of maturity to

ID	Ref	Description	Inspectorate's comments
			mitigate effects of the proposed development. It sets out the assumed heights of hedgerow and woody vegetation. The Inspectorate advises that if the ES conclusions are reliant on such assumptions, it must be clear how the mitigation would be managed, and adapted where required, to achieve the assumed outcome. This should be demonstrably secured in the DCO.

3.14 Climate change (carbon (greenhouse gas) emissions and climate resilience)

(Scoping Report Section 6.14 and method statements for Carbon and Climate Resilience)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.14.1	Table 22 of the Scoping Report	For Oxford to Bletchley: ▪ embodied greenhouse gas (GHG) emissions from construction materials ▪ transport of materials from manufacturer to site ▪ GHG emissions associated with construction and installation processes ▪ GHG emissions associated with land use change	The Scoping Report seeks to scope out this impact for the Oxford to Bletchley section of the proposed development based on the relatively minor nature of the works. High level bullet points describing the works are set out in section 3.1 of the Scoping Report. Noting the study area for GHG emissions described in paragraph 4.5.2 of the Scoping Report comprises construction impacts, and that all the activities listed in table 22 could result in additional GHG emissions from the proposed development, the Inspectorate does not consider that emissions associated with a specific section of the proposed development should be scoped out. This matter should be assessed in the ES.
3.14.2	Section 9.2 and Appendix A of the	Vulnerability to climate change impacts during construction	The Scoping Report seeks to scope out vulnerability to climate change impacts during construction of the proposed development based on the construction programme running to 2034, which falls within the present-day climate epoch meaning that no change is anticipated to average climate values or likelihood of extreme weather events. Impacts

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
	Climate Resilience Method Statement (CRMS)		from present-day climate conditions would be identified and managed through a CoCP, to be submitted with the DCO application. The Inspectorate agrees that this matter can be scoped out on the basis presented in the Scoping Report provided any likely significant effects during construction because of vulnerability to present-day climate impacts are described in the ES and any mitigation required is described and demonstrably secured in the DCO.
3.14.3	Table 9 and Appendix A of the CRMS	Vulnerability of the proposed development during operation to the following climate hazards: ▪ low temperature events; ▪ small increase in wind speed with large spread and high uncertainty; ▪ fog; ▪ relative humidity	The Scoping Report seeks to scope out these matters as it is considered that they are not likely to result in significant risk. Appendix A states that projected climate trends demonstrate there will be a decrease in low temperature events, fog events and relative humidity, and no discernible change in mean wind speed. It is stated that use of modern signalling systems provides resilience to fog, and rail infrastructure is designed to manage cold weather impacts. No additional mitigation would be required for mean wind or relative humidity. The Inspectorate agrees that these matters can be scoped out on the basis presented in the Scoping Report.

ID	Ref	Description	Inspectorate's comments
3.14.4	Paragraph 6.14.9 of the Scoping Report	Carbon management plan (CMP)	A CMP is proposed to outline the approach to carbon management and set targets for carbon reduction, with monitoring and reporting requirements. It is stated that this would be secured by the DCO. If the CMP is intended to set out detail about mitigation of significant adverse effects, the Inspectorate advises that an outline of the CMP should be submitted with the DCO application so it is clear how these would be avoided or minimised.
3.14.5	Paragraph 4.1.4 of the Carbon Method Statement (CMS)	Determining uplift in emissions from Connection Stages 1 and 2	The scope of the carbon assessment is proposed to include emissions from the operation of the proposed development including rail services enabled by the uplift in services above earlier phases of the wider project (Connections Stages 1 and 2) and associated traffic on the road network. The ES should confirm how Connection Stages 1 and 2 are accounted for in the baseline including any assumptions made, what the uplift is for the proposed development and how it was defined, appropriate cross references should be made if this affects other aspects of the ES.
3.14.6	Paragraphs 4.1.4 and 6.1.3 of the CMS	Appraisal period	It is proposed to assess the net contribution of the proposed development to climate change from construction and operation over a 60 year appraisal period. Emissions from end of life decommissioning of components requiring replacement are proposed to be considered for the assessment period. The Inspectorate notes that the proposed development is stated to have a lifespan of over 100 years. Replacement of project components is expected but the Scoping Report does not specify at what point(s) in the lifespan this is expected. The Inspectorate advises that the appraisal period should align with the proposed development lifespan and assessment of GHG emissions arising from expected component replacement should be included throughout that period, or the ES should otherwise justify the alternative appraisal period with reference to relevant guidance.
3.14.7	Section 8.2 of the CMS	Design principles	The Scoping Report states that a key activity to reduce carbon emissions is option selection, and that carbon workshops would be undertaken during design to identify reduction opportunities but it is not stated if this would be reported in the ES. Any design

ID	Ref	Description	Inspectorate's comments
			or embedded measures incorporated to avoid or reduce significant adverse effects should be described in the ES and demonstrably secured in the DCO.
3.14.8	Section 8 of the CRMS	Adaptive management for climate resilience	The Scoping Report states that long-lived or difficult to replace assets that have an acceptable risk level under representative concentration pathway (RCP) 6.0 but not under the RCP8.5 would be highlighted in the assessment, with the additional adaptation measures recommended in the future as the climate continues to evolve. This could include future renewals. The Inspectorate advises that if adaptive management measures are likely to be required to mitigate significant adverse effects due to vulnerability to future climate change, the ES should set out what these are likely to comprise. A commitment to defining and implementing them should be demonstrably secured in the DCO.
3.14.9	Section 8 of the CRMS	Significance of effect for climate resilience assessment	Section 8 of CRMS describes the proposed method for determining overall climate risk. The Inspectorate advises that, in line with the requirements of the EIA Regulations, the ES should also describe the likely significant effects arising from vulnerability of the proposed development to climate change during operation. It should be clear how the "consequence" category in table 7 relates to determination of effect significance.
3.14.10	NA	Indirect or downstream GHG emissions	Paragraph 1.1.6 of the CMS states that the scope and method for assessment of direct and indirect GHG emissions would be set out but section 6 does not identify any sources of indirect emissions. The ES should identify any indirect or downstream GHG emissions arising from construction and operation of the proposed development, including any associated with proposed freight services. Any likely significant effects arising from such emissions should be assessed and reported in the ES.

3.15 Major accidents and disasters

(Scoping Report Section 6.15)

ID	Ref	Applicant's proposed aspect to scope out	Inspectorate's comments
3.15.1	Paragraphs 6.15.15 and 6.15.13 of the Scoping Report	Major accidents and disasters during construction and operation	The Scoping Report states that with measures required by existing legislation (including the Railways and other Guided Transport Systems (Safety) Regulations 2006, Common Safety Methods and the Construction Design and Management (CDM) Regulations 2015) significant effects are not likely to occur as compliance would be secured through an alternative regulatory process. The Scoping Report also states that construction risk would be managed through the design process via a CoCP, and that emergency procedures would be established in accordance with industry best practice measures. This aspect is proposed to be scoped out of the EIA. The Inspectorate agrees that this aspect can be scoped out of further assessment, aside from the matter listed below. Identified risks and corresponding mitigation should be explained in the ES. It should be clear how compliance with the processes and standards referred to is proposed to be secured and implemented.
3.15.2	Section 6.15 of the Scoping Report	Vulnerability of the proposed development from risks associated with Control of Major Accident Hazard (COMAH) sites and existing gas pipelines	Table 23 of the Scoping Report identifies several COMAH sites near to the proposed development. The Health and Safety Executive (appendix 2 of this Opinion) identifies 3 sites in the vicinity of train stations, as well as major accident hazard pipelines (MAPH) that intersect with the proposed development. In the absence of detailed information about these sites and pipelines, and how risks would be managed during construction, the Inspectorate does not agree to scope this matter out. The ES should include an assessment of these matters and describe any mitigation required.

ID	Ref	Description	Inspectorate's comments
3.15.3	n/a	n/a	n/a

3.16 Material resources and waste

(Scoping Report Section 6.16 and the Material Resources and Waste Method Statement)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.16.1	Table 24 of the Scoping Report and section 14 of the Material Resources and Waste Method Statement (MRWMS)	Materials resource use during operation and maintenance works	The Scoping Report states that based on DMRB LA 110, the environmental effect is highly unlikely to significant for materials for the operational phase and can be scoped out. It states that, in line with DMRB LA 110, the assessment will report on use of materials for the first year of operational activities in the ES. The Inspectorate agrees that materials resource use associated with general maintenance during operation is not likely to result in significant effects and can be scoped out on the basis presented in the Scoping Report. However, the Inspectorate notes that section 4.1 of the Scoping Report describes the lifespan of the proposed development as 100 years, and that repair and upgrade of components may be required during its lifetime but detail is not available at this stage. Based on the information provided, the Inspectorate cannot exclude the possibility of significant effects from use of materials for component repair, upgrade or replacement after the first year of operation. The ES should set out information about the materials to be used for these activities, or a worst-case where it is not known. It should describe any likely significant effects arising.
3.16.2	Section 6.16 of the Scoping Report and paragraph 14.1.5 of the MRWMS	Materials required for and waste generated from commercial activities associated with railway operation	The Scoping Report states that this matter is not considered part of the scope of the DCO application and has been scoped out. No supporting justification is presented. In the absence of a definition of commercial activities and the materials and waste requirements associated with them, the Inspectorate does not have sufficient evidence to exclude the possibility of significant effects. This matter should be assessed in the ES, or it should otherwise explain why significant effects are not likely to occur (or why commercial activities are outside of the DCO scope).

ID	Ref	Description	Inspectorate's comments
3.16.3	Paragraph 6.16.17 of the Scoping Report	Study area	The Scoping Report proposes a study area of the east of England and southeast of England for locally sourced materials and waste. The Inspectorate advises that effort should be made to agree the final study area(s) with relevant consultation bodies, and the level of agreement reached should be evidenced in the ES. The applicant's attention is drawn to Oxfordshire County Council's comments (appendix 2 of this Opinion) regarding the potential for East Midlands, and North and West Northamptonshire to be affected by demand for materials and waste management. The study area should be expanded to include these regions, or the ES should otherwise explain why significant effects would not arise in these regions.
3.16.4	Paragraph 2.1.18 of the MRWMS	Borrow pits	The ES should confirm if borrow pits are required and, if so, describe the associated parameters and assessment of any likely significant effects arising. Appropriate cross references should be included where this may affect other aspects of the ES.
3.16.5	Sections 4.1 and 4.2 of the MRWMS	Baseline conditions for peat resource	Peat source is illustrated on the section 3.2 figures in the Book of Figures. The source of this data is not stated in the MRWMS. The ES should describe the baseline condition for peat resource and confirm the data sources used to establish this. Effort should be made to agree any survey required to inform the peat resource baseline with relevant consultation bodies.
3.16.6	Paragraph 12.1.4 and sections 12.2 and 12.3 of the MRWMS	Mitigation and design principles	The Scoping Report describes several embedded mitigation measures that may be considered in the assessment of impacts of materials and waste. It indicates that a CoCP may specify some of these measures and any monitoring required but it is unclear if this is a definitive commitment. If assessment conclusions are reliant on embedded measures, the ES should describe how these have been incorporated into the design of the proposed development and confirm how compliance with them would be secured, for example through the CoCP. The ES should describe how the waste hierarchy has been applied to the proposed development.

ID	Ref	Description	Inspectorate's comments
3.16.7	Table 4 of the MRWMS	Significance criteria	The Scoping Report states that the assessment criteria would follow DMRB Volume 11 LA 110 as summarised in tables 4 and 5 of the MRWMS. For potential sterilisation of a mineral safeguarding site or peat resource, a description is only presented for a "Large" effect and not for "Moderate", "Slight" or "Neutral" effects. It should be clear in the ES how effect significance for this receptor would be determined for categories of effect other than "Large." Any use of professional judgment should be explained.
3.16.8	Paragraphs 13.1.11 and 15.1.13 of the MRWMS	Contaminated land and hazardous waste capacity	The ES should confirm the predicted volume of contaminated land to be excavated and disposed of because of the construction and operation of the proposed development and assess any likely significant effects arising. Where it is not possible to quantify the volume, a worst-case should be used and the ES should explain how this was established. The assessment should include consideration of likely significant effects on existing hazardous waste management facilities.
3.16.9	NA	Method for establishing baseline	The ES should describe the methods used for calculating materials resource provision (including aggregate availability) and waste management capacity and explain how these provide a robust baseline from which to undertake assessment. The applicant's attention is drawn to Oxfordshire County Council's comments (appendix 2 of this opinion) in this regard.
3.16.10	NA	Cumulative effects	The ES should include an assessment of cumulative effects arising from demand for aggregates during construction, where significant effects are likely to occur. The applicant's attention is drawn to Cambridgeshire County Council's comments (appendix 2 of this Opinion) in this regard.

APPENDIX 1: CONSULTATION BODIES FORMALLY CONSULTED

TABLE A1: PRESCRIBED CONSULTATION BODIES

Bodies prescribed in schedule 1 of The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (as amended) (the 'APFP Regulations (as amended)')

SCHEDULE 1 DESCRIPTION	ORGANISATION
The Secretary of State for Defence	Ministry of Defence
The relevant parish council	Gosford and Water Eaton Parish Council
	Kidlington Parish Council
	Islip Parish Council
	Chesterton Parish Council
	Bicester Town Council
	Launton Parish Council
	Charlton-on-Otmoor Parish Council
	Wendlebury Parish Council
	Merton Parish Council
	Bromham Parish Council
	Wyboston, Chawston and Colesden Parish Council
	Stewartby Parish Council
	Kempston Town Council
	Elstow Parish Council
	Brickhill Parish Council
	Clapham Parish Council
	Ravensden Parish Council
	Wilden Parish Council
	Colmworth Parish Council
	Biddenham Parish Council
	Roxton Parish Council
	Tempsford Parish Council
	Aspley Guise Parish Council
	Husborne Crawley Parish Council
	Lidlington Parish Council
	Marston Moreteyne Parish Council
	Ridgmont Parish Council
	Brogborough Parish Council
	West Bletchley Parish Council
	Bletchley and Fenny Stratford Town Council
	Bow Brickhill Parish Council
	Walton Community Council

SCHEDULE 1 DESCRIPTION	ORGANISATION
	Wavendon Parish Council
	Woburn Sands Town Council
	Grendon Underwood Parish Council
	Quainton Parish Council
	Middle Claydon Parish Council
	Mursley Parish Council
	Newton Longville Parish Council
	Marsh Gibbon Parish Council
	Charndon Parish Council
	Calvert Green Parish Council
	Twyford Parish Council
	Steeple Claydon Parish Council
	East Claydon Parish Council
	Winslow Town Council
	Swanbourne Parish Council
	Little Horwood Parish Council
	Great Horwood Parish Council
	Bourn Parish Council
	Caldecote Parish Council
	Eltisley Parish Council
	Papworth Everard Parish Council
	Elsworth Parish Council
	Foxton Parish Council
	Barrington Parish Council
	Great and Little Eversden Parish Council
	Harlton Parish Council
	Newton Parish Council
	Harston Parish Council
	Haslingfield Parish Council
	Hauxton Parish Council
	Great Shelford Parish Council
	Comberton Parish Council
	Dry Drayton Parish Council
	Fulbourn Parish Council
	Cambourne Town Council
	Little Shelford Parish Council
	Toft Parish Council
	Hardwick Parish Council
	Teversham Parish Council
	Abbotsley Parish Council
	St. Neots Town Council
	Toseland Parish Council
	Yelling Parish Council
	South Hinksey Parish Council

SCHEDULE 1 DESCRIPTION	ORGANISATION
	Kennington Parish Council
	Botley and North Hinksey Parish Council
	Beckley and Stowood Parish Council
	Garsington Parish Council
	Horspath Parish Council
	Forest Hill with Shotover Parish Council
	Stanton St. John Parish Council
	Sandford-on-Thames Parish Council
	Yarnton Parish Council
	Shipton-on-Cherwell and Thrupp Parish Council
	Bletchingdon Parish Council
	Weston-on-the-Green Parish Council
	Fencott and Murcott Parish Council
	Ambrosden Parish Council
	Piddington Parish Council
	Blackthorn Parish Council
	Kirtlington Parish Council
	Middleton Stoney Parish Council
	Bucknell Parish Council
	Stratton Audley Parish Council
	Begbroke Parish Council
	Arncott Parish Council
	Caversfield Parish Council
	Bladon Parish Council
	Littlemore Parish Council
	Blackbird Leys Parish Council
	Old Marston Parish Council
	Risinghurst and Sandhills Parish Council
	Wootton Parish Council
	Kempston Rural Parish Council
	Wilshamstead Parish Council
	Cardington Parish Council
	Thurleigh Parish Council
	Bolnhurst and Keysoe Parish Council
	Staploe Parish Council
	Turvey Parish Council
	Stagsden Parish Council
	Stevington Parish Council
	Oakley Parish Council
	Wixams Parish Council
	Cople Parish Council
	Renhold Parish Council
	Great Barford Parish Council
	Milton Ernest Parish Council

SCHEDULE 1 DESCRIPTION	ORGANISATION
	Little Staughton Parish Council
	Great Denham Parish Council
	Hulcote and Salford Parish Council
	Woburn Parish Council
	Eversholt Parish Council
	Ampthill Town Council
	Houghton Conquest Parish Council
	Cranfield Parish Council
	Blunham Parish Council
	Sandy Town Council
	Everton Parish Council
	Aspley Heath Parish Council
	Steppingley Parish Council
	Little Brickhill Parish Council
	Shenley Brook End Parish Council
	Loughton & Great Holm Parish Council
	Woughton on the Green Community Council
	Kents Hill, Monkston and Brinklow Parish Council
	Broughton Parish Council
	Simpson and Ashland Parish Council
	Old Woughton Parish Council
	Shortstown Parish Council
	Waddesdon Parish Council
	Hillesden Parish Council
	Stewkley Parish Council
	Ludgershall Parish Council
	Westcott Parish Council
	Edgcott Parish Council
	Oving Parish Council
	North Marston Parish Council
	Preston Bissett Parish Council
	Padbury Parish Council
	Granborough Parish Council
	Thornborough Parish Council
	Nash Parish Council
	Whaddon Parish Council
	Dunton Parish Council
	Drayton Parslow Parish Council
	Stoke Hammond Parish Council
	Great Brickhill Parish Council
	Adstock Parish Council
	West Wratting Parish Council
	Little Wilbraham and six mile bottom Parish Council
	Wimpole Parish Council

SCHEDULE 1 DESCRIPTION	ORGANISATION
	Longstowe Parish Council
	Caxton Parish Council
	Graveley Parish Council
	Conington Parish Council
	Meldreth Parish Council
	Fowlmere Parish Council
	Thriplow and Heathfield Parish Council
	Shepreth Parish Council
	Orwell Parish Council
	Whittlesford Parish Council
	Sawston Parish Council
	Stapleford Parish Council
	Babraham Parish Council
	Balsham Parish Council
	Barton Parish Council
	Madingley Parish Council
	Girton Parish Council
	Histon and Impington Parish Council
	Milton Parish Council
	Fen Ditton Parish Council
	Stow cum Quy Parish Council
	Swavesey Parish Council
	Oakington and Westwick Parish Council
	Kingston Parish Council
	Croxton Parish Council
	Grantchester Parish Council
	Coton Parish Council
	Bar Hill Parish Council
	Great Wilbraham Parish Council
	Orchard Park Community Council
	Waresley-cum-Tetworth Parish Council
	Hail Weston Parish Council
	Little Paxton Parish Council
	Great Gransden Parish Council
	Offord Cluny and Offord D'Arcy Parish Council
	Hilton Parish Council
	Fenstanton Parish Council
	Great Paxton Parish Council
The Environment Agency	The Environment Agency
Natural England	Natural England
The Forestry Commission	Forestry Commission
The Historic Buildings and Monuments Commission for	Historic England

SCHEDULE 1 DESCRIPTION	ORGANISATION
England (known as Historic England)	
The relevant internal drainage board	Waterbeach Level Internal Drainage Board
	Over and Willingham Internal Drainage Board
	Old West Internal Drainage Board
	Swavesey Internal Drainage Board
	Bluntisham Internal Drainage Board
	Swaffam Internal Drainage Board
	Haddenham Level Drainage Commissioners
	Buckingham and River Ouzel Internal Drainage Board
	Alconbury and Ellington Internal Drainage Board
	Bedfordshire and River Ivel Internal Drainage Board
The Canal and River Trust	The Canal and River Trust
The relevant Highways Authority	Oxfordshire County Council
	Cambridgeshire County Council
	Buckinghamshire Council
	Milton Keynes City Council
	Central Bedfordshire Council
	Bedfordshire Borough Council
	National Highways
The Civil Aviation Authority	Civil Aviation Authority
The Health and Safety Executive	Health and Safety Executive
United Kingdom Health Security Agency, an executive agency of the Department of Health and Social Care	United Kingdom Health Security Agency
NHS England	NHS England

TABLE A2: RELEVANT STATUTORY UNDERTAKERS

'Statutory undertaker' is defined in The APFP Regulations (as amended) as having the same meaning as in section 127 of the Planning Act 2008 (PA2008)

STATUTORY UNDERTAKER	ORGANISATION
The relevant police authority	Northamptonshire Police and Crime Commissioner
	Cambridgeshire Police and Crime Commissioner
	Bedfordshire Police and Crime Commissioner
	Hertfordshire Police and Crime Commissioner
	Essex Police and Crime Commissioner

STATUTORY UNDERTAKER	ORGANISATION
	Thames Valley Police and Crime Commissioner
The relevant ambulance service	South Central Ambulance service NHS foundation trust
	East Midlands Ambulance service NHS trust
	East of England Ambulance service NHS Trust
The relevant fire and rescue authority	Essex County fire and rescue
	Hertfordshire fire and rescue service
	Bedfordshire fire and rescue service
	Northamptonshire fire and rescue service
	Oxfordshire fire and rescue service
	Buckinghamshire & Milton Keynes fire and rescue service
	Cambridgeshire fire and rescue service
The relevant Integrated Care Board	NHS Bedfordshire, Luton and Milton Keynes Integrated Care Board
	NHS Hertfordshire and West Essex Integrated Care Board
	NHS Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board
	NHS Cambridgeshire and Peterborough Integrated Care Board
	NHS Northamptonshire Integrated Care Board
NHS England	NHS England
The relevant NHS Trust	East Midlands Ambulance service NHS trust
	East of England Ambulance service NHS Trust
The relevant NHS Foundation Trust	Bedfordshire Hospitals NHS Foundation Trust
	South Central Ambulance Service NHS Foundation Trust
Railways	Network Rail Infrastructure Ltd
	National Highways Historical Railways Estate
Canal Or Inland Navigation Authorities	The Canal and River Trust
Civil Aviation Authority	Civil Aviation Authority
Licence Holder (Chapter 1 Of Part 1 Of Transport Act 2000)	NATS En-Route Safeguarding
Universal Service Provider	Royal Mail Group
Homes and Communities Agency	Homes England
The relevant Environment Agency	The Environment Agency
The relevant water and sewage undertaker	Anglian Water
	Cambridge Water
	South Staffordshire Water Plc
	Thames Water
	Thames Water Commercial Services

STATUTORY UNDERTAKER	ORGANISATION
The relevant public gas transporter	Cadent Gas Limited
	Northern Gas Networks Limited
	Scotland Gas Networks Plc
	Southern Gas Networks Plc
	CNG Services Ltd
	Energy Assets Pipelines Limited
	ES Pipelines Ltd
	ESP Connections Ltd
	ESP Networks Ltd
	ESP Pipelines Ltd
	Fulcrum Pipelines Limited
	GTC Pipelines Limited
	Harlaxton Gas Networks Limited
	Independent Pipelines Limited
	Indigo Pipelines Limited
	Inovyn Enterprises Ltd
	Last Mile Gas Ltd
	Leep Gas Networks Limited
	Mua Gas Limited
	Quadrant Pipelines Limited
	Stark Works
	National Gas
The relevant electricity generator with CPO Powers	Little Barford Power Station
	Eastern Power Networks Plc
	National Grid Electricity Distribution (East Midlands) Limited
	National Grid Electricity Distribution (West Midlands) Limited
	National Grid Electricity Distribution (South Wales) Limited
	National Grid Electricity Distribution (South West) Limited
	Southern Electric Power Distribution Plc
	Advanced Electricity Networks Ltd
	Aidien Ltd
	Aurora Utilities Ltd
	Eclipse Power Network Limited
	Energy Assets Networks Limited
	ESP Electricity Limited
	Fulcrum Electricity Assets Limited
	Green Generation Energy Networks Cymru Ltd
	Harlaxton Energy Networks Limited
	Independent Distribution Connection Specialists Ltd
	Independent Power Networks Limited

STATUTORY UNDERTAKER	ORGANISATION
	Indigo Power Limited
	Last Mile Electricity Ltd
	Leep Electricity Networks Limited
	Mua Electricity Limited
	Optimal Power Networks Limited
	Stark Infra-Electricity Ltd
	The Electricity Network Company Limited
	UK Power Distribution Limited
	Utility Assets Limited
	Vattenfall Networks Limited
	UK Power Networks Limited
The relevant electricity transmitter with CPO Powers	National Grid Electricity Transmission Plc
	National Grid Electricity System Operation Limited

TABLE A3: LOCAL AUTHORITIES AS DEFINED IN SECTION 43(3) OF THE PA2008

LOCAL AUTHORITY
Bedford Borough Council
Buckinghamshire Council
Central Bedfordshire Council
Cambridge City Council
Cherwell District Council
Huntingdonshire District Council
Milton Keynes City Council
Oxford City Council
South Cambridgeshire District Council
Cambridgeshire County Council
Oxfordshire County Council
Braintree District Council
Dacorum Borough Council
East Cambridgeshire District Council

LOCAL AUTHORITY
Fenland District Council
London Borough of Hillingdon
Luton Borough Council
North Hertfordshire Council
Slough Borough Council
South Oxfordshire District Council
St. Albans City and District Council
Stratford-on-Avon District Council
Three Rivers District Council
Uttlesford District Council
Vale of White Horse District Council
West Oxfordshire District Council
West Suffolk Council
Royal Borough of Windsor and Maidenhead
North Northamptonshire Council
Peterborough City Council
Hertfordshire County Council
Wokingham Borough Council
West Northamptonshire Council
Essex County Council
Gloucestershire County Council
Lincolnshire County Council
Norfolk County Council
Reading Borough Council

LOCAL AUTHORITY
Suffolk County Council
Swindon Borough Council
Warwickshire County Council
West Berkshire Council
Wiltshire Council

TABLE A4: NON-PRESCRIBED CONSULTATION BODIES

ORGANISATION
Cambridgeshire and Peterborough Combined Authority

APPENDIX 2: RESPONDENTS TO CONSULTATION AND COPIES OF REPLIES

CONSULTATION BODIES WHO REPLIED BY THE STATUTORY DEADLINE:
Anglian Water
Bedford Borough Council
Bedford Group of Drainage Boards IDB
Bladon Parish Council
Blunham Parish Council
Botley and North Hinksey Parish Council
Brickhill Parish Council
Broughton Parish Council
Buckinghamshire Council
Caldecote Parish Council
Cambridge City Council
Central Bedfordshire Council
Cherwell District Council
Clapham Parish Council
CNG Services
Coton Parish Council
Dacorum Borough Council
East Cambridgeshire District Council
Eltisley Parish Council
Environment Agency
Forestry Commission
Great and Little Eversden Parish Council

Great Barford Parish Council
Great Paxton Parish Council
Harlton Parish Council
Harston Parish Council
Haslingfield Parish Council
Historic England
Houghton Conquest Parish Council
Health and Safety Executive
Huntingdon District Council
Islip Parish Council
Kingston Parish Council
London Borough of Hillingdon
Middle Level Commissioners
Milton Ernest Parish Council
Milton Keynes City Council
National Gas
National Grid Electricity Transmission
National Highways
NATS Safeguarding
Network Rail
Newton Parish Council
Norfolk County Council
Oxford City Council
Oxfordshire County Council
Padbury Parish Council
Ravensden Parish Council

Royal Borough of Maidenhead and Windsor
Royal Mail
RWE
South Cambridgeshire District Council
South Oxfordshire District Council
St Albans City and District Council
Staploe Parish Council
Stratford-on-Avon District Council
Thames Water Utilities
Toseland Parish Council
UK Health Security Agency
Uttlesford District Council
Vale of White Horse District Council
Waddesdon Parish Council
Walton Community Council
West Suffolk Council
Westcott Parish Council
Yelling Parish Council

Anglian Water Services
Thorpe Wood House
Thorpe Wood
Peterborough
PE3 6WT

www.anglianwater.co.uk
strategicgrowth@anglianwater.co.uk

Our ref ScpR.EWR.NSIP.25.ds

Karen Wilkinson
Senior EIA Advisor
The Planning Inspectorate

EastWestRail@planninginspectorate.gov.uk

31 January 2025

Dear Karen

Application by East West Railway Company Limited (the Applicant) for an Order granting Development Consent (DCO) for the East West Rail (the Proposed Development)
EIA Scoping Report consultation

Thank you for the opportunity to comment on the scoping report for the above project. Anglian Water Services (AWS) is the appointed water and sewerage undertaker for the project in Buckinghamshire, Milton Keynes, Central Bedfordshire and Bedford as well as the northeast of Cherwell and AWS is the sewerage undertake In Huntingdonshire, South Cambridgeshire and Cambridge. AWS is also joint promoter of Nationally Significant Infrastructure Projects (NSIP) for new water supply and wastewater projects in Cambridgeshire that will support growth in the coming decades.

- **Catalyst for connected sustainable growth.**

AWS supports the proposed development of East West Rail (EWR) in principle given it can be a catalyst for sustainable connected growth in the Anglian Water region. AWS responded to the Applicant's non statutory consultation last week (23rd February 2025). We note the Planning Inspectorate's past advice to applicants on the timing of scoping consultation requests and the resource pressures that these place on consultees including Local Planning Authorities (LPA). The following response is submitted on behalf of AWS in its statutory capacity and relates to water resources, the water supply network, water recycling centres, water recycling assets and the sewer network and the related role of surface drainage. In supporting growth, AWS is leading the sector in reducing the capital (embedded) carbon in national infrastructure projects by designing out the need for asset diversions and reducing emissions from construction materials and methods when new connections and existing asset diversions are needed.

In the AWS response to the Applicant's non statutory consultation we set out an executive summary of the principal concerns that AWS asked the applicant's team to address. These are:

1. Ridgmont Station and the early selection of the new station option to enable the AWS pumping station to progress and support an upgrade in strategic water supply needed by 2027 to serve Milton Keynes growth.

2. Progression of collaborative asset interface assessment and diversion designs to agree critical assets for early detailed design and reduce the number and scale of diversions.

3. Land take and phasing around Cambridge which may impact the Milton WRC relocation NSIP project and the urgent need to contact and work with the AWS Head of Delivery for the Milton WRC project

4. Impacts of land take, the Safeguarding Direction and construction impacts on other AWS national infrastructure projects including the Fens Reservoir.

5. Water efficiency and the use of the Water Resources Assessment approach from design onwards to drive up water efficiency and reduce the volume of wastewater generated by EWR during construction and operation.

Our specific asks of EWR for the ES are highlighted in *italics* below. As part of engagement with the applicant AWS will record these action points in the Statement of Common Ground (SoCG) to be produced with the applicant and which is submitted with the NSIP application to assist the Examining Authority's consideration of the project.

- **Capital carbon and regional prosperity.**

In another statutory capacity AWS is also seeking to support Councils in their role in planning for growth through Local Plans. Part of that role is through highlighting where we have existing capacity that can be utilised to support new homes and businesses. Where we don't have water or wastewater capacity, we are recommending that growth is at scale as our drive to reduce carbon emissions has shown that concentrated growth has significantly lower carbon intensity than spreading growth across multiple locations which each need new capacity. As a purpose lead organisation our investment and support for infrastructure planning in our region extending from Oxfordshire to the Humber is to support 'social and environmental prosperity'. AWS will be assessing the project's contribution to delivering prosperity and the AWS's part on supporting NSIP projects through applying and measuring the sustainability metrics set out in Appendix 1.

- **Water Resources**

As part of earlier engagement with the applicant AWS has set out the current water scarcity position to EWR. The new position as of 2023 and stemming from AWS's regulatory duty to maintain a supply and demand balance for domestic (mainly residential) customers is that supply to meet new non- domestic demands are increasingly constrained. The position is set out in a summary provided to EWR in November 2024. The EWR route and corridor are located within the WRMP24 - Ruthamford South Water Resource Zone (WRZ) where water is supplied from abstraction from the River Great Ouse supplying Grafham reservoir. A small amount of groundwater is also abstracted from the Woburn Sands aquifer. The statutory water undertaker from Croxton and the boundary between Huntingdonshire and South Cambridgeshire through to Cambridge City is Cambridge Water.

The Anglian Water region and the Cambridge Water area are identified as 'seriously water stressed' in the Environment Agency's 2021 classification of water stressed areas. One specific point for the Environmental Statement (ES) therefore and in view of the potential impacts on water resources, is that the applicant is advised to consider the published Water Resources East Regional Plan which sets out the collective water companies position in the east of England. The AWS draft Water Resource Management Plan (WRMP) is available on our website. AWS's final WRMP reached final determination by Ofwat in December 2024. AWS Non-Domestic Water

supply position paper is available at Non- domestic water policy. The policy has previously been provided to the applicant. In summary, this means that the project's ES will need to consider water resources and water efficiency and that a Water Resources Assessment (WRA) will be required to be produced by the applicant and agreed with AWS. *The WRA will need to address water and wastewater for the EWR temporary construction compounds and activities as well for permanent operational sites including stations, sidings and maintenance facilities.*

AWS recommends that the WRA is an integral part of the Water Resources chapter of the ES (see 6.11 of the applicant's Scoping Report). *The interaction with AWS NSIP projects and current and planned infrastructure to support growth should be minimised by the design, assessment and mitigation of the proposed development, 'the Project', and this should be set out in the Cumulative Impacts chapter of the EIA (see 4.4, 4.5, 6.11, 6.14 and 6.16).* The completion of the WRA will enable the project to show that it is maximising water efficiency and protection of finite water resources which are needed to support the region's growth. AWS requests that the AWS WRMP and Drainage and Wastewater Management Plan (DWMP) are added to the Data Sources for the Project. In this context we welcome the support of Central Bedfordshire Council (Table 2) for the Project to engage with AWS on Water Resources matters.

- **Pre-application stage engagement**

Following several introductory meetings our engagement with the applicant commenced in November 2024 and has to date focused on the existing assets clashes for the EWR route and corridor which is being initially assessed by the AWS team. For context, most NSIP that AWS has supported in the region have tens of assets that need protection or diversion. We anticipate that there for the EWR project will be over 100 assets needing diversions. AWS and EWR are currently considering the first 10 existing critical water pipeline clashes which will need to be factored into the projects design, redline and programme from day one given their scale and significance in supplying water to existing and fast-growing communities within and near the EWR corridor.

AWS's input to the project will be covered by agreements between AWS and EWR and resourcing by applicant (excluding our statutory responses to Scoping consultation, for example, will enable AWS to support the project through pre-application to DCO decision stage including technical, planning, legal and property advice to assist the project. We welcome (5.3.1) the applicant's commitment to continue to engage with AWS on the water resources assessment and agree that this should be collaboratively with organisations including the Environment Agency (EA). AWS has already commenced that bilateral discussion with the EA. *We recommend that engagement (5.3.1) is progressed by the applicant through Expert Topic Groups as used by other NSIP projects to ensure a collective agreement is reached on assessment, design and mitigation is agreed in the pre-application phase.*

We recommend that the applicant seek further advice relating to wastewater capacity and connection options can be obtained by contacting the Growth Planning Team at: planningliasion@anglianwater.co.uk

The Project – Existing infrastructure

There are significant existing AWS water supply, water recycling and network assets which serve towns and villages along the project route including Milton Keynes, Bedford and Cambridge which may be impacted by the project. For example, at Lidlington AWS has a 750mm steel potable water main and at Clapham Road Bedford a 710mm HPPE water main. Other assets in the corridor include the Bedford Water Treatment facility and the current Milton Wastewater Recycling Centre (WRC) which serves Cambridge. *The project will need to consider abstraction and water storage locations along the route corridor (Table 2, EIA Scoping Method Statement*

Technical Appendix – Water Resources. AWS requests that the applicant commence work with AWS, other water companies and the EA to ensure that existing assets including source protection zones are not compromised by construction methods or the operation of EWR.

As there are multiple locations for potential asset interactions, where changes to project asset locations could avoid impacts and diversions, we welcome the applicant's engagement with our Asset Diversions team. *We would urge that early consideration, and assessment is given to minimising the need to disrupt or divert utility assets which has a carbon impact and increases the risk of service disruption. AWS recommends that progress on solutions, including the carbon saving from designing out the need for works are recorded by the applicant, agreed by AWS and captured in the projects ES, summarised in the SoCGs with utility companies and managed through the projects Carbon Management Plan.*

The upgrading of the existing line, the construction of the new line and the supporting infrastructure for the project including electricity cables has the potential to damage AWS assets causing flooding, a loss of water or wastewater services and pollution. *AWS requires that the following standoff distances are applied for working each side of the medial line of AWS pipes. The text is drawn from our template Protective Provisions which have been supplied to EWR will need to be agreed with AWS prior to the DCO submission.*

> (a) 4 metres where the diameter of the pipe is less than 250 millimetres.
> (b) 5 metres where the diameter of the pipe is between 250 and 400 millimetres, and
> (c) a distance to be agreed on a case-by-case basis and before the submission of the Plan under sub-paragraph (1) is submitted where the diameter of the pipe exceeds 400 millimetres.

These distances are a starting point for design, assessment, diversion or mitigation measures including crossing provisions. The work now commission by the applicant from AWS will enable the majority of assets to have bespoke protections designed in for assets that are not being diverted. *The Construction Management Plan (CMP) (1.6.8, Appendix B, 8.1.1 et al), Code of Construction Practice (CoCP) and Construction Traffic Management Plan (CTMP) (6.3.14, 8.33 et al) should include steps to remove the risk of damage to AWS assets from vibration, plant and machinery including haul roads.* AWS supports the use of geophysical surveys for archaeology to provide a preliminary assessment of the location of assets and to enable design and location choices such as electricity supply and train charging infrastructure placement. We welcome the commencement of the provision of GIS layers showing all AWS asset interactions. This can for example EWR to design out the need to move multiple utilities from specific locations and also ensure that sufficient land is included within the projects redline for safe working to relocate assets during the entire construction programme and maintain safe access to retained, relocated or new assets.

- **EIA Scoping Report**

2.4.13 AWS supports the passenger connectivity and consequent productivity purpose and benefits of the projects. AWS considers that the freight service benefits of the project should be included in the ES as the capital projects which AWS proposes to take forward in future years will require bulk products which can be effectively transported by rail freight.

5.1.2 AWS agrees with the application of the mitigation hierarchy (Figure 24). AWS specifically supports the avoid/ minimise/ rectify/ compensation sequential approach in the design of the Project by the applicant and the reduction on the number and scale of asset diversions, and the work with AWS to address residual impacts.

6.7.11 AWS considers that the Business Case for the Project should set out how the connectivity gains (passenger and freight) will unlock economic growth and productivity within the growth sectors set out in the government's Invest 2034 plan for investment and growth in the Oxford Cambridge growth corridor (Also A.5.2. page 175 of 184) AWS would welcome explicit recognition that investment in water and wastewater infrastructure over and above that agreed in Ofwat's Final Determination in December 2024 will be required to support that employment and supporting services growth and the resultant need for housing for new employees. Those investors and employees will also be attracted by the ability to access the natural environment in the EWR corridor including AWS Reservoirs and publicly accessible parks and blue- green infrastructure (see A.6.5). (Also A.4.4 and A.4.6, page 173 of 184)

Cumulative Impacts

AWS has set out our significant concerns to the applicant in our 23rd January 2025 non-statutory consultation response regarding the current lack of engagement with AWS on water and wastewater projects which have or are likely to have consent before the project's NSIP application reaches its decision point. AWS has also set out how other projects planned for approval and delivery during the currently planned for construction stage of project (2027 to 2035) could be effectively planned into the EWR projects design and assessment to reduce cumulative impacts. These projects are planned to support the sustainable growth of the region as well as addressing climate change challenges and enable long term environmental improvements in water and wastewater services for residents and business. Those benefits include supporting sustainable water supply by partner water companies to address severe water scarcity in Cambridge, for example. The AWS projects to be considered in the project's cumulative assessment include:

A. Cambridge Wastewater Treatment Plant Relocation (CWWTPR)
B. Grafham to Rede Strategic Water Transfer Pipeline (G2R)
C. Ridgmont Pumping Station and Strategic Water Main to Milton Keyn
D. Fens Reservoir and associated infrastructure
E. Lincolnshire Reservoir

The advanced position of the CWWTPR NSIP, the criticality of the G2R transfer to supplement Cambridge's water supply in this decade and the urgent increase in water supply to support Milton Keynes growth by 2027 delivered by the Ridgmont Pumping station mean that these three projects require the applicant to undertake urgent engagement, design decisions and land take notifications to effected parties in the next three months.

AWS comments on specific EIA Scoping Report documents

- **Code of Construction Practice (CoCP)**

We note the list of environmental matters to be included in the CoCP. Our observations on this with reference to the numbered sections are:

1.3 Agriculture and soils. *AWS would welcome a commitment to minimise the disruption of soil in construction to reduce the risk to buried utilities and the use of no dig methods which reduce capital carbon emissions.*

1.4 Air quality. *AWS considers that dust suppression measures should utilise rainwater collection to harvest water and indeed provide construction stage blue infrastructure through SuDS to reduce flood risk rather than using scarce potable water supplies*. (Also 1.7.3)

1.5 Carbon. See above requests to the applicant.

1.8 Ground settlement. *AWS will require the design of groundworks to consider the impact of works and changes to surface and groundwater flows on the integrity of assets*. AWS will look to scope this into detailed design work on existing and new assets.

1.12 Resources and waste. *AWS requires that wastewater management during construction and operational stages is considered by the applicant in the WRA as part of the ES.*

1.13 Sound, noise and vibration. See above request to the applicant.

1.14 Traffic and transport. *AWS requests that the ES and CoCP consider existing planned traffic movements from NSIP projects already in the public domain.* The CoCP should be updated to include movements from other projects which would be in construction at the same time and utilising the same roads as the Project as those projects when those projects published traffic movement data in pre-application.

1.15 Water resources and flood risk. AWS welcomes the Project's commitment to manage surface water and ground water resources through the CoCP. AWS recommends that public water supply impacts during construction and operational stages are included in the list at 1.15.3. *AWS advises that all surface and ground water management should follow the drainage hierarchy and utilises SuDS as the first option as a nature-based solution which does not increase the risk of public sewer flooding.* We welcome the inclusion of the Climate Resilience Method Statement (page 157 of 184, 7.4.13) which will enable the project to consider the risk of climate change in designing drainage solutions. AWS has on other projects encountered construction stage flooding which has caused assets damage and loss of service to customers due to the increased frequency, duration and severity of rainfall events. Construction stage climate risk to AWS assets should not therefore be descoped from the CCRA (7.4.10 and 9.2.1) unless that is agreed for those specific assets by AWS. AWS agrees that all asset groups including drainage and utilities are scoped into the CCRA (Table 8, 9.3.1 and Table 9).

- **Socio-Economics and Human Health Method Statement**

Both 6.11 AWS agrees that works to utilities – diversions, protection and new connections – should be scoped into the likely sources of impact. This is on the basis that the loss of waste or wastewater services and the effects that may have included flooding and pollution can have a severe impact on the local community's human health. The risk includes effects on operatives required to attend and repair burst pipes and clean up effects from escapes of water or sewerage.

- **Landscape and Visual Method Statement**

8.3.1 and 12.2 AWS agrees that the work to date by the Applicant has not provided a baseline against which the impacts of utility diversions (or new connections) can be assessed. To rectify this and enable utilities to be descoped from the ES, the applicant should conclude a water and wastewater design fix for all significant works prior to the ES assessment being conducted ahead of the statutory and PEIR consultation.

- **Biodiversity Net Gain**

2.2.2 AWS agrees that utilities works are a part of the Project which should be baselined by the applicant ahead of the prospective implementation of Biodiversity Net Gain (BNG) mandatory requirements later in 2025. AWS confirms that all BNG and indeed other required mitigation

measures for AWS works as part of the EWR project will need to be designed, assessed and funded be the applicant. AWS understands that loss of BNG from utilities works would even under recently announced proposals for alternative compensatory measures still require the loss to be assessed and compensated elsewhere under a national nature recovery plan.

New connections

As set out at the start of our response the position on water supply for non- domestic use during construction and operation has changed in the past 18 months. AWS requires that the project seek to minimise its demand for water and records this in its Water Resource Assessment (WRA) in the EIA. AWS recommends that new water supply connections are not sought during construction and that potable water supply for welfare facilities, for example, are served by tanker to reduce the embedded (capital) carbon from providing new connections.

Given the approach taking on other linear projects AWS would welcome clarification that the EWR project will sourcing non potable water supplies, for dust suppression and vehicle washing for example, from local abstraction rather than the public water supply.

AWS would also welcome confirmation that the projects need for temporary concrete batching facilities (6.16.1) with their consequent water demands will be minimised. If so, then the project's WRA can record that only potable supply connections will be sought for permanently staffed operational stage facilities such as stations. For construction stages the use of tankers for potable water supplies to at satellite compounds can minimise the need temporary water connections.

As with water supply, we understand from our engagement with the applicant that project's position on wastewater needs has not yet been considered. AWS is currently advising LPAs on the potential constraints to water recycling centres and the sewerage network as a result of work to develop our business plans and the consequent final determination by Ofwat. AWS would welcome early engagement by the applicant on its wastewater needs as although new foul connections would be funded by the applicant these may not be technically feasible and may compromise existing capacity that was to be utilised to serve permitted or planned housing or other employment growth.

Further advice wastewater capacity and options can be obtained by contacting Anglian Water's Pre-Development Team at: planningliasion@anglianwater.co.uk The AWS pre- development team will liaise with the AWS Alliance team currently commissioned by the applicant to review asset clashes, on the AWS approach to assessment, design and delivery of the project's selected wastewater options.

On new connections AWS would support an approach by the applicant (6.14.2, page 139 of 184) which considers the whole life carbon of the project and includes those emissions associated from any onsite construction-related activities and from the production of materials, such as pipes for utility diversions. This would support the evidenced based evolution of the design of the project to reduce interactions with existing utilities infrastructure and the removal the need for new water and wastewater connections during construction and then operational stages. The AWS team will in proposing design solutions for avoiding diversions and designing low carbon diversions and new connections (where needed) apply the lessons AWS has learnt from delivering a 65% reduction in capital carbon in our projects in 2025 against the 2010% baseline.

For the avoidance of doubt AWS will record the carbon reductions and final whole life carbon numbers for reporting to Ofwat. As with BNG the cost of reducing emissions from works to divert or provide new connections will need to be assessed and funded by the applicant. AWS will

support this design and assessment work through the AWS and our Alliance team's expertise utilised over the past decade in designing in lower carbon solutions. The allocation of those GHG will be to the project as whilst AWS supports the overall projects benefits it for is the applicant to report the carbon impacts of the project in its ES and as part of the rail and construction sectors contribution to delivering net zero.

Next steps

AWS would welcome the continued progression of discussions with the applicant, in line with the requirements of the 2008 Planning Act and guidance. Experience has shown that early engagement and then agreement is required between NSIP applicants and statutory undertakers during design and assessment and well before submission of the draft DCO for examination. Consultation at the statutory PEIR stage would in our view be too late to inform design and may result in objections and delays to the project, including potentially requests to change the projects redline to ensure AWS services to existing customers and to support growth are not prejudiced. *We consider that the EWR NSIP project should be assessed and developed in accordance with the Water Industry Act 1991 and the National Policy Statements which relate to the water sector*. As the EWR NSIP project progresses, we would require the planning application and specifically the ES to:

- *include reference to the existing infrastructure managed by AWS or partners,*
- *minimise the need to divert AWS assets through collaborative design,*
- *provide for agreed replacement infrastructure (when and where required),*
- *specify and assess the provision of new AWS infrastructure,*
- *show how the selection of the new station at Ridgmont option removes a threat to a strategic water main to serve Milton Keynes and so does not hinder existing planned housing and employment growth in the EWR corridor*
- *show how the design of the Cambridge section of the project has considered the Milton WRC NSIP, which is at an advanced point in the Decision stage*
- *assess the cumulative impacts of other proposed AWS NSIP projects including the Madingley water supply from the Fens Reservoir and to remove or mitigate conflicts between EWR and those projects.*
- *consider and mitigate the adverse impacts on water resources (water supply and demand balance, water supply connections and impacts on source protection zones) and on wastewater/ water recycling services. This should include the projects which AWS is progressing to support existing and planned growth in the EWR corridor. Within that corridor from Oxfordshire to Cambridgeshire, AWS currently serves some 1.4million customers and an additional 270,000 homes are planned by 2050[1].*

As part of the wider progression of the project alongside the ES, AWS recommends discussion on the following issues and NSIP/ DCO documents:

[1] Housing targets as set out in existing Local Plans for the eight Councils from Cherwell to South Cambridgeshire. We note that current Local Plans do not provide for the increase in housing need targets published by Government in 2024 or potential growth from yet to be announced New Towns.

1. Draft Protective Provisions and Requirements including the WRA.
2. Removal of Safeguarding which prevents or delays progression of AWS projects to support growth or deliver environmental improvements from 2025 to 2030.
3. Expert Topic Groups on water, wastewater and drainage including rainwater harvesting and SuDS design for construction stage non potable water supply.
4. Draft Statements of Common Ground to capture progression of sustainable solutions agreed by all related parties.
5. A schedule of Statements of Commonality – potentially based on Expert Topic Groups – including but not limited to the Environment Agency, LPAs and County Councils.
6. Agreement on the methodology for assessing growth as part of the Business Case and Socio-Economic section of the ES, to inform AWS and other utilities business plans to support utility investments to enable a potential uplift in employment and housing growth stimulated by the project's connectivity benefits.
7. A programme of works aligned to the draft DCO Works schedule which recognises the scale of other projects in the region including the Great Grid upgrade and the National Highways road schemes and the call upon utilities and their contractors' resources.

AWS role on the NSIP application will be managed by Darl Sweetland [redacted]@anglianwater.co.uk and so please do not hesitate to contact him should you require clarification on the above response or during the pre- application to decision stages of the project. The technical assessment of asset clashes and subsequent joint design work will be led by James Bescoby-Winslade [redacted]@anglianwater.co.uk. Contacts for specific AWS projects and inputs to the EWR project cumulative assessment have been provided to the applicant separately.

Yours sincerely,

[redacted]

Phil Jones
Growth Strategy Manager

cc East West Rail Co. Ltd c/o
[redacted]@wsp.com
[redacted]@eastwestrail.co.uk

[redacted]@environment-agency.gov.uk

Attachments:

1. None. All provided by links in response.

Appendix 1 – EWR and aligned Sustainable Development Goals with metrics for NSIPs

1. Drought & flood resilience

- ✓ Focused growth (commercial & homes) away from resource hotspots including Cambridge (SDG17)

Metrics: (i) Water 20m3 plus (WRA required) (ii) Rainwater & FE utilisation (incl. firewater)

- ✓ Growth outside of east of England long term coastal flooding areas (SDG11)
- ✓ Growth a Cambridge increases case for AWS solutions including SRO (SDG6)
- ✓ Growth at Cambridge before 2030 incentivises water efficiency enabling regional roll out (SDG6)
- ✓ Natural flood management test bed for attenuation features (SDG9)
- ✓ Supports MK-Bedford Waterway (SDG14)

- All Anglian region is water stressed area (SDG12)
- Limits on non-domestic water supplies and medium-term target to reduce non-domestic demand as per FD contributing to 1% reduction 2025-2030 (SDG8)

Metrics: (i) Water 20m3 plus (WRA required) (ii) Rainwater & FE utilisation (incl. firewater)

2. Sustainable Growth

- ✓ Business connectivity & investment (SDG9)

Metric: AW investment and employment (n.b. tension between reducing AW capital works to reduce carbon and contribution to construction stage investment)

- ✓ Education & academia connectivity (SDG4)

Metric: AW including Alliance skills development providing capacity for NG Great Grid Upgrade etc

- ✓ UK PLC biotech sector growth, innovation and L&D global centre (SDG9)
- ✓ Reduced congestion (SDG13)
- ✓ Reduced travel times (SDG3)
- ✓ Community and political recognition of support for infrastructure as catalyst for growth (SDG17)
- ✓ On train productivity 'v' car journeys down time (SDG3)
- ✓ Sustainable leisure, tourism and service access journeys (SDG11)
- ✓ Increased high skill employment and spin offs (SDG8)
- ✓ Distributed growth across Oxford Cambridge corridor (SDG1)(SDG3)

Metric: Growth based on sustainability hierarchy and Catchment Prioritisation

- ✓ Making the case for sustainable growth aligning with long term resource management (SDG11)
- ✓ Growth away from protected landscapes and habitats (SDG15)
- ✓ Growth at scale supports IWM and water neutrality (SDG12)
- ✓ Biodiversity net gain of at least 10% along route and in wider landscape (SDG15)

Metric: BNG linked to LNRSs

- Disruption from construction works (SDG16)

Metric: No. of EWR and AW compounds

- Loss of part of Bourn Airfield site (SDG12)
- Possible physical barrier to species and habitat migration (SDG15)

Metric: BNG linked to LNRSs

3. Catchments and Water Quality

- ✓ Water and water recycling asset protection (SDG6)

Metric: No. of above ground assets (Instruct Savills & AWS legal)

- ✓ Growth provides funding for drainage 'betterment' for existing communities (SDG6)

Metrics: (i)Delivers drainage betterment for community flood resilience (ii)No net increase in surface water flows to public sewer (iii) AWS Requirements on WRA & SWM pre commencement:

- WRC DWF constraints at Bedford and Cambridge (SDG14)

Metric: Standard DCO Order AWS PP or bespoke PP with DCO Requirements

4. Carbon

- ✓ Use of existing assets (Bletchley to Bedford) (SDG12)
- ✓ Reduced need for asset diversions & capital carbon (SDG7)

Metric: No. of assets needing diversions (AWS cap. Carbon proxy)

- ✓ Low carbon journeys including from Cambourne (SDG13)
- ✓ Supports public transport links (SDG17)
- ✓ Focused growth enables investment and utility carbon economies of scale (SDG13)

Metric: Net zero date i.e. date project recoups its capital carbon

- ✓ Growth at scale supports homes & business future proofing including renewables (SDG7)

- Need for new infrastructure & consequent capital carbon (Bedford to Cambridge)

Planning Inspectorate
Environmental Services
Operations Group 3
Temple Quay House
2 The Square
Bristol, BS1 6PN

Please ask for: Peter Dijkhuis
Direct line: 01234 718537
E-mail:
Date: 30 January 2025
Ref: 25/00123/LPA
FINAL/ Rev. 2

Issued by email:
eastwestrail@planninginspectorate.gov.uk

To: The Planning Inspectorate

Environmental Statement and Scoping Opinion - response

In accordance with the Planning Act 2008 (as amended), Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulations 10 and 11, and the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (as amended).

Response date: 31 January 2025

Bedford Borough Council has the following COMMENTS to make with regard to the Project as notified by PINs for application reference No: **TR040012-000019**

Bedford Borough Council Ref No.: 25/00123/LPA

APPLICANT: East West Rail Company Limited, Company Registration 11072935 (the 'Applicant').

PARTICULARS OF DEVELOPMENT:
The infrastructure proposals for East West Rail comprise a new rail link that would connect communities between Oxford, Milton Keynes, Bedford and Cambridge. The proposals include the construction of a new railway between Bedford and Cambridge and associated works to upgrade the existing railway between Oxford and Bedford. Together these comprise the 'Application' (as set out by Applicant §1.1.1)

COMMENT

In terms of PINs' letter, 2 January 2025, notifying Bedford Borough Council (the 'Council') as a statutory consultee to the above Application regarding the Scoping Opinion, we have reviewed the Applicant's Environmental Impact Assessment Scoping Report and, as requested, comment accordingly / inform the Planning Inspectorate of information that the Council consider should be provided in the Environmental Statement (ES).

For clarity, we refer to PINs Advice Note regarding use of terms, namely:

(PINs Advice Note 7; §3.14) Aspects: The Planning Inspectorate refers to 'aspects' as meaning the relevant descriptions of the environment identified in accordance with the EIA Regulations; and,

(PINs Advice Note 7; §5.7) Matters: The Planning Inspectorate uses the term 'matters' referring to those parts that are a subdivision of the aspect, for example an assessment of a particular species is a 'matter' to the aspect of biodiversity.

LOCAL PLANNING AUTHORITY'
STATUTORY CONSULTATION RESPONSE

EXECUTIVE SUMMARY

1. The Applicant has submitted a Request for a Scoping Opinion (Assessment Scoping Report, dated 05.12.2024) in accordance with the EIA Regulations which notes that further surveys, Project resolution, and supporting studies need to be undertaken, against a methodology as set out, to further inform, evaluate, and potentially mitigate against potential significant effects as may be identified by the Project. This will lead to the preparation of a Preliminary Environmental Information Report (PEIR), Environmental Statement (ES), and the refinement and preparation of a Code of Construction Practice (CoCP).

2. **RECOMMENDATION:** Bedford Borough Council notes their in-principle agreement with the Scoping Opinion as submitted, albeit with comments as raised, which need to be addressed by the Applicant. The Council reserves its right to comment further as the above reports are tabled for discussion and statutory response.

BEDFORD BOROUGH COUNCIL: Internal consultation responses

Historic Environment Team (Cultural Heritage)	Comments incorporated in response.
Pollution (Noise and sound)	Comments incorporated in response.
Highways (Development Control)	Comments incorporated in response.

ASSESSMENT OF THE APPLICATION

1.0 INTRODUCTION

1.1 **Project Description:** The project will comprise a new rail link that would connect communities between Oxford, Milton Keynes, Bedford and Cambridge. The proposals include the construction of a new railway line between Bedford Station and Cambridge Station. There will be other associated works to the railway network in and around Oxford, Bicester, Winslow, Bletchley, and on the Marston Vale Railway Line between Bletchley and Bedford. These works will include but are not limited to changes to level crossings, improvements to existing stations, improved accessibility for pedestrians and cyclists accessing the stations, and the provision of new facilities (the 'Project').

1.2 In more detail, as set out on the Applicant's webpage (Chp 9 Consultation Document), proposals for the area Fenny Stratford to Kempston (Scoping Fig. 4), partially within the Council, include et al:

a) Two options for service patterns and stations on the Marston Vale Line. The options would either retain all nine existing stations or consolidate them into four new stations at Woburn Sands, Ridgmont, Lidlington and Stewartby;
b) Twin-tracking at Fenny Stratford, where a second track would be built to allow for new EWR services;
c) Level crossings on the Marston Vale Line, including diversions and closing some crossings; and,
d) Passing loops between Ridgmont and Stewartby so that faster passenger trains could overtake slower trains.

1.3 Proposals to the south of Bedford and Bedford St Johns, Bedford station, and the area north of Bedford (Chp 10 Consultation Document) (Scoping Chp. 3.3, Fig. 6), including proposals to et al:

a) Relocate Bedford St Johns station to the south-west to provide better accessibility and connectivity to Bedford Hospital (and Bedford Town Centre from the south);
b) Build a new two-track railway to the north of Sandhurst Road that would replace the existing single track Marston Vale Line into Bedford Station;
c) Rebuild the Bedford station building, creating a new station plaza, constructing footbridges and two new platforms (reduced from three shown in previous proposals), provision of cycle storage, and multi-storey car park;
d) Construct two additional tracks alongside the Midland Main Line to make sure EWR services can run reliably without conflicting with other trains;
e) Build a new circa 1.1km long viaduct over the Great River Ouse and Paula Radcliffe Way; and,
f) Realign Ampthill Road, Cauldwell Street, Ford End Road, Bromham Road and the A6 Great Ouse Way to enable the railway to be built and operated.

1.4 Proposals to the section Clapham Green to Colesdon (Chp 12 Consultation Document) (Scoping Chp. 3.4, Fig. 9), including proposals to et al:

a) Lay approximately 12km of new railway track and build embankments, cuttings, bridges and viaducts where needed to enable this;
b) Divert some roads, tracks and paths that cross the new railway so that these can still be used, for example by building new bridges; and,
c) Install two passing loops so that faster passenger trains could overtake slower trains.

1.5 Proposals to the section Roxton to east of St Neots (Chp 13 Consultation Document) (Scoping Chp. 3.5, Fig. 10), including proposals to et al:

a) A section of new railway and associated infrastructure approximately 10km long;
b) Two possible alignments through the Tempsford area (1b and 1c), each making use of viaducts linked by embankment;
c) A new station at Tempsford, which would also include an interchange with the East Coast Main Line; and,
d) A temporary rail logistics hub connecting with the proposed alignment and the East Coast Main Line to enable construction materials to be transported by rail.

1.6 It is noted that the Applicant's Scoping Report relates to the works required to deliver Connection Stage 3 (§2.2.1 '*Connection Stage would complete East West Rail and enable passenger services to operate between Oxford and Cambridge via Bletchley and Bedford. To complete this work, we will need to apply for a Development Consent Order (DCO), which would grant consent to build the new railway between Bedford and Cambridge, as well as the other upgrades between Oxford and Bedford to deliver the full proposed East West Rail service'*.)

1.7 A detailed description of the infrastructure works that form the Project is set out in the Applicant's Report Chp. 3 (Project Description).

1.8 To deliver the Project, East West Rail Company (EWR) will apply for an order granting development consent (DCO) under the Planning Act 2008. If granted, the DCO will provide the powers required for the construction, maintenance, and operation of the Project.

1.9 Under the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, Schedule 2, the Project is defined as 10(d) 'Construction of railways', threshold criteria 'the area of the Works exceeds one hectare' and is consequently subject to an Environmental Impact Assessment subject to the selection criteria for Screening as set out in Schedule 3.

Non-statutory consultation

1.10 It is noted that the Council has prepared a response to East West Rail's non-statutory consultation request, which was discussed at Full Council on the 15 January and approved by its Executive on the 29 January. The response was supported by four background documents, namely:

a) Built and Natural Environment (BNE) Specialist's Comments on ecology, landscape, and sustainability (dated 12.12.2024/ Rev. B).
b) Modelling and Economic Review (dated 12.12.2024).
c) Transport Update Report Review (dated 09.12.2024/ V1.1).
d) Technical Review (dated 12.12.2024/ Rev. V1.0).

1.11 The BNE topic areas (ecology, landscape, and sustainability) were assessed against proposal aspect(s), key issue(s), and proposed mitigation measure(s), against the following questions, namely:

a) Q7a. Please tell us which of the options for the Marston Vale Line stations you prefer.
b) Q9a. Please tell us your preference for the proposed location of Stewartby station.
c) Q10. Provide any comments you have on our proposals for level crossings along the Marston Vale Line, including proposed diversion routes.
d) Q11. Please provide any comments you have about our proposals in the Fenny Stratford to Kempston route section.
e) Q12. Please provide any comments you have about our proposals in the Bedford route section.
f) Q13. Please provide any comments you have about our proposals in the Clapham Green to Colesden route section.
g) Q14a. Please tell us your preference for the Tempsford alignment.

h) Q15. Please provide any comments you have about our proposals in the Roxton to east of St Neots route section.
i) Q22. Please provide any comments you have in relation to these route-wide matters.

1.12 The four background documents are submitted as part of this EIA Scoping Response (included as Appendix A). Aspects and matters raised within the Council's background documents are not repeated in this response but remain a material consideration to the Application.

2.0 METHODOLOGY

2.1 In general, the Council is in agreement regarding the Applicant's approach as set out in §1.6.5 '*This information is underpinned by detailed topic method statements setting out the proposed approach to the detailed EIA topic assessment or "Approach to" documents that set out our approach to other assessments. The method statements each broadly address the following matters: Relevant standards and guidance; Establishing the baseline; Preliminary baseline description; Sources of impact; Potential impacts and effects; Assumed mitigation; Evaluating significance; and, Scoping in and/or out'.*

2.2 In this regard, the Applicant is referred to Schedule 4(5) of the EIA Regulations '*the description of the likely significant effects on the factors specified in regulation 4(2) should cover the direct effects and any indirect, secondary, cumulative, transboundary, short-term, medium-term, and* ***long-term****, permanent and temporary, positive and negative effects of the development. This description should take into account the environmental protection objectives established at Union level or United Kingdom level which are relevant to the project…';* and, Schedule 4(6) '*A description of the forecasting methods or evidence, used to identify and assess the significant effects on the environment, including details of difficulties (for example technical deficiencies or* ***lack of knowledge****) encountered compiling the required information and the main uncertainties involved*'. Attention is drawn, but not limited to, those matters as enbolded by the Case Officer which need to be addressed in the Environmental Statement supporting any future application.

2.3 As noted above, the EIA Regulations (Schedule 4(5)(e)) require a description of the likely significant effects of the Project inclusive of '*the* ***cumulation of effects*** *with other existing and, or approved projects, taking into account any existing environmental problems relating to areas of particular environmental importance likely to be affected or the use of natural resources*' (Ref. PINS Advice Note 17 regarding Cumulative Effects Assessment (August 2019)). In this regard the Applicant is referred to the Local Plan 2030, the Allocations and Designations Local Plan (2013) Saved 2020, and representations to the emerging Local Plan 2040, with specific reference to major applications, namely:
a) Discussions regarding the location of Universal Studios' proposal at Stewartby / Kempston Hardwick; and,
b) Little Barford new settlement (just north of the proposed Tempsford Station).
c) Further, the Applicant is referred to several solar farm applications within the immediate to 5km area of the Project that could generate cumulative effect. These either sit with PINs (NSIP) or have been lodged with the Council.

In this regard it is suggested that the nature of cumulative effect is broadened beyond '*existing and/or approved developments'* (as discussed in §4.5.14) to those identified in the emerging Local Plan, or as a minimum afforded some weight.

2.4 The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as Amended) and related Screening Matrix's interpretation of EIA development means *'development…likely to have significant effect on the environment by virtue of factors such as its nature, size or location'.* The Matrix's response to the screening criteria - '*Is a significant effect likely, having regard particularly to the magnitude and spatial extent (including population size affected), nature, intensity and complexity, probability, expected onset, duration, frequency and reversibility of the impact and the possibility to effectively reduce the impact? If the finding of no significant effect is* ***reliant on specific features or measures*** *of the project envisaged to avoid, or prevent what might otherwise be significant adverse effects on the environment, then* ***these should be identified in bold'.*** The Applicant's ES should make specific reference to the address of such matters should such aspects/ matters be identified**.**

2.5 Collectively, the Scoping Request as submitted by the Applicant will be reviewed against the methodology as set out by the Applicant and matters of clarification raised as bolded by the Council above to ensure that all aspects and matters are addressed in any future planning application made.

3.0 ASPECTS of the PROJECT

3.1 The Applicant notes that the Project is not limited to the construction of an enhanced and new rail route but will include supporting infrastructure, feed substations and associated utility works, operational facilities (§2.4.6 '*variety of facilities and buildings would be needed across the route, including stabling and sidings for trains, depots to maintain trains, and areas that can be used to store material needed for maintaining the track and systems themselves; staff car parking and welfare facilities would also be required at various locations'*), passing loops, road infrastructure, earthworks, (§2.5.2) temporary construction compounds and haul routes, remedial and enhancement landscape and habitat measures, long-term landscape and habitat management, etc. These matters should be reviewed individually and collectively in terms of any assessment made.

3.2 It is noted that §2.4.7 '*The locations for these facilities are still being evaluated and the areas currently under consideration are presented as part of the 2024 non-statutory consultation. The proposals will be confirmed at the statutory consultation, after taking account of feedback received and following further design development*'. Whilst the Council understands the need for such flexibility, the Applicant should allow for additional technical surveys and related assessment should the Applicant find that the final Project proposals cut through and / or effects sensitive archaeological areas or habitats (including hedgerows considered important under the Hedgerow Regulations). In light of this statement, the Council reserves the right to comment further, including the request for further EIA surveys and assessments relating to the final proposals for the Project.

3.3 While the EWR's primary purpose is to provide passenger connectivity between the various towns on-route, it is noted that part of the Applicant's business case is to §2.4.13

'*consider how the railway can maintain existing freight services that already run through commuter hubs including Oxford, Bicester, the Marston Vale and Bedford, and plan for increased future freight demand to enable wider economic growth'*. It is noted that these are two different operational models that may have different effect(s) on the surrounding communities (e.g. night-time disruption, noise, dark-skies, pollution, etc.) and should be addressed within the assessment accordingly.

3.4 The Project will be interfacing with the existing Midland Main Line through Bedford which may require (§2.5.11) '*works may be undertaken outside operational hours. This would generally take place at night or over weekends'.* Such matters, as noted above, should be addressed within the assessment, specifically how this may affect surrounding, existing neighbouring communities and residential properties.

3.5 On the route from Bedford Station towards St Neots, the Applicant note several pieces of infrastructure, viaducts, and / or station buildings that will be located circa 8 to 22m above current ground level. Consequently, the assessment will need to address the potential visual effect of long-distant views from the surrounding fairly flat landscape towards the Project, inclusive of potential mitigation and enhancement measures.

3.6 In terms of the location of the proposed (§3.5.11 to 13) Construction Logistics Hub, the Applicant's attention is drawn to the Little Barford New Settlement proposal, reps as made to the emerging Local Plan, which is for the delivery of circa 4,000 houses and associated facilities. It is understood from the Little Barford applicant that they are in discussion with EWR regarding the effect that EWR has on their site, including (visual and functional) severance, and the locational impact of the Hub. While the emerging Plan carries no weight, the Council is in-principle supportive of this new settlement as set out in Policy HOU19 (Little Barford New Settlement). The Council would suggest that this policy carries some weight when assessing cumulative effect.

3.7 In general, the Council is supportive of the methodology and/or statements made as set out by the Applicant in Chp. 4 (EIA and scoping the assessment). For the record, the Council notes the Applicant's statement §4.3.7 '*Effects will be determined as being major, moderate or minor. In general, a major or moderate effect will be deemed significant'*. The EIA Regulations defines a significant effect as one that the Applicant believes should be considered by the decision makers in granting development consent.

3.8 The Council is supportive of the Applicant's statement (§4.4.1) that they will address both combined effect(s) and cumulative effect(s) with the proviso that they address the emerging proposals as set-out in paragraph 2.3 above.

3.9 In general, the Council are supportive of the mitigation strategy as set out by the Applicant in Chp. 5 (Mitigation Strategy).

ENVIRONMENTAL ASSESSMENT TOPICS

4.0 AGRICULTURE AND SOILS

4.1 It is noted that much of Bedford Borough outside of its main urban area of Bedford and Kempston is shown on the Agricultural Land Classification Map – Eastern Region (2010) as being located on land classed as either 'Very Good' or 'Good to Moderate' agricultural value (Local Plan Fig. 13 would identify the soil within the Project corridor as Grade 1, 2 and 3a). Therefore, although agricultural land is an important and high-quality resource it is not considered to be a scarce resource in the borough and on balance any effect arising from loss of 'best and most versatile land' from this Project, which is likely to be limited in extent, is unlikely to be significant due to the prevalence of it within the borough.

4.2 It is suggested that potential impacts (§6.2.5) should address the potential to find underground contamination not identified in surveys which if left in-situ may affect soil and groundwater quality.

5.0 AIR QUALITY

5.1 It is suggested that §6.3.1 '*The assessment of air quality impacts from the Project will address how activities and proposals associated with the Project's construction and* ***operation*** *will affect air quality and potential consequences for human health and ecology*' should be read against §2.4.13 '*consider how the railway can maintain existing freight services that already run through commuter hubs including… Bedford, and plan for increased future freight demand…*' in terms of potential long-term effect to immediately adjacent residential communities.

5.2 The Council has not seen evidence to justify the statement (§6.3.5) that air quality impacts during both the Project's construction and operation would '*result principally from road traffic',* as this does not address any changes to air quality generated by additional electric, diesel, and hybrid train movement through Bedford Town Centre and near and around St Neots, considerable settlements with immediately adjacent residential communities. This matter is part recognised in §6.3.6 but then not addressed in Mitigation (§6.3.13 – 16).

5.3 It is noted that the air quality study area for road traffic is defined as 200m (§6.3.11), while for operations – diesel freight trains is set at 15 to 30m (§6.3.12). The Council is not supportive of this very limited study area for diesel trains on the basis of proposed additional activity in close proximity to immediately adjacent residential communities.

6.0 COMMUNITIES AND HEALTH

6.1 (§6.4.2) '*The assessment considers how the Project proposals will affect residential and community assets and networks, as well as the health of local populations. This includes loss of residential properties or land, as well as loss of or impacts on community facilities supporting health, education or amenity (including open spaces). It considers how settlements or closely associated settlements may be actually or perceptually separated by the railway. It also considers how other environmental impacts and effects (noise, visual,*

dust, traffic) might act in combination to the detriment of overall community amenity and quality of life. The assessment also considers how effects on determinants of health (such as air quality, noise, and access) could result in impacts on human health'. It is noted that some of the concerns / observations raised above regarding immediately adjacent residential communities will be addressed within this aspect / topic.

6.2 In this regard, the assessment should specifically address those properties located along the railway, as identified in the Applicant's Consultation Document Fig. 45 (Cauldwell Street), Fig. 47 (Bedford Station), and Fig. 50 (Poets area) which will be most affected.

6.3 It is noted that the current proposal for six tracks to run through Bedford town centre, affecting Bedford Station and the 'Poet's' residential area, would require the demolition of residential properties adjoining the railway and the closure of various residential roads. The number of properties to be demolished remains unchanged from the previous figure (No.37), but further development of the proposals has resulted in an increase in the number from which land would need to be acquired (from 28 to 37). Further, potential land requirements to address noise mitigation and screening to the remaining, existing residential properties along this narrow corridor are not illustrated. Whilst the Council believes that these additional tracks are unnecessary, it is also concerned that more land may be required than is suggested should the tracks be constructed. A worst-case scenario with related mitigation and appropriate compensation should be tabled for discussion.

6.4 The Council is in-principle supportive of Table 11 (Proposed scope - human health and communities).

7.0 ELECTRO-MAGNETIC INTERFERENCE

7.1 In light of the campus nature of Bedford Hospital, where it is unknown where equipment that may be affected by EMI is located internally, it is suggested that (§6.5.8) the study area in relation to the hospital is increased to extend westwards to Victoria Road.

8.0 LAND QUALITY

8.1 The Council is in-principle supportive of Table 14 (Proposed scope - land quality) based on the assurances set out in §6.6.22 (consenting channels) and §6.6.23 '*no unacceptable risk should remain at the completion of the Project*'.

9.0 SOCIO-ECONOMICS

9.1 Within §6.7.4 '*Demolition of commercial premises and / or assets'* it is understood that this will include an assessment of those operators / businesses located within Bedford Station which is proposed to be demolished and a new station provided. It is assumed that within the assessment / EWR's business case that there may be a review of the potential to construct the new facility prior to the demolition of the existing to enable a continuation of these business operations to serve commuters at the station.

9.2 The Council is in-principle supportive of Table 15 (Proposed scope - socio-economics).

10.0 SOUND, NOISE AND VIBRATION

10.1 In light of parts of the route being elevated above the existing landscape, or carried in a viaduct across the River Great Ouse, sound may be able to travel further and consequently without knowing the nature of mitigation measures proposed to these parts of the route (e.g. screen dampers or similar), the Council reserves the right to request additional surveys to be undertaken during any design development state. A similar approach was adopted by affected local planning authorities located along the route with High Speed Two (HS2).

10.2 In light of the possibility that as an interim measure there may be three different operating systems (i.e. one which assumes a pure diesel fleet, a hybrid of the two, and full electrification for passenger trains), it is suggested that each scenario is assessed accordingly within the ES.

10.3 In terms of noise and vibration assessments, these assessments should address where the EWR runs parallel to the existing mainline and the contribution from new movements with existing rail activity creates / results in cumulative impact.

10.4 The Council is in-principle supportive of Table 16 (Proposed scope – sound, noise and vibration).

11.0 TRAFFIC AND TRANSPORT

11.1 With regards to §6.9.11 '*The baseline for the traffic and transport assessment will be established through reference to existing...'* or suggest models as held by either the Council and / or National Highways. In this regard, the Applicant's attention is drawn to the current pause of the emerging Local Plan 2040's examination by the Planning Inspectorate.

11.2 (§6.9.12) suggest that the relevant planning and transport authorities are expanded to include Active Travel England to ensure that enabling / encouraging modal shift is embedded into the very scope of the Project.

11.3 Within the user groups (§6.9.17) there is no specific recognition regarding disruption, mitigation, and enhancement for disabled groups that use the public highways (both road and pavements based) to access the station and other destinations that may be affected by the Project. All user groups should be picked up by default, and further clarification should be provided through the Equality Impact Assessment. It is assumed that non-motorised user (NMU) category will cover peds, cyclists, and mobility aid users.

11.4 With the above clarification / addition, the Council is in-principle, supportive of Table 17 (Proposed scope – traffic and transport).

11.5 While this may be subject to further discussions between the Applicant and the Council, it should be noted that the east-west movement in Bedford Town Centre across the current railway servitude at Ford End Road and the A4280 is <u>severely restricted</u> in terms of traffic movement and an exceptionally poor environment for other modes of movement (pedestrians, cyclists, disabled) which may continue to limit accessibility to the proposed new Bedford Station. It is suggested that any mitigation measures should address NMU

accessibility across this physical barrier, on the basis that mitigation should aim to improve accessibility where the current offer is poor, rather than replace as like for like.

11.6 (EIA Scoping Method Statement – Traffic and Transport)

a) It is suggested that §8.1.4 should address '*provide clear and up to date signing for vehicles and NMUs, and website-based information'* as a potential mitigation; with this to be reflected in Table 22 (Mitigation to T&T) as a relevant mitigation measure.
b) Responsibility for monitoring during construction and operation should be assigned either to the Applicant, or to the Local Highway Authority WITH APPROPRIATE FUNDING provided by the Applicant.
c) The proposed Code of Construction Practice, Station Travel Plans, and similar strategies which are to be used to monitor the traffic and transport impact should be developed in partnership with the Local Highway Authority (LHA), with funding being made available to the LHA. These matters should be agreed between the Applicant and the Local Highway Authority prior to the DCO been granted, or the DCO being granted subject to such an Agreement.

11.7 It is explicitly noted that the EWR Project should be a champion for creating modal shift as promoted by the Government through Active Travel England. The Project should table a network of mitigated, enhanced, and new pedestrian and cycleway routes and related storage facilities leading from the surrounding residential neighbourhoods to the various station, enabling 'Door-to-door connectivity' on a funded basis. The impact of such a network should be assessed within any further studies undertaken by the Applicant.

12.0 BIODIVERSITY

12.1 It is noted that the Applicant should also refer to the Council's non-statutory consultation response (attached as Appendix) which set out the Built and Natural Environment (BNE) Specialist's comments on ecology, landscape, and sustainability.

12.2 (§6.10.17) '*The Project is …committed to the achievement of 10% BNG. While this is an objective out with the requirements of the EIA (and the mitigation of likely significant effects), it is part of a wider strategy that conceives the Project as green infrastructure'.* This statement is strongly supported by the Council.

12.3 The Council is in-principle supportive of Table 18 (Proposed scope – biodiversity).

13.0 WATER RESOURCES

13.1 For reference, in light of climate warming, increasingly the Council is concerned that development proposals as consented do not make adequate provision for landscape establishment, specifically regarding a Watering Regime Strategy where water may need to be tanked to newly established planting over say an 18-month period. In is suggested that any assessment reviews the affect of drawing water from local resources to water the instated planting, including related traffic movements.

13.2 The Council is in-principle supportive of Table 19 (Proposed scope – flood risk and water resources), but suggest that the matter above is addressed within the relevant topic area/ or the '*Groundwater and surface water receptors - Maintenance activities'* are scoped in.

14.0 HISTORIC ENVIRONMENT

Proposed Study Area

14.1 The Scoping Report includes a short section "§6.12 Historic environment' which is supported by a more detailed 'EIA Scoping Method Statement – Historic Environment' (pp.448-522). §6.12.9 states that a Study Area of 1km within the draft Order limits has been used for designated heritage assets and 500m for non-designated heritage assets. Further, it suggests that this limit is informed by Zone of Theoretical Visibility (ZTV) studies and forms a '*pragmatic*' and '*proportionate study area*'. §5.12.10 sets out that assets identified outside these areas '*that is highlighted by stakeholders may also be included*'. The Method Statement does not refer to a 1km / 500m study area but §9.3.1 does indicate that any such buffer will be informed by a ZTV study and that buffer '*will not be treated as a hard boundary*'.

14.2 However, §4.4 of the Scoping states that the ZTV has yet to be modelled. Consequently, there appears to be no justification for a 1km / 500m Study Area referred to in the Scoping at this stage. Whilst such a narrow study area may be appropriate for certain stretches of the new railway which is to be built through Bedford Borough, in some cases the Project will be potentially visible from longer distances due to topographic and landscape factors and/or the proposed nature of the infrastructure (such as cuttings, embankments or viaducts). As the nature of the Project is currently unclear and the necessary ZTV studies have not been carried out, the Applicant has not demonstrated that the 1km study area is appropriate, and has not demonstrated that significant effects to heritage assets could occur outside this area.

14.3 Furthermore, the Scoping appears to suggest that any asset outside the 1km Study Area will only be assessed if it is identified by stakeholders – this places a significant burden on stakeholders rather than the Applicant and is not the intent of the EIA Regulations. It is therefore advised that the Study Area should be clearly informed by the ZTV, and that the Applicant should assess the ZTV once modelled to consider whether any assets located outside a Study Area should also be included. This could be agreed in consultation with stakeholders, but it is not for stakeholders to identify these assets.

14.4 A comparatively narrower Study Area for non-designated heritage assets is not objected to in principle, but again this should be justified by ZTV studies.

Assessment methodology

14.5 Notwithstanding the comments relating to the Study Area above, the Scoping request intends to scope in all designated heritage asset types within the Project area located in Bedford Borough, as well as permanent and temporary impacts of the Project, which is agreed with. It is also agreed that all assets located within the Study Area will be subject to a

high-level review which can then be used to scope out particular assets or focus the assessment on specific or groups of assets.

14.6 (Method Statement; pg. 68/515) Table 3 (Heritage value of assets) is relatively vague and should specifically refer to designations (Schedule Monuments, graded listed buildings and RP&Gs). It is also unclear why conservation areas are considered to mostly be of 'medium' interest – this contradicts the categorisation of 'most designated heritage assets' in the 'high' category above.

14.7 Local circumstances will need to be taken into account when assessing the significance of heritage assets, one example being ridge and furrow as well-preserved surviving examples are becoming increasingly rare in Bedford Borough. There is a particularly large surviving area within the proposed route to the south of Clapham that we would suggest is higher in value than indicated in MS§5.6.16 '*low heritage value'.*

14.8 Note that all stages of the archaeological evaluation work, both non-intrusive and intrusive elements should be complete with the full results included in the Environmental Statement. Failure to do this could compromise any proposed archaeological mitigation strategy submitted as part of the DCO process.

14.9 Mitigation: at this stage the stated mitigation principles are agreed with. However, MS§7.1.5 states that recording assets '*may offset harm by allowing a gain in knowledge and understanding of the asset and creates a record for future research*'. This statement is disagreed with and in our view conflicts with paragraph 218 of the NPPF – recording '*should not be a factor in deciding whether such loss should be permitted*' and therefore should not carry any weight as a 'heritage benefit' to offset harm to its significance. Rather, the aim of the recording is to capture and record the significance of assets to be lost and interpret its contribution to the understanding of the past.

14.10 Assumptions and limitations: the final bullet point in MS§10.1.1 ends with 'and' - are further points missing?

14.11 Proposed scope: see comments above regarding the study area and the ZTV; until the ZTV is modelled it seems too early to conclusively scope out heritage assets such as Registered Parks and Gardens as proposed in MS Table 7.

14.12 The Council is not supportive of Table 20 (Proposed scope – historic environments) for reasons as set out above.

15.0 LANDSCAPE AND VISUAL

15.1 With reference to §6.13.7, parts of the route between Bedford and St Neots are extensively elevated above the existing landscape or carried in a viaduct across the River Great Ouse valley and consequently, within a fairly flat countryside landscape, the visual impact of this infrastructure may be more extensive that the (§6.13.15) 2km study area suggested but may have effect on (very) long-distant views. Consequently, it is suggested that this infrastructure is recognised within the permanent impacts as a specific element, rather than subsumed within 'built structure', and that the study area may need to extend beyond 2km.

As the impact on long-distance views has not yet been determined, the Council reserves the right to request additional surveys, LVIA's, etc. to be undertaken during any design development state.

15.2 The Council is supportive of §6.13.10 which recognises the permanent effect of a new railway line within the predominantly rural setting between Bedford and Cambridge.

15.3 As part of any mitigation strategy, it should be recognised that the visual impact of the viaduct within the River Great Ouse valley cannot be mitigated and consequently this built structure should be celebrated through design excellence to make a positive contribution to this setting. This should be an expressed commitment from the Applicant. A similar approach was undertaken by HS2 regarding viaducts and culverts.

15.4 The Applicant makes reference to two multi-storey car parks, one to be located at the proposed St Johns' Station and the other at Bedford Station. It is understood that the St John's Station multi-storey car park would serve both Bedford Hospital (staff and hospital users) and EWR commuters. The Bedford Midland Station multi-storey car park would serve EWR and the Midland Main Line commuters. Within the Scoping Opinion no car parking, cycle storage, related facilities requirements have been set out, nor has the final height of each multi-storey car park been defined. This should be assessed within the LVIA study.

15.5 It is noted that the Bedford Midland Station multi-storey car park would be located adjacent to the Bedford Town Centre Conservation Area and consequently the necessary conservation assessments would be required.

15.6 It is unclear whether multi-storey car parks are to be provided at Stewartby and Tempsford Stations (EWR and East Coast Main Line). Should this be the case, as these may be significantly scaled buildings, these should be independently assessed within the LVIA study.

15.7 The Council is in-principle supportive of Table 21 (Proposed scope – landscape and visual).

16.0 CARBON (GREENHOUSE GAS) EMISSIONS

16.1 Should the Applicant calculate / postulate potential carbon dioxide reduction by means of (§6.14.1) '*It also considers the emissions associated with* ***modal shift*** *from rail and road users due to behaviour changes caused by the Project'* within the Environmental Statement, then the Applicant will need to evidence within the design development stage the full measures that the Project will be delivering to verify such Greenhouse Gas (GHG)/ CO_2e reduction. This should evidence positive financial contribution and Project delivery of say all-weather cycle storage facilities, enhanced and/or new cycle pathways and networks, enhanced and/or new pedestrian network, NMU bridge links across the railways, and enhanced measures for disabled accessibility. It will not be acceptable that such opportunities are identified as part of the Project but require investment and delivery by the Council and / or third parties to be enacted.

16.2 The Council is in-principle supportive of Table 22 (Proposed scope – carbon).

17.0 MAJOR ACCIDENT AND DISASTERS

17.1 The Council have no comment to make on this Topic.

18.0 MATERIAL RESOURCES AND WASTE

18.1 The Council is in-principle supportive of Table 24 (Proposed scope – material resources and waste).

19.0 BIODIVERSITY NET GAIN

19.1 The Council is supportive of the Applicant's commitment to delivering 10% BNG across the whole Project (§7.2.1).

19.2 (§7.2.3) **'***The baseline for BNG will be a static baseline established for the EIA of the Project. The baseline will comprise all land within the draft Order limits. If offsite provision of BNG is required (i.e., habitat creation and enhancement to achieve BNG that is outside of draft Order limits), the off-site baseline will be assessed in order to calculate the net change in habitat units from off-site habitat creation or enhancement only'.* It is noted that the Council does not own or operate sites to accommodate off-site BNG provision. Consequently, this will need to be a private agreement between the Applicant and third parties.

20.0 HABITATS REGULATIONS ASSESSMENT

20.1 The Council is supportive of the approach outline.

21.0 CLIMATE RESILIENCE

21.1 (Chp. 7.4) As noted by the Applicant, the UK's climate is changing with hotter, drier summers with increased frequency and duration of heatwaves and droughts, and warmer, wetter winters. This is having a direct effect on existing habitat hierarchies, specifically a change to existing, native planting and the emergence / establishment of more endemic and foreign planting. It is recognised that this will need to be a managed approach to address long-term change to our landscapes and rural habitats. On this basis, it is suggested that landscape / habitat is addressed as an Asset which (§7.4.10) '…*would have a level of sensitivity and adaptive capacity when exposed to a change in a particular climate hazard*'.

21.2 The Council is supportive of the approach outline.

22.0 EQUALITY IMPACT ASSESSMENT

22.1 The Council have no comment to make on this Topic.

23.0 FLOOD RISK ASSESSMENT

23.1 In terms of surface water flood risk/ management in the Bedford Borough Council LLFA's drainage area, the Applicant should comply with the Council's Supplementary Planning

Document for Sustainable Drainage Systems (2018) when designing the surface water drainage and SuDS proposals along and adjacent to the route.

23.2 It is noted that areas of the Project within Bedford Borough Council fall within Bedford and River Ivel Internal Drainage Board's jurisdiction and should comply with their drainage requirements, consents, bylaws etc.

23.3 For areas within the Project affecting main rivers such as the River Great Ouse, the Environment Agency's drainage requirements will need to be satisfied.

23.4 The Council is in-principle supportive of the approach outline.

24.0 WATER FRAMEWORK DIRECTIVE

24.1 No comment is made.

25.0 ARBORICULTURE

25.1 In terms of (§7.81.) '*An assessment of the trees within the draft Order limits will be undertaken with a focus on risks from the Project to trees considered notable due to their size or age, or where ecological, landscape or heritage value had been identified by complementary disciplines. Planning constraints associated with tree preservation orders (TPO) and conservation areas will be outlined',* the Council draws the Applicant's attention to the Hedgerow Regulations (1997), the Inclosure Act, Management of Hedgerows Regulations (2024), and the Council's Local Plan Policy 40 (Hedgerows) in terms of the protection of important hedgerows.

26.0 THE ENVIRONMENTAL STATEMENT

26.1 While the Council is supportive of the main documents being easy to read and understood, and supportive of a (§8.1.1.) '*strong reliance on graphics',* it is noted that all proposals, mitigation and enhancement measures, and strategies need to be quantifiable to inform clarity in determination, delivery, and enforcement.

26.2 The Council notes the Applicant's proposal for (Chp. 8.2) digital reporting of the Environmental Statement and Preliminary Environmental Information Report (PEIR). While this may be an innovative approach, it does not aid reading by statutory consultees when reviewing, cross-reviewing/referencing, and discussing the submitted material. Further, 'story maps, time-sliders, dashboards, videos and flythroughs' do not create a verifiable submitted material base as they are graphic representations of the Applicant's planning intent that is open to subjective interpretation. On this basis, the Council is NOT supportive of this approach as formally submitted material to a planning application.

26.3 It is noted that matters of the Project within the jurisdiction or adjacent to Bedford Borough Council have yet to be finalized (A.1.4) '*There remain a few locations where options remain, including proposals for: the crossing of the River Great Ouse south of St Neots and the location of the new Tempsford station'.* Consequently, the Council reserves the right to comment further when these matters have been resolved.

26.4 The Council has no comment(s) on Appendix B: DRAFT Code of Construction Practice (CoCP) other than currently as made above.

27.0 BEDFORD BOROUGH COUNCIL'S CONCLUSION

27.1 To meet the requirements of the Infrastructure Planning (Environmental Impact Assessment) Regulations (2017) (the 'EIA Regulations'), Nationally Significant Infrastructure Project (NSIPs) which are likely to have a significant effect on the environment, Applicants are required to undertake an EIA and to provide an Environmental Statement (ES) to accompany the Application. In accordance with Regulation 10(1), '*a person who proposes to make an application for an order granting development consent may ask the Secretary of State to state in writing their opinion as to the scope, and level of detail, of the information to be provided in the environmental statement'* (a 'Scoping Opinion')'.

Regulation 10(3) of the EIA Regulations states that a scoping request must be accompanied by: '*a) a plan sufficient to identify the land; b) a description of the proposed development, including its location and technical capacity; c) an explanation of the likely significant effects of the development on the environment; and, d) such other information or representations as the person making the request may wish to provide or make*'. This material has been submitted by the Applicant.

27.2 The Applicant has submitted a Request for a Scoping Opinion (Assessment Scoping Report, dated 05.12.2024) in accordance with the EIA Regulations which notes that further surveys, Project resolution, and supporting studies need to be undertaken, against a methodology as set out, to further inform, evaluate, and potentially mitigate against potential significant effects as may be identified by the Project. This will lead to the preparation of a Preliminary Environmental Information Report (PEIR), Environmental Statement, and the refinement and preparation of a Code of Construction Practice (CoCP).

27.3 **RECOMMENDATION:** Bedford Borough Council notes their in-principle agreement with the Scoping Opinion as submitted, albeit with comments as raised which need to be addressed by the Applicant. The Council reserves its right to comment further as the above reports are tabled for discussion and statutory response.

28.0 REPORTS

The Scoping Report is accompanied by the following documents:

(V01) PINs Letter - notification (dated 2 January 2025)
(V02) EIA Scoping Report (Ref. 133735-MWJ-Z0-XXX-REP-EEN-000035; dated 5 December 2024)
(V03) EIA Scoping Report Figures – Part 1
(V04) EIA Scoping Report Figures – Part 2

Due to staffing resources and the relatively short period in which to respond to the Applicant's extensive Environmental Impact Assessment Scoping Report, the Council has not been able to revert with consultation from all internal technical consultees. Those that have been received are included in this report.

The response is solely that of Bedford Borough Council, submitted without prejudice.

Should you require any clarification, please contact: Peter Dijkhuis (Planning Case Officer).

Appendix (BBC_EWR):

a) Built and Natural Environment (BNE) Specialist's Comments on ecology, landscape, and sustainability (Dated 12.12.2024/ Rev. B).
b) Modelling and Economic Review (dated 12.12.2024).
c) Transport Update Report Review (dated 09.12.2024/ V1.1).
d) Technical Review (dated 12.12.2024/ Rev. V1.0).

Planning Services
Decision Date: 30 January 2025

EWR Non-Statutory Consultation:

BNE Specialists Comments on Ecology, landscape and Sustainability
Date: 12 December 2024 Revision B

Officers:
Emma Davies, Principal Sustainability Officer
Daniel Weaver, Principal Ecology Officer
Helen Sayers, Principal Landscape Architect

This document sets out the Built and Natural Environment Team's Specialist comments on Landscape, Ecology and Sustainability on behalf of Bedford Borough Council, regarding EWR Co.'s Non-Statutory Consultation for the East West Rail (EWR) proposal relating to the route within the boundary of Bedford Borough.

7a. Please tell us which of the options for the Marston Vale Line stations you prefer:

Topic area	**Proposal aspect(s)** *e.g., Consultation Document, Fact sheet – Our approach to Historic Environment, Environmental Sustainability Strategy etc.*	**Key issue(s)** *Please list as brief numbered sentences to explain the identified issue – please also identify between where it is an issue of principle or where information is missing/further justifications needed.*	**Proposed mitigation measure(s)** *Brief numbered sentences (clearly corresponding with the identified issue)*
Ecology	Technical Report and Plan and profile drawings	The least ecologically damaging option would be keeping the existing stations and there being no consolidation. However, given the potential impact of the proposed Universal Studio Theme Park, the consolidation of the two stations would not significantly increase the ecological impact of the theme park and therefore, there would be no ecological preference between either option. • If the theme park is confirmed there is no preference • if the theme park is not confirmed, then option 1a.	More information is required around the demolition of the stations, and general mitigation strategies required for the development of the Theme Park.
Landscape	Technical Report and Plan and profile drawings	We support consolidated stations option 2 because it will result in planned stations relating to and connecting communities rather than the existing stations which are remote from settlements and villages.	More information is required on existing patterns of use and the results of public consultation alongside more

Topic area	Proposal aspect(s) *e.g., Consultation Document, Fact sheet – Our approach to Historic Environment, Environmental Sustainability Strategy etc.*	Key issue(s) *Please list as brief numbered sentences to explain the identified issue – please also identify between where it is an issue of principle or where information is missing/further justifications needed.*	Proposed mitigation measure(s) *Brief numbered sentences (clearly corresponding with the identified issue)*
			detail on the design of the stations.
Sustainability	Technical Report Table 10 MVL Station and Service Concept Assessment Factors Summary	It is noted that in relation to the environmental impacts and opportunities, both options show a minor worsening of impacts in relation to carbon. Option 2 would perform better from a climate resilience perspective as new stations would be designed to modern standards of climate resilience. To further mitigate any impacts on carbon associated with Option 2, we would recommend an approach to station design like that being implemented for the new Cambridge South Station. This includes achievement of a BREEAM excellent rating and the use of engineered timber to reduce the embodied carbon of the station. Opportunities for renewable energy generation should also be maximised as part of the design of the new stations to further reduce operational carbon emissions, with the provision of new stations in option 2 offering greater potential for renewable energy generation subject to early consideration as part of the design development.	Provide further design detail.

9a. Please tell us your preference for the proposed location of Stewartby station:

Topic area	**Proposal aspect(s)** *e.g., Consultation Document, Fact sheet – Our approach to Historic Environment, Environmental Sustainability Strategy etc.*	**Key issue(s)** *Please list as brief numbered sentences to explain the identified issue – please also identify between where it is an issue of principle or where information is missing/further justifications needed.*	**Proposed mitigation measure(s)** *Brief numbered sentences (clearly corresponding with the identified issue)*
Ecology	Technical Report Chapter 7.9	Given option 1 would be mostly built on pre-developed land, it is likely that option 1 would have the least ecological impact, given option 2 will build on agricultural land. The pre-developed land will have an ecological value, but it will be limited to the small area natural habitats within the boundary and possibly some of the older buildings adjacent.	A full array of ecological assessments must be undertaken to understand the potential impacts of the development. This will include extensive bat activity transects, static detectors and building inspections.
Landscape	Technical Report Chapter 7.9 and Plan and profile drawings	The potential development of a Theme Park at Stewartby influences the location of a new station. If the theme park proceeds Option 2 is preferred because the station would be located centrally and would be easy to access by residents and visitors to the theme park.	The new station must be integrated with the development of the former brickworks and with existing facilities and communities in the area. The new station must have good pedestrian and cycle connections on both sides of the railway to encourage use of the railway and make it easy to reach. More detail of the station design and surrounding public realm is required.
Sustainability	No comment		

10. Please use the boxes below to provide any comments you have on our proposals for level crossings along the Marston Vale Line, including proposed diversion routes. Please leave the boxes blank if you do not have any comments.

- **Green Lane** - Retain as a CCTV crossing.
- **Stewartby Brickworks** - Close with no replacement.
- **Wootton Broadmead** (Broadmead Road) - Retain as a CCTV crossing.
- **Wootton Village** - Close and divert to Kempston Hardwick crossing.
- **Kempston Hardwick (Manor Road)** - Assumed to be closed by Network Rail with new overbridge. If not closed, would be upgraded to full barrier crossing.
- **Woburn Road** - Assumed to be closed by Network Rail with new footbridge. If not closed, would be upgraded to miniature stop light crossing.

Topic area	**Proposal aspect(s)** *e.g., Consultation Document, Fact sheet – Our approach to Historic Environment, Environmental Sustainability Strategy etc.*	**Key issue(s)** *Please list as brief numbered sentences to explain the identified issue – please also identify between where it is an issue of principle or where information is missing/further justifications needed.*	**Proposed mitigation measure(s)** *Brief numbered sentences (clearly corresponding with the identified issue)*
Ecology	Technical Report Chapter 7.10.4	1.Kempston Hardwick (Manor Road) - There is likely to be general construction impacts to the development of a new over bridge which are likely to have an ecological impact; although, with suitable mitigation these can be removed. In the longer term, additional lighting around the over bridge and station has the potential to impact commuting and foraging bats and therefore, there must be suitable survey effort in place to assess the impact and analysis of required mitigation. 2.Woburn Road – Given the proximity to the River Great Ouse, the construction of a new foot bridge is likely to have an impact to the riverbank and river habitats. Therefore, the preference would be for a stop light crossing.	1.Suitable ecological survey effort must have been undertaken to assess the possible impacts of increased artificial lighting at night on nocturnal species. With situatable mitigation in place to remove any residual risk of impact. 2.A full array of ecological and BNG assessments should be undertaken, with suitable mitigation and compensation if required.
Landscape	No comment		
Sustainability	No comment		

11. Please provide any comments you have about our proposals in the Fenny Stratford to Kempston route section. Your comments can include topics such as:

- Passing loops between Ridgmont and Stewartby.
- Community benefits and impacts.
- Land and property requirements.
- Environmental and sustainability (refer to the Environmental Update Report).
- Construction and logistics.
- Traffic and transport (refer to the Transport Update Report).
- Door to Door Connectivity and Active Travel.

Topic area	**Proposal aspect(s)** *e.g., Consultation Document, Fact sheet – Our approach to Historic Environment, Environmental Sustainability Strategy etc.*	**Key issue(s)** *Please list as brief numbered sentences to explain the identified issue – please also identify between where it is an issue of principle or where information is missing/further justifications needed.*	**Proposed mitigation measure(s)** *Brief numbered sentences (clearly corresponding with the identified issue)*
Ecology	Technical Report Chapter 7.9.5 Passing loops	Eastbound Passing Loop option – severity of impact will depend on the design and implementation. Impacts to the west of the current line will encroach on the Forest Centre Millennium Park which is undesirable and will likely have the greater ecological impact. However, if land take was exclusively from east of the current line those impacts can be reduced and likely mitigated to remove any residual risk of harm. Westbound Passing Loop option – this is likely to be exclusively within derelict land, which will have an intrinsic ecological value; however, it will likely have the least ecological value compared to other more natural habitats.	Eastbound – adequate ecological assessment and mitigation required. Westbound - adequate ecological assessment and mitigation required.
Landscape	Passing loops between Ridgmont and Stewartby Plan and profile drawings	The passing loops will impact on the adjacent landscape and so an assessment of the impacts is required.	Detailed design information is required including tree survey, an AIA and tree protection strategy, proposed and existing levels and detailed site sections.

Topic area	Proposal aspect(s) *e.g., Consultation Document, Fact sheet – Our approach to Historic Environment, Environmental Sustainability Strategy etc.*	Key issue(s) *Please list as brief numbered sentences to explain the identified issue – please also identify between where it is an issue of principle or where information is missing/further justifications needed.*	Proposed mitigation measure(s) *Brief numbered sentences (clearly corresponding with the identified issue)*
Landscape	Land and property requirements Plan and profile drawings	The route passes through the Forest of Marston Vale and so design and mitigation must follow design guidance for the Forest and Local Plan Policies 36S Forest of Marston Vale and 37 Landscape Character.	Refer to the 'Bedford Borough Council Developing in the Forest of Marston Vale: Design Guidance Supplementary Planning Document (SPD)'. Refer also Bedford Borough Landscape Character Assessment 2014 (updated 2020) by LUC. This section of the route is in 5D North Marston Clay Vale landscape character area. More details of the landscape mitigation and landscape design in and around the rail corridor are required.
Landscape	Door to Door Connectivity and Active Travel Plan and profile drawings	Connectivity between stations (new or existing) and existing and new communities is critical and should be supported through safe routes for cycling and walking and bike storage at the stations.	More details are required to show how active travel is addressed in the design of the public realm, footpaths, cycle paths and the stations.
Sustainability	Climate and carbon with reference to the Technical Report and Environmental Update Report	The general approach to considering the impacts on climate change, notably related to carbon emissions as part of the Environmental Statement is noted. However, given the high-level nature of the information provided as part of the non-statutory consultation, we would request early sight of detailed assessment of carbon and the	Provide further detail on the assessment of carbon as part of the construction and operational phases of the proposed development, along with mitigation measures.

Topic area	Proposal aspect(s) *e.g., Consultation Document, Fact sheet – Our approach to Historic Environment, Environmental Sustainability Strategy etc.*	Key issue(s) *Please list as brief numbered sentences to explain the identified issue – please also identify between where it is an issue of principle or where information is missing/further justifications needed.*	Proposed mitigation measure(s) *Brief numbered sentences (clearly corresponding with the identified issue)*
		mitigation measures proposed to reduce the impacts associated with construction of the railway and associated structures.	

12. Please provide any comments you have about our proposals in the Bedford route section. Your comments can include topics such as:

South Bedford and Bedford St Johns

Topic area	Proposal aspect(s) *e.g., Consultation Document, Fact sheet – Our approach to Historic Environment, Environmental Sustainability Strategy etc.*	Key issue(s) *Please list as brief numbered sentences to explain the identified issue – please also identify between where it is an issue of principle or where information is missing/further justifications needed.*	Proposed mitigation measure(s) *Brief numbered sentences (clearly corresponding with the identified issue)*
Ecology	Technical Report 8.1.1 - 8.1.5	1. The proposed developments of Bedford St. Johns station, the multistorey car park (and redevelopment of Caudwell Street Bridge, and relocation of sidings to Caudwell Walk all represent the use of brownfield sites and would have a minimum impact to natural or semi-natural habitats. There will be intrinsic ecological values to the physical infrastructure (bridges and buildings for example); however, suitable mitigation should be able to remove any residual risk of harm. 2. If any modifications are required to the rail bridge over the River Great Ouse, there could be a significant impact to the river and its associated habitats.	1.Adequate ecological assessment and mitigation required. 2. Adequate ecological assessment and mitigation required.
Landscape	The relocation of Bedford St	Relocation and expansion of the St Johns station creates an	More details of the station and access

Topic area	Proposal aspect(s) *e.g., Consultation Document, Fact sheet – Our approach to Historic Environment, Environmental Sustainability Strategy etc.*	Key issue(s) *Please list as brief numbered sentences to explain the identified issue – please also identify between where it is an issue of principle or where information is missing/further justifications needed.*	Proposed mitigation measure(s) *Brief numbered sentences (clearly corresponding with the identified issue)*
	Johns station to the site of what is currently the Britannia Road car park, between Ampthill Road and Cauldwell Street. Plan and profile drawings and Technical Report	opportunity to provide a more accessible, visible and improved station which will attract more users and connect to the hospital and other parts of Bedford. The station design must consider access routes for all users prioritising people on foot/wheelchair and cycle. There is an opportunity to improve the wider area around the station through a coordinated design strategy or masterplan including the surface level car parks and former railway sidings on the north of the track. Green infrastructure should form part of the proposals, integrated with access routes, and connecting to the existing green infrastructure network.	routes are required. More information of highways realignments and proposed levels required. A bespoke design for the station should be developed so that the design is sympathetic to the surrounding context. The station must accommodate cycle storage. Tree surveys of this area are required with an Arboricultural Impact Assessment and mitigation strategy for loss of any trees (refer to Local Plan Policy 39 retention of trees)
Landscape	A new multi-storey car park to the west of the railway, to replace lost parking at the Britannia Road car park. Plan and profile drawings and Technical Report	The consolidation of surface level parking into a Multi Storey Car park (MCSP) is a more efficient use of space and will free up land for other uses, creating an opportunity to improve the wider area around the station.	More details of the height, materials, form and massing of the MSCP are required. More supporting information is required to explain the distribution of parking between hospital and station users and how access routes and connectivity to other places and facilities have been addressed. Details are required to show a strategy for use of land currently used for surface level

Topic area	Proposal aspect(s) *e.g., Consultation Document, Fact sheet – Our approach to Historic Environment, Environmental Sustainability Strategy etc.*	Key issue(s) *Please list as brief numbered sentences to explain the identified issue – please also identify between where it is an issue of principle or where information is missing/further justifications needed.*	Proposed mitigation measure(s) *Brief numbered sentences (clearly corresponding with the identified issue)*
			parking after consolidation of the parking into the MCSP.
Landscape	Building a new two-track railway to the north of Sandhurst Road that would replace the existing single track Marston Vale Line into Bedford station Plan and profile drawings and Technical Report	The construction of the two new tracks will impact on areas of existing trees and appears to require large scale tree removal. The construction of the new track will also impact on existing green space, play and sports facilities and a county wildlife site.	Tree surveys are required alongside full details of tree removals, an Arboricultural Impact Assessment (AIA) tree protection and a mitigation strategy. Full details are required to show the proposed design, mitigation for loss of open space, play, sports etc in the permanent works and during construction.
Landscape	The relocation of Jowett Sidings to Cauldwell Walk	No comments	
Sustainability	Relocation of Bedford St Johns	The relocation of the Bedford St Johns Station offers the opportunity the delivery of a highly sustainable station building. We would recommend an approach that achieves a BREEAM excellent rating and incorporates renewable energy provision to help minimise the operational carbon of the station buildings. We would also recommend consideration be given to integrating cycle parking into the proposed multistorey car park to enhance sustainable transport options for those using EWR and working at or visiting Bedford Hospital. Early consideration should be	Provide further design detail.

Topic area	Proposal aspect(s) *e.g., Consultation Document, Fact sheet – Our approach to Historic Environment, Environmental Sustainability Strategy etc.*	Key issue(s) *Please list as brief numbered sentences to explain the identified issue – please also identify between where it is an issue of principle or where information is missing/further justifications needed.*	Proposed mitigation measure(s) *Brief numbered sentences (clearly corresponding with the identified issue)*
		given to the design of the station and platform access to take into account the large numbers of people who may look to bring bikes with them on their train journeys.	

Bedford Midland

Topic area	Proposal aspect(s) *e.g., Consultation Document, Fact sheet – Our approach to Historic Environment, Environmental Sustainability Strategy etc.*	Key issue(s) *Please list as brief numbered sentences to explain the identified issue – please also identify between where it is an issue of principle or where information is missing/further justifications needed.*	Proposed mitigation measure(s) *Brief numbered sentences (clearly corresponding with the identified issue)*
Ecology	The redevelopment of Bedford station. Technical Report Chapter 8.2		Adequate ecological assessment and mitigation required.
Landscape	The redevelopment of Bedford station	Construction of a new station and consolidation of the surface level parking into a MSCP is positive and an opportunity to transform the area around the station, east and west of the track, and to encourage rail use.	More detail is required to show how connectivity to the rest of Bedford is addressed, materials, scale, height and mass of the station in relation to the surrounding townscape context. Tree surveys are required alongside full details of tree removals, an AIA tree protection and a mitigation strategy. We recommend that a masterplan for the area around the station is designed alongside the

Topic area	Proposal aspect(s) *e.g., Consultation Document, Fact sheet – Our approach to Historic Environment, Environmental Sustainability Strategy etc.*	Key issue(s) *Please list as brief numbered sentences to explain the identified issue – please also identify between where it is an issue of principle or where information is missing/further justifications needed.*	Proposed mitigation measure(s) *Brief numbered sentences (clearly corresponding with the identified issue)*
			station facilities and includes public realm improvements and new green infrastructure. Western access routes into the station should be tested and considered because these potentially improve connectivity and access to the station from a wider area.
Landscape	New and improved parking facilities at Bedford station, including a multi-storey car park on Ashburnham Road on the site of the current station car park.	The multi storey car park will allow removal of the surface level parking which is supported. The plans and illustrations (technical report illustrations 73 to 75) show a large building which may not align and coordinate with the smaller scale of the existing context.	More details are required to show height, scale and mass of the MSCP.
Sustainability	The redevelopment of Bedford station	Given the location of Bedford Station within the Bedford Town Station and South Local Opportunity Plan, it will be important that the redeveloped station building is constructed to the highest possible design and sustainability standards. We would recommend an approach that achieves a BREEAM excellent rating as a minimum and incorporates renewable energy provision to help minimise the operational carbon of the station buildings. The location of the station building within this important area for	Provide further design detail.

Topic area	Proposal aspect(s) *e.g., Consultation Document, Fact sheet – Our approach to Historic Environment, Environmental Sustainability Strategy etc.*	Key issue(s) *Please list as brief numbered sentences to explain the identified issue – please also identify between where it is an issue of principle or where information is missing/further justifications needed.*	Proposed mitigation measure(s) *Brief numbered sentences (clearly corresponding with the identified issue)*
		regeneration may also offer the potential for the use of emerging standards, such as the UK Net Zero Carbon Buildings Standard. Noting the consideration being given to provision of cycle storage and sustainable transport connections to the station, early consideration should also be given to the design of the station and platform access to consider the large numbers of people who may look to bring bikes with them on their train journeys.	

North of Bedford

Topic area	Proposal aspect(s) *e.g., Consultation Document, Fact sheet – Our approach to Historic Environment, Environmental Sustainability Strategy etc.*	Key issue(s) *Please list as brief numbered sentences to explain the identified issue – please also identify between where it is an issue of principle or where information is missing/further justifications needed.*	Proposed mitigation measure(s) *Brief numbered sentences (clearly corresponding with the identified issue)*
Ecology	Construction of two new tracks, continuing alongside the four-track Midland Main Line as it passes the Poets area	Although there will be an intrinsic ecological value to the residential buildings and gardens, there is unlikely to be any principal ecological reasons for objection.	Adequate ecological assessment and mitigation required.
Ecology	Construction of a new 1.1km (0.68 miles) long viaduct over the River Great Ouse and Paula Radcliffe Way. Technical Report chapter 8.4	The construction of the viaduct does represent significant potential ecological impacts in both the construction period and operational period. During construction the Technical Report states that there will be extended hours working on both the bridges and the	No extended working hours around the River Great Ouse if bats are to be impacted by such activities. There should be no floodlighting of the River Great Ouse

Topic area	Proposal aspect(s) *e.g., Consultation Document, Fact sheet – Our approach to Historic Environment, Environmental Sustainability Strategy etc.*	Key issue(s) *Please list as brief numbered sentences to explain the identified issue – please also identify between where it is an issue of principle or where information is missing/further justifications needed.*	Proposed mitigation measure(s) *Brief numbered sentences (clearly corresponding with the identified issue)*
		realignment of the A6. Working at night under flood lighting poses a significant impact to any commuting or foraging bats along the River Great Ouse, as well as any long-term impacts that any additional lighting may have. Other ecological impacts to both habitats and protected species will require survey and suitable mitigation.	unless the third derogation test of the Conservation of Habitats and Species Regulations 2017 (as amended) can be satisfied. Please also see R (Morge) v Hampshire County Council (heard on 19 January 2011) on the use of the term "S*ignificant impact*" when assessing impacts to relevant species.
Landscape	Construction of two new tracks, continuing alongside the four-track Midland Main Line as it passes the Poets area.	Widening of the track in this location is not supported because it requires demolition of some existing houses and reduction in the gardens of other houses. The widening of the rail corridor also affects existing trees and the street scene in the Poets area.	Clarification of the options appraisal is required to show which other options have been considered. A Tree survey and AIA is required. Full details of landscape mitigation are required to address the interfaces between the widened railway and the remaining residential streets and plots in the poet's area. Mitigation should extend east beyond the railway boundary.
Landscape	Construction of a new 1.1km (0.68 miles) long viaduct over the River Great	This is a very significant structure which could have a positive effect on the local area and become a landmark but must be designed sensitively in relation to its location in the	Full details of the viaduct design are required along with an LVIA. Details must include plans with levels,

Topic area	Proposal aspect(s) *e.g., Consultation Document, Fact sheet – Our approach to Historic Environment, Environmental Sustainability Strategy etc.*	Key issue(s) *Please list as brief numbered sentences to explain the identified issue – please also identify between where it is an issue of principle or where information is missing/further justifications needed.*	Proposed mitigation measure(s) *Brief numbered sentences (clearly corresponding with the identified issue)*
	Ouse and Paula Radcliffe Way.	Great Ouse River Valley and the surrounding landscape context.	sections, 3D visualisations and verified views as part of the LVIA. Mitigation must be aligned with Local Plan Policy 37 Landscape character. Refer also Bedford Borough Landscape Character Assessment 2014 (updated 2020) by LUC. The viaduct is in Landscape character area 3B Oakley - Great Ouse Limestone Valley, which is a wide, open shallow valley. Open views across the valley are sensitive to development.
Landscape	Diverting some utilities, including overhead power lines to avoid the new viaduct.	The impacts of diverting utilities above and below ground must be assessed as part of the Environmental statement and LVIA.	Full details of utility diversions are required because these will have impacts on landscape character and views.
Sustainability	No comment		

Other works in Bedford

Topic area	Proposal aspect(s) *e.g., Consultation Document, Fact sheet – Our approach to Historic Environment, Environmental Sustainability Strategy etc.*	Key issue(s) *Please list as brief numbered sentences to explain the identified issue – please also identify between where it is an issue of principle or where information is missing/further justifications needed.*	Proposed mitigation measure(s) *Brief numbered sentences (clearly corresponding with the identified issue)*
Ecology	No comment		
Landscape	Works to roads in the area to enable the railway to be built and operated Technical Report And Plan and profile drawings	These works potentially have landscape and visual impacts and affect connectivity between places and communities.	Full details of all amended roads required showing existing and proposed levels, retaining walls, section drawings to scale.
Sustainability	No comment		

General

Topic area	Proposal aspect(s) *e.g., Consultation Document, Fact sheet – Our approach to Historic Environment, Environmental Sustainability Strategy etc.*	Key issue(s) *Please list as brief numbered sentences to explain the identified issue – please also identify between where it is an issue of principle or where information is missing/further justifications needed.*	Proposed mitigation measure(s) *Brief numbered sentences (clearly corresponding with the identified issue)*
Ecology	Construction and logistics.	The construction impacts especially to the River Great Ouse and its associated habitats and species has the potential to be significant if unsuitable mitigation is put in place. East West Rail should be aware of the difficulties of linear projects cutting through significant bat commuting routes and should have conducted the required surveys to understand the impacts.	Adequate ecological assessment and mitigation required.
Landscape	Land and property requirements	More information is required about the railway corridor as it passes through Bedford to show how it impacts neighbouring properties, residents and other users such as schools.	Detailed drawings including scaled sections required. Full details of landscape mitigation required.

Topic area	Proposal aspect(s) *e.g., Consultation Document, Fact sheet – Our approach to Historic Environment, Environmental Sustainability Strategy etc.*	Key issue(s) *Please list as brief numbered sentences to explain the identified issue – please also identify between where it is an issue of principle or where information is missing/further justifications needed.*	Proposed mitigation measure(s) *Brief numbered sentences (clearly corresponding with the identified issue)*
Landscape	Land and property requirements	More information is required to show how the areas around St John station and Bedford station will be integrated with the new stations as part of a fully coordinated masterplan and proposals for re use of the surface level parking areas.	More information about the two town centre stations and integration with Bedford.
Landscape	Construction and logistics	The construction compounds and access routes will impact on residential areas, schools and community facilities.	More information is required on the construction phasing, access and compounds and the proposed landscape mitigation.
Sustainability	Climate and carbon with reference to information contained in the Technical Report and Environmental Update Report	The general approach to considering the impacts on climate change, notably related to carbon emissions as part of the Environmental Statement is noted. However, given the high-level nature of the information provided as part of the non-statutory consultation, we would request early sight of detailed assessment of carbon and the mitigation measures proposed to reduce the impacts associated with construction of the railway and associated structures. The carbon assessment will need to include the impacts associated with all proposed demolition associated with the project.	Provide further detail on the assessment of carbon as part of the construction and operational phases of the proposed development, along with mitigation measures.

13. Please provide any comments you have about our proposals in the Clapham Green to Colesden route section. Your comments can include topics such as:

Topic area	**Proposal aspect(s)** *e.g., Consultation Document, Fact sheet – Our approach to Historic Environment, Environmental Sustainability Strategy etc.*	**Key issue(s)** *Please list as brief numbered sentences to explain the identified issue – please also identify between where it is an issue of principle or where information is missing/further justifications needed.*	**Proposed mitigation measure(s)** *Brief numbered sentences (clearly corresponding with the identified issue)*
Ecology	Carriage Drive Technical Report 9.1.1	Carriage Drive is currently an unlit private road with wooded boundaries and mature trees. The roadway is ecologically linked with Clapham Park Wood to the northeast and Park Wood to the southeast. surrounding habitats include parkland woodland, grasslands, and agricultural fields. The cutting, temporary realignment of Carriage Drive, and new overbridge all have the potential to cause a significant ecological impact; therefore, surveys and analysis must be completed to best practice standards to provide a robust mitigation strategy. Any new lighting in this area must be in-line with the results of nocturnal surveys and remove any impacts to commuting and foraging bats	Adequate ecological assessment and mitigation required. All new lighting must be designed to remove any impacts to commuting or foraging bats.
Ecology	Graze Hill Technical Report 9.1.2	New cutting and over bridge have the potential to cause an ecological impact to habitats and species. Graze Hill is currently unlit and may provide a commuting and foraging path for bats and other nocturnal species.	Adequate ecological assessment and mitigation required. All new lighting must be designed to remove any impacts to commuting or foraging bats.
Landscape	Diversions of roads, tracks and paths that cross the new railway	The railway reduces connections between the villages in this section.	More information is required on the re-routed paths and bridleways and the proposed measures to maintain pedestrian and bridleway connectivity.

Topic area	Proposal aspect(s) *e.g., Consultation Document, Fact sheet – Our approach to Historic Environment, Environmental Sustainability Strategy etc.*	Key issue(s) *Please list as brief numbered sentences to explain the identified issue – please also identify between where it is an issue of principle or where information is missing/further justifications needed.*	Proposed mitigation measure(s) *Brief numbered sentences (clearly corresponding with the identified issue)*
			Full details of bridges, other structures and associated access routes required.
Landscape	Land and property requirements	This section of the route is in the Renhold Clay Farmland landscape character area 1E, as defined in the LUC Landscape Character Assessment. This is an open, gently undulating landscape, dominated by arable farmland with scattered woodland and fields defined by hedgerows and hedgerow trees. The landscape includes historic elements such as field boundaries, settlements and earthworks. Introduction of the rail corridor disrupts the existing pattern of landscape.	Full details of the Landscape and Visual impacts to be assessed in an LVIA. Mitigation and landscape design strategies must refer to the LUC Landscape Character Assessment. Mitigation must extend beyond the boundaries and edges of the rail corridor so that the railway is integrated with the wider landscape character. Full details of proposed and existing levels required along with full details of bridges and embankments and cuttings.
Sustainability	Climate and carbon with reference to information contained in the Technical Report	The general approach to considering the impacts on climate change, notably related to carbon emissions as part of the Environmental Statement is noted. However, given the high-level	Provide further detail on the assessment of carbon as part of the construction

Topic area	Proposal aspect(s) *e.g., Consultation Document, Fact sheet – Our approach to Historic Environment, Environmental Sustainability Strategy etc.*	Key issue(s) *Please list as brief numbered sentences to explain the identified issue – please also identify between where it is an issue of principle or where information is missing/further justifications needed.*	Proposed mitigation measure(s) *Brief numbered sentences (clearly corresponding with the identified issue)*
	and Environmental Update Report	nature of the information provided as part of the non-statutory consultation, we would request early sight of detailed assessment of carbon and the mitigation measures proposed to reduce the impacts associated with construction of the railway and associated structures. This is especially important given the nature of some of the infrastructure along this section of the route, which will inherently have high embodied carbon impacts, for example viaducts.	and operational phases of the proposed development, along with mitigation measures.

14a. Please tell us your preference for the Tempsford alignment:

Topic area	Proposal aspect(s) *e.g., Consultation Document, Fact sheet – Our approach to Historic Environment, Environmental Sustainability Strategy etc.*	Key issue(s) *Please list as brief numbered sentences to explain the identified issue – please also identify between where it is an issue of principle or where information is missing/further justifications needed.*	Proposed mitigation measure(s) *Brief numbered sentences (clearly corresponding with the identified issue)*
Ecology	No preference	Both alignments pose significant potential ecological impacts to both protected and priority species, and habitats. The potential for in-combination impacts at the new Black Cat Roundabout should be carefully considered, especially in the proximity of the viaduct over the new road layout and the River Great Ouse.	Adequate ecological assessment and mitigation required.
Landscape	No preference	Both alignments include major viaduct structures and pass through open areas in Landscape character area 4A Great Ouse Clay Valley. Option 1B is preferred in relation to BBC site allocations for development in this area. However, both options should be	Landscape and visual impact assessment required for both options to assess the impacts of each option. Details of design of the viaducts, proposed

Topic area	Proposal aspect(s) *e.g., Consultation Document, Fact sheet – Our approach to Historic Environment, Environmental Sustainability Strategy etc.*	Key issue(s) *Please list as brief numbered sentences to explain the identified issue – please also identify between where it is an issue of principle or where information is missing/further justifications needed.*	Proposed mitigation measure(s) *Brief numbered sentences (clearly corresponding with the identified issue)*
		assessed in terms landscape and visual impacts.	and existing levels and landscape mitigation required.
Sustainability	Technical Report Table 15 Tempsford alignment assessment factors summary	It is noted that the consideration of the assessment factors for the Tempsford alignment shows a minor improvement in environmental impacts and opportunities for option 1c. The report goes onto note that the option performs slightly better than the baseline for several supporting considerations including carbon. To assist in decision making. it would be helpful to have further information on the degree of improvement offered by option 1c over Options 1b for all of the assessment factors. In relation to carbon, it is assumed that the slight improvement is due to a reduction in embodied carbon due to the reduction in height and a reduced length of viaducts. This could be presented in the form of embodied carbon calculations showing the difference in kg/CO_{2e} between the route alignment options.	Provide further information on assessment factors for both options.

15. Please provide any comments you have about our proposals in the Roxton to east of St Neots route section. Your comments can include topics such as:

Topic area	Proposal aspect(s) *e.g., Consultation Document, Fact sheet – Our approach to Historic Environment, Environmental Sustainability Strategy etc.*	Key issue(s) *Please list as brief numbered sentences to explain the identified issue – please also identify between where it is an issue of principle or where information is missing/further justifications needed.*	Proposed mitigation measure(s) *Brief numbered sentences (clearly corresponding with the identified issue)*
Ecology	Logistic Hubs	No preference, both options have the potential to have a significant impact on ecology through both the construction phase and operational phase, especially if there is to be additional lighting. Option B is more likely to impact any nearby roosting bats within adjacent woodland areas; however, the East Coast Main Line may provide connectivity for commuting and foraging bats for option F. Therefore, sufficient survey effort must be applied to both options.	Adequate ecological assessment and mitigation required. All new lighting must be designed to remove any impacts to commuting or foraging bats.
Ecology	Construction and logistics	Both options pose significant potential ecological impacts that will need to be suitably mitigated. Construction impacts including construction lighting and additional operational lighting must be assessed in combination with the new Black Cat Roundabout and new A428 road alignment and road viaduct.	Adequate ecological assessment and mitigation required.
Landscape	A temporary rail logistics hub located on the East Coast Main Line which would enable construction materials to be transported by rail.	We support this in principle but there is not enough information to assess the impacts on landscape	LVIA and detailed design information for each option required
Landscape	Logistics Hub Option B rather than F	Logistics hub B is more contained than option F and so likely to have less landscape and visual impact than option F which appears to have a larger footprint with	Further information on both options is required including LVIA and detailed design information and landscape mitigation strategies.

Topic area	Proposal aspect(s) *e.g., Consultation Document, Fact sheet – Our approach to Historic Environment, Environmental Sustainability Strategy etc.*	Key issue(s) *Please list as brief numbered sentences to explain the identified issue – please also identify between where it is an issue of principle or where information is missing/further justifications needed.*	Proposed mitigation measure(s) *Brief numbered sentences (clearly corresponding with the identified issue)*
		more significant landscape impacts.	
Landscape	Door to Door Connectivity and Active Travel	Connectivity between the new Tempsford station and existing and new communities is critical and should be supported through safe routes for cycling and walking and bike storage at the station.	More details are required to show how active travel is addressed in the design of the public realm and the station.
Landscape	Land and property requirements	Landscape and visual impacts of the railway and associated structures	More information is required on the details of the embankments, bridges and structures along the rail corridor including existing and proposed levels, materials and landscape mitigation proposals. Planting and other green infrastructure should be coordinated with the context of the Lower Great Ouse River Valley green infrastructure opportunity area (BBC Local Plan) and refer to the LUC Landscape Character Assessment for guidance on mitigation.
Landscape	New station at Tempsford	The station platforms are elevated above the surrounding landscape and so potentially impact on the surrounding landscape. A bespoke station design is required to address its location and the surrounding landscape context.	Details required of the station including access routes, information on materials, lighting, details of access routes between the ground level and elevated areas.

Topic area	**Proposal aspect(s)** *e.g., Consultation Document, Fact sheet – Our approach to Historic Environment, Environmental Sustainability Strategy etc.*	**Key issue(s)** *Please list as brief numbered sentences to explain the identified issue – please also identify between where it is an issue of principle or where information is missing/further justifications needed.*	**Proposed mitigation measure(s)** *Brief numbered sentences (clearly corresponding with the identified issue)*
Sustainability	New station at Tempsford	We would recommend an approach to the new stations along the route that follows a similar approach to that being implemented for the new Cambridge South Station. This includes achievement of a BREEAM excellent rating and the use of engineered timber to reduce the embodied carbon of the station. Green roofs are also utilised to help reduce the visual impact of the station. The renewable energy generation potential of stations should be maximised to help reduce operational carbon emissions.	Provide further design details

22. Please provide any comments you have in relation to these route-wide matters.

Operating the Railway

Topic area	Proposal aspect(s) *e.g., Consultation Document, Fact sheet – Our approach to Historic Environment, Environmental Sustainability Strategy etc.*	Key issue(s) *Please list as brief numbered sentences to explain the identified issue – please also identify between where it is an issue of principle or where information is missing/further justifications needed.*	Proposed mitigation measure(s) *Brief numbered sentences (clearly corresponding with the identified issue)*
Ecology	No comments		
Landscape	Stabling trains and maintaining the railway	Areas for train storage /stabling may have an impact on adjacent residents and users and the surrounding landscape.	Details required of boundary treatments, finished levels, lighting and landscape mitigation.
Landscape	Operational facilities (Environmental Update Report)	Supporting facilities such as compounds, staff accommodation and parking will impact on views and landscape	More detail of the design and impacts on the surrounding landscape (LVIA) is required. A strategy for the locations and design of facilities including buildings is required to address impacts on landscape.
Landscape	Powering our trains (Environmental Update Report)	The proposed rail corridor including overhead gantries and power equipment will impact on views and landscape.	More detail of the design and impacts on the surrounding landscape (LVIA) is required. A strategy for the locations and design of power equipment including sub substations for the railway is required.
Sustainability	Fact Sheet – Our approach to powering the trains	The preference for the use of discontinuous electrification subject to further work, with full electrification being the baseline position assumed in these proposals, is welcomed. It is noted that in the interim some services will temporarily use diesel passenger trains until overhead electrification has	Outline and quantify how and when the use of diesel for freight and passenger services will be decarbonised and meet the DfT commitments to carbon reduction.

Topic area	Proposal aspect(s) *e.g., Consultation Document, Fact sheet – Our approach to Historic Environment, Environmental Sustainability Strategy etc.*	Key issue(s) *Please list as brief numbered sentences to explain the identified issue – please also identify between where it is an issue of principle or where information is missing/further justifications needed.*	Proposed mitigation measure(s) *Brief numbered sentences (clearly corresponding with the identified issue)*
		been installed, with the Environmental Update Report noting that this may be until all construction through to Cambridge has been completed. We consider it important that a fixed end date for the use of diesel trains, both passenger and freight, is committed to, to ensure that EWR is consistent with the requirements of the Climate Change Act and DfTs own commitments to end diesel only trains on the rail network	

Delivering the railway

Topic area	Proposal aspect(s) *e.g., Consultation Document, Fact sheet – Our approach to Historic Environment, Environmental Sustainability Strategy etc.*	Key issue(s) *Please list as brief numbered sentences to explain the identified issue – please also identify between where it is an issue of principle or where information is missing/further justifications needed.*	Proposed mitigation measure(s) *Brief numbered sentences (clearly corresponding with the identified issue)*
Ecology	Construction (Environmental Update Report)	The large scale of the construction compounds and access routes will have major impacts on ecology and Biodiversity .	Adequate ecological assessment and mitigation required.
Landscape	Environment and sustainability	New bridges, embankments, viaducts and other structures will impact on landscape.	Further details required of all structures including a design strategy.
Landscape	Environment and sustainability	Drainage basins are indicated alongside the route and are an important element of the project.	More details are required to demonstrate how the basins are integrated into the landscape and mitigation.

Topic area	**Proposal aspect(s)** *e.g., Consultation Document, Fact sheet – Our approach to Historic Environment, Environmental Sustainability Strategy etc.*	**Key issue(s)** *Please list as brief numbered sentences to explain the identified issue – please also identify between where it is an issue of principle or where information is missing/further justifications needed.*	**Proposed mitigation measure(s)** *Brief numbered sentences (clearly corresponding with the identified issue)*
Landscape	Construction (Environmental Update Report)	The large scale of the construction compounds and access routes will have major impacts on the landscape.	The design of reinstatement work and mitigation must be coordinated and sympathetic to with the surrounding landscape and townscape character. More details are required.
Sustainability	Environmental Update Report	The general approach to considering the impacts on climate change, notably related to carbon emissions as part of the Environmental Statement is noted. However, given the high-level nature of the information provided as part of the non-statutory consultation, we would request early sight of detailed assessment of carbon and the mitigation measures proposed to reduce the impacts associated with construction of the railway and associated structures. This must include the carbon impacts associated with all demolition works associated with the project. We would support the use of materials with low embodied carbon wherever possible and would recommend that where new or replacement habitats are proposed, consideration be given to how the carbon sequestration potential of these habitats could be maximised. In addition to the consideration of carbon, it will be important to understand how the wider climate impacts will be	Provide further information on how climate resilience and climate impacts beyond just flood risk is being factored into the ES. Provide further detail on the assessment of carbon as part of the construction and operational phases of the proposed development, along with mitigation measures. Consider water resource demand generated by both the construction and operational phases of EWR as part of the ES and identify

Topic area	Proposal aspect(s) *e.g., Consultation Document, Fact sheet – Our approach to Historic Environment, Environmental Sustainability Strategy etc.*	Key issue(s) *Please list as brief numbered sentences to explain the identified issue – please also identify between where it is an issue of principle or where information is missing/further justifications needed.*	Proposed mitigation measure(s) *Brief numbered sentences (clearly corresponding with the identified issue)*
		considered as part of the ES, noting that flood risk is already considered. This should include the consideration of wider climate impacts and resilience measures, for example the impacts of heat during the construction phase and also on the operation of the railway, so it will be important for us to understand how this will be considered as part of the Environmental Statement. Water scarcity is also a considerable issue facing the East of England, so as part of the consideration of the impacts of the proposed development on water resources, it will be important to consider whether construction and operational impacts on potable water supplies in terms of creating additional demands on water resources and to develop mitigation measures to minimise any requirements.	appropriate mitigation measures.
Sustainability	Construction of new stations	We would recommend an approach to the new stations along the route that follows a similar approach to that being implemented for the new Cambridge South Station. This includes achievement of a BREEAM excellent rating and the use of engineered timber to reduce the embodied carbon of the station. Green roofs are also utilised to help reduce the visual impact of the station. The renewable energy generation potential of stations should be maximised to help	Provide further design detail.

Topic area	Proposal aspect(s) *e.g., Consultation Document, Fact sheet – Our approach to Historic Environment, Environmental Sustainability Strategy etc.*	Key issue(s) *Please list as brief numbered sentences to explain the identified issue – please also identify between where it is an issue of principle or where information is missing/further justifications needed.*	Proposed mitigation measure(s) *Brief numbered sentences (clearly corresponding with the identified issue)*
		reduce operational carbon emissions. It is noted that the consultation references a modular design approach to new stations, but it will be important to ensure that the station design meets the requirements of local planning policies as set out in local plans. It will also be important to ensure that the design of stations and platform access takes into account the large numbers of people who may look to bring bikes with them on their train journeys.	
Sustainability	Energy infrastructure – Technical Report	<u>Section 14.1 – Proposal for powering the trains</u> It is noted that the development of the EWR project will require works to make grid connections to bring power supply to the railway as well as realigning and diverting existing utilities supplies. This includes substation upgrades across the route. As part of work on EWR, it will be important to ensure that the electricity infrastructure requirements of are factored into work on infrastructure planning including work on Regional Energy Strategic Plans being developed by the National Energy Systems Operator.	Ensure that the energy infrastructure requirements of EWR are integrated into local and/or regional energy planning to ensure coordination with other projects.

SLC Rail

East West Rail 2024 Non-Statutory Consultation

Technical Review

For Bedford Borough Council

V1.0 December 2024

SLC Rail

Contents

1 Introduction

Bedford Borough Council (BBC) commissioned SLC Rail to provide technical support to its review of the materials presented by the East West Railway Company (EWR Co) as part of its 2024 Non-Statutory Consultation (NSC) on the future stages of the East West Rail project. Specifically, BBC has asked SLC Rail to provide a technical commentary to support BBC's response to a selection of the consultation questions posed by EWR Co as part of this consultation. The questions that SLC Rail has been asked to provide commentary on are listed in Appendix A of this document.

In addition, BBC has asked SLC Rail to review of BBC's response to EWR Co's 2021 NSC and of SLC Rail's previous advice from January 2024 (relating to the provision of additional tracks north of Bedford station) to determine whether either of these are materially impacted by the updated proposals now presented by EWR Co.

This report documents the outcome of SLC Rail's review of the relevant elements of the consultation materials, BBC's 2021 Consultation Response and SLC Rail's January 2024 advice.

2 Methodology

In preparing this report, SLC Rail has reviewed the following materials:

- EWR Co 2024 NSC materials (as published on the EWR Co website www.eastwestrail.co.uk/consultation2024):
    - Consultation Document
    - Technical Report
    - Environmental Update Report
    - Transport Update Report
    - Plan & Profile drawings
- Bedford Borough Council's response to EWR Co's 2021 NSC (copy provided by BBC)
- SLC Rail's January 2024 report to Bedford Borough Council "East West Rail – Route Update Review" (22nd January 2024)

In carrying out this review, it has been necessary to refer to other documents including materials published by EWR Co in relation to the 2021 NSC.

Due to the constrained timeframe in which this review has necessarily been undertaken, SLC Rail's review of the 2024 consultation materials has been primarily targeted on those sections of the documents that relate to the specific consultation questions that BBC has requested a technical commentary on.

3 Background to the EWR project

The East West Rail project aims to deliver a new rail route linking Oxford to Cambridge via key urban centres in between. In doing so it aims to:

- Improve public transport links in the corridor;
- Stimulate economic growth, housing, and employment through the provision of new, reliable and attractive inter-urban passenger train services; and
- Contribute to improved journey times and inter-regional passenger connectivity by connecting with existing north-south routes and routes beyond Oxford and Cambridge.

The project is being delivered in phases. The first of these delivered a fully upgraded railway between Oxford and Bicester (together with a new section of railway linking to the London - Birmingham Chiltern Main Line) in two stages completed in 2015 and 2016. This allowed Chiltern Railways to commence operation of a new train service linking London Marylebone and Oxford.

Construction works on the next phase of the project, which involves the upgrading and reopening of the railway between Bicester and Bletchley, have recently been completed. This will facilitate the operation of new passenger train services linking Oxford and Milton Keynes Central, which are expected to commence in 2025. The works on this phase of the project have been delivered by Network Rail with oversight from EWR Co.

Subsequent phases will see the upgrading of the existing Marston Vale Line (MVL) (linking Bletchley and Bedford) and the construction of a new railway linking Bedford to Cambridge.

EWR Co. refers to the completed phases of the project as "Connection Stages":

- Connection Stage 1 – introduction of passenger services between Oxford and Milton Keynes Central.
- Connection Stage 2 – additional passenger services introduced running between Oxford and Bedford
- Connection Stage 3 – extension of passenger services beyond Bedford to Cambridge

(The Oxford – Bicester works pre-date EWR Co and are not officially covered by the Connection Stage nomenclature. However, these works and the resulting train services are sometimes unofficially referred to as "Connection Stage 0").

The 2024 NSC, in common with those in 2019 and 2021, aims to gather feedback from the public and key stakeholders that will be used to refine the scheme proposals. These proposals are expected to be subject of an application by EWR Co to the Secretary of State for Transport for a Development Consent Order (DCO) that would authorise the construction works (together with the associated acquisition of land and property) necessary to deliver the train services envisaged at Connection Stage 3.

4 Technical Commentary

4.1 General observations about the consultation materials

The volume of material presented as part of this consultation is large. Between them, the Consultation Report, Technical Report, Environmental Update Report and Transport Update Report have over 1,100 pages. This is in addition to the Plan and Profile drawings, Factsheets and Land & Property documents that EWR Co has published. As a consequence of the volume of material and the time available in which to undertake this review, the review has necessarily focused on those parts of the documents that are relevant to the specific questions that BBC has asked for support on.

To fully understand some of the proposals, it is necessary to consider information from multiple documents and the Plan & Profile drawings. The proposals for the MVL are particularly complex due to the degree of optionality – there are now three train service and station proposals together with six options relating to passing loops (some of which are not compatible with all the station options) and additional optionality relating to Stewartby and Ridgmont stations.

The Technical Report contains less detailed technical information than might be expected. In respect of some of the proposals, such as the passing loops on the MVL, the Technical Report does little more than reiterate what is said in the Consultation Report. Without additional and more detailed technical information, it is difficult to fully understand or verify some of the decision making that underpins the latest proposals.

The information presented in the Environment and Transport Update reports is at an early stage of development. Consequently, some of the information presented is generic and not specific to the current proposals.

4.2 The Marston Vale Line station and train service concepts (Question 7a)

The current consultation proposes three options for the MVL stations and train services. In the 2021 NSC, just two options were proposed. The first option in the current consultation, referred to as "the Existing Stations Option" or "Concept 1a", would retain the existing intermediate stations on the MVL. The existing hourly train service between Bletchley and Bedford would continue to operate, calling at all the intermediate stations. (Bedford St Johns station would be relocated in this and all other options, due to the proposed realignment of the railway in the south of Bedford). In addition, two further services would be introduced each hour. These "semi-fast" services would run from Oxford to Cambridge and, on the MVL, would call at Woburn Sands, Ridgmont, Lidlington, Stewartby and Bedford St Johns (instead of just Woburn Sands and Ridgmont in the equivalent option in the 2021 NSC). These trains would not call at Fenny Stratford, Bow Brickhill, Aspley Guise, Millbrook or Kempston Hardwick. As well as the Bletchley – Bedford service and the Oxford – Cambridge services, part of the route would also be served by two further trains per hour between Stewartby and Cambridge. In the 2021 NSC, these services operated between Bletchley and Cambirdge and in the 2023 Route Update Announcement (RUA), they were shown as operating only between Bedford and Cambridge. On the MVL, these services would serve Stewartby and Bedford St Johns only. Stewartby station would be expanded to support the operation of the Stewartby – Cambridge services. Concept 1a is a development of Concept 1 from the 2021 NSC.

The second option, referred to as "the Consolidated Stations Option" or "Concept 2", would see all the existing intermediate stations on the MVL closed and replaced by new stations serving Woburn Sands, Ridgmont, Lidlington and Stewartby. In the cases of Woburn Sands, Lidlington and Stewartby, the new stations would be in different locations to the current stations. The consultation materials suggest that Ridgmont could either be relocated or the current station could be upgraded on its present site. (As noted above, Bedford St Johns station would be relocated due to the proposed realignment of the railway in the south of Bedford). In this option, the existing hourly Bletchley to Bedford service would be discontinued. Two trains per hour would operate from Oxford to Cambridge, serving all the new stations (instead of just Woburn Sands and Ridgmont as in the 2021 NSC). A further train each hour would operate from Bletchley to Cambridge, again serving all the new MVL stations. A fourth train each hour would operate between Stewartby and Cambridge, calling at only Stewartby and Bedford St Johns on the MVL. Concept 2 is a development of the Concept 2 proposals set out in the 2021 NSC.

In a change to previous proposals, a third option is included in this consultation. This option is referred to as "the Hybrid Option" or "Concept 1b". In this option, the new stations from the Consolidated Stations option would be built. These would replace the existing Woburn Sands, Ridgmont, Lidlington and Stewartby stations. The option included in Concept 2 of upgrading Ridgmont on its current site presumably also applies to this option. As with the other options, Bedford St Johns would also be relocated. However, the existing intermediate stations at Fenny Stratford, Bow Brickhill, Aspley Guise, Millbrook and Kempston Hardwick would be retained and would continue to be served by an hourly service between Bletchley and Bedford. The pattern of train services on the route would be the same as for the Existing Stations option: one train per hour Bletchley – Bedford calling at all stations, two trains per hour Oxford – Cambridge calling at just the new/relocated stations and two further trains per hour Stewartby – Cambridge serving just Stewartby and Bedford St Johns.

In Concepts 1a and 1b, EWR Co's working assumption is that the 1 train per hour Bletchley – Bedford continue to be operated by diesel-powered trains rather than the electric or battery/electric trains that are proposed for other services on the route. The Technical Report states that it would be difficult to justify the investment required to convert this service to hybrid battery/electric operation but does not explain what additional investment would be required and whether this would be limited to just rolling stock or whether investment would be required in both rolling stock and infrastructure. It is worth noting that the rolling stock currently operating on the MVL is around 40 years old and is likely to require replacement ahead of the EWR works being completed.

Unlike in the 2021 NSC, no indicative train service timetables are presented making it difficult to understand the interactions between the faster and slower services in Concepts 1a and 1b. The reduction in the quantum of services operating over the majority of the MVL, the reduced maximum speed (75mph compared to 100mph in the 2021 NSC) and the increased number of stops for the Oxford - Cambridge services will have removed the need for semi-fast services to overtake stopping services at or near Ridgmont (as proposed in the 2021 NSC) and will likely have reduced the performance risks resulting from faster services catching up slower ones. The increased number of station calls and reduced maximum line speed would result in an increase in journey time from Bedford to stations to the west. This increase would be at least partially offset by the use of electric or hybrid battery-electric rolling stock, which generally capable of faster acceleration than diesel rolling stock.

The Technical Report states (on page 121) that "EWR Co is also doing further work to determine whether, if station consolidation is taken forward, all of the consolidated stations would be delivered upon EWR opening". It is not clear from this statement whether, in the circumstances where only some of the new

stations are opened on "day 1", some of (or all) the existing stations would remain open to maintain connectivity for the affected areas or whether connectivity would be maintained by some other means, such as a temporary bus service.

The Technical Report sets out EWR Co's assessment of the three station and train service Concepts. This assessment results in an expressed preference for Concept 2 and the decision not to proceed with Concept 1b. However, Concept 1a has been taken forward in light of the potential impacts arising from the closure of existing stations on the MVL as part of Concept 2. This assessment includes a number of points that could be considered to be misleading or inaccurate. However, it is unlikely that any of these points would materially impact the outcome of the assessment.

The Stewartby – Cambridge services are omitted from evaluation as, in EWR Co's view, they are not a differentiator. However, the location of Stewartby station differs between the Concepts. This would impact the mileage covered by each train operating the Stewartby – Cambridge services resulting in differing operating costs. Although the distance between the two station location options is small, when multiplied up across the number of trains operating on the route, the cumulative impact over the life of the scheme could be significant. Also, in Concept 2, one of the Stewartby – Cambridge services is extended to Bletchley to provide the third train per hour between Bletchley and Stewartby. This reduces the quantum of services operating between Stewartby and Bedford from five in Concepts 1a and 1b to four in Concept 2. It therefore appears that the Stewartby – Cambridge services are relevant to the assessment being undertaken.

On page 121 of the Technical Report, there is a statement that in support of Concept 2 that states, "The opportunity to lengthen and extend the Bletchley to Bedford service to Cambridge represents a chance to improve this connectivity further". This statement is misleading. In theory, there is nothing to prevent this service from being extended to Cambridge in any of the other Concepts, by combining it with one of the Stewartby – Cambridge services. In Concepts 1a and 1b this would mean either the service would need to be operated by 2-car diesel-powered trains throughout (assuming one accepts EWR Co's assertion that it is impractical to convert the stopping service to hybrid battery-electric operation), or operational controls would need to be put in place at the remaining intermediate stations with short platforms (Fenny Stratford, Bow Brickhill, Aspley Guise, Millbrook and Kempston Hardwick) to ensure that on the longer trains proposed to be used for EWR services, doors were not able to be opened on the part of the train that is unable to be accommodated within the operational platform length. Given the low numbers of passengers using these stations, such a solution should be practicable and therefore the opportunity to extend the service also exists for the other Concepts.

Some of the statements justifying EWR Co's decision not to pursue Concept 1b are also potentially misleading. While Concept 1b would likely be the most expensive to deliver (because it entails upgrades at the retained existing stations as well as the construction of the new stations), the additional cost is not quantified and could be relatively low, depending on the scale of works required at the retained intermediate stations (which does not appear to have been fully defined at this stage). The Technical Report goes on to state that Concept 1b would "constrain the capacity, frequency and speed of train services for most MVL residents" and would "have fewer direct services to Cambridge". Although the presence of the stopping service theoretically constrains capacity, it does not appear to do so to the extent that impacts frequency of passenger services that are proposed. The reduced speed presumably relates to the longer journey time between Bletchley and Bedford that would apply to the stopping service. However, this impacts only one of the three trains per hour operating on this section – the speed / journey time of the other two trains would be no different to that in the other Concepts. Combining the stopping service with one of the Stewartby – Cambridge services would overcome the issue of fewer direct services to Cambridge

(albeit the third Cambridge service each hour from the affected stations would have a longer journey time) and would remove the need to provide turnback capacity at Bedford.

Kempston Hardwick is described (on page 131 of the Technical Report) as "the least used station on the line" having just 34 entries and exits per day in 2019/20. However, Aspley Guise is stated (on page 129) to have 30 entries and exits per day, making Aspley Guise the least used station.

Page 136 of the Technical Report states that "In Concept 1b, the largest employment centres (Oxford, Milton Keynes, Bletchley, Bedford and Cambridge) would not benefit from improved rail journey times…". This is incorrect – Concept 1b appears capable of delivering the same fastest journey times as Concepts 1a and 2. In the conclusions (on page 147 of the Technical Report), Concept 2 is described as having faster journey times. Again, there appears to be no reason why this would be the case – although it is correct that one train per hour would have a longer journey time in Concepts 1a and 1b than the equivalent train in Concept 2.

EWR Co's assessment of the three options has shown that Concept 2 offers significant benefits over the other two Concepts. Given the current level of development of some aspects of the proposals (such as the scope of station works for both new and retained stations), as the scheme progresses and more detail becomes available it would be advisable to reassess the Concepts to ensure the outcome remains unchanged.

On the basis of our review of the three Concepts as presented, we generally agree with EWR Co's conclusion that Concept 2 appears to be the best performing. This is because it provides modern stations better located to serve the future distribution of housing and businesses across the area and therefore better cater for demand. It provides a consistent level of service at all stations, provides enhanced station facilities and it avoids the cost of upgrading the existing intermediate stations, many of which have low levels of use and/or are heavily constrained by surrounding land uses. It also avoids the on-going operating costs associated with operation of the current stopping service. Although we do not have access to the costs and revenues associated with this service, it is highly likely that revenues are not covering the cost of operating this service and that revenue attributable to the stopping service would reduce following introduction of the faster EWR services. Discontinuing the stopping services would therefore result in a reduction in the net operating costs of the railway between Bletchley and Bedford.

4.3 Stewartby station (Question 9a)

The proposals for Stewartby station are not clearly explained. From the details provided in the Technical Report, it appears that in Concept 1a, Stewartby station would be expanded on its current site with a new footbridge and an additional platform face. However, there is no clear description of the layout of the expanded station and this option is not represented in the Plan & Profile drawings. The option of retaining and expanding the station on its current site is not mentioned in the Consultation Report.

Under Concept 2, it is proposed to close the current Stewartby station and replace it with a new station at one of two sites. Option 1 moves the station around 250m to the northeast of the current station site, providing a three-platform station that would be accessed from the east side of the railway via a new access road from Stewartby Way (although the Technical Report and Consultation Report both state that access would be from Green Lane, contrary to what is shown in Figure 60 of the Technical Report, Figure 28 of the Consultation report and the Plan & Profile drawings).

Option 2 replaces the current station with a new station located around 250m to the northeast of Broadmead Road level crossing. The proposed site is at the northeastern extremity of the search area that was set out in the 2021 NSC. This option provides a three-platform station accessed from the east side of the railway via a new access road from Broadmead Road.

Concept 1b incorporates the Concept 2 proposals for relocated stations.

Option 1 for Stewartby station takes land from the Stewartby Brickworks development site. The option increases the walking distance between the station and Kimberley College. The Consultation Report (page 100) states that the walking distance would be 200m further than today but the distance to the new station via the new access road appears to be closer to 450m further. The option would benefit from an additional access point on the west side of the railway. This would reduce the walking distance between the station and Kimberley College. It would also mean that college students would not need to pass over Green Lane level crossing (which is now proposed for retention) when travelling to and from the station. This would improve the safety of the level crossing. Subject to the provision of suitable drop off and/or parking facilities on the west side of the railway, it would also avoid the need for people arriving at the station by car from the Bedford Road / A4421 direction to traverse the level crossing, further improving safety.

Option 2 is located within the development area that extends along the railway corridor between Stewartby and Kempston Hardwick and would serve this development better than Option 1. Option 2 is further from Kimberly College. There is scope to reduce the walking distance between the college and the station through the provision of new active travel routes as part of the redevelopment of the former Stewartby Brickworks site. If this option is taken forward, EWR Co should be encouraged to develop and commit to the provision of measures that mitigate the impacts of the increased distance between the station and the college.

As with Option 1, the new station site would benefit from the addition of an entrance of the western side of the railway. This would remove the need for vehicles to traverse the retained Broadmead Road level crossing to access the station.

Access to the Option 2 station site is via a new access road from Broadmead Road, which is an unlit, rural, single-carriageway road that has a 60mph speed limit and no footway. This is not conducive to the use of active travel modes to access the station. If Option 2 is pursued, EWR Co should be encouraged commit to the delivery of measures to improve the accessibility of the station by active travel modes.

The Option 2 station site is around a mile closer to Bedford than the Option 1 site. Consequently, Option 2 would reduce mileage for Stewartby – Cambridge trains by around 2 miles per round trip. Although the increase in variable costs associated with the resulting additional vehicle mileage are not large for an individual round trip, when multiplied by the number of trains that are expected to operate, the cumulative costs over the lifetime of the scheme could be significant.

The statement made on page 101 of the Consultation Document relating to access to the railway by residents of Wootton is inaccurate. Regardless of whether Kempston Hardwick station is retained or closed, Wootton residents would have the option to access EWR services at Stewartby where there would, in all Concepts be four (not three) direct services to Cambridge each hour.

4.4 Level crossings (Question 10)

4.4.1 General points

EWR Co's approach on level crossings has changed from the proposals presented in the 2021 NSC, which sought to close the vast majority of the level crossings on the MVL. The proposals in the current consultation seek to reduce project costs and reduce the impacts of crossing closures by retaining many of the crossings. The consultation sets out proposals to enhance certain of the retained crossings to improve their safety.

The safety of individual crossings is presented in terms in terms of the "Fatalities and Weighted Injuries" (FWI) measure. The Technical Report states (in section 3.8.2.8) that assessments using Network Rail's All Level Crossing Risk Model (ALCRM) have been undertaken but the full results of these assessments are not reported. The Technical Report goes on to state (in section 7.2.1) that the FWI calculations performed by EWR Co use road traffic data gathered during 2021. Given that 2021 was impacted by the Covid pandemic and that traffic levels are known to have increased as part of the post-Covid recovery of the economy, it is likely that the traffic volumes recorded will be lower than traffic volumes in 2024. Traffic volumes are also likely to further increase in the period between now and completion of the EWR scheme due, in part, to on-going development in the vicinity of the railway. Although the Technical Report (in section 3.8.2.8) states that increases in crossing use arising from the EWR scheme have been considered, it is not apparent whether other sources of growth from the 2021 levels have been appropriately considered.

The Office of Rail and Road (ORR) ("Principles for managing level crossing safety", June 2021) recommends that "the first consideration for all level crossings should be whether there are reasonably practicable alternatives to a level crossing". Only where closure (with necessary mitigation) is deemed not to be reasonably practicable should engineering controls (such as the level crossing upgrades proposed by EWR Co at many of the crossings) be implemented. ORR's guidance points out that for a risk control measure (such as closure and replacement with a bridge) to not be reasonably practicable, the cost of the measure should be "grossly disproportionate" when compared to the risk. It is not clear from the material presented whether, in the case of crossings proposed for retention, EWR Co has assessed the replacement of the crossings with alternative means of crossing the railway to be not reasonably practicable.

The number of CCTV level crossings that would now remain on the MVL in combination with a significant increase in train frequency, would lead to a significant increase in signaller workload. This is because CCTV crossings require the signaller to view live CCTV coverage of the crossing and confirm the crossing is clear of obstructions each time the barrier lowering sequence completes prior to the passage of a train. The issue of signaller workload (in relation to MVL level crossings) is not discussed in any of the consultation materials, but it is possible the increased signaller workload could result in the need to employ additional signallers and to provide an additional signaller's workstation in the signalling control centre. This would result in additional capital and operational costs.

The acceptability of barrier down times appears to be based solely on highway capacity considerations and does not appear to take account of inconvenience to crossing users.

In respect of the crossings within the Bedford Borough area, the decision to retain crossings appears to be a retrograde step from the previous proposals. The retention of the crossings would lead to increased inconvenience to crossing users, could result in increased levels of crossing misuse and is likely to result in increased operational costs for the railway with no apparent benefit (over the 2021 proposals) to the local community other than the avoidance of the short-term disruption associated with the construction of the bridges that were previously proposed.

4.4.2 Green Lane crossing

The Technical Report states that barrier down time at this crossing would increase to 28 minutes per hour. The extended barrier down times would impact rail users trying to access Stewartby station Option 1. With high numbers of students using the crossing on their way between Stewartby station and Kimberley College, the increased barrier down time and frequency of crossing closures would result in an increased the risk of misuse of the crossing.

The use of Green Lane level crossing would be impacted by the future development of the Stewartby Brickworks site. Any decision on whether to retain Green Lane crossing needs to account for how the development would impact the movement of road traffic and pedestrians in the area, especially as proposals for the site that have obtained planning consent incorporate a new road bridge over the railway.

4.4.3 Brickworks crossing

This crossing serves an internal (private) access road within the former brickworks site and a public footpath that appears to terminate near close to the edge of an adjacent former landfill site. The closure of this crossing without replacement is proposed. Given the proposals (referred to above) to provide a new road bridge as part of the redevelopment of the brickworks site, the closure of the level crossing appears to be acceptable.

4.4.4 Wootton Broadmead crossing

This crossing is proposed for retention as a CCTV crossing. Barrier down times for the crossing are reported as being 34 minutes each hour with Stewartby station relocation option 1 or the retention of Stewartby station at its current location or 27 minutes each hour with station relocation option 2.

However, it appears that a third scenario exists that has not been assessed. With station and train service Concept 1a, Stewartby station remains in its current location and five passenger trains per hour (in each direction) traverse Wootton Broadmead crossing. With Concept 2 and Option 1 for the relocation of Stewartby station, there would be four passenger trains per hour and with Concept 2 and Stewartby Option 2 there would be three passenger trains per hour using the crossing. It is not clear whether the reported 34 minutes per hour barrier down time relates to the four trains per hour or five trains per hour scenario. (Concept 1b is not considered as EWR Co has stated its intention not to proceed with this concept).

If Stewartby station relocation option 2 were pursued, the increased barrier down time would impact station users and this could lead to an increased risk of misuse by rail passengers in a hurry to catch their train.

4.4.5 Wootton Village crossing

Wootton Village crossing is a rural public footpath level crossing located between Stewartby and Kempston Hardwick stations. EWR Co proposes to close this crossing on the basis of very low recorded use. In mitigation for the closure, a diversion of the affected public footpath is proposed. This involves creating new sections of public footpath on each side of the railway to connect with Manor Road. The proposed diversion would be around 1km longer than the current route via Wootton Village crossing.

Given the low use of this crossing and the nature of the journeys being undertaken (which are likely to be leisure journeys), this additional length might be acceptable. However, part of the diversion route is along

Manor Road, which currently has no footway and 40mph speed limit. If this closure is pursued, EWR Co should be encouraged to commit to the provision of a footway along the relevant section of Manor Road.

4.4.6 Manor Road (Kempston Hardwick) crossing

Consent has previously been obtained by Network Rail (by way of the 2020 Transport and Works Act Order (TWAO) for the first stage of EWR works as then envisaged) for the closure of this crossing and its replacement with a bridge carrying Manor Road over the railway. This consent was obtained by Network Rail as part of previous proposals for the MVL that would have seen one additional train service (in each direction) per hour on the route and no increase in the maximum speed of trains on the route.

The consultation materials state that if Network Rail does not implement the consented crossing closure option, EWR Co proposes to upgrade Manor Road crossing from an automatic half-barrier crossing to full-barrier crossing with obstacle detectors. This type of crossing operates in a similar way to a CCTV crossing except that a radar-based obstacle detection system is used to confirm the crossing is clear of obstructions instead of relying on a visual check by the signaller.

Given the much higher frequency of passenger train services now proposed (up to five trains per hour in each direction compared to two trains per hour in the 2020 TWAO proposals) and the proposal to increase the maximum speed of trains from 60mph to 75mph, the proposal to retain the crossing is surprising as it appears to be at odds with Network Rail's decision to pursue closure of this crossing.

Unlike for other level crossings on the route, no barrier down time is quoted in the Technical Report. However, it can reasonably be assumed that the values would be broadly similar to those quoted for Wootton Broadmead crossing with Concept 2 and Stewartby station option 1 or Concept 1a and Stewartby station retained at its current location, i.e. at least 34 minutes per hour. Given the higher volumes of road traffic on Manor Road, this would cause a greater level of inconvenience to road users.

Only one FWI score is reported for this crossing. It is not clear whether this relates to the Concept 1a or Concept 2 level of train service.

4.4.7 Woburn Road crossing

Woburn Road crossing is a public footpath crossing located on the outskirts of Bedford. The footpath leads from an industrial estate, across fields to the B530 south of Bedford. There is also an unofficial path leading from the crossing to the loading bays of the nearby Interchange Retail Park.

Network Rail has previously obtained consent to close this crossing and provide a footbridge over which the public right of way would be diverted. The Technical Report states that if Network rail does not proceed with the closure of the crossing, EWR Co would seek to retain the crossing and upgrade it by the adding miniature stop lights. As with the similar situation at Manor Road crossing, the decision to retain the crossing is surprising and seemingly at odds with Network Rail's decision to pursue closure for a lower-risk scenario.

4.5 Other matters relating to the Fenny Stratford to Kempston route section (Queston 11)

4.5.1 Passing loops

The 2021 NSC described a proposal to provide passing loops on the MVL near Ridgmont. These loops would have facilitated the operation of the passenger services then proposed as Concept 1 by allowing "semi-fast" Oxford/Bletchley - Cambridge services to overtake the slower stopping service. This was necessary as a result of the frequency of service proposed and the difference in average speed of the stopping and semi-fast services as then proposed. The loops would also have allowed the semi-fast services to overtake freight trains.

The current consultation considers the provision of loops at either Stewartby or Ridgmont. Six potential loop locations are presented, three for westbound trains, three for eastbound trains. Some of the loop options are not compatible with some of the current station options.

Following the reduction in the quantum of services west of Stewartby, a reduction in the maximum speed of passenger services and an increase in the number of stations at which the semi-fast services would call, the loops are no longer required for passenger services.

Although the Technical Report (in section 3.8.2.4) states that the proposed loop locations are based on timetable evaluation, no timetables are presented in the consultation materials to allow verification of the validity of the chosen locations. Given that the difference in average speed of freight and passenger services will now be much less (as a result of the reduced maximum speed and revised stopping patterns), the need for passenger trains to overtake freight trains is likely to be lower. However, the loops might be useful to allow freight services to be held clear of passenger services while they await an available path on another part of the network such as the West Coast Main Line (accessed at Bletchley) or the Midland Main Line through Bedford.

Of the six loop locations proposed, only three are within the Bedford Borough area, those being the Stewartby locations (a) east of the railway, south of Broadmead Road, (b) east of the railway, north of Broadmead Road, and (c) west of the railway, north of Broadmead Road. Loops (b) and (c) conflict with Stewartby station relocation Option 2. Loop (a) appears to be clear of all Stewartby station options, although its western end would be very close to Stewartby station Option 1.

All three loop options appear to require the acquisition of land beyond the current railway boundary. In all cases, the amount of land required specifically for the loop is low and comprises a narrow strip running alongside the existing railway boundary. However, in all three cases, the land required is within sites proposed for development.

The consultation materials are silent in respect of the existing passing loop located on the west side of the railway, south of Broadmead Road. It is not clear why this loop has not been considered as part of these proposals, either for retention in its current form or, if necessary, lengthened.

4.5.2 Community benefits and impacts

The proposals would deliver a significant uplift in connectivity for communities along the MVL corridor, opening up new journey opportunities including a range of new destinations that can be reached directly and many more that can be reached with a change of train at one of several interchange stations on the route.

However, this needs to be considered against the impact of increased noise (especially for those living closest to the railway), construction activities (in the short term) and on-going impacts to road traffic caused by the significant increases in level crossing barrier down times, and the extent to which mitigation

can be provided for these impacts. In the case of noise mitigation, this most commonly takes the form of acoustic fencing placed alongside the railway. The Plan & Profile drawings indicate locations where noise mitigation might be provided. No locations within Bedford Borough are indicated on this section of the route. Consideration will need to be given to the provision of noise mitigation in proximity to the housing proposed on the former Stewartby Brickworks site and potentially alongside new development between Stewartby and Kempston Hardwick if this proceeds ahead of the railway scheme.

4.5.3 Land and property requirements

As noted above, the proposed passing loops would require land that is currently earmarked for development. The proposals for the relocation of Stewartby station require further areas of development land, but this is unavoidable if the station is to best serve the planned developments. Additional development land is shown as being required for environmental mitigation measures. In the case of this latter requirement, the provision of alternative mitigation using other land that is not proposed for development might be possible in some circumstances.

Land within the former Stewartby Brickworks site is shown as being required for a construction compound. This could impact on the timing of the delivery of new housing on this site and consideration should be given to reducing the amount of land required or using an alternative site.

4.5.4 Environmental and sustainability

The assessment of environmental impacts together with proposals for their mitigation are at an early stage of development. The Environmental Update Report identifies no impacts of significance on this route section within the Bedford Borough area. The draft order plans provide an indication of initial proposals for environmental mitigation measures, but it should be expected that these proposals will evolve as the project is developed further and detailed surveys are completed.

4.5.5 Construction and logistics

At this stage, there is little specific information available about construction methods and logistics. It is notable that there appears to have been a move away from the option considered as part of the 2021 NSC to undertake works on the MVL during an extended closure (often referred to as a "blockade") of the line. An extended closure would allow works to be completed quicker, reducing the overall period of disruption for local communities and existing rail users and reducing the need for nighttime and weekend working.

Also of note is that Connection Stage 2 will seemingly now be implemented ahead of the works required for Connection Stage 3. This would mean that the newly introduced Oxford – Bedford services would be subject to disruption resulting from the subsequent construction activities.

As noted above, a large construction compound is proposed at Stewartby. Road access to this compound is proposed to be taken from Broadmead Road. This site would be used to supply plant and materials to individual work sites along the Marston Vale Line.

4.5.6 Traffic and transport

The Transport Update Report sets out the baseline conditions and an initial assessment of (primarily) highway impacts resulting from the scheme.

In respect of the part of the Fenny Stratford to Kempston route section with the Bedford Borough area, no significant impacts are noted. However, the report does note that by 2032 several roads will be operating at or close to capacity without the scheme. These include Manor Road (Kempston Hardwick). This situation would be exacerbated if EWR Co proceeds with the option to retain Kempston Hardwick level crossing if Network Rail does not proceed with the previously consented replacement of the crossing with a bridge.

4.5.7 Door to Door Connectivity and Active Travel

No specific proposals are presented. Detailed proposals will need to be prepared in respect of access to the relocated station at Stewartby. As noted previously, the access route to the Option 2 station site at Stewartby is not currently conducive to the use of active modes to reach the station and specific proposals are required in respect of connectivity between the relocated station and Kimberly College.

4.6 Bedford Route Section (Question 12)

4.6.1 Bedford St Johns – realignment of the railway and relocation of St Johns station plus associated changes to car parking

The consultation sets out proposals to realign the railway in the vicinity of St Johns station. The reason for the realignment is to allow an increase in the maximum speed of trains (from 15mph to 40mph) and to allow the enlargement of St Johns station which is currently located on a very short section of straight track between two tight curves. As part of these proposals, the currently single-track railway in this area will benefit from the addition of a second track. The realignment utilises a short section of the former Bedford – Hitchin railway alignment that is currently used for car parking.

A consequence of the realignment is that Bedford St Johns station would be moved around 110m to the west, bringing it closer to Bedford Hospital. The relocated station would have two platforms, and a station building is shown on plans in the Consultation and Technical Reports. The building is shown on the opposite side of the railway to the hospital and no indication is given on what provision would be made for pedestrian access from the building to the hospital. The reasoning for placing the building remote from the hospital is unclear and the decision to do so is surprising given that the consultation mentions the benefits of the station facilitating access to the hospital. Hospital visitors would clearly benefit from the station building being placed on the same side of the line as the hospital.

The Technical Report states that vehicular access to the station would be taken from Melbourne Street. There are no detailed plans showing how this access would be arranged but it seems likely that it would pass through the current Melbourne Street car park, which is shown as being included within the draft Order Limits on the Plan & Profile drawings. There is also no detail how interchange with bus services would be achieved. EWR Co should be asked to consider rearranging the station site to place the building on the opposite side of the line and to provide access from the Britannia Road direction. Bus interchange could then be provided using the existing bus stop and associated layby on Britannia Road.

The realignment of the railway would require the permanent acquisition of the majority of the current Britannia Road car park, which caters for hospital staff and visitors. To compensate for the lost parking, a new multi-storey car park (up to 9 storeys high) would be provided on part of the existing Britannia Road car park that is not required for the realigned railway. It is proposed that the car park would be for both hospital and railway users. The operation of this car park would need to be carefully managed to ensure that adequate space is available for both groups of users and charges would need to be set that are

appropriate to both types of use. The construction of new car park and the realigned railway would need to be phased in a way that ensures that adequate numbers of parking spaces remain available for hospital users at all stages of the works.

In connection with proposals to electrify the railway, the consultation materials state that the existing bridge carrying Ampthill Road over the former Hitchin alignment and the existing bridge carrying Cauldwell Street over the current MVL railway alignment might have to be reconstructed to provide additional clearance for electrification equipment. The consultation also proposes the lowering of the railway by up to 1m beneath the two bridges. Neither of these proposals is confirmed as being required and both measures are subject to further consideration of which sections of the railway would be fitted with overhead electrification, more detailed surveys of the existing clearances and further design work to determine whether the works can be avoided. The reconstruction of the two bridges has the potential to cause significant traffic disruption and the works, if undertaken, would need careful phasing to ensure impacts are minimised as far as possible.

The reconstruction of Cauldwell Street bridge is noted as having an impact on the adjacent road junctions (with Britannia Road, Prebend Street and Cauldwell Close) due to the need to raise the highway over the bridge by up to 2m. The proposals include a temporary diversion of Prebend Street through land currently used as car parking for Borough Hall but there is no description of how the loss of parking would be mitigated. The works would also result in the permanent closure of the junction of Cauldwell Street and Cauldwell Close. This road is a no through road that provides the sole means of vehicular access to two businesses – a garage and tool and plant hire business. The proposals include the formation of a new access to Cauldwell Close from Holme Street, a relatively narrow residential street that does not appear well suited to the type and volume of traffic that would potentially use it. The existing care home located on the corner of Britannia Road and Cauldwell Street would be acquired and demolished in connection with the works if the bridge raising goes ahead.

The lowering of the railway, if carried out, would increase its vulnerability to flooding given its proximity to the River Great Ouse and the fact that lowering would make the resulting shallow cutting a low point in the locality. If this proposal is taken forward, it will be essential for suitable flood prevention and mitigation measures to be incorporated into the design.

The works in this area deliver a number of benefits. As well as allowing the double-tracking of the railway (which facilitates the operation of more frequent and more reliable train services), Bedford St Johns station would be moved closer to the hospital and the new station would be of a much better standard than the current very basic one. The realignment of the railway and the concentration of car parking into a multi-storey car park frees up a large area of land, extending southeast from Cauldwell Street. When combined with the adjoining former railway lands associated with the original Bedford St Johns station, this represents a significant opportunity for alternative uses.

However, the works associated with the provision of overhead electrification is likely to lead to significant disruption during construction. Given the scale of likely disruption, EWR Co should be encouraged to find alternatives that do not entail the reconstruction of Ampthill Road and Cauldwell Street bridges. The works could potentially be avoided by not equipping this section of line with overhead electrification equipment (and using hybrid trains in battery mode through this part of the route) or by investigating the use of reduced clearances (together with any necessary mitigation measures to ensure safe operation of the electrification equipment).

Other construction activities associated with the works in this area will also require careful planning to minimise the impact of construction traffic on town centre roads.

4.6.2 Relocation of Jowett Sidings to Cauldwell Walk

The provision of a two-track approach to the proposed new EWR platforms at Bedford station necessitates the removal of five existing sidings (known as Jowett Sidings) that are used to stable (i.e. store) Thameslink trains that are not required for service outside of peak periods. EWR Co is proposing to provide replacement sidings adjacent to the existing Thameslink maintenance depot located adjacent to the Midland Main Line near Cauldwell Walk.

Rail access to the replacement sidings would be provided from the Midland Main Line slow lines at the north end of the site. The sidings would occupy the area between the Midland Main Line and Thameslink depot that is currently occupied by Cauldwell Walk and the business premises that are accessed from Cauldwell Walk. As such, the proposals would necessitate the acquisition and demolition of the business premises and stopping up of Cauldwell Walk.

The proposed location for the replacement sidings is a logical choice as it avoids the use of a green field site and retains the sidings in close proximity to Bedford station to meet operational needs. Placing the sidings next to the existing facility concentrates activity onto one site, which would bring a degree of operational efficiency. The creation of a new connection from the Midland Main Line into the replacement sidings would involve track and signalling alterations, the implementation of which would cause disruption to the Midland Main Line. These works would need to be carefully planned to minimise disruption to rail users.

4.6.3 Bedford station

The consultation materials set out revised proposals for the redevelopment of Bedford station. Under the latest proposals, the existing station buildings would be demolished to make way for two new EWR platforms (reduced from three in the 2021 NSC) on the east side of the station and the extension and widening of the current platform 1A to provide an additional platform for Thameslink services.

The reduction in the number of platforms, together with a move away from straight platforms to curved platforms (approximately following the alignment of the existing platforms) has reduced the need to acquire adjacent properties – now, just one property is impacted with the loss of a parking area. While this approach has benefits in terms of impacts on adjacent properties, it would slightly worsen the interface between trains and the new platforms resulting in a modest increase in stepping distances for passengers boarding and alighting from trains compared to the previous proposals.

The Technical Report notes that the length of the EWR platforms would be 202m. It states that, normally, only 106m of the platform would be used and the additional length is required "to ensure that in scenarios where services are disrupted, trains can be split and joined". It is not clear from the information provided how the length of 202m has been arrived at although it is likely to represent the length of two 4-car trains plus additional length as mandated by standards (to allow for inaccurate stopping of trains). What is also not clear is what scenario would result in the need to couple two EWR trains as the majority of EWR stations would not be able to accommodate the resulting 8-car formation. Regardless of whether the additional platform length is provided at this stage, it would be sensible to configure the station and track layout to provide the space for 8-car platforms to allow for future train lengthening if required. (This should also be considered at other stations on the route, such as the relocated Stewartby station and Bedford St Johns).

The reduction in the number of platforms needed at Bedford is attributed to the decision to extend to Stewartby the two trains per hour from Cambridge that were previously proposed to terminate at Bedford.

What is not clear from the details provided is how the reversal of the one train per hour "all stations" service from Bletchley to Bedford that is proposed as part of MVL Concept 1a would be accommodated.

The extension of Platform 1a to create an additional Thameslink platform is described as being necessary to improve the performance of Thameslink services. Although not explicitly described as such, it appears provide a replacement for the siding to the north of Bedford station that is currently used by some Thameslink trains to free up platform capacity in the station. This siding would be removed to make way for the new EWR tracks leading north from the new platforms. The existing platform 1a isn't currently accessible from the London direction (it can only be accessed from the MVL or the sidings south of the station). No details are provided of how the necessary connection to allow use by Thameslink trains would be achieved but it is apparent that creation of such a connection could impact the track and signalling layout to the south of the station, potentially resulting in the need for alterations to the connections to Bedford Carriage Sidings. (Bedford Carriage Sidings are separate from Jowett Sidings and are not impacted by the proposed new tracks connecting the MVL to the new platforms at Bedford station).

To create adequate space for the new platforms and associated tracks, the existing station building, forecourt and much of the at-grade station parking together with Bedford Borough Council's Ashburnham Road car park would be removed. Replacement parking would be provided in a multi-storey car park located between the railway and Ashburnham Road. This would be up to eight storeys high. Part of the existing at-grade parking at the northern (Bromham Road) end of the site would be retained, although the documents note that the option of a further multi-storey car park on this area is being considered. This would reduce the number of storeys required in the car park fronting Ashburnham Road. Without this reduction in height, the car park could have an adverse visual impact on Ashburnham Road and could be an overly dominant feature in a street that is otherwise mostly fronted by residential properties.

The proposals include three station footbridges – one main bridge and two emergency egress bridges. The bridge located at the southern end of the station appears to be well located to facilitate the provision of a new access to the station from the west side of the railway (although such an access is not included in the current proposals). In the absence of a detailed justification for the provision of thee bridges, this level of provision seems excessive.

The diagrams and visualisations included in the documentation indicate a new station building extending from a point near Ford End Road bridge to the site of the current building. This building would be very long and thin and, in the absence of any indication of the proposed internal layout, it is difficult to understand how this building would function. Mention is made of the ticket gates being located on the main footbridge and one of the visualisations in the Technical Report appears to show retail / food and beverage outlets occupying the lower floor of the building with tables and seating on the paved area in front. It is therefore possible that the intention is to place the main station facilities on the bridge. However, the limited depth between the public realm and the platforms means it would be difficult to accommodate all the necessary facilities.

A "station plaza" is also shown at the southern (Ford End Road) end of the site. This is described as providing for pedestrians, cyclists, buses and taxis. Provision of such a facility in this location would provide a more logical transition between the town centre and the station. However, the consultation materials do not include any layout details, and it is difficult to understand how these multiple and potentially conflicting uses would all be accommodated in the relatively small area indicated. The layout of this area would need to be kept under review as the proposals develop to ensure the final layout appropriately meets the needs of all users.

During the construction phase, a temporary station car park is proposed on the west side of the railway, accessed via a new junction on Ford End Road. This proposal would place additional pressure on the junction of Ford End Road, Midland Road and Prebend Street, which could exacerbate existing congestion that occurs on the approaches to this junction. The walking distance from the temporary car park site to the existing station building would be around 650m, around double the maximum walking distance from the extremities of the existing station car park. Consideration will need to be given to potential impacts on those with mobility difficulties, heavy luggage and young children and whether suitable mitigations can be provided. One potential solution would be to provide, at an early stage in the redevelopment, an additional entrance to the station from the west side of the railway, aligning with the proposed southern footbridge. This would reduce the walking distance from the temporary car park to under 200m.

The Technical Report also highlights the potential need for the partial reconstruction of Ford End Road bridge to provide clearances for overhead electrification of the new EWR tracks. If this work is shown to be necessary, it would restrict access to the temporary car park site. The necessary works to and around the station would therefore need to be carefully co-ordinated to ensure that the station is able to continue to operate throughout the construction period.

4.6.4 North of Bedford station – construction of two additional tracks

Proposals for the section of the route to the north of Bedford station, along the Midland Main Line corridor remain largely unchanged from proposals previously published in the 2021 non-statutory consultation and the 2023 RUA. Two additional tracks, for the use of EWR services, are proposed on the east side of the existing railway corridor. The provision of these additional tracks continues to require the demolition of (primarily) residential properties adjoining the railway. The number of residential properties to be demolished remains unchanged from the figure reported in the 2023 RUA (37). Further development of the proposals has resulted in an increase (from the 2023 numbers) of the number of properties from which land would be acquired from 28 to 37.

In January 2024, SLC Rail produced a report for Bedford Borough Council which included a review of the justification for the provision of two additional tracks in this corridor. The Technical Report acknowledges the SLC Rail report (in section 10.4) but restates the need for additional tracks without addressing any of the points raised in the report. Nothing in the latest consultation material changes the conclusions of that report.

The two additional tracks proposed by EWR Co would provide additional capacity and flexibility in constructing future EWR timetables. They would also reduce conflicts between EWR and other services through Bedford and would therefore contribute to delivering higher levels of operational performance reducing the opportunities for delays to propagated and spread between the MML and EWR routes. However, the magnitude of performance benefit needs to be weighed against the substantial impacts caused by the construction of the additional tracks. The magnitude of benefit has not yet been quantified by EWR Co making it difficult to determine whether the additional tracks can be considered to be essential rather than just desirable and whether the impacts can reasonably be justified.

The January 2024 SLC Rail report discusses how the highly constrained pathing of freight services south of Bedford is a key issue and how this would impact the interaction of freight services and EWR passenger services on a four-track layout north of Bedford station. The report discusses how the provision of the long-mooted platform 5 on the west side of the station and the extension of platform 1a on the east side (to create what has been termed “platform 0”) would potentially allow platform 3 to be used to hold freight trains clear of both Thameslink services and EWR services. This would create the necessary “firebreak” that

would improve timetable flexibility and reduce performance impacts arising from the interaction of freight and EWR services. The provision of platform 5 is also mentioned in Network Rail's "Bedford Area Strategic Advice" (published in 2022), which recommends that provision of the platform as part of the East West Rail works is considered further. Further work is required to demonstrate whether the works to provide platforms 0 and 5 would provide enough additional capacity to facilitate operating EWR services on the existing tracks north of Bedford while maintaining acceptable levels of performance.

Should it be shown that this solution does not provide the required capacity, alternative reconfigurations of the track layout through the station area might now be possible. The latest EWR proposals see a reduction in the number of platforms required for EWR services. This means that, within the footprint of Bedford station envisaged in the 2021 NSC, there is now additional space available that could be used for reconfiguring the layout of the non-EWR part of the station, such as by providing another additional platform to the east of the extended platform 1a. A more detailed engineering and timetabling study would be required to determine whether, within the space potentially available, it is possible to reconfigure the platform and track layout to provide the necessary track capacity. Such a reconfiguration could be complex given the constraints imposed by Ford End Road bridge, the existing configuration of tracks and sidings to the south thereof and the length of track required to accommodate a full-length freight train.

If it were possible to demonstrate that EWR services could be operated (without unacceptable impacts on existing services) using the existing Midland Main Line tracks north of Bedford station, not only would the impacts on residential properties be avoided but it is likely that the need to alter Bromham Road bridge could also be avoided. This would avoid disruption to pedestrians and road traffic in the area resulting from the necessary temporary closure of Bromham Road.

The Consultation Report notes that a five-track layout (i.e. one additional track for EWR) has been considered but rejected and states that "it would require a similar amount of land" to the six-track proposal. If it were shown to be viable, such an option could reasonably be expected to reduce the width of the strip of land required by almost 3.5m. Again, a detailed timetabling and performance study would be required to determine whether a five-track layout could deliver adequate capacity and adequate levels of operational performance, either on its own or in combination with layout changes at Bedford station.

Given the magnitude of impact that the proposed additional tracks north of Bedford station would have on residential properties, EWR Co should be strongly encouraged to thoroughly investigate all other reasonably practicable options and robustly demonstrate that the additional tracks are the only viable solution.

4.6.5 Construction of a new viaduct over the River Great Ouse and Paula Radcliffe Way

To connect the Midland Main Line corridor to the onward EWR route towards Tempsford and Cambridge, a 1.1km long viaduct is proposed. The viaduct and its approaches cross the A6 (twice), the River Great Ouse (twice), the River Great Ouse flood plain and Clapham Road. A viaduct is proposed instead of a series of discrete bridges connected by embankment to reduce the impact on the flood plain, reduce the amount of compensatory flood storage required and reduce the amount of land to be permanently acquired.

This use of a viaduct appears to be a sensible choice to provide the connection between the two adjoining sections of the route given the nature of the obstacles that need to be crossed. Due to the local topography, the viaduct would become a prominent feature in the local landscape. As such, the design of the viaduct

and any associated mitigation works should aim to soften the appearance and minimise the adverse visual impact of the structure.

Construction of the viaduct would necessitate the diversion of utilities in the vicinity of the new structure. Such diversions are commonplace in large infrastructure projects of this nature and would be arranged with the relevant utility companies. The utility companies will insist on appropriate provisions to ensure that supply to their customers is not impacted by the works.

The construction of the viaduct and its approaches would require temporary closures of The Great Ouse Way, Paula Radcliffe Way and Clapham Road. These closures would need to be carefully coordinated to manage the impact on the road network in this part of Bedford.

4.6.6 Other matters relating to the Bedford route section

4.6.6.1 Road traffic impacts during construction

The nature of the proposed works in the Bedford area would have a significant impact on the local highway network during the construction phase. Numerous roads could be subject to extended period of closure to facilitate bridge reconstruction works. Some of the affected roads already operate at or close to capacity during peak periods and the diversion of traffic onto adjacent routes would increase congestion on those routes, cause delays and inconvenience road users. The resulting disruption has the potential to negatively impact the local economy as a result of people choosing to not to visit Bedford.

The works to Ampthill Road, Cauldwell Street (which also affects other nearby roads) and Ford End Road are associated with the possible provision of overhead electrification on the Bedford – Bletchley section of the railway. The consultation materials note that a decision has not yet been taken as to which parts of the railway would be equipped with overhead electrification and, if this section the route is so equipped, whether the reconstruction of the bridges carrying these three roads over the railway is required. Given the scale of disruption that these reconstructions could potentially cause and the limited options to mitigate this disruption, EWR Co should be strongly encouraged to find alternative solutions that avoid the need for the bridge reconstructions. Such alternative solutions could include not fitting this section of the railway with overhead electrification, using technical solutions that reduce the amount of clearance beneath the bridges or track lowering (to the extent possible within the constraints imposed by other features such as the River Great Ouse bridge).

Given the number of roads that would potentially be affected by road closures and other road works, works would need to be carefully programmed and co-ordinated to ensure that the highway network around Bedford can continue to function.

4.6.6.2 Construction and logistics

Construction activities in the Bedford area would utilise construction compounds at the following locations:

- In the vicinity of St Johns station
- Adjacent to the existing Jowett Sidings (south of Ford End Road)
- Cauldwell Walk
- Multiple sites adjacent to the River Great Ouse Viaduct to the north of Bedford

Detailed construction traffic routes are not set out in the consultation material, but the implication is that the compounds would be supplied by road. Given the location of some of these compounds within the built-up part of Bedford, construction traffic is likely to impact traffic conditions on town centre roads, many of which would be impacted by the proposed temporary road closures. It is not clear from the consultation materials whether consideration has been given to the possibility of making use of the rail network for delivery of materials either from source or from a railhead located outside of Bedford, for example, on the MVL. While such an approach would not eliminate the need for construction traffic to use the highway network, it could potentially reduce the volume of construction traffic on town centre roads.

4.6.6.3 Door-to-door connectivity

The consultation materials contain no detailed proposals in respect of door-to-door connectivity or active travel. Measures should be considered that reduce the need for rail users to drive to Bedford and Bedford St Johns stations. This would reduce road traffic in the town and reduce the amount of parking required at the two stations. The opening of Wixhams station (on the Midland Main Line south of Bedford) and the proposed relocation of Stewartby station provide an opportunity to undertake a wider review of the provision of access to the rail network in the Bedford area for car users.

4.6.6.4 Community benefits and impacts

The proposals would deliver significant improvements to connectivity for Bedford residents and businesses, opening up new journey opportunities including a range of new destinations that could be reached directly and many more that could be reached with a change of train at one of several interchange stations on the route.

However, in this route section especially, this needs to be considered against the negative impacts of the proposed works. The impact on residential property of the proposed additional tracks north of Bedford station has already been mentioned and every effort should be made to find an alternative solution that avoids these impacts.

Although much of this route section is on existing railway corridors, the additional EWR services would result in increased noise impacts. The provision of acoustic fencing (or other suitable forms of mitigation) to reduce the impacts on residential properties and other sensitive receptors should be considered. Detailed noise modelling will need to be undertaken as details of the proposed railway are finalised to determine where mitigation would be required.

The local community would be negatively impacted during the construction as a result of road closures and by noise, dust and vibration from construction activities. Road closures have already been discussed above. Construction activities should be programmed to avoid nighttime and weekend working except where absolutely necessary and, where necessary, measures to reduce noise, dust and vibration should be implemented.

4.6.6.5 Land and property requirements

The impact on residential property of the additional tracks north of Bedford is discussed in preceding sections of this report. Beyond these impacts, the land and property requirements described in the consultation materials appear broadly reasonable for the scale and nature of works proposed.

4.7 Clapham Green to Colesden (Question 13)

4.7.1 Diversions of roads, tracks and paths that cross the new railway

The proposed new section of railway between the Clapham Green and Colesden areas would intersect with numerous roads and public rights of way. The consultation materials set out a range of measures to maintain connectivity across the railway. These include right of way diversions and new bridges to allow rights of way to pass over or under the railway.

The consultation materials do not include any details of usage surveys for any of the affected rights of way, making it difficult to determine the scale of impact resulting from the individual proposals. Rural public rights of way often have very low levels of use and, if that is the case for the public rights of way on this section of route then the proposals appear broadly acceptable. If some of the affected public rights of way are more heavily used than others, it might be necessary to consider revising the proposals to rebalance mitigation works to favour those more heavily used routes over those with lower levels of use.

Some of the proposed right of way diversions involve routing users along sections of public highway. The highways concerned do not presently have footways or segregated facilities for cyclists or horse riders and the consultation materials do not appear to propose the provision of these as part of the scheme. This potentially places diverted users at risk from road vehicles. Suitable mitigation proposals would need to be put in place as the scheme detail is developed further. Diversion of a rural public right of way along a public highway would result in a change in the character of the right of way and, depending on the purposes for which the current routes are used, could lead to a change in levels of use due to potential users not wanting to walk (or ride) alongside road traffic.

4.7.2 Passing loops near Colesden

Passing loops are proposed to allow passenger trains to overtake freight services. The locations where passing loops are required are determined from operational requirements derived from the structure of the train service timetable. The Technical Report notes that loop locations have been selected from analysis of the timetable. However, no timetable details are provided within the consultation materials meaning it is not possible to determine whether the loops are necessary or whether their proposed locations are appropriate.

The location proposed for the passing loops does not appear to lead to additional impacts beyond the additional land take required to accommodate the additional width of the railway formation required for the loops.

4.7.3 Community benefits and impacts

Community impacts would be most directly felt through the construction period, during which time there would be short-term localised increases in traffic (particularly HGVs), noise, vibration and potentially dust. The construction activities would also have short-term visual impacts. Mitigation measures can be used to lessen the impact of construction activities. These include temporary noise barriers, dust suppression measures and considerate use and positioning of temporary lighting to limit light pollution.

Once the railway is complete and is operation, there would be on-going noise and visual impacts. However, mitigation measures (such as noise barrier close to sensitive receptors and planting / landscaping alongside the railway corridor) would reduce these impacts.

The benefits of the scheme would be from the improved public transport connectivity that the scheme creates, with new journey opportunities available from Bedford and Tempsford.

4.7.4 Land and property requirements

The land and property requirements indicated on the draft plans show multiple large construction and logistics sites. The amount of land required seems slightly higher than might be expected for a scheme of this nature. It is possible that as the scheme design and construction methodology develop further, there will be scope to reduce the amount of land required for this temporary purpose.

The majority of the land required, either temporarily or permanently, for the scheme is agricultural. The Environmental Report states that areas of garden land would be taken from four residential properties on Ravensden Road and Colesden Road. From examination of the Plan & Profile drawings, it appears that the Ravensden Road land is required to form a balancing pond and for habitat creation. The balancing pond appears to be cut into the proposed new railway embankment that would otherwise be located on the garden land. It is not clear whether the balancing pond and new habitat could be located on alternative land, avoiding the impact on residential properties. It is not apparent from the consultation materials why the land associated with the Colesden Road property is required.

4.7.5 Environmental and sustainability

The Environmental Update Report describes, at a high level, baseline conditions and states that appropriate mitigation measures will be developed. As a result of the rural nature of this section of the route, the biggest impacts are expected to be noise and visual impacts. The extent of visual impact will be reduced by the rolling nature of the landscape on much of this route section. New blocks of woodland and other planting are proposed to further mitigate potential visual impacts. Over time, it is to be expected that embankment and cutting slopes would take on a more natural appearance as vegetation becomes established. A range of measures are commonly employed to accelerate this process of “re-greening”.

Noise modelling work will be undertaken to determine where acoustic fencing and bunding would be required to reduce noise impacts to acceptable levels.

The Environmental Update Report notes an absence of designated sites (both statutory and non-statutory) on this route section, although four county wildlife sites are stated to be located adjacent to the project. Several ponds are within the boundaries of the project and these have the potential to support a variety of species. The open countryside through which the project passes provides suitable habitat for a variety of species of mammal and bird. It is apparent that further work is required to determine the presence of protected species and the mitigation measures that might be required in consequence. This is not unusual at this stage in a project and more details will be determined as part of the Environmental Impact Assessment that will be undertaken.

4.7.6 Construction and logistics

As noted above, the quantity of land shown on the Plan & Profile drawings as being required for construction and logistics sites appears higher than expected, although this could be related to the extensive nature of the earthworks on this section of route and the need to stockpile excavated and imported materials prior to their incorporation into the new embankments. Haul roads within the Order Limits are proposed on this section of route. These would reduce the volume of construction traffic using local roads. However, the

main compound sites would need to be accessed from the public highway network. The prosed construction traffic routes have not yet been confirmed.

4.7.7 Traffic and transport

The report provides high-level baseline information together with limited estimates of the impact of the scheme on highway traffic. The report notes that a limited number of roads are expected to operate at levels approaching or exceeding theoretical capacity in 2032 due to construction traffic. However, limited weight can be attached to these preliminary findings as construction traffic routes have not yet been defined.

4.7.8 Door-to-Door Connectivity and Active Travel

In common with other route sections, few details are provided on door-to-door connectivity and active travel proposals. The rural nature of this route section means that public and active travel options for travel from villages to the stations Bedford and Tempsford are currently extremely limited. As the scheme develops, consideration should be given to measures that could improve this situation. However, it is possible that the relatively low population in most of this route section and the distance involved in travelling to the nearest stations limit the opportunities to provide suitable new facilities in a cost-effective way.

4.8 Tempsford Alignment Preference (Question 14a)

The consultation sets out proposals for two potential alignments for the railway in the Tempsford area. These are referred to as Alignment 1b (which runs to the south of the Black Cat interchange) and Alignment 1c (which runs to the north of the Black Cat interchange). Both alignments are evolutions of the Alignment 1 (Tempsford Variant) that was presented in the 2023 RUA and which is now referred to as Alignment 1a.

Both alignments entail the construction of significant viaduct structures to carry the new railway over major roads, the East Coast Main Line Railway, the River Great Ouse and the floodplain associated with the river. Both options incorporate a new station that would serve both the EWR route and the existing East Coast Main Line and allow interchange between the two routes.

The total length of viaduct on Alignment 1b would be around 4km (two structures 1.6km and 2.4km long) whereas that on Alignment 1c would be shorter at 2.3km (two structures 1.6km and 0.7km long). The maximum height of the railway on Alignment 1b would higher than for Alignment 1c. This is because Alignment 1b needs to cross the new A421 dual carriageway currently under and this section of road is itself elevated above ground level on an embankment. This could mean that Alignment 1b would be likely to have a greater visual impact than Alignment 1c.

The Technical Report notes that for both alignments, Tempsford station would be towards the north of the area proposed for development at Tempsford. However, as Alignment 1b is slightly further south than 1c, it would be marginally better located in relation to the proposed development.

From a railway operations perspective, the two alignment options are similar. The most notable difference is the slightly steeper gradients on Alignment 1b, although the gradients remain acceptable. According to the Technical Report, the Tempsford station on Alignment 1b would facilitate easier interchange between EWR and East Coast Main Line platforms (due to the additional height of Alignment 1b allowing a mezzanine level for passenger interchange to be created between the two railways). The Technical Report also notes

that the Alignment 1b station offers the option to have platforms added on the East Coast Main Line fast lines at a later date – this is stated to be more difficult to achieve at the Alignment 1c station.

On the basis of the information reviewed, there are advantages and disadvantages with both alignment options. Alignment 1b appears to offer the opportunity to create a marginally better Tempsford station, with easier interchange and the option of providing fast line platforms on the East Coast Main Line in future.

4.9 Roxton to east of St Neots (Question 15)

4.9.1 Temporary rail logistics hub

Provision of a rail logistics hub has the potential to reduce the volume of construction-related road traffic associated with delivery of the scheme. Two options are presented, Options B and F. Option B is located to the east of the East Coast Main Line whereas Option F is located further south and to the west of the East Coast Main Line. These options have been selected from a longlist of six potential sites.

Of the two options put forward, Option B is the only option that is compatible with both Tempsford route alignment options. Option B allows tracklaying works to proceed eastwards from the hub ahead of completion of the Tempsford viaduct structures. Option F is located between two new viaduct structures and as such is dependent on the completion of the viaducts before tracklaying in either direction can commence.

For both sites, the connections to and from the East Coast Main Line incorporate very tight curves (with radii in the region of 200m). This would severely limit the speed with which trains enter and leave the site with the result that they would consume more capacity on the East Coast Main Line than would be the case if higher curve radii were used. Within the Option F site, it appears that the sidings would also be tightly curved. This is not ideal, especially for trains that will be carrying long lengths of rail. The straighter sidings in Option B are preferrable.

The consultation materials state that it is only intended to be used towards the end of the construction programme, in connection with rail systems work (such as track laying). EWR Co should be encouraged to make greater use of the hub during earlier stages of the works, especially given the cost and potential disruption (to East Coast Main Line passengers) resulting from its construction and decommissioning.

Consideration should also be given to the provision of further hubs in the Bedford and Shelford areas as this would increase resilience and potentially reduce the construction programme by supporting simultaneous works on multiple workfaces.

4.9.2 Community benefits and impacts

Community benefits and impacts would be similar to those described for the previous route sections. Visual impacts would be greater on this route section due to the height and length of the viaduct structures proposed near Tempsford. As there is already a proliferation of road and rail infrastructure in this area, the new railway would be less conspicuous than might be the case were the same structures placed in an area with a more natural landscape. However, steps should be taken to reduce the visual impact of the railway through careful design, screening (where possible) and measures to reduce light pollution from the new Tempsford station and associated car parking. This is particularly relevant for the EWR platforms, which would be elevated a considerable height above ground level.

4.9.3 Land and property requirements

A greater amount of land appears to be required for Alignment 1c than for Alignment 1b. This is due to a greater proportion of Alignment 1b being on viaduct and less on embankment. However, the Environmental report notes that Alignment 1b requires the acquisition of four residential properties and four business premises. Alignment 1c requires the acquisition of two residential properties.

4.9.4 Environmental and sustainability

This route section crosses the River Great Ouse and its flood plain as well as other watercourses. Appropriate measures will need to be incorporated into construction methodologies to reduce and avoid the risk of impacts to ecology and water quality.

The Environmental Update Report notes the presence of barbastelle bats near the route of the railway. Further work is required to understand the potential impacts of the railway on these bats and to develop any mitigation measures that may be required. This issue will need to be kept under review as the scheme proposals are further developed.

4.9.5 Traffic and transport

The Transport Update Report notes that construction traffic associated with the scheme could cause several roads to operate at or close to capacity. The roads affected are:

- Bedford Road and Roxton Road at Roxton
- Chawston Lane at Chawston
- The A428 at Eaton Socon
- Link between A1 and A428 at Eaton Socon
- The B1046 at Eynesbury
- Barford Road at Eynesbury.

As the construction methodology is developed further, options to mitigate or avoid these impacts will need to be devised. Options could include restricting construction traffic to off-peak times.

4.9.6 Door to Door Connectivity and Active Travel

In common with the proposals for other route sections, no specific proposals are presented for this route section. Careful consideration will need to be given to opportunities to encourage the use of public transport and active travel modes to reach the new Tempsford station. Measures that could be considered include the creation of an active travel corridor alongside railway to link the station to nearby areas of proposed development.

4.10 Route-wide matters (Question 22)

4.10.1 General points

Many of subjects that can be considered to be route-wide matters have either been discussed in relation to individual route sections in preceding sections of this report or the material presented in this consultation is

not sufficiently developed to allow informed comment. However, comments are presented below on some route-wide issues.

4.10.2 Train Services

The proposed new passenger services set out in the consultation materials would provide new journey opportunities and improve the connectivity of Bedford and the surrounding areas. However, the services proposed do not include direct services to Milton Keynes Central. Such a service would link Bedford and surrounding areas more easily to the employment, education and leisure opportunities in the city centre as well as providing direct interchange with intercity services operating on the West Coast Main Line (which do not call at Bletchley).

The provision of a direct service would either require additional infrastructure to allow trains to proceed directly from the MVL onto the West Coast Main Line towards Milton Keynes or would require trains to reverse at Bletchley station. This service could be created as an extension of the hourly Cambridge – Bletchley service proposed as part of service Concept 2. The West Coast Main Line is currently heavily utilised and opportunities to path this service between Bletchley and Milton Keynes Central are likely to be limited. However, the opening of HS2 will result in significant changes to the structure of the timetable on the West Coast Main Line which might provide additional pathing opportunities.

The consultation materials do not clearly explain the services that would operate on the Marston Vale Line at Connection Stage 2. It is stated that an additional service would operate each hour between Oxford and Bedford in Connection Stage 2, but the documents do not explain which stations of the Marston Vale Line the additional service would call at. It is also of note that the Connection Stage 2 services are now proposed to commence ahead of the major works necessary for Connection Stage 3 on the MVL being undertaken. In the 2021 NSC, the upgrade of the MVL was to be completed ahead of the commencement of additional services. By commencing the new services ahead of the works, the new services would be subject to potentially significant disruption during the early years of operation.

4.10.3 Approach to works on the Marston Vale Line

The 2021 NSC considered the option of undertaking works on the MVL during an extended closure of the line. With the reduction in the overall scope of works on this route section, the option of an extended closure appears to have been dropped. However, the works in the Fenny Stratford and Bedford areas would be disruptive and, in the absence of an extended closure, would require numerous separate possessions and potentially additional nighttime and weekend working. The services introduced at Connection Stage 2, together with the existing services on the Marston Vale Line would be disrupted by these works.

The opportunity of utilising an extended closure of the route should be reconsidered as it would potentially reduce the programme duration for the MVL works and reduce the impacts of nighttime and weekend working on local residents.

Consideration should also be given to accelerating the MVL works through the use of alternative consenting mechanisms for the works on this section of the route. This would de-link the consent for the MVL works from the consent from the main construction activity to the east of Bedford and might allow the earlier introduction of enhanced services between Bedford and Oxford, beyond those now proposed to be introduced at Connection Stage 2. This would potentially deliver greater benefits to the Bedford area at an earlier date and ease the programming of road closures by allowing an earlier start on works to the south of Bedford station.

4.10.4 Powering the trains

The consultation contemplates either the full electrification of the railway between Oxford and Cambridge or the use of discontinuous electrification in combination with hybrid battery-electric trains. The latter option would reduce the need for existing bridge structures over the railway to be reconstructed to provide clearance for overhead electrification equipment. This is particularly relevant in Bedford where several structures have been identified as potentially requiring reconstruction to facilitate electrification. Any consideration of discontinuous electrification should focus on avoiding as many as possible of the bridge reconstructions in the Bedford area as this would avoid significant disruption during the construction phase and could shorten the programme for delivery of the railway through Bedford.

The consultation materials state that EWR Co's working assumption is that, if it is retained (as per Concept 1a), the existing MVL stopping service would continue to utilise diesel-powered traction. The reasoning for this assumption is not fully explained but it is likely that it relates to EWR Co's intention to procure 4-car trains for the new EWR services which could not be fully accommodated at the many of the existing MVL station platforms (which are only suitable for use by 2-car trains). Given that the existing MVL rolling stock is already circa 40 years old and is likely to require replacement within the next five to 10 years, it is surprising that a solution (comprising either an infrastructure solution or operating controls to allow the use of longer trains) is not being considered as part of the EWR project.

4.10.5 Rolling stock stabling and maintenance locations

Detailed proposals for new rolling stock stabling and maintenance facilities have not been presented as part of this consultation. However, the Technical Report includes an indication of locations that are being considered for such facilities. The provision of these facilities can bring new employment opportunities for the area where they are located. However, these facilities need to operate round the clock and can be a source of disturbance to local residents, especially during the night. The development of proposals for new facilities should therefore focus on locations that are less likely to impact local residents and suitable mitigation measures should be incorporated within the proposed facilities.

4.10.6 Construction traffic impacts

The recently completed works on Connection Stage 1 of the East West Rail project and the ongoing works on HS2 have resulted in significant construction traffic impacts within Buckinghamshire. A range of lessons have been learned from the experience of Buckinghamshire Council in dealing with these impacts. EWR Co should engage with Buckinghamshire Council and take account of the lessons learned when planning construction logistics for future stages of the EWR scheme.

4.10.7 Homes, land and property

The construction of a new railway and its associated facilities cannot be undertaken without impacts on land and property. The specific requirements of a railway (especially in terms of gradients and curvature) can restrict the ability of a new railway to avoid impacts on specific properties. However, regard should be paid to the specific impacts arising from the need to acquire residential properties. Because of the impacts such acquisitions can have on individuals, families and the wider community, additional effort should be devoted to finding solutions that remove the need to acquire people's homes.

This is particularly relevant to the Bedford area where a significant number of properties are currently proposed to be acquired and demolished. As highlighted in preceding sections of this document, the

options for avoiding these demolitions have not yet been exhaustively explored and further work should be undertaken to test whether options to provide additional track capacity to hold freight services in the Bedford station area are (a) feasible and (b) provide adequate timetable flexibility and performance robustness to remove the need for the currently-proposed additional two tracks north of Bedford station.

5 Review of Bedford Borough Council's Response to the 2021 Non-Statutory Consultation

Having reviewed the response by BBC to the 2021 Non-Statutory Consultation, it appears that the position set out in that response will not be materially altered by the proposals set out in the current consultation. It should, however, be noted that evolution and refinement of the proposals since 2021 means that some of the specific matters covered in the 2021 response (including elements of the response relating to level crossing proposals and to now-discounted alignment options east of Bedford) are not relevant to the current proposals.

Appendix 1 – Consultation Questions

Bedford Borough Council asked SLC Rail to provide technical commentary to support their response to the following consultation questions posed by EWR Co.:

7a. Please tell us which of the options for the Marston Vale Line stations you prefer:

- Existing Stations Option (Concept 1a)
- Consolidated Stations Option (Concept 2)
- No preference
- Other

9a. Please tell us your preference for the proposed location of Stewartby station:

- Option 1: move the station slightly north of its current location
- Option 2: move the station to the north of Broadmead Road
- No preference
- Other

10. Please use the boxes below to provide any comments you have on our proposals for level crossings along the Marston Vale Line, including proposed diversion routes. Please leave the boxes blank if you do not have any comments.

- **Green Lane** - Retain as a CCTV crossing.
- **Stewartby Brickworks** - Close with no replacement.
- **Wootton Broadmead** (Broadmead Road) - Retain as a CCTV crossing.
- **Wootton Village** - Close and divert to Kempston Hardwick crossing.
- **Kempston Hardwick (Manor Road)** - Assumed to be closed by Network Rail with new overbridge. If not closed, would be upgraded to full barrier crossing.
- **Woburn Road** - Assumed to be closed by Network Rail with new footbridge. If not closed, would be upgraded to miniature stop light crossing.

11. Please provide any comments you have about our proposals in the Fenny Stratford to Kempston route section. Your comments can include topics such as:

- Passing loops between Ridgmont and Stewartby.
- Community benefits and impacts.
- Land and property requirements.
- Environmental and sustainability (refer to the Environmental Update Report).
- Construction and logistics.
- Traffic and transport (refer to the Transport Update Report).
- Door to Door Connectivity and Active Travel.

12. Please provide any comments you have about our proposals in the Bedford route section. Your comments can include topics such as:

South Bedford and Bedford St Johns

- The relocation of Bedford St Johns station to the site of what is currently the Britannia Road car park, between Ampthill Road and Cauldwell Street.

- A new multi-storey car park to the west of the railway, to replace lost parking at the Britannia Road car park.
- Building a new two-track railway to the north of Sandhurst Road that would replace the existing single track Marston Vale Line into Bedford station.
- The relocation of Jowett Sidings to Cauldwell Walk

Bedford Midland

- The redevelopment of Bedford station.
- New and improved parking facilities at Bedford station, including a multi-storey car park on Ashburnham Road on the site of the current station car park.

North of Bedford

- Construction of two new tracks, continuing alongside the four-track Midland Main Line as it passes the Poets area.
- Construction of a new 1.1km (0.68 miles) long viaduct over the River Great Ouse and Paula Radcliffe Way.
- Diverting some utilities, including overhead power lines to avoid the new viaduct.

Other works in Bedford

- Works to roads in the area to enable the railway to be built and operated, including the potential realignment of Ampthill Road, Cauldwell Street and Ford End Road, and realignment of Bromham Road and A6 Great Ouse Way.

General

- Community benefits and impacts.
- Land and property requirements.
- Environmental and sustainability (refer to the Environmental Update Report).
- Construction and logistics.
- Traffic and transport (refer to the Transport Update Report).
- Door to Door Connectivity and Active Travel.

13. Please provide any comments you have about our proposals in the Clapham Green to Colesden route section. Your comments can include topics such as:

- Diversions of roads, tracks and paths that cross the new railway.
- Installation of two passing loops near Colesden.
- Community benefits and impacts.
- Land and property requirements.
- Environmental and sustainability (refer to the Environmental Update Report).
- Construction and logistics.
- Traffic and transport (refer to the Transport Update Report).
- Door to Door Connectivity and Active Travel.

14a. Please tell us your preference for the Tempsford alignment:

- Alignment 1b: south of the Black Cat roundabout
- Alignment 1c: north of Black Cat roundabout
- No preference
- Other

15. Please provide any comments you have about our proposals in the Roxton to east of St Neots route section. Your comments can include topics such as:

- A temporary rail logistics hub located on the East Coast Main Line which would enable construction materials to be transported by rail.
- Community benefits and impacts.
- Land and property requirements.
- Environmental and sustainability (refer to the Environmental Update Report).
- Construction and logistics.
- Traffic and transport (refer to the Transport Update Report).
- Door to Door Connectivity and Active Travel.

22. Please provide any comments you have in relation to these route-wide matters:

Operating the railway

- Train services
- Powering our trains
- Supplying power to EWR
- Stabling trains and maintaining the railway
- Our approach to freight

Delivering the railway

- Environment and sustainability
- Effects on traffic and transport
- Homes, land and property
- Construction
- Utilities

Bedford Borough Transport Model

East-West Rail Transport Update Report Review

Delivering a better world

Quality Information

Prepared by	Checked by	Approved by
Emily Parr	Ian Stanness	Mark Dazeley
Senior Consultant	Associate Director	Regional Director

Revision History

Revision	Revision date	Details	Authorised	Name	Position
v1.0	2024-12-05	Initial draft for discussion			
v1.1	2024-12-09	Draft for issue	Yes	Mark Dazeley	Regional Director

Prepared by:

Emily Parr
Senior Consultant
T: 01727 530000

AECOM Limited
Marlborough Court
10 Bricket Road
St Albans
Hertfordshire
AL1 3JX

aecom.com

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Section 1 – Overview

1.1 Introduction

1.1.1 East-West Rail Company issued a Transport Update Report to Bedford Borough Council in November 2024 which provides a qualitative overview of the existing and forecast conditions on the transport network, including early consideration of possible impacts of the proposed East-West Rail scheme on the transport network.

1.1.2 East-West Rail is a strategic scheme implementing a new mainline railway between Oxford and Cambridge via Bletchley and Bedford. This is being implemented in three stages:

- **Connection Stage 1:** Oxford to Milton Keynes, with passenger services due to be running from 2025.
- **Connection Stage 2:** Oxford to Bedford, with planning consent granted in 2020 and services due to be running from 2030.
- **Connection Stage 3:** Oxford to Cambridge via Bletchley and Bedford to complete the full East-West Rail scheme which, at the time of writing, requires a Development Consent Order (DCO).

1.1.3 The Transport Update Report (TUR) is a non-statutory document providing *"qualitative analysis of transport impacts […] to provide some early information on the types of transport impacts which could be experienced, where these may be and to inform early thinking on mitigation identification."*[1] The TUR will be superseded by a Transport Assessment which will accompany the DCO application.

1.1.4 Bedford Borough Council has requested a review of this Transport Update Report, including a comparison with the existing forecasts developed using the Bedford Borough Transport Model (BBTM) for the assessment of the new Local Plan. This review is constrained by the information available within the Transport Update Report. No other reporting or evidence have been considered as part of this review.

1.1.5 This review of the Transport Update Report firstly considers a high-level review of the approach and assumptions adopted in producing the analysis contained in the report (see Section 2). The Transport Update Report is not a detailed model development or forecasting report; therefore, this review is high-level in nature, limited to the information available in the Transport Update Report, and highlights areas where the approach adopted is unclear based on the available reporting and areas for possible discussion / clarification with East-West Rail Company.

1.1.6 The analysis of the forecast transport issues and impacts contained within the Transport Update Report is split into eight sections corresponding to sections of the proposed East-West Rail route. These are:

- Oxford to Bletchley;
- Fenny Stratford to Kempston;
- Bedford;
- Clapham Green to Colesden;
- Roxton to east of St Neots;
- Croxton to Toft;
- Comberton to Shelford; and
- Cambridge.

1.1.7 The review of the forecasts presented in the Transport Update Report (detailed in Section 3) focuses on the analysis contained in the sections covering Bedford and Clapham Green to Colesden as these are located within Bedford Borough. Information contained in the sections for Fenny Stratford to Kempston and Roxton to east of St Neots is also considered, focusing on locations of interest to Bedford Borough, such as those within the borough or immediately adjacent to the borough.

1.1.8 The Transport Update Report contains an overview as to how locations requiring mitigation will be identified and how mitigation measures will be developed. This review considers this strategy for the identification and development of mitigation measures (see Section 4).

[1] East-West Rail Transport Update Report, §1.2.1

Section 2 – Approach and Assumption Review

2.1 Introduction

2.1.1 This section reviews the TUR's assumptions and approach to the modelling underpinning the assessment of highway impacts presented in the TUR. The modelling evidence is provided from a strategic highway model, the East-West Rail Strategic Highway Model (or EWRSHM). The EWRSHM will be superseded by a new strategic transport model covering the East-West Rail route, which will form the basis of the analysis for the Transport Assessment.

2.2 East-West Rail Strategic Highway Model

2.2.1 The extent of information in the TUR about the EWRSHM is limited due to the nature of the document and is summarised as follows:

- the EWRSHM considers the Department for Transport's Transport Analysis Guidance (TAG) for calibration, validation, growth, COVID, and uncertainty;
- the model has been calibrated to a 2019 base year, which "*includes a detailed local highway network and model zone system covering the Bedford to Cambridge area and includes a strategic highway network coverage and supporting model zone system detail based on the South East Regional Transport Model [sic] for the rest of the project area of interest.*"[2]; and
- the EWRSHM represents an AM Peak hour, average interpeak hour and PM Peak hour.

2.2.2 The TUR provides no detail on modelling assumptions and methodology, including:

- model zoning system and its development;
- network coverage and its development;
- count coverage and performance against TAG guidelines;
- journey time coverage and performance against TAG guidelines; or
- forecasting approach or assumptions, including:
  - methodology for generating forecasts (e.g. use of a variable demand model);
  - growth assumptions (e.g. TEMPro, approved planning permissions, or Local Plan) and changes in transport provision (e.g. highway schemes) over time, with the TUR stating that the forecasts include "*publicly available data and information for highways, public transport, and walking and cycling*"[3]; and
  - how changes in travel demand during construction or operation were derived.

2.2.3 The Area of Detailed Modelling of the EWRSHM is provided in the TUR and is reproduced in Figure 2.1. This figure shows that the EWRSHM includes a wide Area of Detailed Modelling from St Albans in the south, Oxford in the west, Peterborough in the north, and Bury St Edmunds in the east. Given the extent of the Area of Detailed Modelling, this suggests that there may be a lower level of detail within Bedford Borough and surrounding areas than in a model with a smaller geographical coverage (such as the BBTM).

2.2.4 The EWRSHM forecasts include a 2023 baseline, a construction year of 2032, an opening year of 2034, and a future year assessment of 2049. The 2032, 2034, and 2049 forecasts are produced for a without-scheme and with-scheme scenario. The with-scheme forecasts include either construction traffic in 2032 or changes to travel demand from the proposed East-West Rail scheme in 2034 and 2049. At this stage of the assessment, no mitigation has been tested in the EWRSHM.

2.2.5 Considering the limited detail contained in the TUR regarding the development, performance, and forecasting process for the EWRSHM, we have been unable to establish whether the EWRSHM is an appropriate tool with which to assess the forecast highway impacts of construction or operation of the

[2] East-West Rail Transport Update Report, §1.3.2
[3] East-West Rail Transport Update Report, §6.1.4

proposed East-West Rail scheme. The TUR acknowledges that "*it is possible that some of the impacts identified in this TUR would differ from those identified in the TA at a later stage*"[4] due to changes in modelling assumptions and project design changes in forthcoming work for the DCO application.

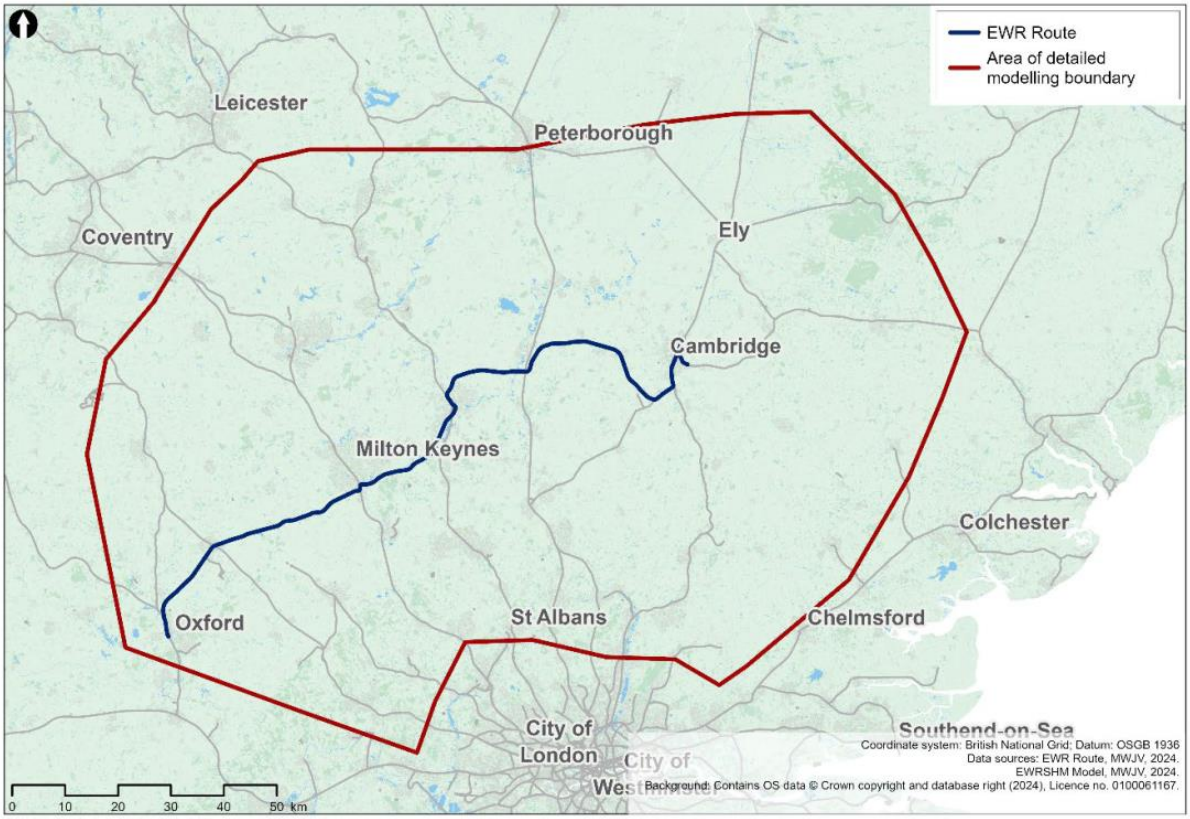


Figure 2.1: EWRSHM Geographical Coverage (TUR Figure 10)

[4] East-West Rail Transport Update Report, §1.3.5

Section 3 – Transport Forecast Review

3.1 Introduction

3.1.1 This section reviews the transport forecasts presented in the TUR alongside forecast information available from Bedford Borough Council's strategic model, the Bedford Borough Transport Model (BBTM). The review of the transport forecasts presented in the TUR centres around whether the results are comparable with those proposed by the BBTM and highlights any areas which have been identified in the TUR to have increases in congestion either during construction or during operation of the proposed scheme.

3.1.2 This review is split into the following two sections:

- traffic flow data (where data have been provided in the TUR and how they have been used); and
- volume-over-capacity analysis as an indicator of congestion.

3.2 Traffic Flow Data

3.2.1 There are several tables within the TUR reporting traffic numbers in the form of annual average daily traffic (AADT) from observed count data. These count data have been sourced from the DfT's Road Traffic Statistics website[5].

3.2.2 The traffic flows available from the DfT's Road Traffic Statistics do not typically reflect observed annual average daily traffic but are estimated from available data. Typically, annual average daily traffic is estimated from a one-day manual classified traffic count (undertaken between 07:00 and 19:00), expanded using available long-term count data. The one-day manual classified traffic count may also not be observed in a given year but may be estimated from a count undertaken in a previous year using observed year-on-year changes in traffic.

3.2.3 Several of the AADTs reported in the TUR from the DfT's Road Traffic Statistics are listed as "estimated", as the calculation is based on a count several years old. The guidance alongside the Road Traffic Statistics flags that counts marked as "estimated" should be "*used with caution*"[6] and that other sources of count data (such as from local highway authorities) may provide more accurate estimates.

3.2.4 As such, there is uncertainty around the accuracy of the annual average daily traffic sourced from the DfT's Road Traffic Statistics; however, these counts are presented in the TUR only to provide context on the relative traffic levels on key routes within the study area. Our understanding is that the reported traffic flows may not align with those represented in the EWRSHM (no comparison of observed and modelled flows is presented) and therefore are not used in the subsequent analysis of congestion.

3.2.5 Using estimated annual average daily traffic flows from the base year (2018) BBTM[7], a comparison has been undertaken against the reported traffic flows (typically 2023) detailed in Section 9 to 12 of the TUR. The locations of these count sites are shown in Figure 3.1. The comparison between the traffic flows reported in the TUR and the estimated AADTs from the BBTM is presented in Table 3.1 and Figure 3.2 to Figure 3.4.

3.2.6 Figure 3.2 to Figure 3.4 show that although there are differences between the two sources, the order of magnitude for each of the roads identified is similar between those reported in the TUR and those estimated from the BBTM. This suggests a broad agreement between the traffic flow estimates presented in the TUR (sourced from DfT estimates) and those estimated from the BBTM, noting the uncertainties around both estimates.

3.2.7 As the traffic flows reported in the TUR are not sourced from the EWRSHM and have not been used in the calculation of congestion, the broad alignment between the reported traffic flows and the BBTM

[5] https://roadtraffic.dft.gov.uk/#6/55.250/-1.000/basemap-regions-countpoints
[6] https://roadtraffic.dft.gov.uk/about
[7] AADTs have been estimated using factors which have been calculated from four bi-directional counts collected by Bedford Borough Council covering 2023. Due to the small sample size used to calculate these factors, there is uncertainty around these estimates.

does not provide any assurance on the quality of the EWRSHM or the subsequent congestion analysis.

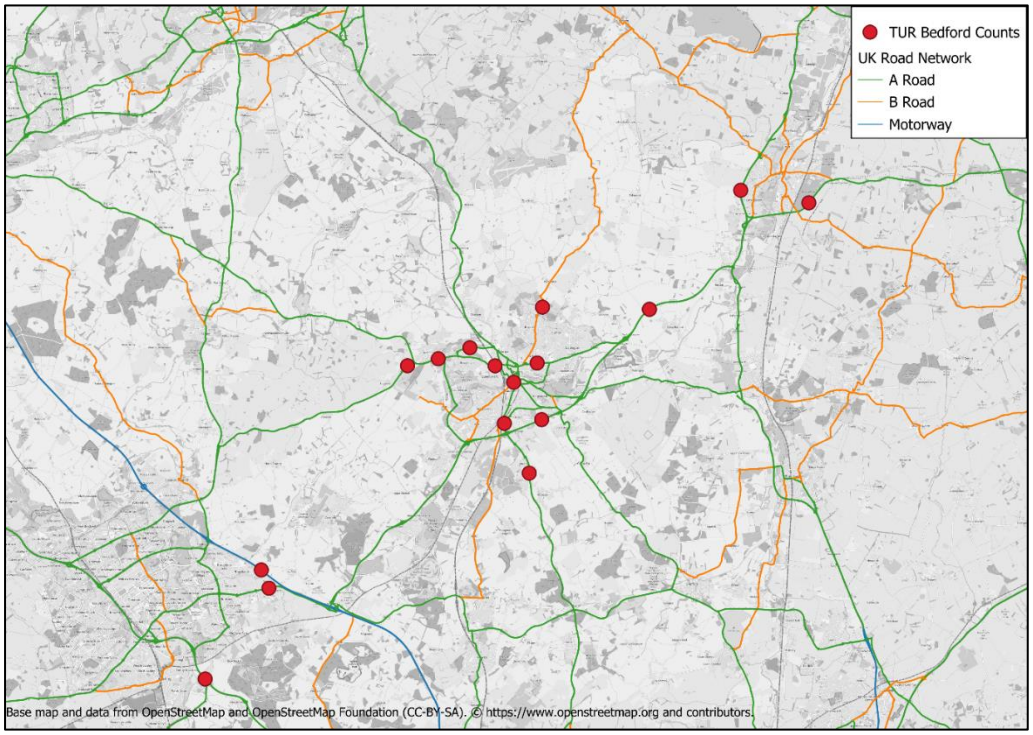


Figure 3.1: TUR Traffic Flow Locations Reviewed

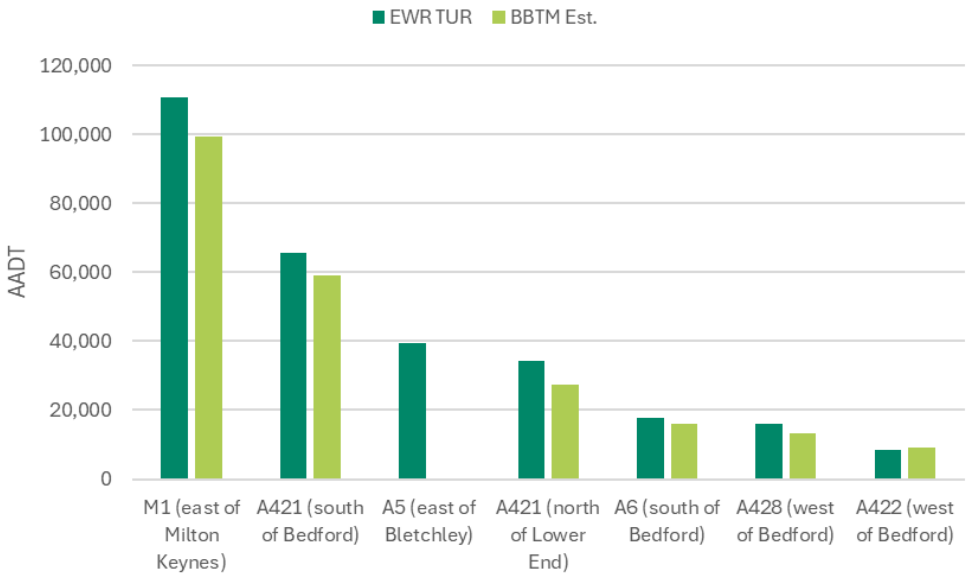


Figure 3.2: AADT Flow Comparison, TUR Table 13[8]

[8] No comparison was possible for the A5 (east of Bletchley) due to the link being outside the Area of Detailed Modelling in the BBTM.

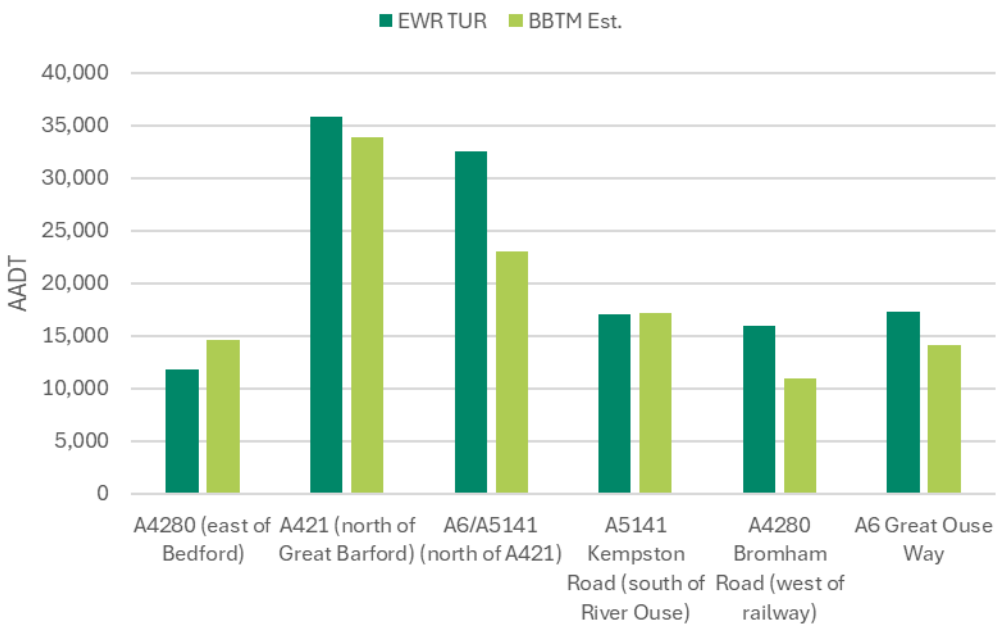


Figure 3.3: AADT Flow Comparison, TUR Table 20

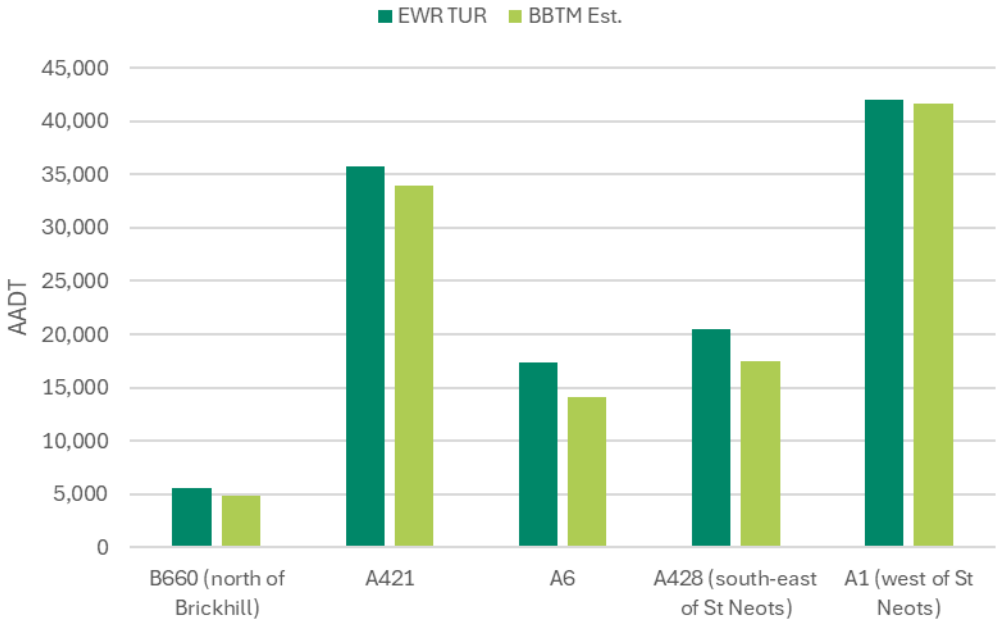


Figure 3.4 AADT Flow Comparison, TUR Table 23 & 27

Table 3.1: Comparison of AADTs from TUR and BBTM

TUR Ref.	Location	TUR (2023)	BBTM (2018)
Table 13 (Fenny Stratford to Kempston)	M1 (east of Milton Keynes)	110,646	99,229
	A421 (south of Bedford)	65,582	59,136
	A5 (east of Bletchley)[9]	39,438	-
	A421 (north of Lower End)	34,283	27,235
	A6 (south of Bedford)	17,645	15,859
	A428 (west of Bedford)	16,072	13,397
	A422 (west of Bedford)	8,503	9,176
Table 20 (Bedford)	A4280 (east of Bedford)	11,792	14,649
	A421 (north of Great Barford)	35,823	33,904
	A6/A5141 (north of A421)	32,574	22,992
	A5141 Kempston Road (south of River Ouse)	17,023	17,218
	A4280 Bromham Road (west of railway)	15,917	10,892
	A6 Great Ouse Way	17,299	14,149
Table 23 & 27 (Clapham Green to Colesdon and Roxton to East of St Neots)	B660 (north of Brickhill) – 2019 data	5,557	4,811
	A421	35,823	33,904
	A6	17,299	14,149
	A428 (south-east of St Neots)	20,450	17,423
	A1 (west of St Neots)	42,072	41,713

3.3 Volume-Capacity Analysis

3.3.1 Throughout the TUR, volume-capacity forecasts from the EWRHSM have been presented as an indicator of network operation. The TUR details that a location with a forecast volume-capacity ratio above 85% is approaching theoretical capacity and indicates that delay or congestion can be expected, which is generally accepted.

3.3.2 This review of the forecast congestion within the TUR is split into the four of the sections detailed in the TUR which include locations within Bedford Borough. These are:

- Bedford (TUR Section 10);
- Clapham Green to Colesden (TUR Section 11);
- Fenny Stratford to Kempston (TUR Section 9); and
- Roxton to east of St Neots (TUR Section 12).

3.3.3 In general, it is unclear whether the links highlighted in the analysis presented in the TUR are those links with a forecast volume-capacity ratio of more than 85% in the AM Peak *or* PM Peak, or the AM Peak *and* PM Peak (as quoted in the figure legend). It is also unclear how directionality has been considered as part of this analysis, i.e. is a link highlighted if the forecast volume-capacity ratio is above 85% in one direction or in both directions?

3.3.4 For comparison with the forecasts available from the BBTM, we have presented the forecast volume-capacity ratios by direction and considered the maximum forecast volume-capacity ratio on a link in the two peak hours contained in the BBTM reference case forecasts produced as part of the Local Plan assessment (reflecting the adopted Local Plan 2030).

3.3.5 The analysis presented in the TUR only highlights links which are forecast to have a volume-capacity ratio over 85%, but it does not present information on the forecast severity of the congestion at a given location (i.e. if the forecast volume-capacity ratio 86% or 100%). The analysis from the BBTM includes information on the forecast volume-capacity ratio for links forecast to be above 85%.

3.3.6 For each section of the proposed East-West Rail route considered in this review, a comparison of the 'without-scheme' forecasts presented in the TUR against the reference case forecasts from the BBTM

[9] No comparison was possible for the A5 (east of Bletchley) due to the link being outside the Area of Detailed Modelling in the BBTM.

has been undertaken. The assessment of the Local Plan did not produce forecasts for the modelled years presented in the TUR, so the TUR forecasts have been compared with the closest available modelled year from the BBTM. These comparisons are shown in Appendix A to Appendix D (split by route section).

Bedford (TUR Section 10)

3.3.7 Appendix A shows the forecast volume-capacity ratios for Bedford town without the proposed East-West Rail scheme from the TUR and the BBTM. Based on the figures contained in Appendix A, the following observations have been noted:

- Both the TUR and the BBTM show forecast congestion on links around the centre of the town.
- The Bedford Western Bypass to the west of the town is shown to experience congestion in all years within the BBTM and is known to experience delays in the peak hours. The EWRSHM forecasts congestion at the northern end of the route (between Biddenham and Clapham Road), but not for other sections, such as the section between Biddenham and Bromham. (The southern end of the route is included in the analysis for Fenny Stratford to Kempston.)
- The same broad pattern of locations of forecast congestion is shown across the modelled years from the BBTM; however, the severity of the congestion is forecast to increase over time. As the level to which the forecast volume-capacity ratio exceeds 85% is not presented in the TUR, it is not known whether the severity of congestion increases in the EWRHSM forecasts.

3.3.8 In addition to the comparisons between the EWRSHM and BBTM forecasts, the TUR also highlights the additional links which are forecast to be above 85% volume-capacity with the introduction of the scheme. In 2032 this reflects the forecast impacts on construction traffic, with the analysis for 2034 and 2049 reflecting the forecast impact of the opening of the East-West Rail route.

3.3.9 Figure 3.5 shows that there are several roads within Bedford town which are forecast to become congested in the construction scenario. The TUR details that there are expected to be two construction compounds within Bedford town, located adjacent to Bedford St Johns Station and within the industrial estate at Cauldwell Walk. Roads surrounding the compound at Bedford St Johns appear to be affected adversely by the forecast construction traffic.

3.3.10 With the opening of the East-West Rail route, Figure 3.6 shows the additional links forecast to be above 85% with the introduction of the scheme in 2034. The additional links shown in Figure 3.6 are centred around the two stations within Bedford, which is expected given the assumed increase in traffic to / from the stations. The scale of the additional forecast congestion at these locations due to the scheme is not detailed within the TUR.

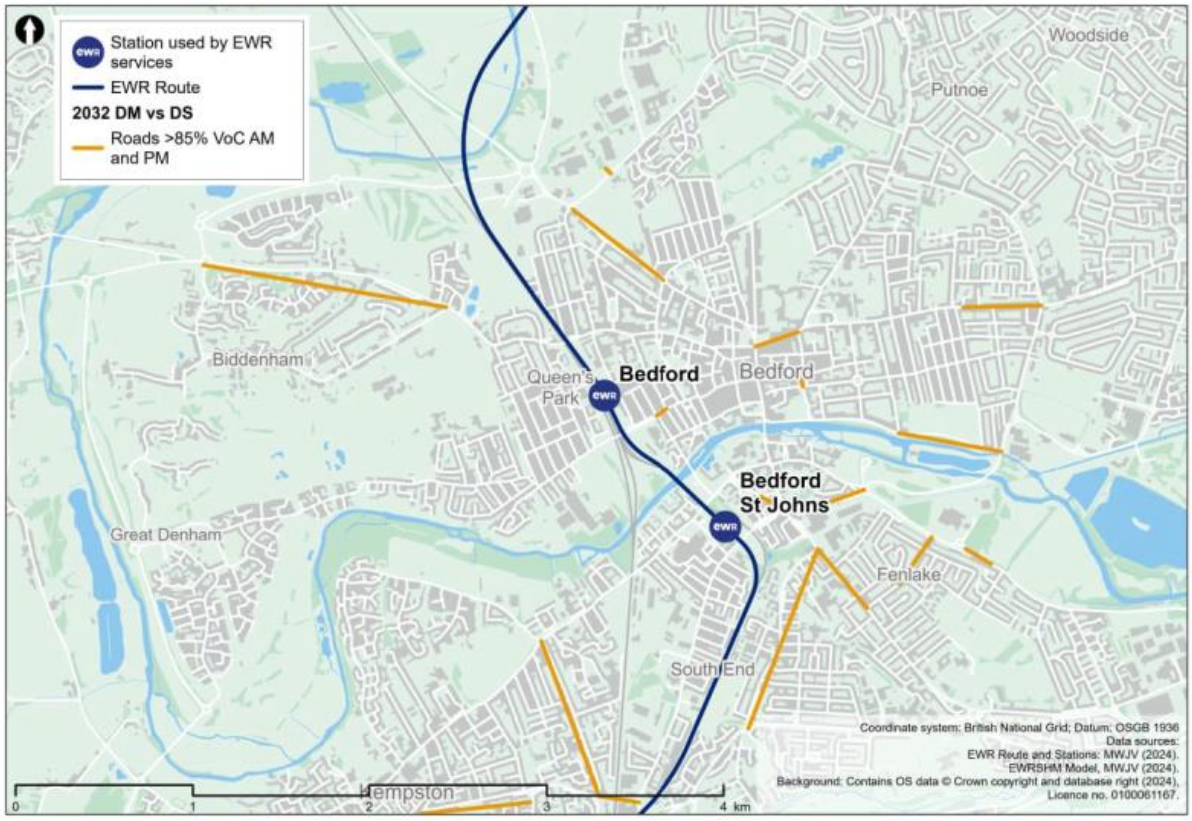


Figure 3.5: Additional Links with Forecast Volume-Capacity Raito >=85% in 2032 Construction Scenario (TUR Figure 48)

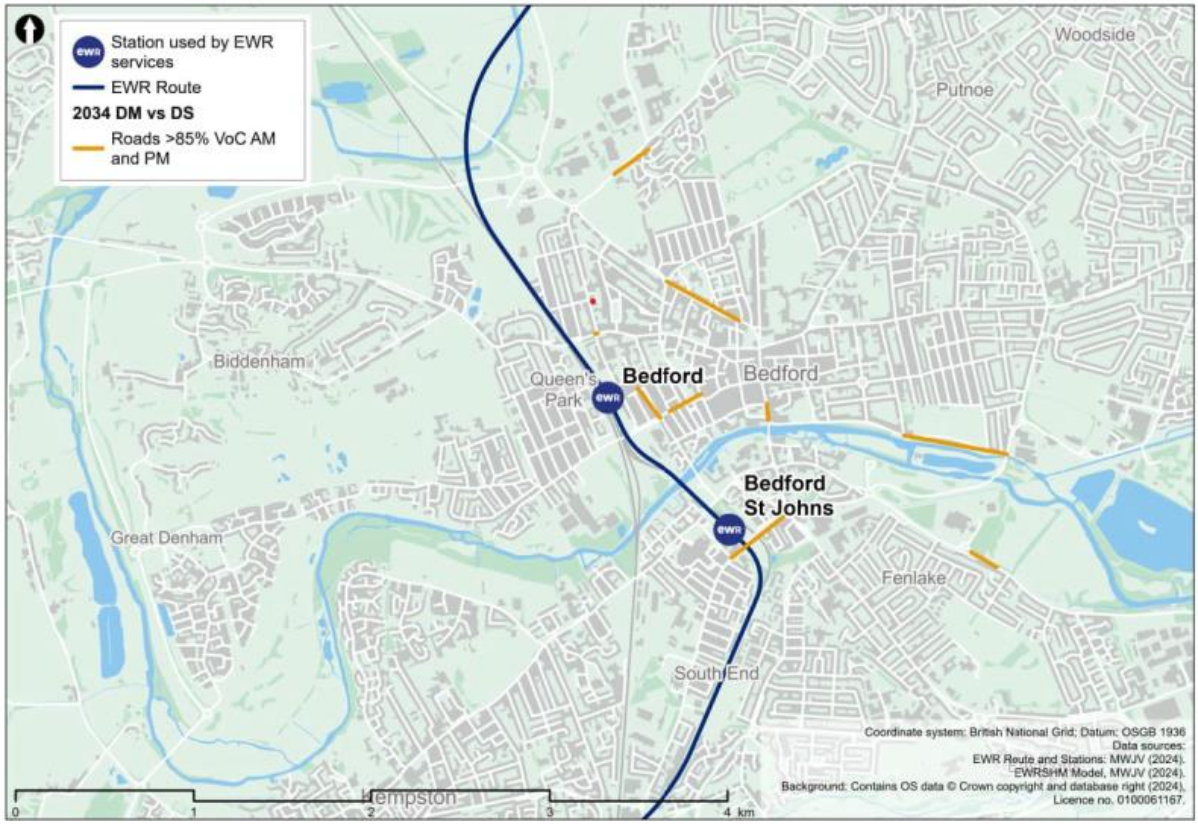


Figure 3.6: Additional Links with Forecast Volume-Capacity Raito >=85% in 2034 With Scheme Scenario (TUR Figure 48)

Clapham Green to Colesden

3.3.11 Appendix B shows the forecast volume-capacity ratios for the Clapham Green to Colesden area from the EWRSHM and the BBTM. This area covers the north-east of Bedford town and routes to the north of the A421 between Bedford and Roxton. The following observations have been noted on the comparison in this area:

- There is no figure presented in the TUR for the 2023 baseline scenario as no links were found to have a forecast volume-capacity ratio above 85%[10]. Conversely, the BBTM base year suggests that the section of the A4280 approaching the junction with the A421 at Renhold operates above 85% volume-capacity.
- The 2032 and 2049 EWRSHM forecasts show congestion on local roads to the north-east of Bedford (through Ravensden and Renhold), which are not replicated in the BBTM forecasts.

3.3.12 There are limited construction impacts forecast in this area (see Figure 3.7); however, the TUR states that there are four main construction compounds within this section of the route. As no details on the assumed construction traffic and how this has been derived are included in the TUR, it is not possible to conclude whether the limited forecast impact of construction within this section is plausible.

3.3.13 No additional routes are forecast to be above 85% volume-capacity ratio in 2034 with the opening of the East-West Rail route, with a limited number of additional routes forecast to exceed this threshold in 2049 (see Figure 3.8). As there are no East-West Rail stations proposed for this section of the route, changes in traffic volumes in this area are expected to be limited with the opening of the scheme.

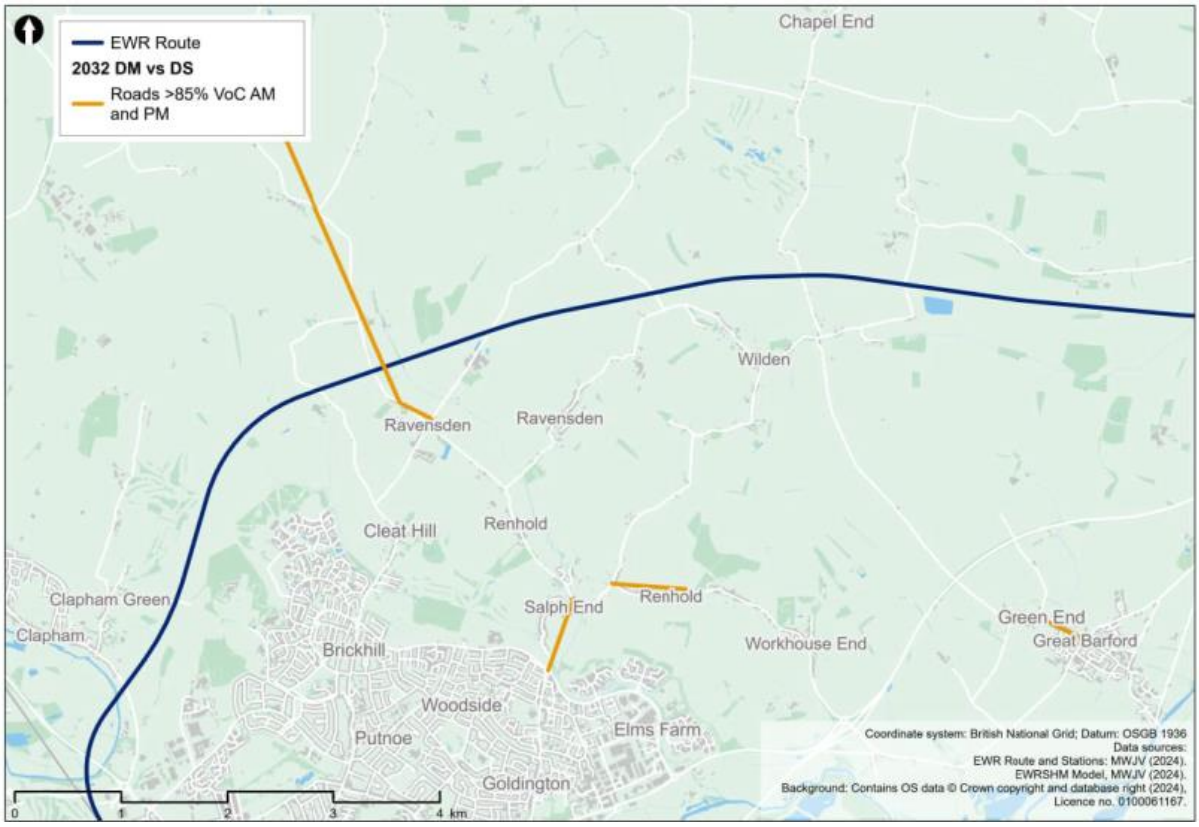


Figure 3.7: Additional Links with Forecast Volume-Capacity Raito >=85% in 2032 Construction Scenario (TUR Figure 56)

[10] East-West Rail Transport Update Report, § 11.1.6

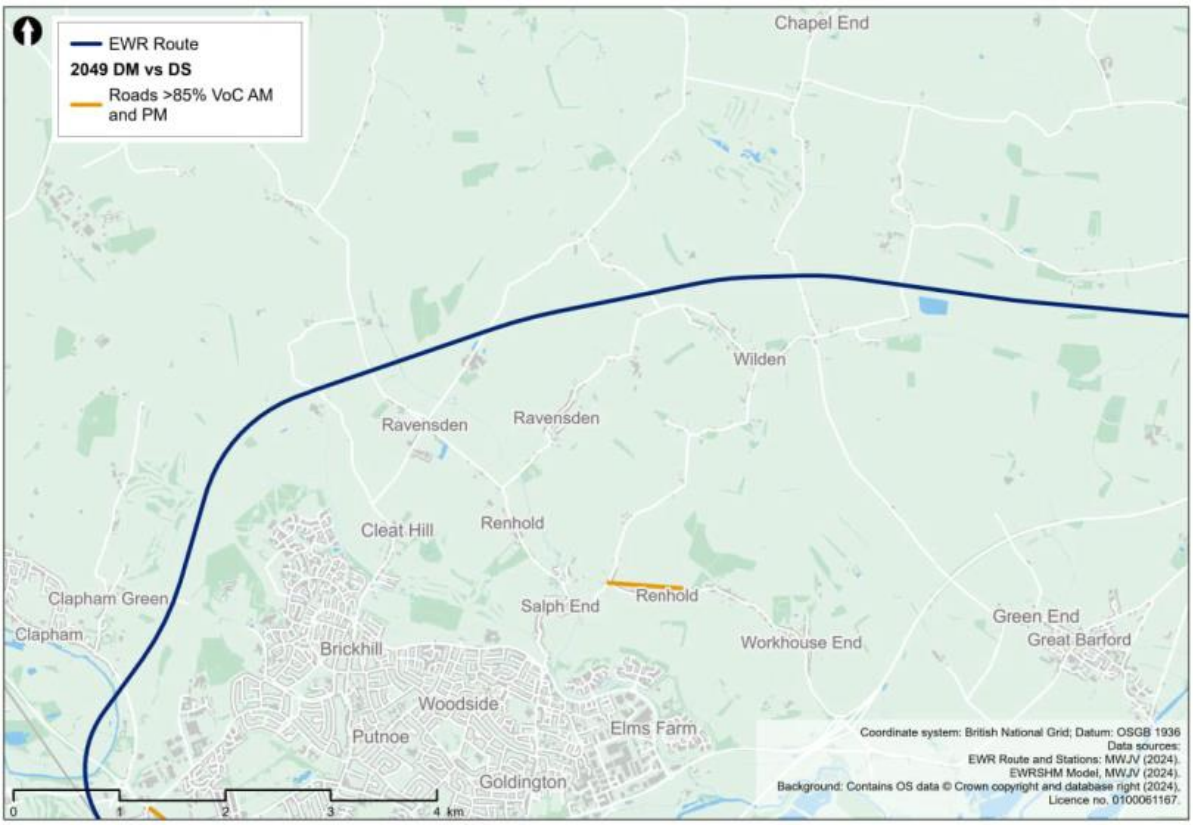


Figure 3.8: Additional Links with Forecast Volume-Capacity Raito >=85% in 2049 With Scheme Scenario (TUR Figure 57)

Fenny Stratford to Kempston

3.3.14 Appendix C shows the volume-capacity forecasts from the EWRSHM and the BBTM for section of the East-West Rail route between Fenny Stratford to Kempston. The north-eastern end of this section is within Bedford Borough, with the A421 from the M1 to Bedford of particular interest. Based on the comparison of the two forecasts, the following observations have been made:

- In there is a similar pattern of forecast congestion between the 2023 EWRSHM forecast and the 2018 BBTM base year, with congestion shown around M1 Junction 13, along the A509 near Newport Pagnell, within Milton Keynes (noting that only the eastern edge of Milton Keynes is included in the Area of Detailed Modelling for the BBTM), and at the southern end of the Bedford Western Bypass.
- In the 2032 and 2049 forecasts from the EWRSHM, most of the A421 between the M1 and Bedford and a significant number of minor routes along this corridor are forecast to be operating above an 85% volume-capacity ratio. The corresponding BBTM forecasts include additional forecast congestion within this corridor, but not to the same extent, and does not forecast congestion issues along the A421 to the south of Bedford.
- The BBTM forecasts show severe conditions on the A421 near Bedford, specifically at the two junctions with the A6. The EWRSHM forecasts show some congestion in these areas; however, no congestion is forecast at the eastern A6 junction on the A421 and the severity of the forecast congestion at these locations is not presented in the TUR.

3.3.15 In terms of the forecast impacts of the scheme, Figure 3.9 shows a small number of additional links with a forecast volume-capacity ratio above 85% in the 2032 construction scenario. These include a section of the A421 to the south of Bedford and some links in south-western Bedford town.

3.3.16 There are also a small additional number of links with a forecast volume-capacity ratio of over 85% in 2034 with the opening of the proposed scheme (see Figure 3.10), with a similar pattern of impacts forecast in 2049. There are no forecast impacts to the north-east of this section of the proposed route within Bedford Borough, with most forecast impacts near Lidlington and to the south of Milton Keynes.

3.3.17 Given that the scheme includes the relocation of some stations along this section of the East-West Rail route and an increase in service provision, it might be expected that there would increases in traffic to / from stations along this section near the A421. As no information is provided on the derivation of the changes in traffic with the opening of the scheme or the forecast change in traffic flows, it is not possible to review if the forecast impacts on congestion are aligned with the assumed changes in traffic.

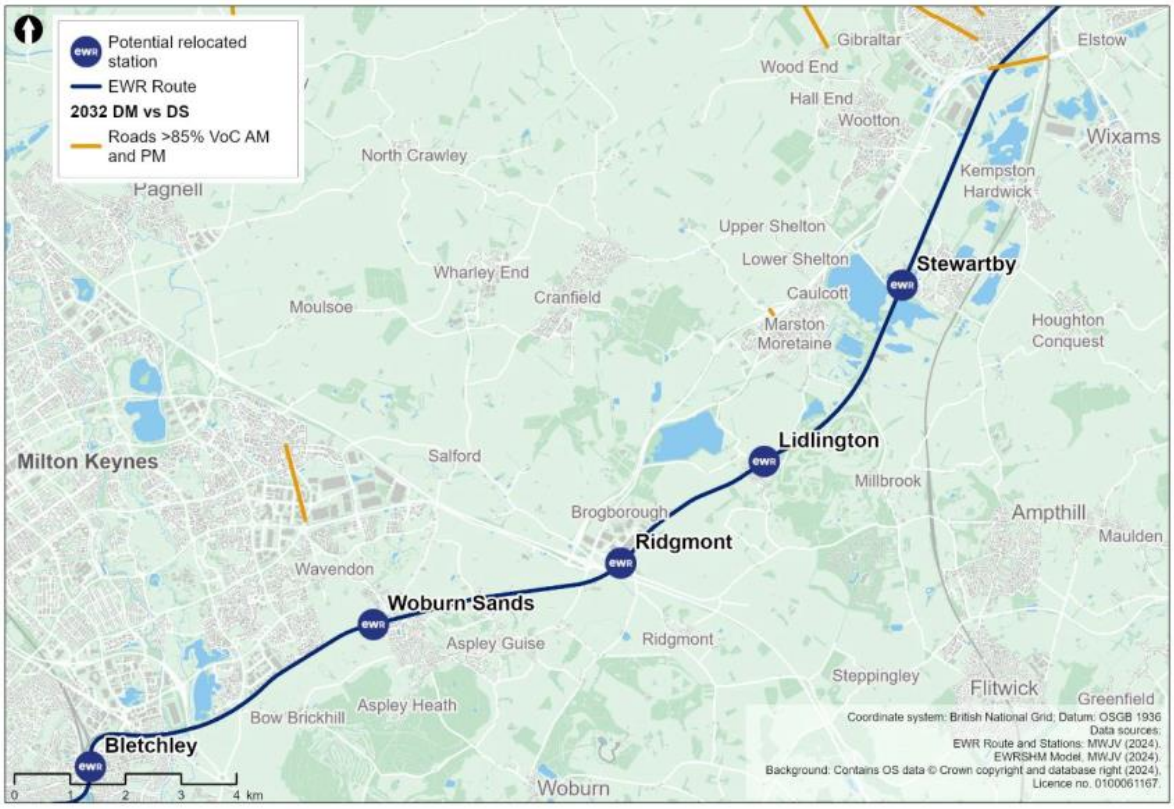


Figure 3.9: Additional Links with Forecast Volume-Capacity Raito >=85% in 2032 Construction Scenario (TUR Figure 36)

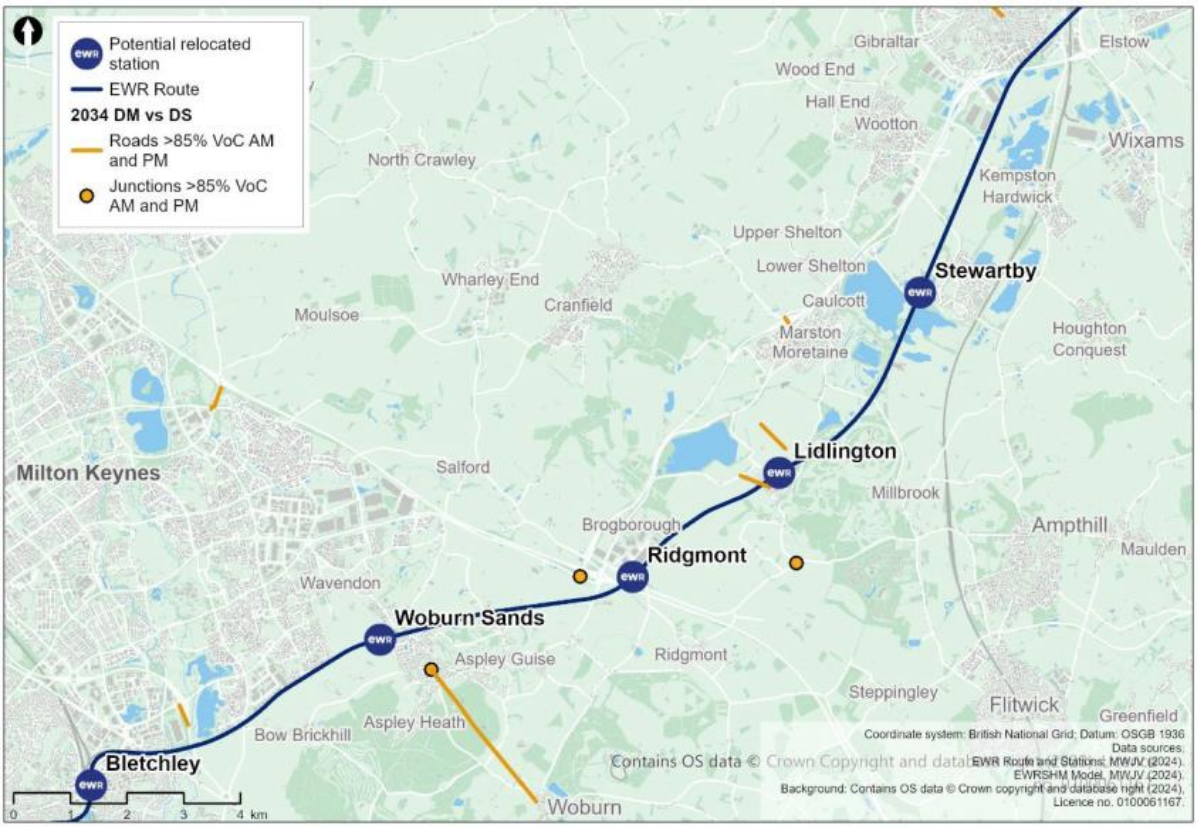


Figure 3.10: Additional Links with Forecast Volume-Capacity Raito >=85% in 2034 With Scheme Scenario (TUR Figure 37)

Roxton to East of St Neots

3.3.18 The western half of this section of the proposed East-West Rail route is within Bedford Borough. Appendix D contains the comparison of the EWRSHM and BBTM forecast volume-capacity ratios. Based on these comparisons, the following observations have been made:

- Considering Figure D.1, which compares the 2023 EWRSHM forecast against the 2018 BBTM base year, these show a similar pattern of congestion, with congestion modelled on approaches to the Black Cat roundabout and along the A428 to the south and east of St Neots.
- Within the subsequent forecast years, the inclusion of the Black Cat to Caxton Gibbet scheme largely removes the forecast congestion from the A1 Black Cat junction. The EWRSHM forecasts retain forecast congestion on the approach to the upgraded junction from Roxton, which is not reflected in the BBTM forecasts.
- In the 2032 and 2049 forecast years, the EWRSHM forecasts include forecast congestion along the existing A428 to the south of St Neots; however, this location is not highlighted as part of the BBTM forecasts. With the opening of the Black Cat to Caxton Gibbet scheme, it is expected that traffic volumes on the existing A428 will reduce and alleviate forecast congestion along the route.

3.3.19 There are several additional links which are forecast to be operating above 85% of capacity because of construction traffic in 2032 (see Figure 3.11). These include routes around the upgraded Black Cat junction, including the route through Roxton, and the existing A428 to the south of St Neots.

3.3.20 The EWRSHM forecasts that there are *"no additional roads with a VoC* [volume-capacity ratio] *>=85% in the 2034 and 2049 reference case vs with project scenarios"*[11]. Given that the proposed scheme includes a new interchange station between the East-West Rail route and the East Coast Main Line at Tempsford, significant changes in traffic flows around the proposed new interchange station would be expected.

[11] East-West Rail Transport Update Report, §12.4.3

3.3.21 As no information is provided on the derivation of the changes in traffic with the opening of the scheme or the forecast change in traffic flows, it is not possible to review if the forecast limited impacts on congestion are aligned with the assumed changes in traffic.

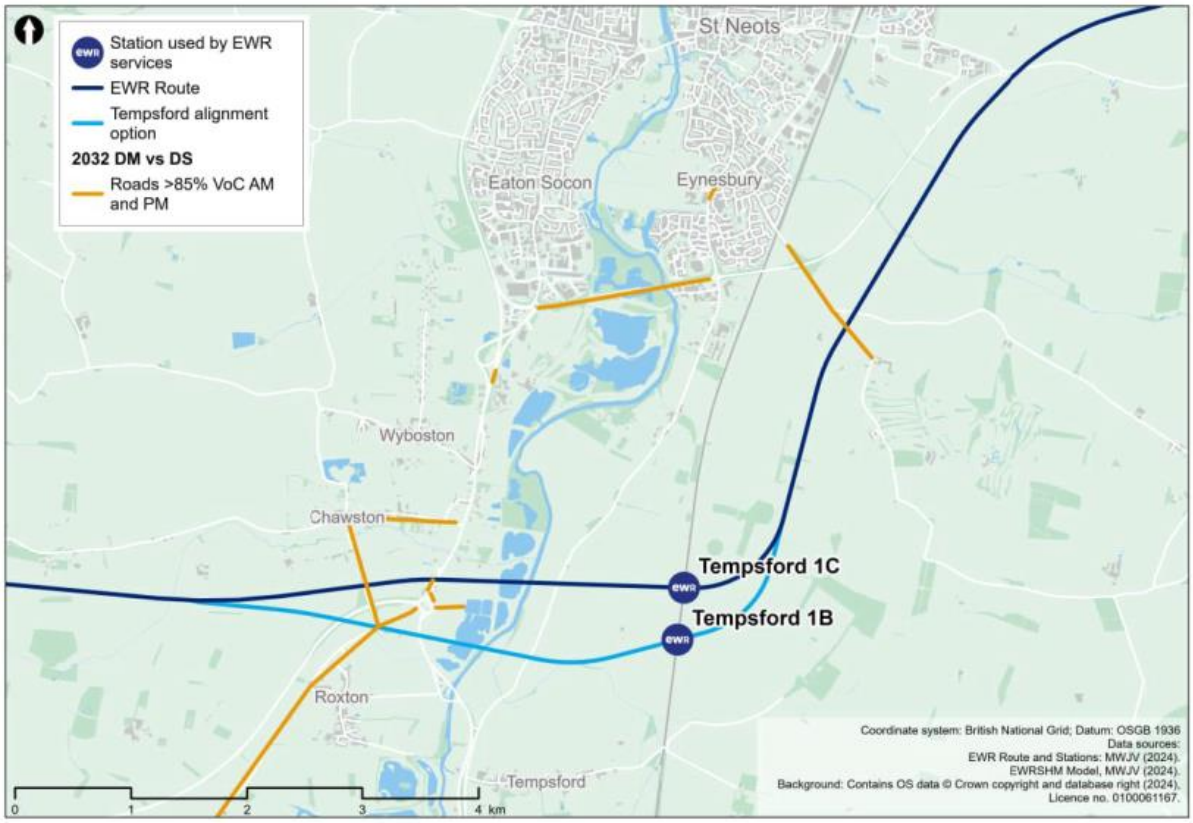


Figure 3.11: Additional Links with Forecast Volume-Capacity Raito >=85% in 2032 Construction Scenario (TUR Figure 65)

Section 4 – Mitigation Strategy Review

4.1 Introduction

4.1.1 The TUR outlines that no mitigation has been tested to date; however, additional testing will be undertaken for the forthcoming Transport Assessment. These tests will *"show the impacts of the mitigation measures at both a local and regional level"*[12]. This section therefore summarises the expected impacts identified in the TUR and how these are to be assessed for mitigation as part of the Transport Assessment.

4.2 Summary of Impacts

4.2.1 Throughout the TUR, two changes have been identified consistently across the scheme sections covering Bedford Borough that are likely to have an impact on the performance of the highway network. These are:

- the additional movements on the highway network due to construction traffic and impacts of roadworks (such as road closures); and
- the provision of new rail services supporting modal shift from car to rail.

4.2.2 The impact of the additional vehicles on the highway network due to construction traffic is likely to add to delay on the highway network, particularly for routes which accommodate construction traffic. This is in addition to the impact of roadworks during the construction period, such as temporary traffic lights and road closures.

4.2.3 Any modal shift from car to rail experienced due to the implementation of the proposed East-West Rail scheme could see a reduction in congestion in some locations; however, it may also contribute to localised delay around some rail stations, with additional traffic accessing the enhanced or new rail services.

4.2.4 Impacts identified to specific parts of the route are also detailed in the TUR, including the closure of level crossings, bridge replacements, and construction work on specific areas of the network both for road realignment (e.g. the A6 north of Bedford) or the implementation of new bridges. All these changes to the infrastructure will have associated works which are likely to reduce the capacity or in some cases completely close roads for a period of time, affecting route choice and congestion levels.

4.2.5 The severity of additional delays due to construction traffic and / or roadworks, or the forecast impacts of the proposed scheme itself are not detailed in the TUR. Further testing with the updated transport model as part of the development of the Transport Assessment will assess these forecast impacts in greater detail. This includes locations forecast to be impacted by the construction and opening of the scheme within Bedford Borough identified within the TUR.

4.3 Mitigation Strategy

4.3.1 The TUR does not propose any specific mitigation and therefore any proposals cannot be assessed for their likelihood to offset the forecast impacts of the East-West Rail scheme; however, the TUR does identify the criteria which will be applied to define where mitigation should be considered. These are detailed in §16.1.8 of the TUR, with the following criteria focussing on highway impacts:

- *"Where links or junctions are forecast in the traffic models to increase to a level that pushes them over capacity (defined as being over 0.85 VoC) in a 'with project' scenario (i.e. the difference between the 'with project' scenario and the baseline scenario), or locations which were already operating over capacity within the baseline scenario, which are then further increased in the 'with project' scenarios. Mitigation considerations for these locations could include any combination of:*
  - *Changes to junction layouts or operation.*
  - *Changes to link widths, layouts, or configurations.*

[12] East-West Rail Transport Update Report, §1.3.3

- *Changes to signage to manage route choice.*
- *Changes to the provision of NMU crossing facilities or infrastructure.*
- *Changes to the provision of on-street parking, traffic regulation orders or markings.*

- *Where links are set to have an increase in traffic by 30% or more (from the relevant baseline scenario), a review of road casualty data would be undertaken for the link to consider if there are any existing safety concerns that may require mitigation, with this to be discussed with relevant stakeholders. Locations along the link would be identified through professional judgement. The 30% threshold is shared with the EIA and based on Institute of Environmental Management and Assessment (IEMA) guidelines. The type of mitigation would be dependent upon the safety concern identified."*

4.3.2 This mitigation strategy appears to capture the instances where congestion would be deemed unacceptable within Bedford Borough and where an assessment of potential mitigation measures would be required. Additionally, the TUR details that monitoring would be undertaken during works so that any locations not deemed to require mitigation as part of the Transport Assessment can be addressed if mitigation becomes necessary[13].

4.3.3 The TUR also states that mitigation will be tested in the updated strategic model developed for the Transport Assessment. Depending on the nature of the mitigation measures proposed, a strategic model covering a wide geographical area may not be a suitable tool to assess smaller interventions and alternative approaches may be required (such as operational modelling of individual junctions or routes).

[13] East-West Rail Transport Update Report, §16.1.13

Section 5 – Summary and Conclusions

5.1 Summary of Review

5.1.1 This report has considered the evidence and commentary associated with implementing the East-West Rail scheme presented in the Transport Update Report issued in November 2024. The consideration of the forecast scheme impacts contained in the Transport Update Report is focussed on those within Bedford Borough.

5.1.2 In terms of the transport model used to produce the analysis detailed in the Transport Update Report, the East-West Rail Strategic Highway Model, the report contains limited detail on the structure, development, performance, and forecasting assumptions used in the model. It is noted that this model will be replaced with a new strategic modelling tool for the assessment of scheme impacts as part of the Transport Assessment to be included in the Development Consent Order.

5.1.3 The Transport Update Report contains limited detail on the transport model forecasts to compare against existing forecasts available from Bedford Borough Council's work developing its new Local Plan. For example, no traffic flow data are presented from the model and the presented congestion forecasts only highlight links which are forecast to have a volume-capacity ratio above 85% and does not provide detail on the scale of these exceedances.

5.1.4 A comparison of the forecast congestion locations has been undertaken against the forecasts available from the modelling undertaken for Bedford Borough's new Local Plan. At a high-level, there is reasonable consistency between the two sets of forecasts, with forecast congestion identified in similar locations (such as Bedford town centre, the northern and southern ends of the Bedford Western Bypass, and at the Black Cat junction prior to the implementation of the Black Cat to Caxton Gibbet scheme).

5.1.5 There are however some key locations of known congestion which are highlighted in the Bedford Borough Local Plan forecasts but are not shown in the forecasts presented in the Transport Update Report. These include the section of the Western Bypass between Biddenham and Bromham and the eastern A6 junction with the A421. Conversely, the forecasts presented in the Transport Update Report show more routes to the south-west of Bedford along the A421 corridor experiencing high levels of congestion, which are not reflected in the Bedford Borough Local Plan modelling.

5.1.6 In terms of the forecast impacts of construction modelled in 2032, in general, the forecast impacts presented in the Transport Update Report align with the proposed locations of construction compounds; however, limited forecast impacts are shown for the section between Clapham Green and Colesden despite four construction compounds being located within this section. As no details on the assumed construction traffic are included in the Transport Update Report, it has not been possible to independently review the likely impacts of construction.

5.1.7 In terms of the forecast impacts of the East-West Rail scheme on highway congestion, in general, increases in forecast congestion are identified around proposed East-West Rail stations with the additional forecast traffic accessing these locations. Limited forecast impacts are presented near stations to the south-west of Bedford and at the new interchange station at Tempsford; however, as with construction impacts, no detail on the assumed changes in traffic flows with the implementation of the scheme has been included in the Transport Update Report and it has therefore not been possible to independently assess these forecasts.

5.1.8 The potential impacts of the scheme identified in the Transport Update Report are generic in nature (such as additional delays due to roadworks and construction traffic) and no specific mitigation measures are identified or tested within the Transport Update Report. The Transport Update Report does detail a framework for the identification of locations where mitigation measures are to be assessed, which appears robust. Specific mitigation measures will be identified and assessed as part of the development of the Transport Assessment using an update strategic model.

5.1.9 In terms of the key specific potential impacts for Bedford Borough detailed in the Transport Update Report, these are:

- highway bridge replacements at Ampthill Road, Cauldwell Street, and Ford End Road bridge widening at Bromham Road;
- new bridges at A6 Great Ouse Way (and local realignment) and A6 Paula Radcliffe Way;

- increased vehicle movements associated with access to station car parks (access from Melbourne Street to a new station car park for Bedford St Johns station and from Midland Road for Bedford station); and
- a series of new highway under bridges and overbridges would be required to cross the new rail alignment at locations including:
  - Clapham Road;
  - Carriage Drive;
  - Graze Hill;
  - Thurleigh Road;
  - Sunderland Hill;
  - Shrubbery Lane;
  - Chequers Hill;
  - Colesden Road;
  - the A421;
  - Bedford Road, north of Roxton;
  - the River Great Ouse; and
  - Roxton Road.

Appendix A Comparison of Volume-Capacity Ratios (Bedford)

East-West Rail Transport Update Report

Bedford Borough Transport Model

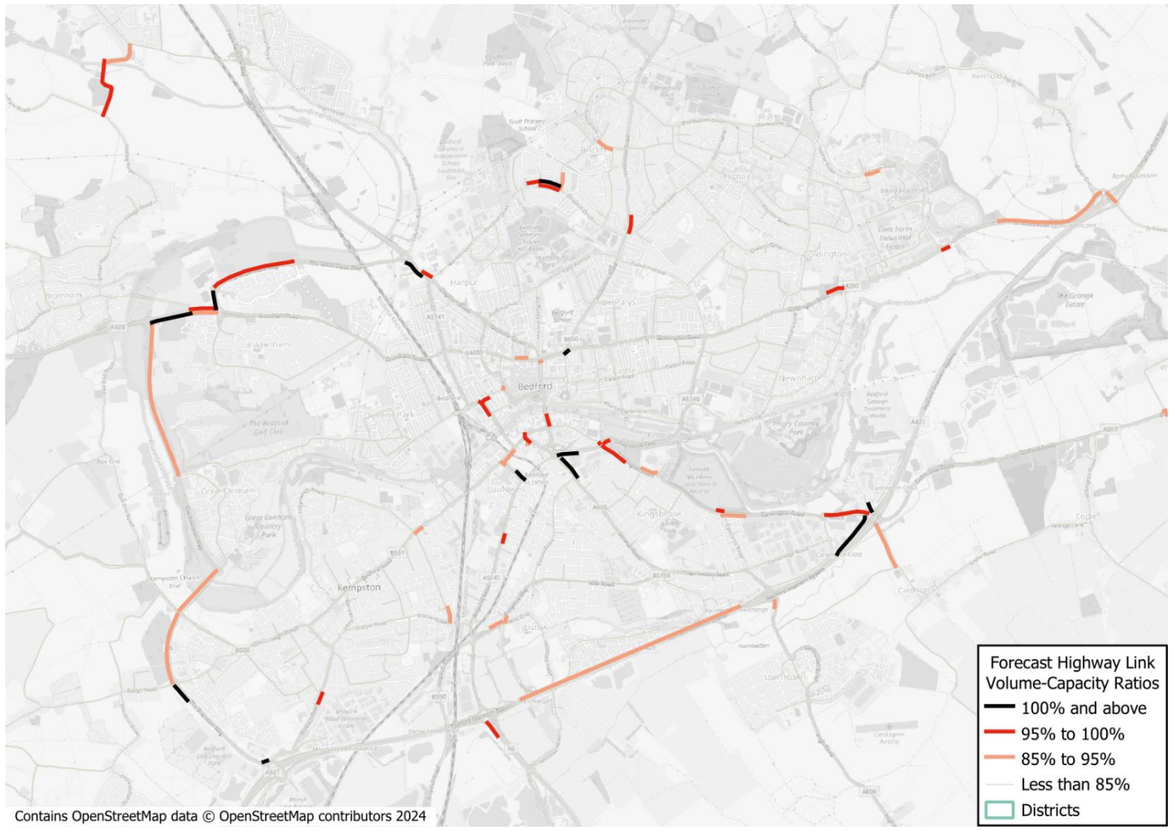
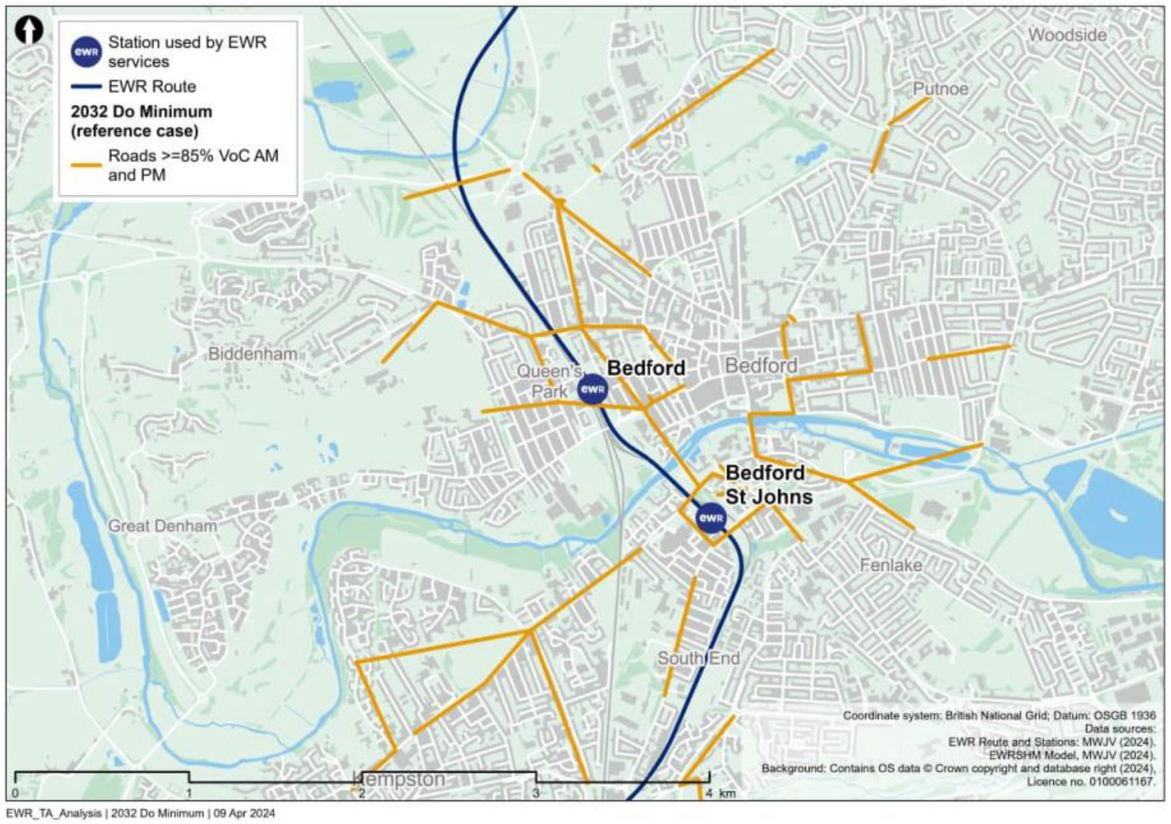


Figure A.1: Comparison of Volume-Capacity Forecasts, EWR TUR 2023 Forecast (source: EWR TUR Figure 41) vs. BBTM 2018 Base Year (Bedford)

East-West Rail Transport Update Report



Bedford Borough Transport Model

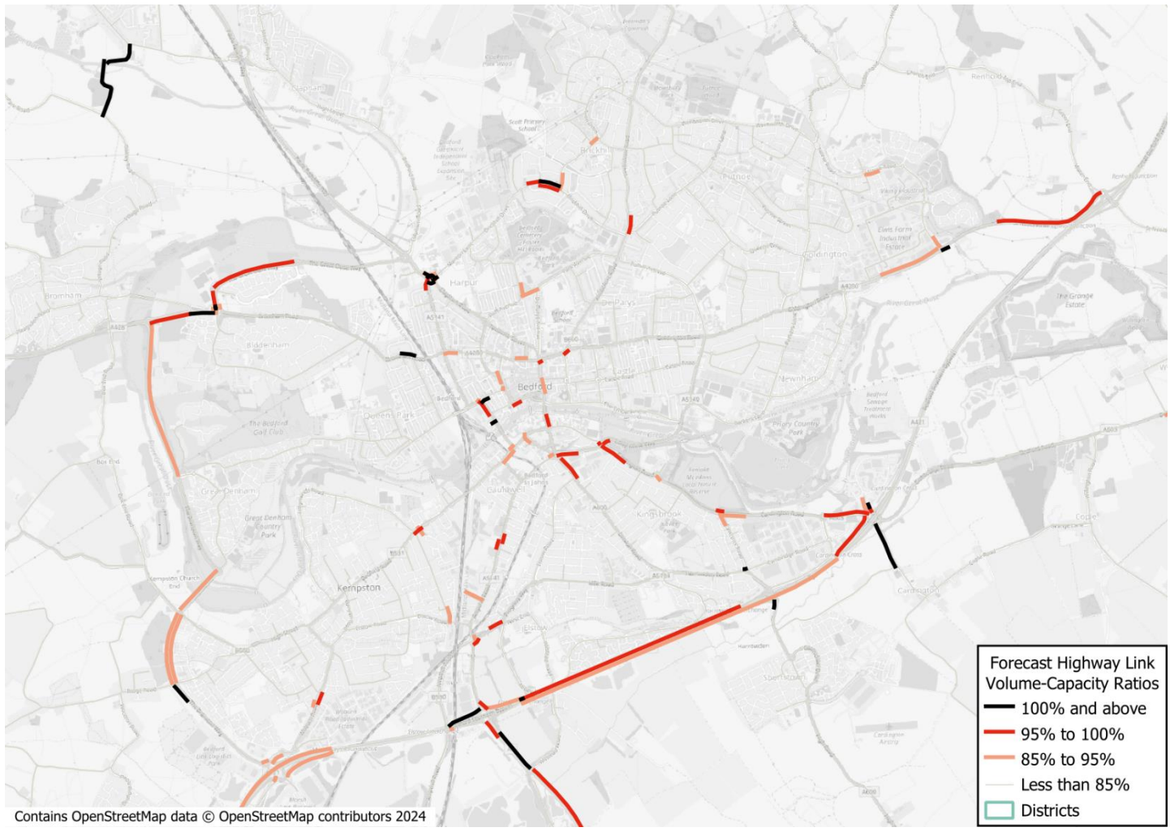
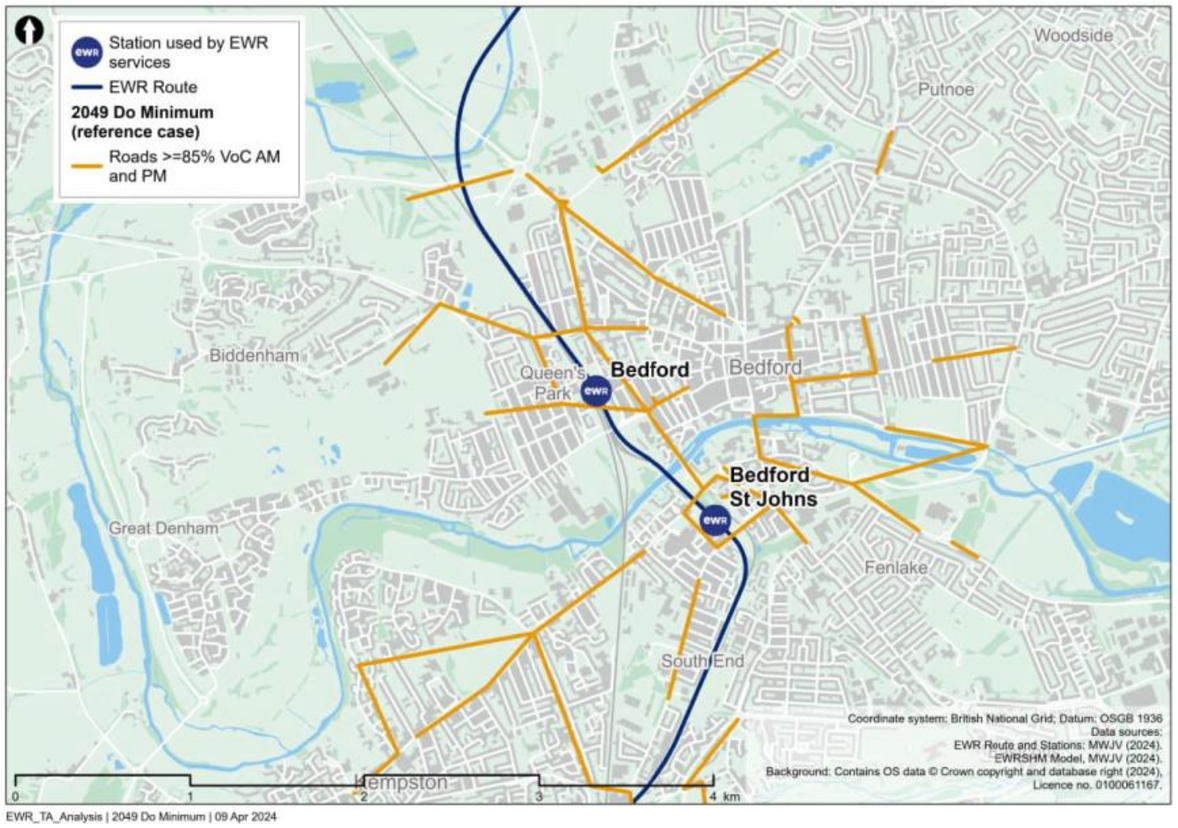


Figure A.2: Comparison of Volume-Capacity Forecasts, EWR TUR 2032 Do Minimum Forecast (source: EWR TUR Figure 45) vs. BBTM 2030 Reference Case (Bedford)

East-West Rail Transport Update Report



Bedford Borough Transport Model

Figure A.3: Comparison of Volume-Capacity Forecasts, EWR TUR 2049 Do Minimum Forecast (source: EWR TUR Figure 47) vs. BBTM 2040 Reference Case (Bedford)

Appendix B Comparison of Volume-Capacity Ratios (Clapham Green to Colesden)

East-West Rail Transport Update Report

No links reported as over 85% volume-capacity within this sub-area of the study area (EWR TUR, para. 11.1.6)

Bedford Borough Transport Model

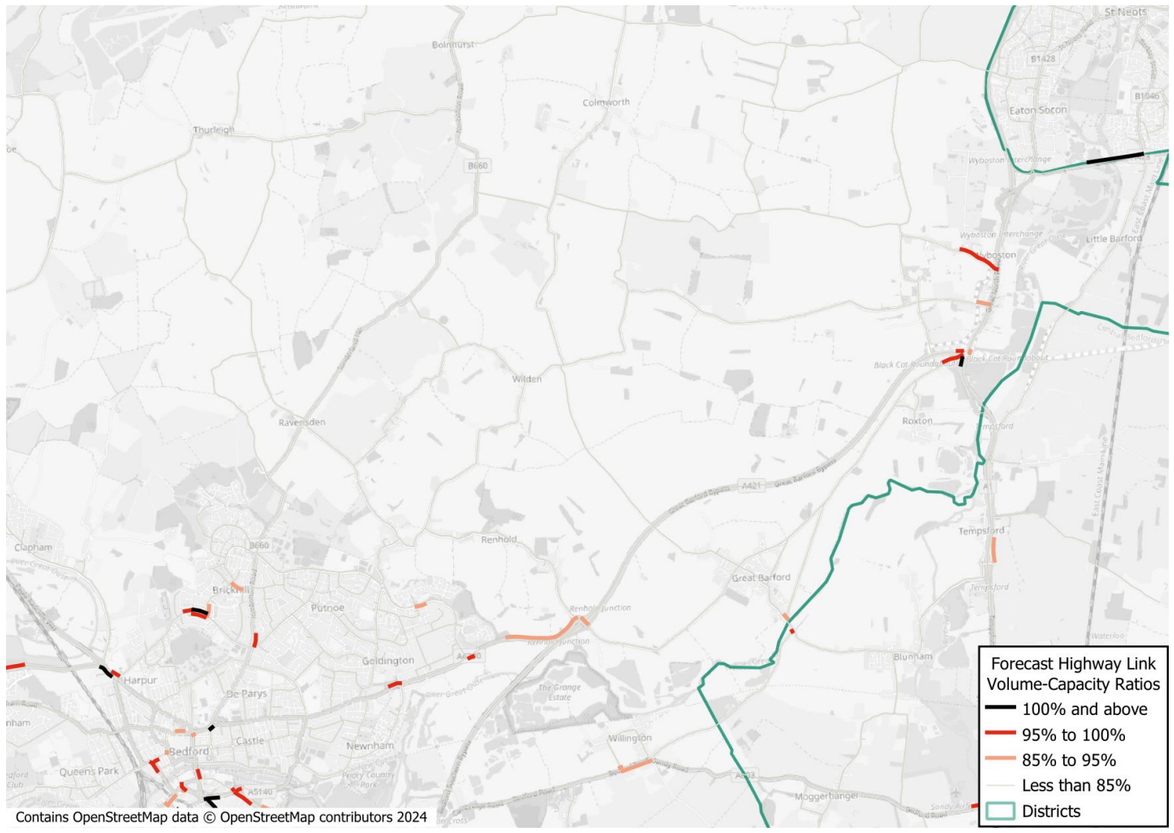
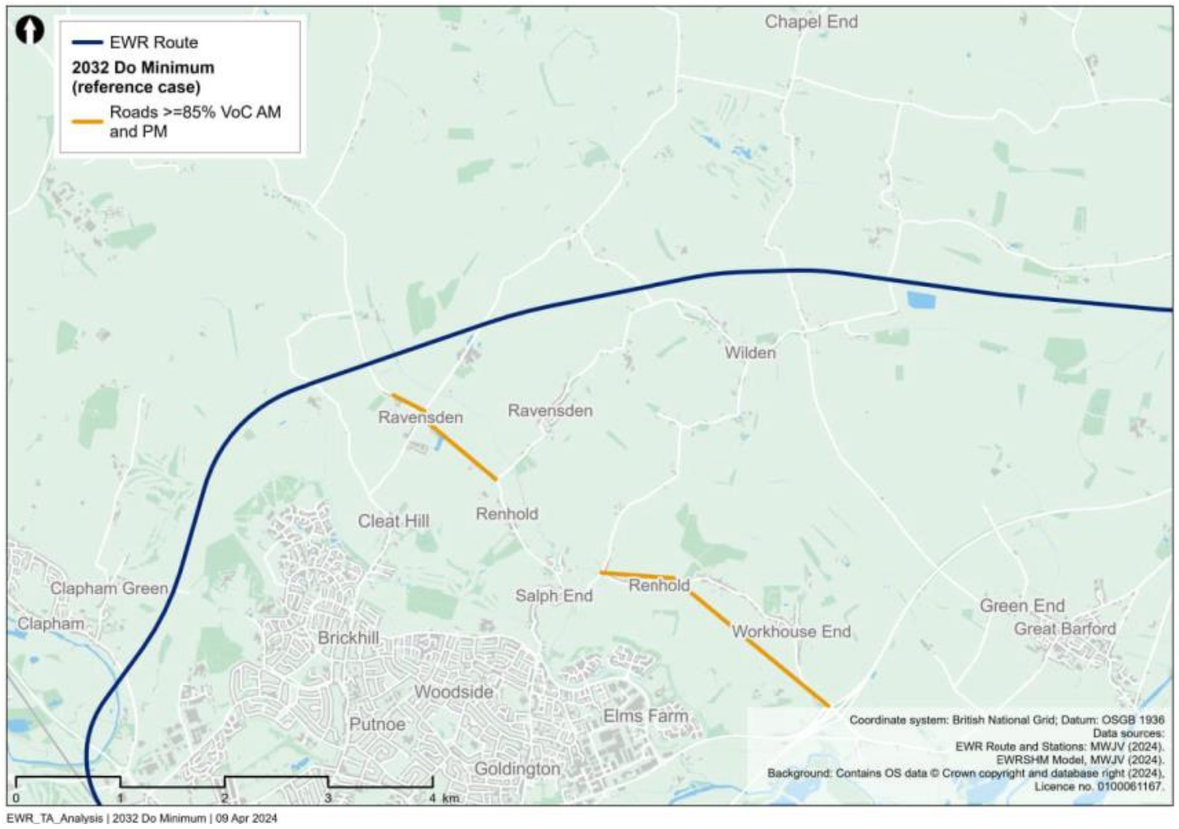


Figure B.1: Comparison of Volume-Capacity Forecasts, EWR TUR 2023 Forecast (source: EWR TUR Figure 41) vs. BBTM 2018 Base Year (Clapham Green to Colesden)

East-West Rail Transport Update Report



Bedford Borough Transport Model

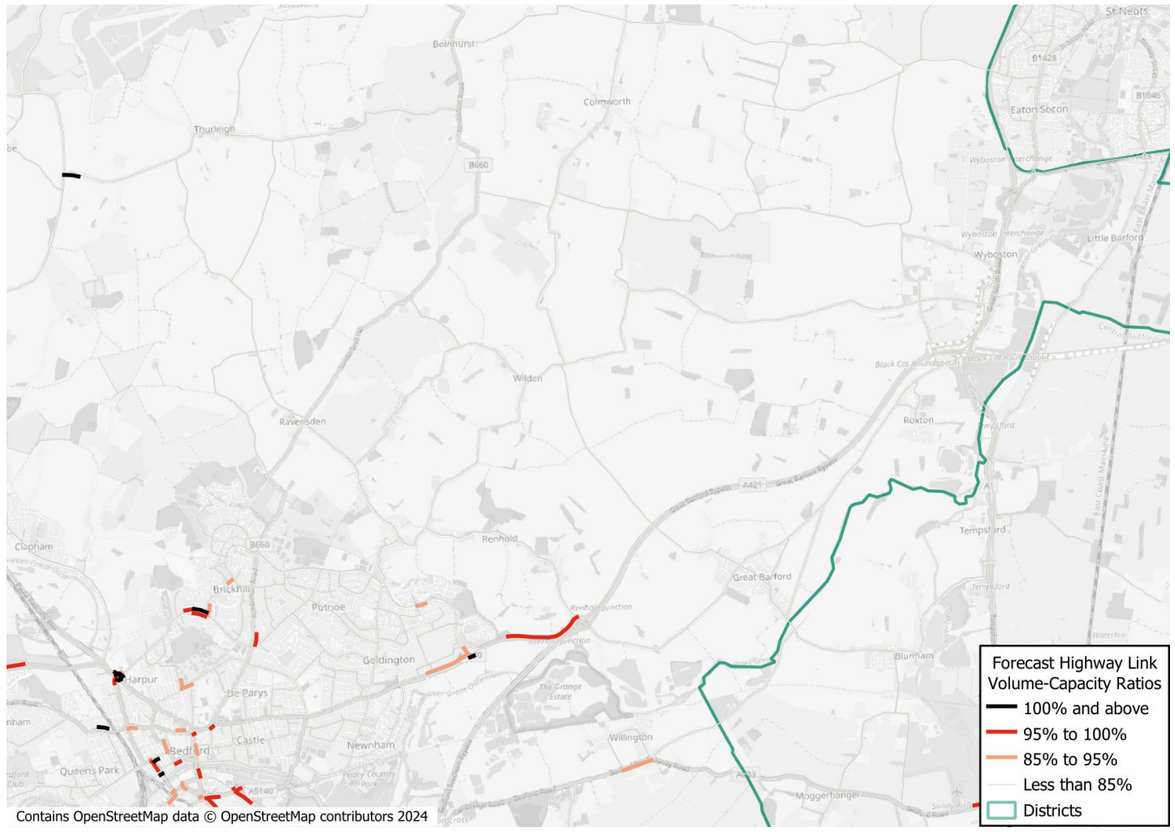
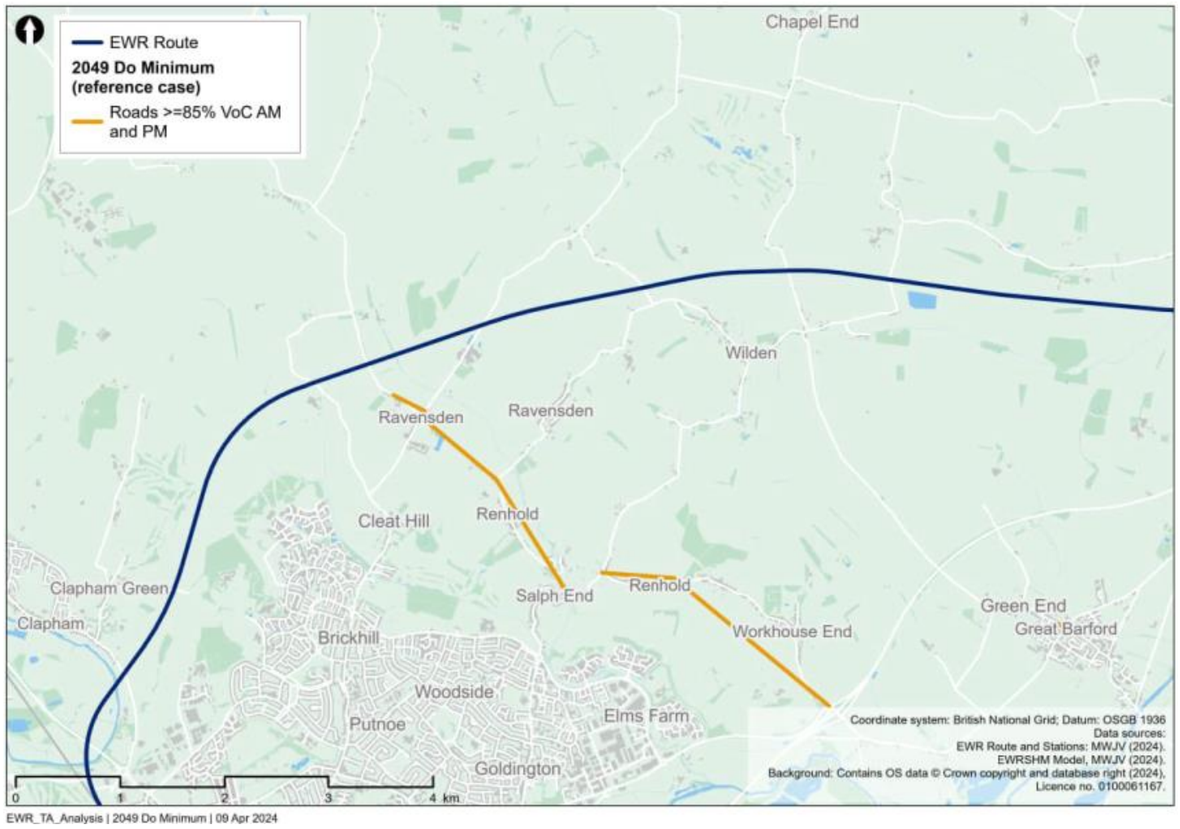


Figure B.2: Comparison of Volume-Capacity Forecasts, EWR TUR 2032 Do Minimum Forecast (source: EWR TUR Figure 53) vs. BBTM 2030 Reference Case (Clapham Green to Colesden)

East-West Rail Transport Update Report



Bedford Borough Transport Model

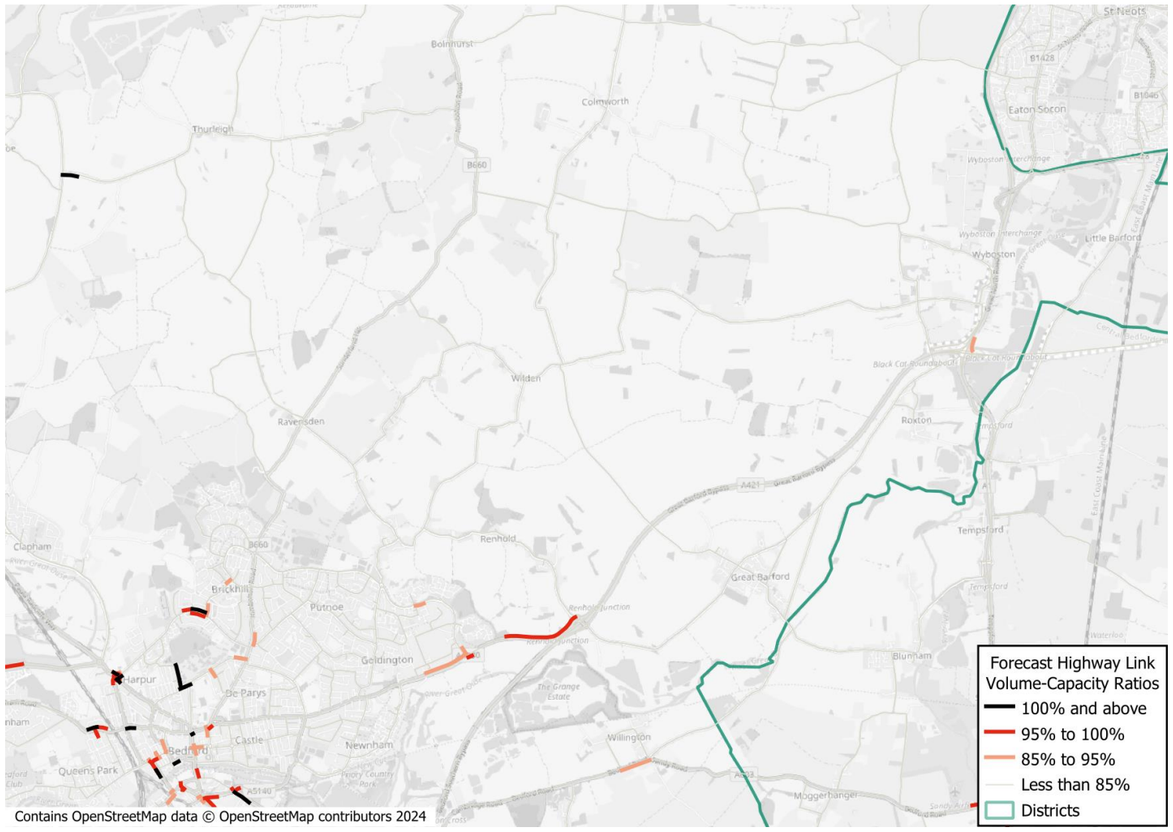
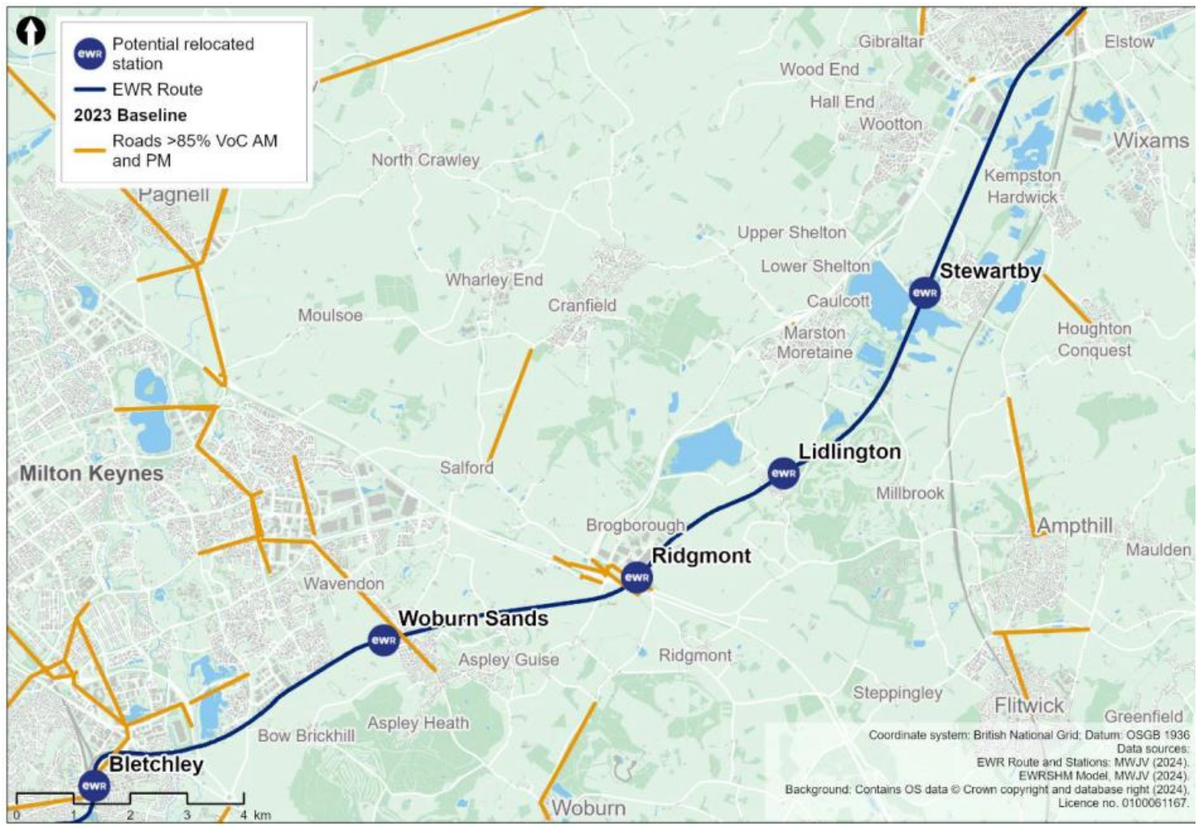


Figure B.3: Comparison of Volume-Capacity Forecasts, EWR TUR 2049 Do Minimum Forecast (source: EWR TUR Figure 55) vs. BBTM 2040 Reference Case (Clapham Green to Colesden)

Appendix C Comparison of Volume-Capacity Ratios (Fenny Stratford to Kempston)

East-West Rail Transport Update Report



Bedford Borough Transport Model

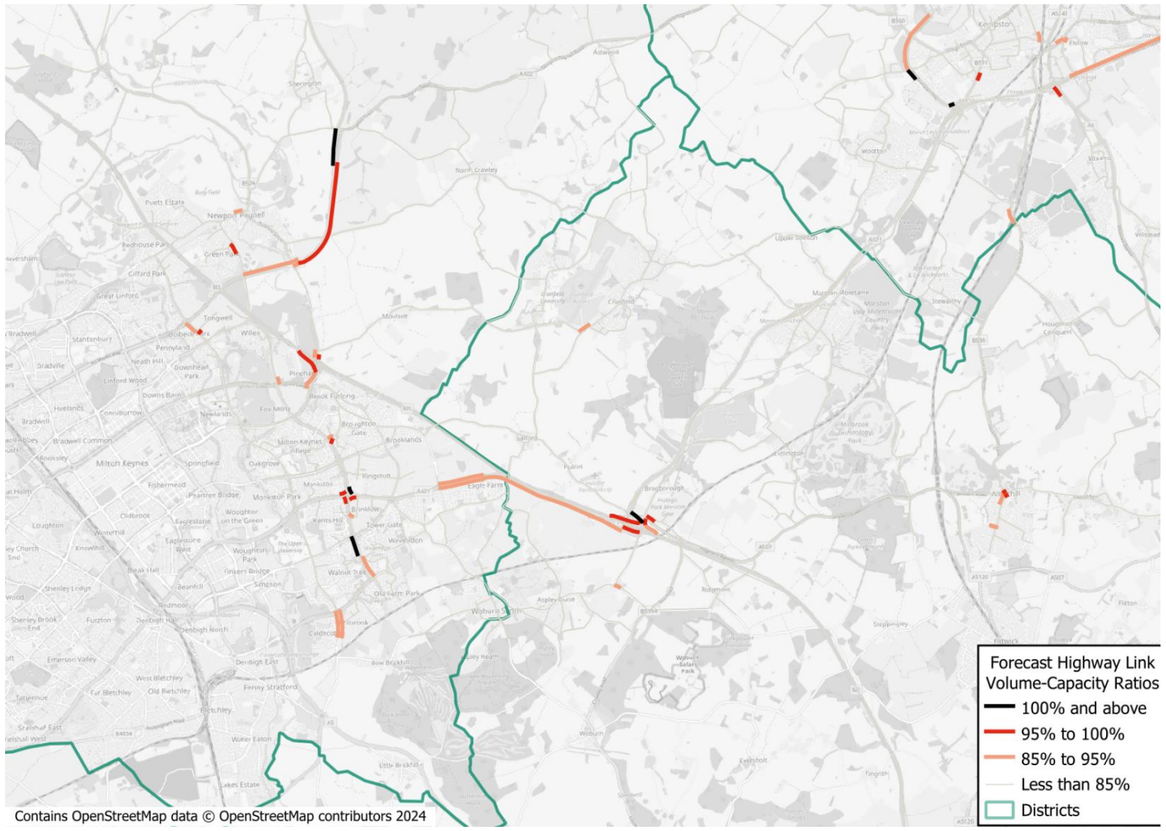
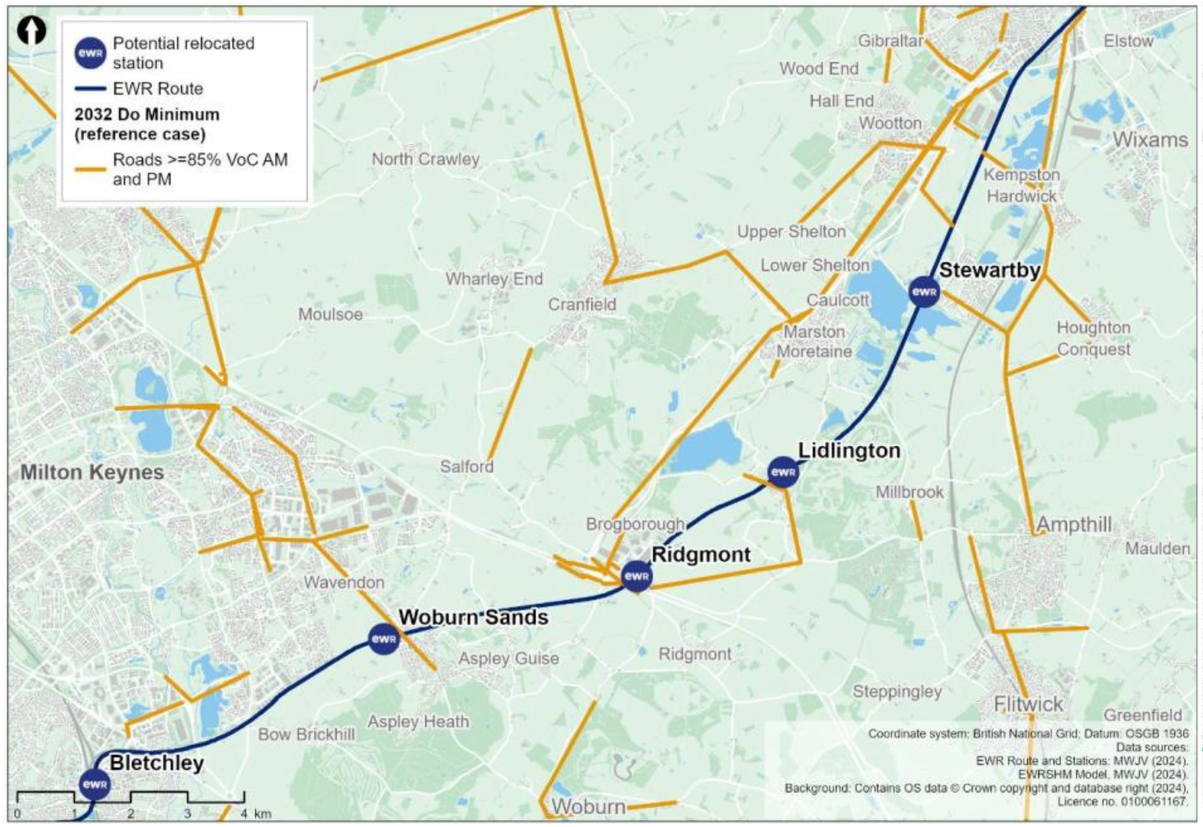


Figure C.1: Comparison of Volume-Capacity Forecasts, EWR TUR 2023 Forecast (source: EWR TUR Figure 27) vs. BBTM 2018 Base Year (Fenny Stratford to Kempston)

East-West Rail Transport Update Report



Bedford Borough Transport Model

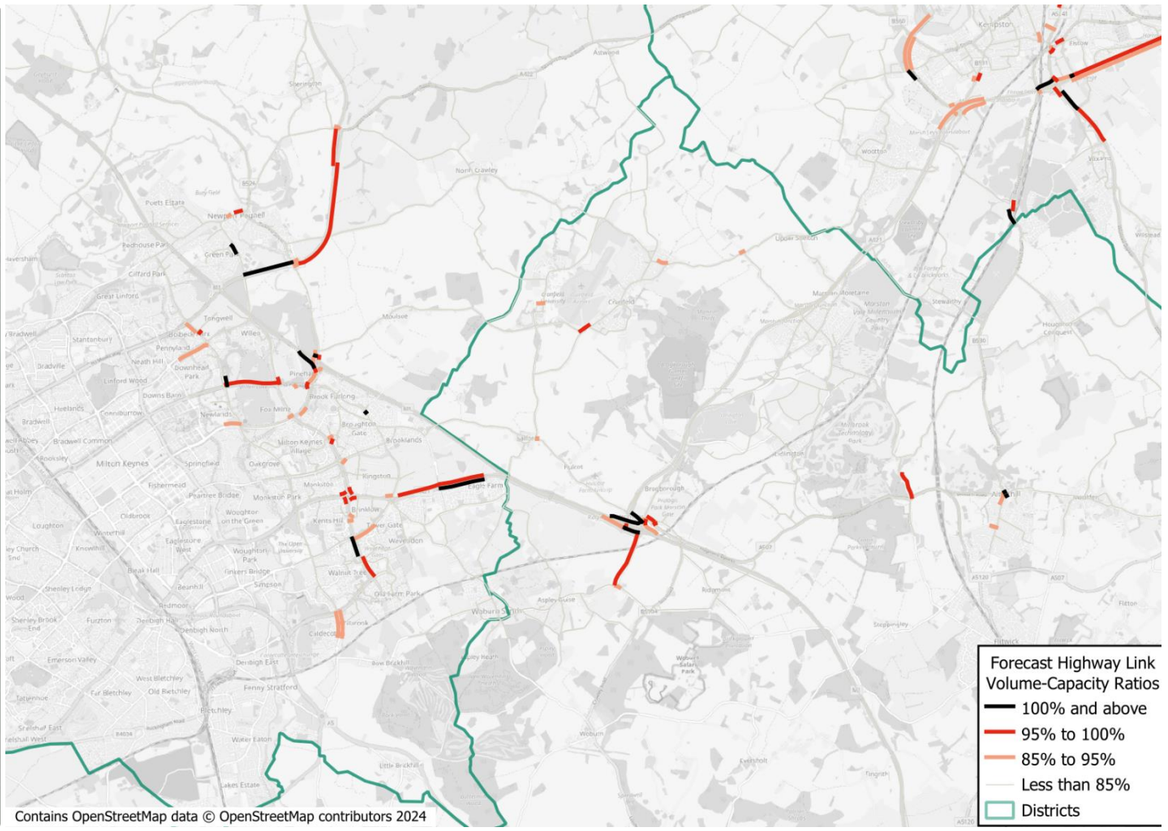
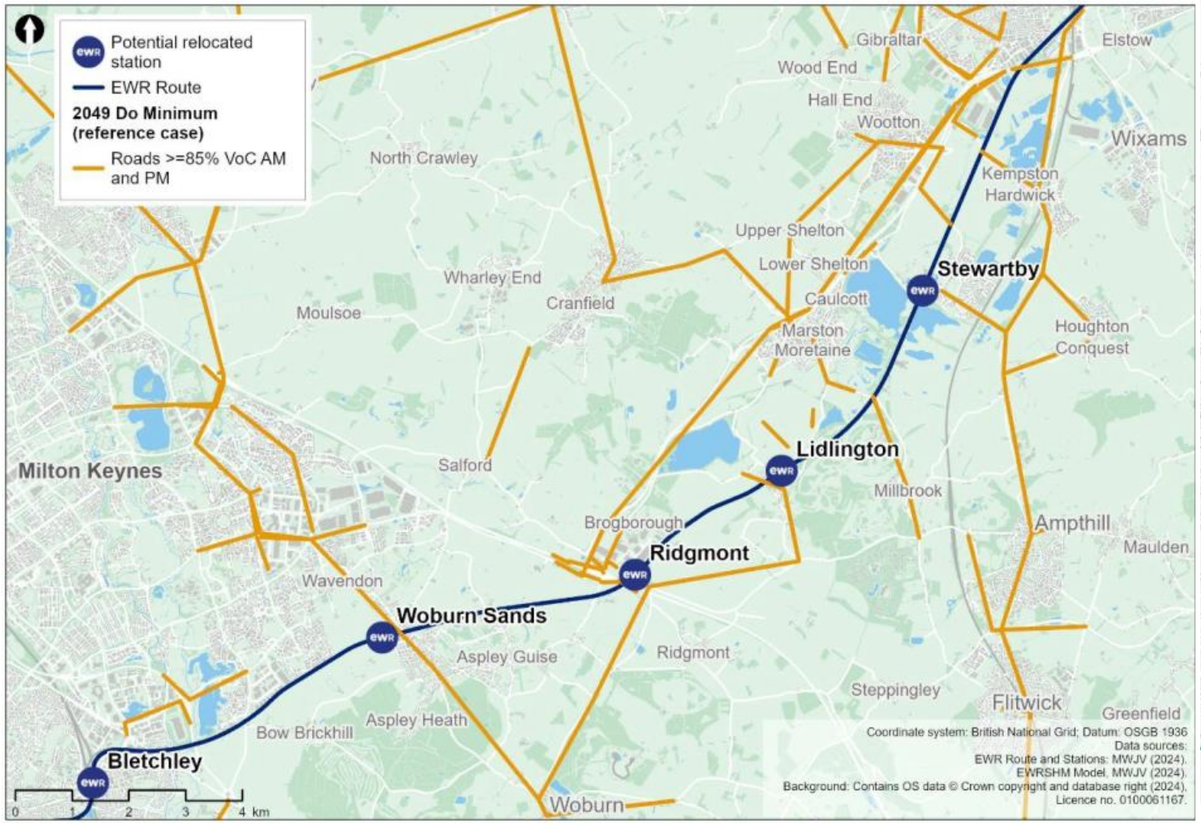


Figure C.2: Comparison of Volume-Capacity Forecasts, EWR TUR 2032 Do Minimum Forecast (source: EWR TUR Figure 33) vs. BBTM 2030 Reference Case (Fenny Stratford to Kempston)

East-West Rail Transport Update Report



Bedford Borough Transport Model

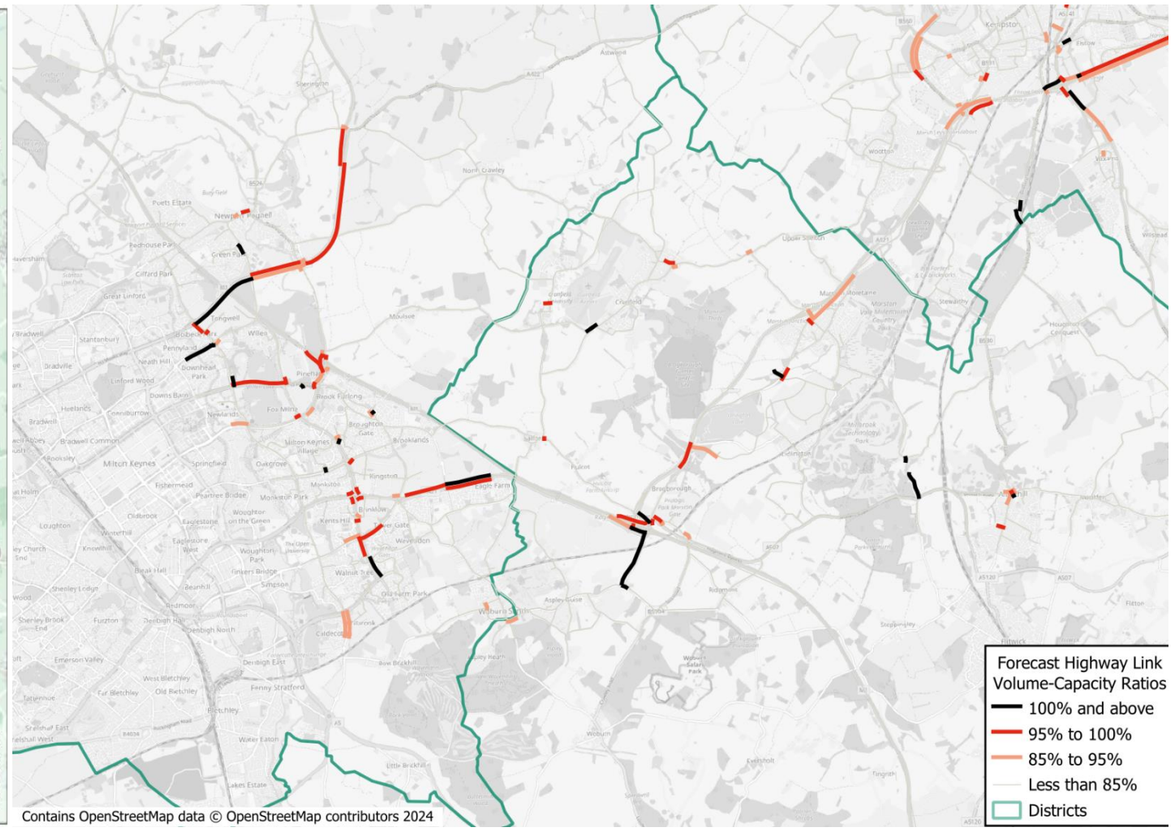
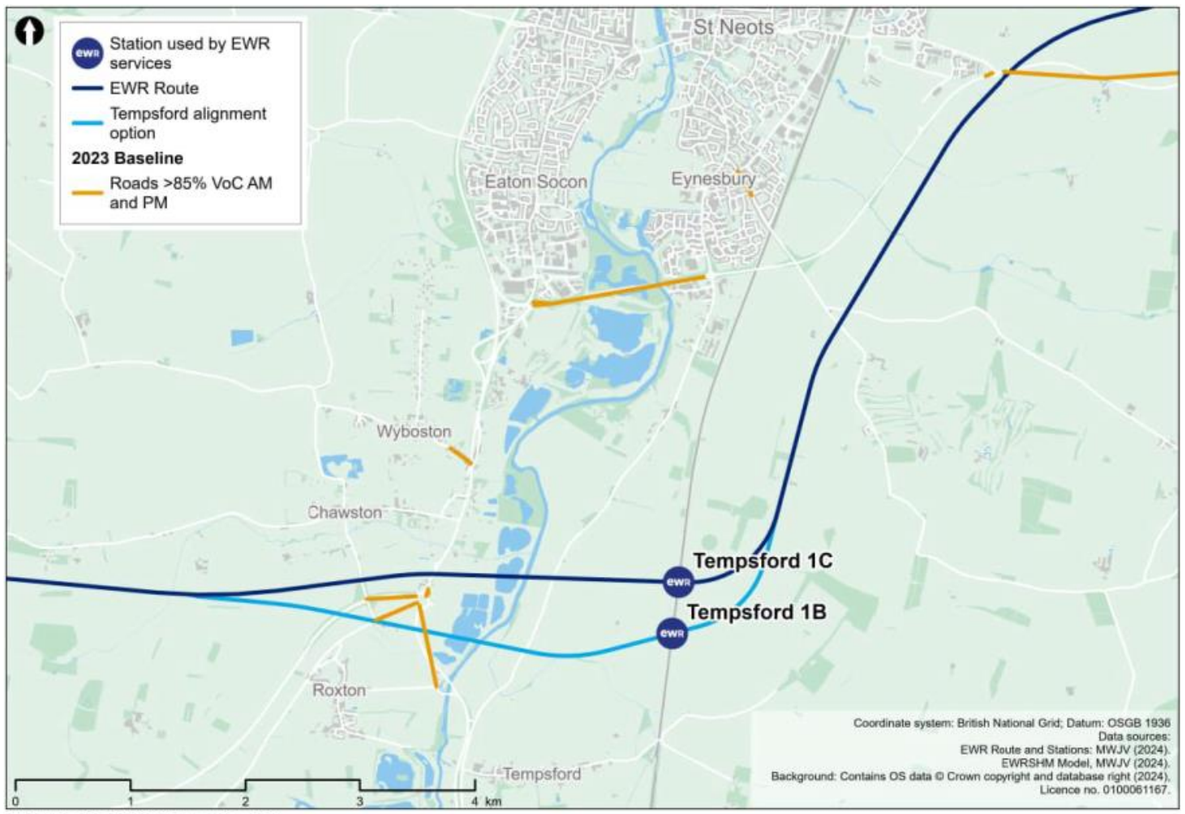


Figure C.3: Comparison of Volume-Capacity Forecasts, EWR TUR 2049 Do Minimum Forecast (source: EWR TUR Figure 35) vs. BBTM 2040 Reference Case (Fenny Stratford to Kempston)

Appendix D Comparison of Volume-Capacity Ratios (Roxton to east of St Neots)

East-West Rail Transport Update Report



Bedford Borough Transport Model

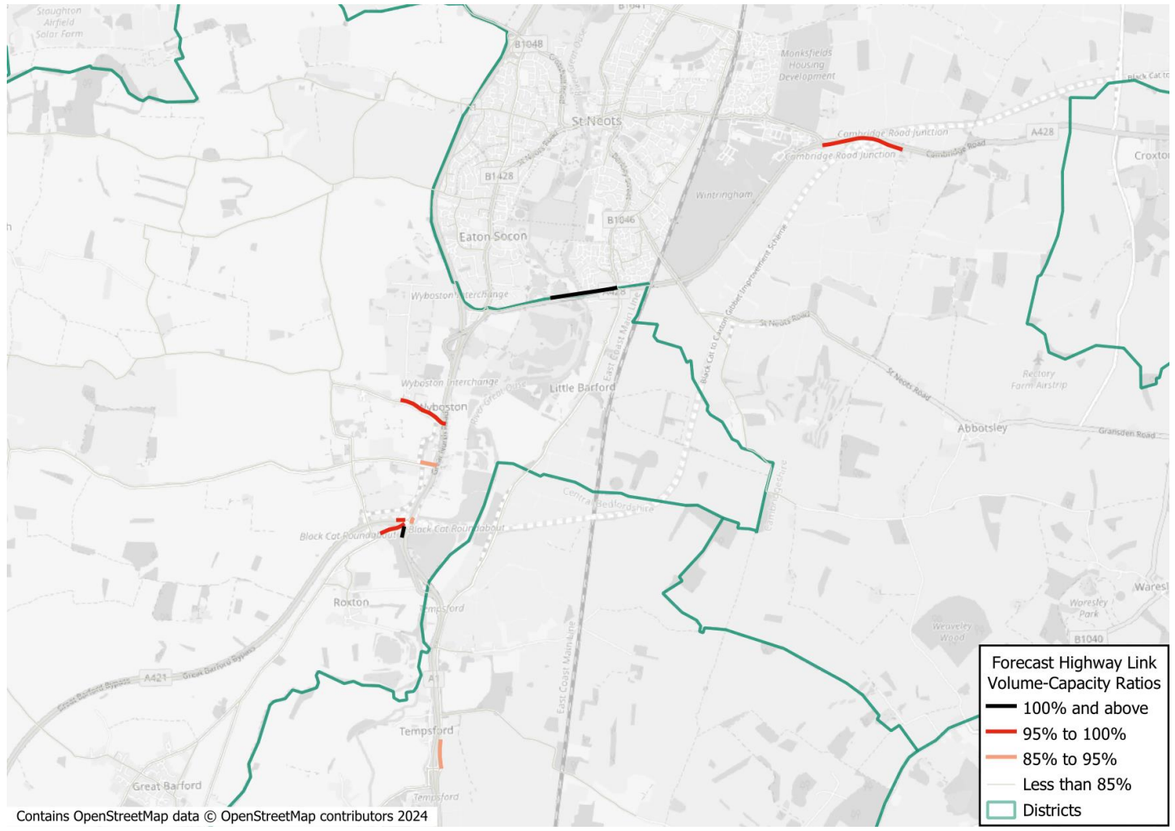
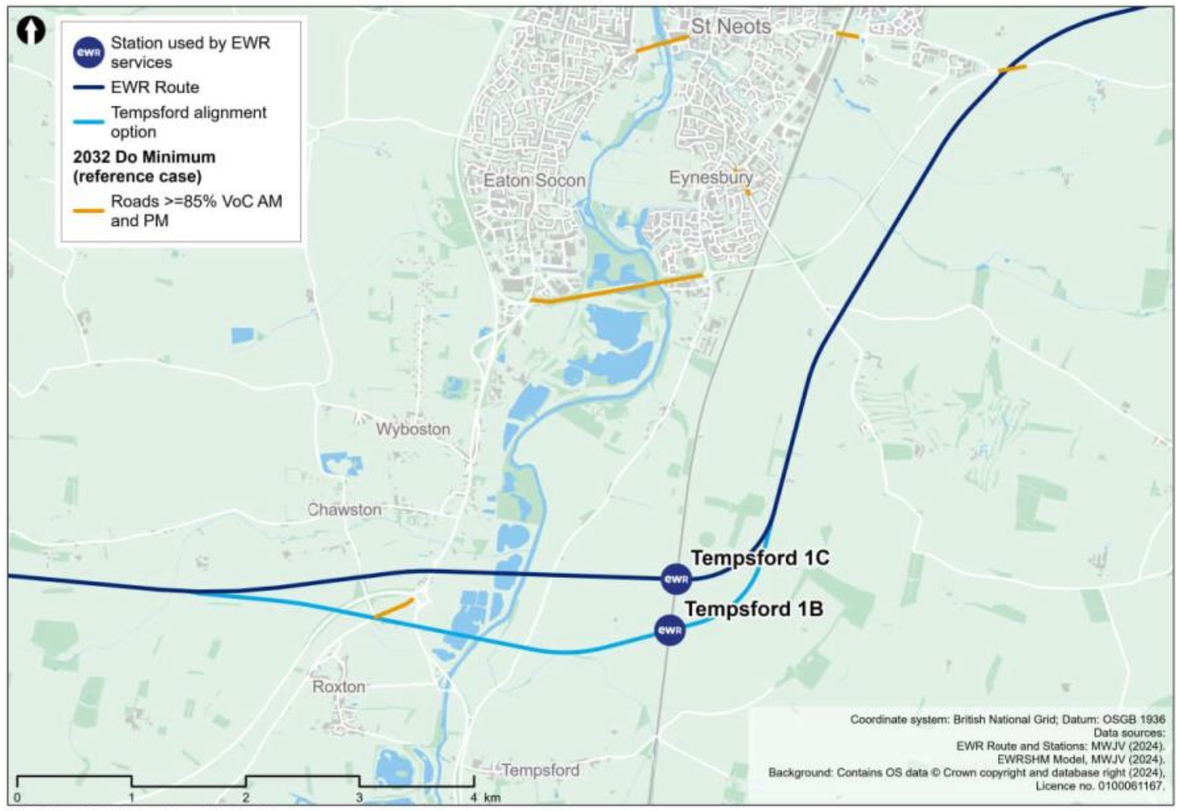


Figure D.1: Comparison of Volume-Capacity Forecasts, EWR TUR 2023 Forecast (source: EWR TUR Figure 60) vs. BBTM 2018 Base Year (Roxton to east of St Neots)

East-West Rail Transport Update Report



Bedford Borough Transport Model

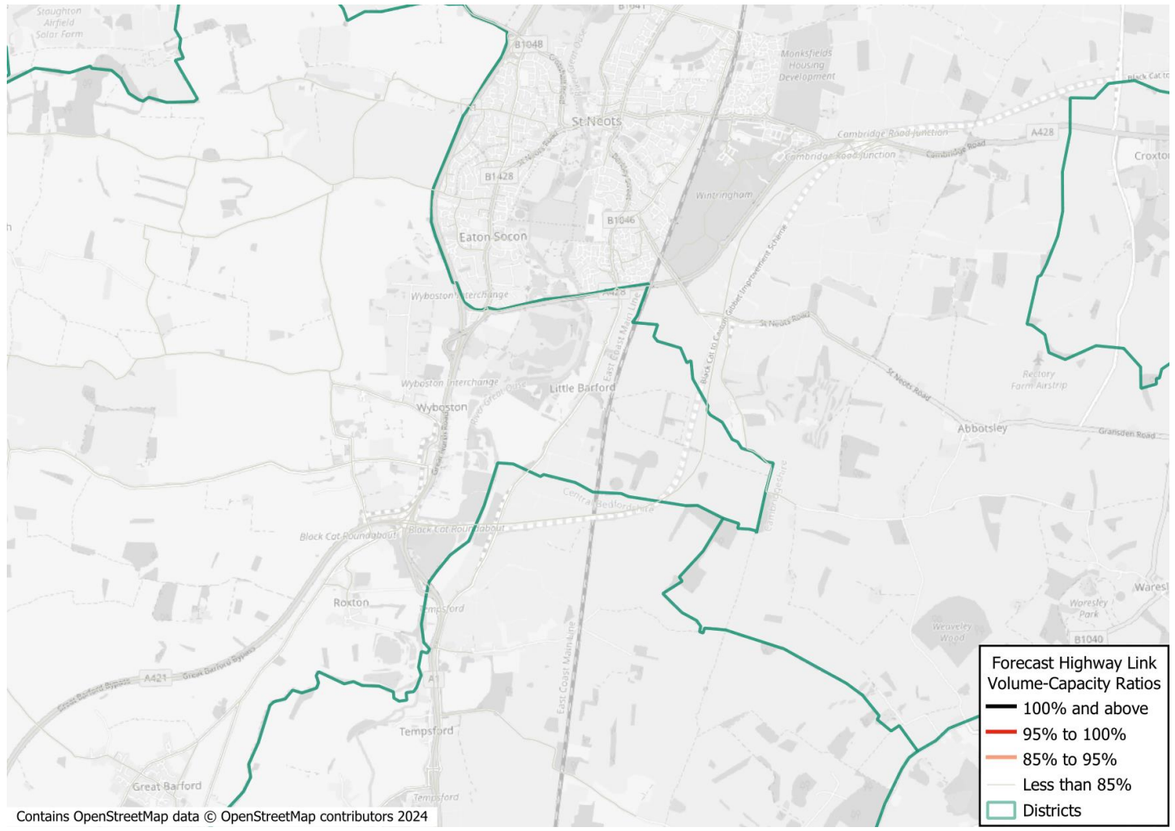
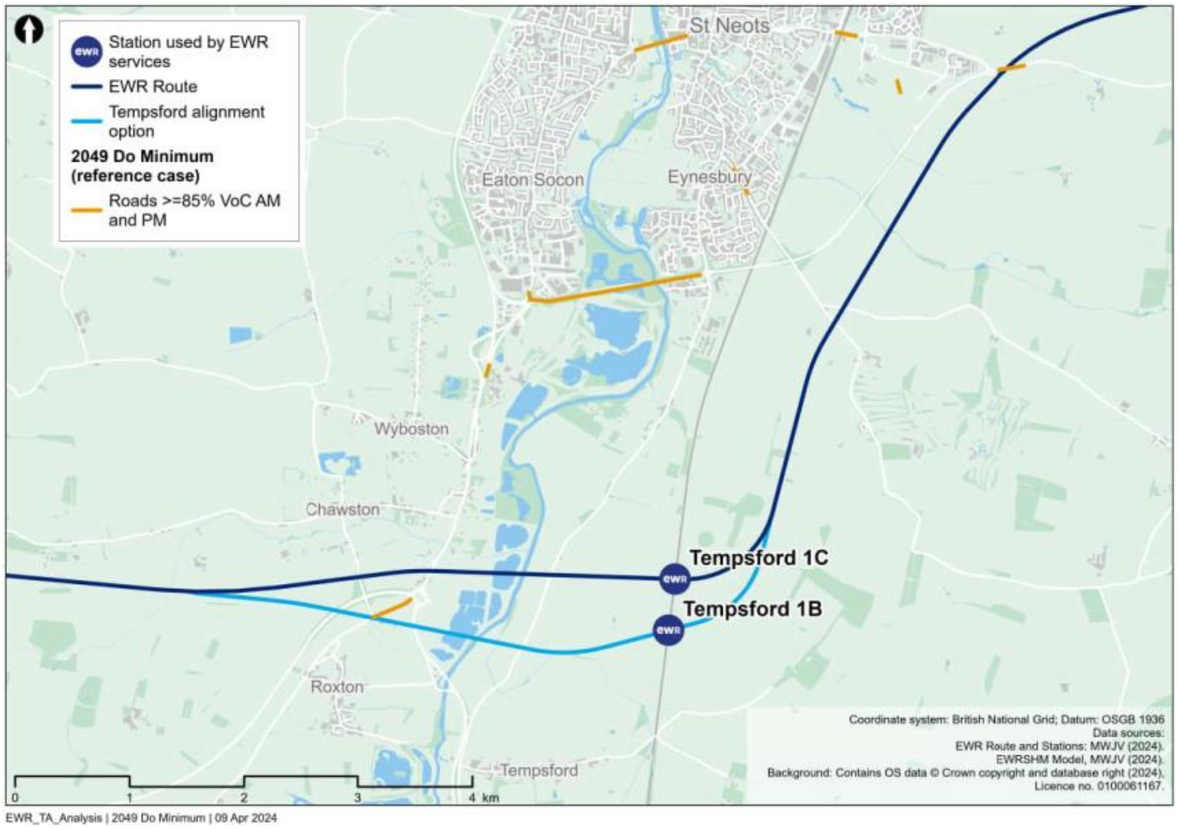


Figure D.2: Comparison of Volume-Capacity Forecasts, EWR TUR 2032 Do Minimum Forecast (source: EWR TUR Figure 62) vs. BBTM 2030 Reference Case (Roxton to east of St Neots)

East-West Rail Transport Update Report



Bedford Borough Transport Model

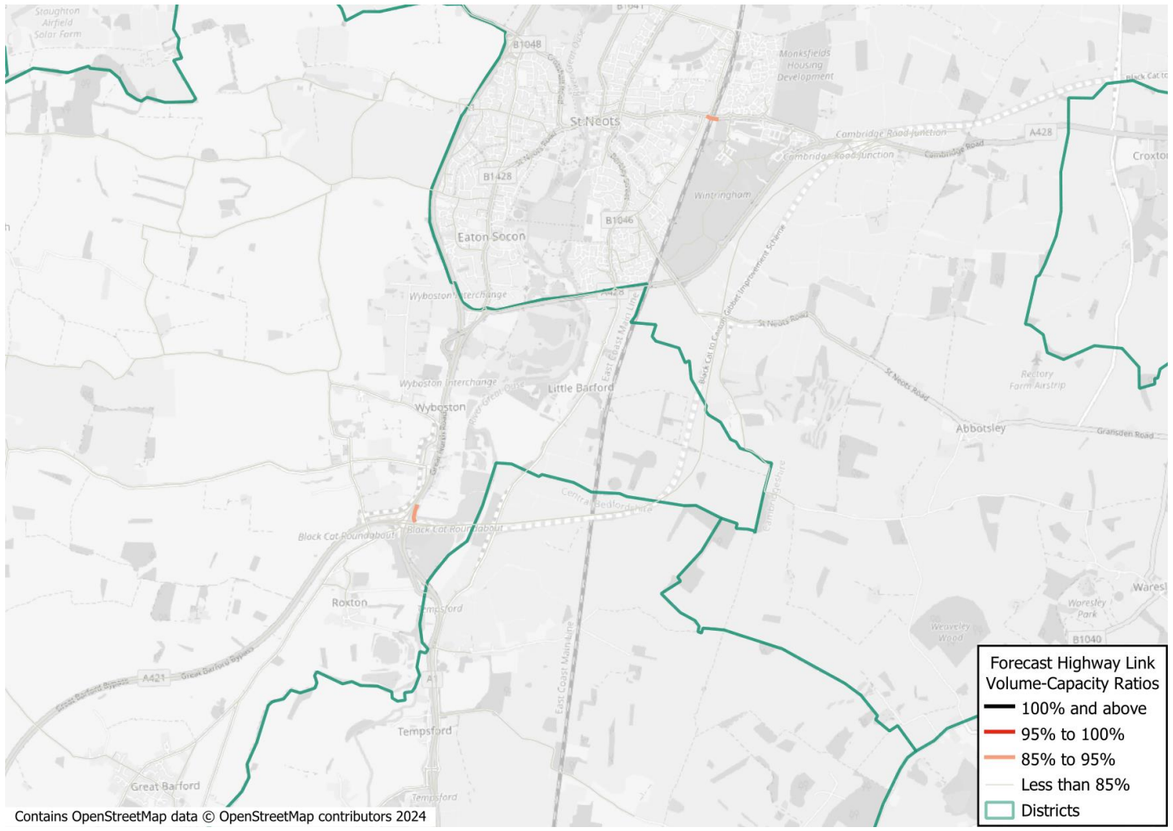


Figure D.3: Comparison of Volume-Capacity Forecasts, EWR TUR 2049 Do Minimum Forecast (source: EWR TUR Figure 64) vs. BBTM 2040 Reference Case (Roxton to east of St Neots)

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EWR PUBLIC CONSULTATION: MODELLING & ECONOMICS REVIEW

BEDFORD BOROUGH COUNCIL

SYSTRA

EAST WEST RAIL

EWR PUBLIC CONSULTATION: MODELLING & ECONOMICS REVIEW

IDENTIFICATION TABLE	
Client/Project owner	Bedford Borough Council
Project	East West Rail
Study	EWR Public Consultation: Modelling & Economics Review
Type of document	Report
Date	12/12/2024
File name	
Number of pages	31

APPROVAL

Version	Name		Position	Date	Modifications
1	Author	James Jackson	Director	10/12/2024	
	Checked by			DD/MM/YY	
	Approved by	James Jackson	Director	12/12/2024	
2	Author				
	Checked by				
	Approved by				

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1. INTRODUCTION

1.1.1 In November 2024 SYSTRA was commissioned by Bedford Borough Council (BBC) to provide support in developing their response to the Public Consultation launched by East West Rail (EWR) on the EWR scheme to link Oxford, Bedford and Cambridge.

1.1.2 Our work provides an assessment of the Wider Economic Impacts on Bedford, of the planned development of East West Rail (EWR) Connection Stage 2 (Bletchley – Bedford) and Connection Stage 3 (Bedford – Cambridge), which together with Connection Stage 1 linking Oxford and Bletchley (which will open during 2025) will provide a direct link between Oxford and Cambridge significantly improving connectivity by rail from Bedford.

1.1.3 We also provide a review of previous work on the economic case for the scheme, which is the latest available appraisal of the scheme and which is still relevant to the current scheme.

1.1.4 Within the 2024 Public Consultation EWR have updated their service specification covering Connection Stages 2 and 3 to provide two options that alter services west of Bedford. We have completed modelling work to asses these options against the previous "base" service specification. These two options are described in more detail below, but in summary the two options cover:

- **Existing Stations Option** – Extends Cambridge – Bedford services to Stewartby
- **Consolidated Stations Option** – Extends both Cambridge – Bedford to Stewartby with one of these services extended to Bletchley, however to achieve this five intermediate stations on the Marston Vale Line would be closed and improved locations provided for the remaining stations

1.1.5 This work builds on three previous studies. The first examined the impact of station locations on Bedford in 2019, prior to a preferred route being identified for CS3. The second study in 2022 examined the impact of EWR on Bedford in the light of the impact on business and commuter travel after COVID-19, and the third study in late 2023 examined different routing options between Bedford and Cambridge.

1.1.6 This work primarily builds on the 2022 and 2023 studies which explored the following three areas:

- Agglomeration impacts
- Labour supply impacts and the impact of hybrid working
- Direct impact on households and commuting patterns attributable to hybrid working

1.1.7 Within this work we have used the previously built models to test the latest service options proposed by EWR plus a sensitivity test looking at direct service to Milton Keynes Central.

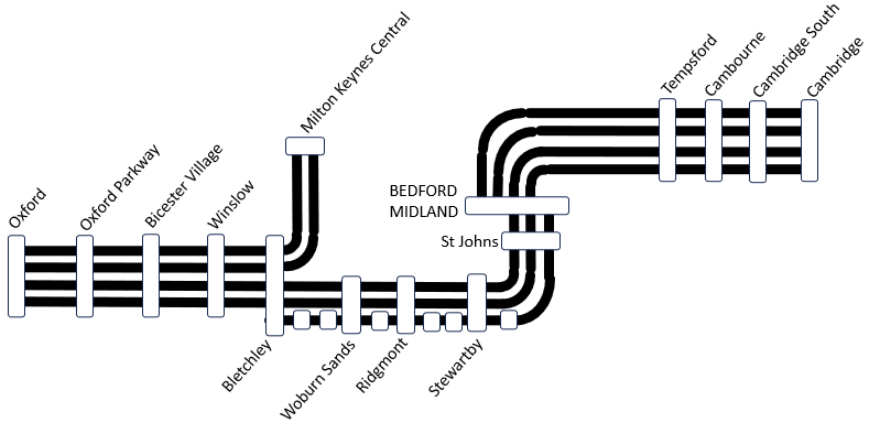
1.1.8 The key findings of the work is that Option 3 (Consolidated Stations), beings the greatest benefits to the Bedford area and that this could be further enhanced with a direct service to Milton Keynes as proposed in Option 4.

2. SERVICE OPTIONS & JOURNEY TIMES

2.1.1 In their November 2024 Public Consultation East West Rail have proposed two different service specifications for services east of Bletchley. Both of these are an evolution of a service specification contained in the 2023 consultation. We have assessed these two options against the 2023 service specification. Figure 1 below presents the 2023 EWR service specification, which is Option 1 within our modelling work.

2.1.2 The key feature of this service pattern are two direct services each hour between Bedford Midland and Oxford and four between Bedford Midland and Cambridge. Stewartby and Bedford St. Johns both enjoy two trains per hour to each of Oxford and Cambridge.

Figure 1. Option 1 – EWR 2023 proposed service pattern



2.1.3 The two service options proposed by EWR in the 2024 Public Consultation are defined below:

- Option 2:Existing Stations Option
- Option 3 Consolidated Services Option

2.1.4 In Option 2 the two Bedford – Cambridge services proposed in Option 1 are both extended to Stewartby calling at Bedford St Johns. The existing Marston Vale Line (MVL) service is retained in its current form

2.1.5 Within Option 3 the number of intermediate stations on the Marston Vale Line are reduced from ten to five, with the retained stations being relocated to optimise their locations in relation to existing and new development. Within the BBC area this would result in the closure of Kempston Hardwick station. This approach would allow one of the two services extended to Stewartby in Option 2, to be further extended to Bletchley.

Figure 2. Option 2 – Existing Stations service pattern

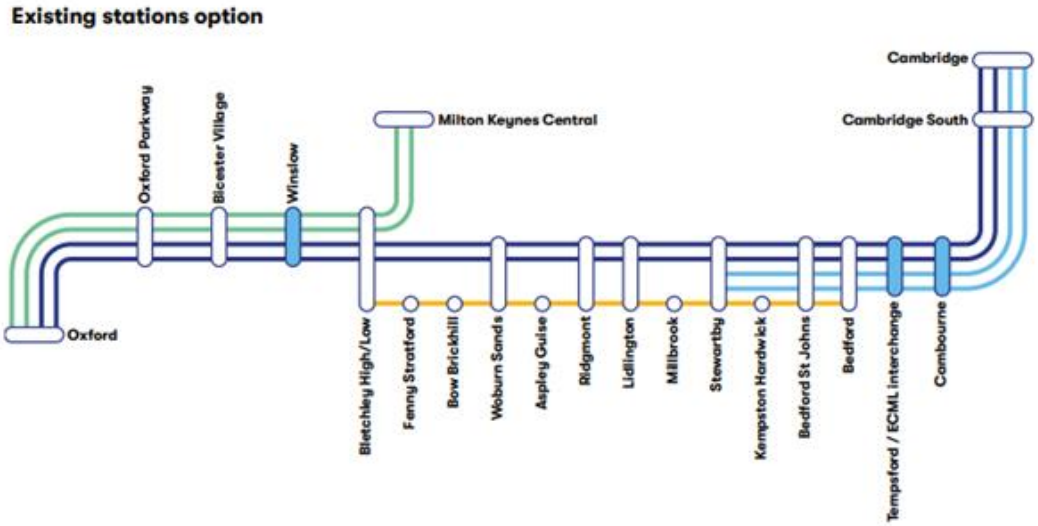
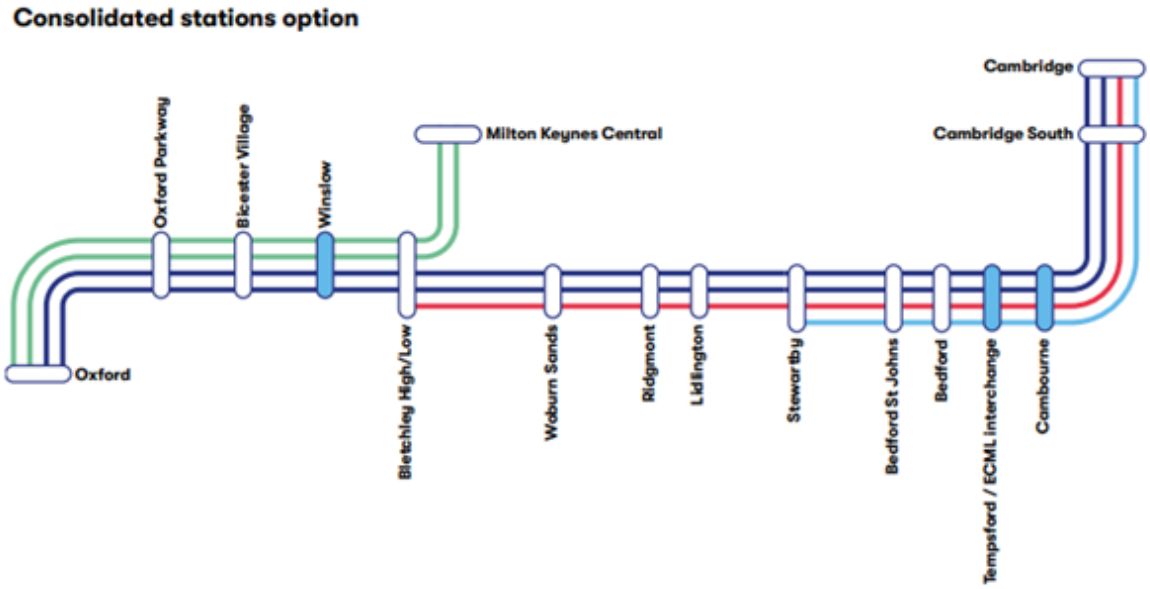


Figure 3. Option 3 – Consolidated Stations service pattern



2.1.6 As part of this work we have also developed a sensitivity test (Option 4). This extends the Cambridge – Bletchley service proposed in Option 3 to Milton Keynes Central providing further direct connectivity from Bedford.

2.2 Journey Times

2.2.1 Since the previous work was undertaken more detail on proposed and actual journey times for EWR services have emerged. This is partly through information available in the consultation but also based on draft timings for services on Connection Stage 1 between Oxford and Bletchley which are now available.

2.2.2 Within our modelling work we have updated journey times based on those set out in the discussion below.

2.2.3 The public consultation documents do not present significant detail on journey times, instead there are a series of narrative statements, which when combined with other information allow journey times to be inferred. The area with the greatest uncertainty and the most relevance to the latest services specifications is the section from Bedford to Bletchley. The public consultation states the following:

- "Oxford – Cambridge via Bedford and Bletchley in approximately 1 hour 35 minutes"
- Bedford – Cambridge "could take 35 minutes"
- Oxford – Milton Keynes "could be cut to under 45 minutes"
- Concept 2 [*consolidated stations option*] "reducing journey times between Bletchley and Bedford to under 30 minutes"

2.2.4 Based on the above we have assumed that the best case journey time for Oxford – Cambridge will be 95 minutes and that the Bedford – Cambridge section will take only 35 minutes.

2.2.5 With Connection Stage 1 (Oxford – Bletchley) approaching completion it is now possible to obtain detailed journey times for this section of route. Details of the timing of driver training journeys are now available on website such as Real Time Trains (using Network Rail timetable data). These show journeys which include allowances for intermediate station calls and performance and pathing allowances and are likely to be shadow schedules for passenger services when they are introduced. These show Oxford – Milton Keynes as having a journey time of 45 minutes, with the journey from Oxford to Bletchley taking 35 minutes. The figure below presents a screenshot of a typical schedule.

Figure 4. Oxford – Milton Keynes Journey Times (Source: Realtime Trains)

		WTT		Route	
Location	**Pl**	**Arr**	**Dep**	**Path**	**Line**
Oxford [OXF]	1		1140		URL
Oxford North Jn.		pass	1142		DB
Woodstock Road Junction ½ min performance allowance		pass	1143½		
Oxford Parkway [OXP]	2	1145½	1147		
Bicester Village [BIT]	2	1154½	1156½		
Bicester Gavray Junction [XGY]		pass	1157½		
Claydon West Jn		pass	1202½		
Winslow [WNO] 1 min engineering allowance		1206	1207		
Bletchley High Level [BLU] ½ min performance allowance	7	1215½	1218½		
Denbigh Hall South Jn		pass	1221		SL
Milton Keynes Central [MKC] Service forms 5F28 to Oxford	2A	1225		SL	

2.2.6 Based on the above the implication is that a 95 minute Oxford – Cambridge journey time requires a Bedford – Bletchley journey time of around 25 minutes including five intermediate stops.

2.2.7 Chapter 7 (p135) of the public consultation technical report notes the following in relation to Bletchley – Bedford journey times:

> *"In Concept 1b, the largest employment centres (Oxford, Milton Keynes, Bletchley, Bedford and Cambridge) would not benefit from improved rail journey times as the service pattern would be consistent with Concept 1a, with only two services per hour experiencing faster journey times at under 30 minutes between Bletchley and Bedford, as opposed to the 42 minutes required for the hourly Bletchley to Bedford service. This is despite the proposed station relocations under this concept, hence this concept received a minor worsening judgement*
>
> *In Concept 2, the largest employment hubs would benefit from improved rail journey times due to the replacement of the existing stopping service with a faster semi-fast service, as such providing three consistent services per hour on the MVL, reducing journey times between Bletchley and Bedford to under 30 minutes."*

2.2.8 Concept 1b refers to the existing stations option whilst Concept 2 refers to the consolidated stations option. It is ambiguous, but suggests that journey times of under 30 minutes are only achievable Concept 2, in part because some services will catch up Marston Vale Line stopping services in Concept 1b.

2.2.9 Our own high level timetabling analysis suggests that in the existing station options a journey time of 30 to 32 minutes would be achievable for EWR trains based on the removal of five station calls, but without any significant line speed increases. It has been assumed that a journey time of 25 minutes could be achieved to match the end to end journey time of 95 minutes.

2.2.10 The table below summarises our understanding around journey times, which forms the basis for our modelling work.

Table 1. EWR Journey Times

ROUTE SECTION	CONCEPT 1	CONCEPT 2	NOTES
Bedford – Bletchley	35 minutes	35 minutes	Based on shadow paths in WTT
Bletchley – Bedford	~30-32 minutes	~25 minutes	Concept 1 assumes current stopping journey times with 5 stops removed Concept 2 assumed to deliver 1 hour 35 minutes + includes Bedford and Bletchley dwell times
Bedford - Cambridge	35 minutes	35 minutes	EWR Consultation
Total	**1 hour 42 minutes**	**1 hour 35 minutes**	

3. IMPACT ON STATION CATCHMENTS

3.1.1 Within this chapter we present our approach to defining catchment areas for stations in the BBC area. This is a key part of the modelling process as it defines the volume of economic activity and population associated with each station. One of the main impacts on potential EWR passengers of the different service options is the effect it will have on station choice. The bulk of the BBC area is served by three stations under EWR:

- **Bedford Midland** – main station in central Bedford served by East Midlands Railway and GTR services. The station has a large charged car park, though access to the station is involves using congested routes at peak times
- **Bedford St. Johns** – local station to the south of central Bedford, currently only served by Marston Vale trains. The station lacks a car park but there is significant third part parking available in the surrounding area. As with Bedford Midland access by car can be congested
- **Stewartby** – existing station on the Marston Vale line to the south west of Bedford and close to significant new housing development. The station will enjoy direct services to both Oxford and Cambridge and is likely to be provided with a larger car park making it an attractive Park & Ride location. It is possible that the station site will be relocated to be more optimal for local development, however we have modelled the existing location in this study.

3.1.2 The three different service options impact the station choice of passengers. To reflect this we have undertaken modelling work to forecast station choice. This has been undertaken from Middle Super Output Areas (MSOAs) in the BBC area to three key EWR destinations:

- Cambridge
- Oxford
- Milton Keynes

3.1.3 We estimated generalised cost (GC) from each MSOA to each destination using the following process:

1. TRACC software was used to estimate journey times from the centroid of each MSOA to each of the three stations by car and on foot
2. Access time generalised costs were estimated by applying values of time to the access time for both modes and vehicle operating costs and car park charges for access by car
3. Average access GC was estimated using the following rules:
   - All trips under 2km were assumed to cycle or walk
   - All trips between 2km and 5km were averaged between car and cycle/walk
   - All trips over 5km were assumed to drive
4. Rail GC was estimated for each service option
5. The Rail GCs were added to access GC giving a combined GC for each MSOA to destination station and service level combination
6. For each service option the lowest GC was allocated for each MSOA – destination pair which allowed the preferred station for each flow to be identified

3.1.4 The table on the following page presents the allocation of stations by served option to each MSOA.

Table 2. Allocation of MSOAs to Station by Option

	OPTION 1			OPTION 2			OPTION 3		
	Cambridge	**Oxford**	**Milton Keynes**	**Cambridge**	**Oxford**	**Milton Keynes**	**Cambridge**	**Oxford**	**Milton Keynes**
Castle & Kingsway	Bedford Mid	St. Johns	St. Johns	St. Johns	Stewartby	Stewartby	Bedford Mid	Bedford	Stewartby
Queens Park	Bedford Mid	Bedford Mid	Bedford Mid	Bedford Mid	Stewartby	Stewartby	Bedford Mid	Bedford Mid	Bedford Mid
Kempston North	Bedford Mid	Stewartby	Stewartby	St. Johns	Stewartby	Stewartby	St. Johns	Stewartby	Stewartby
Cauldwell	St. Johns	St. Johns	St. Johns	St. Johns	Stewartby	Stewartby	St. Johns	St. Johns	Stewartby
Wilstead & Shortstown	Bedford Mid	Stewartby	Stewartby	Bedford Mid	Stewartby	Stewartby	Bedford Mid	Stewartby	Stewartby
Brickhill	Bedford Mid	Stewartby	Stewartby	Stewartby	Stewartby	Stewartby	Bedford Mid	Stewartby	Stewartby
Kempston Central & East	Bedford Mid	Stewartby	Stewartby	St. Johns	Stewartby	Stewartby	St. Johns	Stewartby	Stewartby
Bromham & Biddenham	Bedford Mid	Stewartby	Stewartby	Stewartby	Stewartby	Stewartby	Bedford Mid	Stewartby	Stewartby
Wixams & Elstow	Bedford Mid	Stewartby	Stewartby	Stewartby	Stewartby	Stewartby	Bedford Mid	Stewartby	Stewartby
Wootton & Stewartby	Bedford Mid	Stewartby	Stewartby	St. Johns	Stewartby	Stewartby	Bedford Mid	Stewartby	Stewartby
Newnham	Bedford Mid	Stewartby	Stewartby	St. Johns	Stewartby	Stewartby	St. Johns	Stewartby	Stewartby
Kempston West & South	Stewartby	Stewartby	Stewartby	Stewartby	Stewartby	Stewartby	Stewartby	Stewartby	Stewartby
Goldington	Bedford Mid	Stewartby	Stewartby	St. Johns	Stewartby	Stewartby	Bedford Mid	Stewartby	Stewartby
Clapham/Oakley& Thurleigh	St. Johns	Stewartby	Stewartby	St. Johns	Stewartby	Stewartby	St. Johns	Stewartby	Stewartby
Kingsbrook	St. Johns	St. Johns	St. Johns	St. Johns	Stewartby	Stewartby	St. Johns	St. Johns	Stewartby
De Parys	Bedford Mid	Stewartby	Stewartby	St. Johns	Stewartby	Stewartby	Bedford Mid	Stewartby	Stewartby

	OPTION 1			OPTION 2			OPTION 3		
Harrold, Chellington & Turvey	Bedford Mid	Stewartby	Stewartby	Bedford Mid	Stewartby	Stewartby	Bedford Mid	Stewartby	Stewartby
Riseley & Sharnbrook	Bedford Mid	Bedford Mid	Bedford Mid	Bedford Mid	Stewartby	Stewartby	Bedford Mid	Bedford Mid	Bedford Mid
Putnoe	Bedford Mid	Stewartby	Stewartby	Stewartby	Stewartby	Stewartby	Bedford Mid	Stewartby	Stewartby
Wyboston, Great Barford & Cople	Bedford Mid	Stewartby	Stewartby	St. Johns	Stewartby	Stewartby	Bedford Mid	Stewartby	Stewartby
Harpur	Bedford Mid	Bedford Mid	Bedford Mid	Bedford Mid	Stewartby	Stewartby	Bedford Mid	Bedford Mid	Bedford Mid

3.1.5 There are a number of points that emerge from the table:

- The dominance of Stewartby for access to Oxford and Milton Keynes in all options. This reflects both its good road access but also the reduced journey time towards Oxford by rail in all option relative to central Bedford stations. There is around a 10 minute journey time saving compared to Bedford Midland.
- In Option 2 Stewartby has an increased role reflecting the much poorer connectivity from central Bedford.
- Bedford St. Johns has an increased role in access to Cambridge in Option 3 as a result of its reduced journey time relative to Bedford Midland, though noting that the frequency from St. Johns is lower

4. AGGLOMERATION IMPACTS

4.1.1 Prior to the COVID-19 pandemic agglomeration impacts (which describe the productivity and output benefits associated with businesses being located close together), were seen as one of the major wider economic benefits of transport investment. SYSTRA has previously undertaken modelling work to examine the agglomeration impacts of EWR on the economy of Bedford. In this study we examine how changes in service options and station choice influence agglomeration impacts.

4.1.2 The scale and relevance of agglomeration impacts in relation to transport investment has unsurprisingly been brought into question by the impacts of virtual meetings. The Department for Transport has begun to explore this issue with a research paper, "**Agglomeration under Covid**". Whilst the paper identifies that more empirical research is required, it also highlights that agglomeration impacts will continue to exist, though the scale of those impacts needs reviewing. The report also highlights that the rise in home working and thus reduction in the capacity each company requires in a given location (in terms of office space) may actually increase agglomeration opportunities as more companies can be accommodated in smaller areas than in the past. This implied increase in the density of towns and cities is of relevance to public transport schemes such as EWR which serve town and city centres more effectively than a road network can.

4.1.3 In the EWR context this would imply that key nodes on EWR such as Cambridge, Bedford, Milton Keynes and Oxford would see an increase in the density of companies based in them and thus an overall increase in the level of output within the catchment area of stations, and as described in the following chapter this will also impact on skills matching in the labour market.

4.1.4 Based on this we believe that agglomeration impacts are still valid as there are both up and down sides associated with hybrid working. The move towards more structured attendance at offices as part of hybrid working in the last couple of years highlights this.

4.1.5 The following section sets out methodology for estimating agglomeration impacts.

4.2 Methodology

4.2.1 We have assessed the agglomeration impact on the wider economy of East West Rail in terms of the impact on Gross Value Added.

4.2.2 We have carried out this work using a model based on an approach developed by Network Rail as part of their series of Market Studies. The model produces an estimated change in the GVA as a result of changes to rail services. These results are based largely on the impacts of agglomeration between economies. For example, if Bedford and Milton Keynes are brought closer together then there will be an increase in the level of interaction between the two economies.

4.2.3 Given the context of this modelling we have applied a more disaggregate approach than in earlier modelling work, using the outputs of the station choice work described above.

Agglomeration Economies

4.2.4 At their broadest level, agglomeration economies occur when individuals benefit from being "near" to other individuals, and exist when the spatial concentration of economic activity gives rise to increasing returns in production. Transport and communications play a crucial role because, in most contexts, speed and low costs in transportation and communication provide a direct substitute for physical proximity .

4.2.5 Research has identified where improved rail connectivity between places of different size may provide economic benefits. The obvious example in UK terms is the difference between London and provincial cities where better connectivity will enable the smaller centre to become "a more attractive location; it starts off with lower wages and rents, and improved connectivity means that it will get better access to London's large economic market and large base of suppliers".

The Modelling Work

4.2.6 The model used by SYSTRA has been adapted to incorporate the impact of different economic sectors. The importance of this segmentation by economic sector has been highlighted in research on agglomeration and the 'connectedness' of locations; "there is some evidence that suggests that the strength of these relationships changes by economic sector, with some sectors likely to benefit more from concentration of activity than others"[1] .

4.2.7 The data incorporated into the modelling to define economic sectors was taken from Department for Transport WebTAG guidance on wider impacts (WebTAG Unit A2-1 & A2-4). The four sectors of the economy defined within the modelling are:

- Construction;
- Manufacturing;
- Consumer services;
- Producer Services

4.2.8 While the first two sectors are relatively self-explanatory, the components of the last two perhaps require further definition, as provided in the table below:

[1] Daniel Graham & Patricia Melo, *Advice on the Assessment of Wider Economic Impacts: a report for HS2,* March 2010

Table 3. Definition of Consumer & Producer Services Segments

CONSUMER SERVICES	PRODUCER SERVICES
Motor trade	Computer programming
Wholesale	Information services
Retail	Financial
Land transport	Insurance
Water transport	Auxiliary financial
Transport support	Legal and accounting activities
Post and courier	Activities of head offices
Accommodation	Architectural and engineering
Food and beverage service	R&D
Programming and broadcasting	Advertising and market research
Telecommunications	Other professional
Travel and related activities	Rental and leasing
Education Consumer Services	Employment activities
Repair of computers and goods	Security and investigation
Other personal service activities	Services to buildings
	Office administrative

4.2.9 As well as economic inputs the model also utilises information on in-vehicle journey times, frequency, the need for interchange and access time to and from stations, as well as fares. The approach taken to estimating the frequency and interchange penalties follows the Rail Delivery Group Passenger Demand Forecasting Handbook guidance.

Interpreting Outputs

4.2.10 The outputs of the work are presented for 2023 prices. It should also be noted that values are presented for a single year (I.e. £ per annum) rather than being cumulative over a number of years.

4.2.11 The values are presented as two way flows, meaning that the aggregate value includes both the impact on the origin and the destination. It is possible to divide the results into origins and destinations, however it must be noted that in practice the distribution of the impacts will depend on individual circumstances and linkages within the economy. Even with the best quality of data this is a representation of how the economy might respond and in practice individual companies will respond to reduced transport costs in different ways.

4.3 Results

4.3.1 The table below presents the results of this updated analysis for flows to / from Bedford as well as East-West Rail internal flows. These flows are presented as 2023 values at 2023 prices.

Table 4. GVA Impact per annum of Options 1 to 4 (£ 2023 prices)

	CAMBRIDGE	OXFORD	MILTON KEYNES	TOTAL
Option 1	£5.75	£3.36	£2.80	**£11.91**
Option 2	£5.94	£3.36	£2.80	**£12.09**
Difference	**£0.18**	**£-**	**£-**	**£0.18**
% Difference	**3%**	**0%**	**0%**	**2%**
Option 3	£5.94	£3.53	£3.22	**£12.69**
Difference	**£0.18**	**£0.18**	**£0.42**	**£0.78**
% Difference	**3%**	**5%**	**15%**	**7%**
Option 4	£5.94	£3.53	£3.63	**£13.1**
Difference	**£0.18**	**£0.18**	**£0.83**	**£1.19**
% Difference	**3%**	**5%**	**30%**	**10%**

4.3.2 It can be seen that in all options there is a very substantial benefit to the Bedford economy of the construction of EWR which is consistently around £12m per annum, around half of which is generated from improved connectivity to Cambridge. It is the transformational impact of new links to Oxford and Cambridge rather than the detailed aspects of service specifications that determine the scale of these outputs.

4.3.3 It can be seen that the overall impact on GVA of changes to the service specification is comparatively limited. For Option 2 the only impact relates to the effect of increasing service frequency from two to four trains per hour between Stewartby, Bedford St Johns and Cambridge. As a frequency uplift, rather than the operation of a new direct link, the impact is expected to be modest.

4.3.4 Option 3 generates impacts across all three destinations. The Option 2 impact towards Cambridge is retained, whilst both Oxford and Milton Keynes benefit from a reduction in journey times on the Marston Vale Line. Additionally Milton Keynes sees a further uplift associated with an assumed frequency uplift between Bedford and Bletchley.

4.3.5 In Option 1 and 2 it is assumed that no through passengers would use the Bedford – Bletchley stopping service from end to end, as the service would be caught up by the following EWR service, meaning that there would be little or no time advantage in catching it. In Option 3 this changes with stopping service replaced by an extended Cambridge – Bedford EWR service, giving journey times consistent with other EWR services on the route. This has therefore been treated as frequency enhancement, giving

three opportunities to travel to Milton Keynes (via interchange) each hour. This triggers a 15% uplift in agglomeration on this flow and a 7% uplift overall.

4.3.6 Option 4 is a further development of Option 3 with proposed Cambridge – Bletchley service extended to Milton Keynes, providing a direct link between the two towns for the first time. This doubles the uplift towards Milton Keynes, relative to Option 3 from £0.42m to £0.83m, generating a 30% uplift in agglomeration benefits between Bedford and Milton Keynes relative to Option 1.

5. LABOUR SUPPLY IMPACTS

5.1 Introduction

5.1.1 SYSTRA has undertaken an assessment of labour impacts in line with *TAG Unit A2.3 Employment Effects.* This TAG unit provides guidance on quantifying and valuing the employment effects of transport investment, this is focussed on labour supply impacts.

5.1.2 Labour supply impacts are an area which will be impacted by hybrid working. Labour supply impacts in relation to transport investment are based on the idea that by improving transport connectivity employers will have access to a wider labour market (and thus be able to better match jobs with individuals with suitable skills), and that also employees will have access to more jobs. Ultimately this leads to a trickledown effect where those not participating in the economy may move to being economically active.

5.1.3 For those jobs where hybrid working is a realistic option there are likely to be significant labour supply benefits. In extremis full time virtual working makes home location in relation to job location irrelevant. A more realistic, and emerging scenario, is one where the catchment area for labour supply for a job expands to a point which is acceptable to the labour force for travelling at the frequency at which they are required to physically attend a work location. This will vary for individuals and economic sectors, but if it is assumed that employees attend work physically between two and three times per week it implies that a doubling of previous generalised costs for a journey on a single day would be the upper limit of a catchment (i.e. the same amount is spent on the time and cost of transport as pre-hybrid working, but it is spread over fewer days). These types of scenarios are linked to the following sections on housing and commuting costs.

5.1.4 In such a scenario car use may well become less attractive for commuting if a car in a household (especially a second car) is required solely for commuting as making fewer trips increases the cost per trip by spreading the fixed cost of ownership over fewer trips. Similarly the impact of congestion and journey time reliability means that the increase in the catchment area for jobs when travelling by car is unlikely to have a linear relationship to distance

5.1.5 In contrast, where direct rail services are provided, the increase in catchment area for jobs is likely to be more linear in nature.

5.1.6 In the following sections we deploy the TAG methodology to explore the impact on Bedford of EWR across the three service options.

Methodology

5.1.7 Labour supply impacts have been quantified as specified in *TAG Unit A2.3 Equations 2 and 3.* These formulae take account of the generalised cost of travel between an origin and a destination in the do minimum and do something scenarios. The following origin – destination pairs were used in the analysis:

- Bedford – Oxford

- Bedford – Milton Keynes Central
- Bedford – Cambridge

5.1.8 We have undertaken model runs that examine the impact of EWR with and without hybrid working. To achieve this we have undertaken the following tests:

- Test 1: Change in labour supply impact with opening of EWR **without** hybrid working (assume rail mode share of 50% after EWR opens)
- Test 2: Change in labour supply with EWR and hybrid working with an assumption that rail generalised cost falls by 50% and car generalised cost falls by 25% (assumes that savings relating to car are non-linear)
- Test 3: Change in labour supply impacts with EWR and hybrid working and an assumption that weekly commuting costs fall by 50% for rail but remain constant for car (isolates rail impact from combined car and rail impact in Test 2)

5.1.9 The 50% rail mode share is felt to be a reasonable assumption for longer distance commuter flows where rail is competing against a relatively congested road network. The assumption about hybrid working is felt to be robust as many office workers have returned for between 2 and 3 days per week. It is likely the EWR will be most attractive to those in office/ home working based roles.

5.2 Results

5.2.1 The table below presents the results of the three tests and three service options for each of Cambridge, Oxford and Milton Keynes.

Table 5. Labour supply impact on Bedford – Cambridge (£ per annum GVA 2023 prices)

	OPTION 1	OPTION 2	% DIFF	OPTION 3	% DIFF	OPTION 4	% DIFF
Test 1	£25,071	£30,753	23%	£30,753	23%	£30,753	23%
Test 2	£307,271	£310,112	1%	£310,112	1%	£310,112	1%
Test 3	£210,399	£213,240	1%	£213,240	1%	£213,240	1%

Table 6. Labour supply impact on Bedford – Oxford (£ per annum GVA 2023 prices)

	OPTION 1	OPTION 2	% DIFF	OPTION 3	% DIFF	OPTION 4	% DIFF
Test 1	£5,470	£5,470	0%	£6,061	11%	£6,061	11%
Test 2	£23,332	£23,332	0%	£23,628	1%	£23,628	1%
Test 3	£16,461	£16,461	0%	£16,756	2%	£16,756	2%

Table 7. Labour supply impact on Bedford – Milton Keynes (£ GVA 2023 prices)

	OPTION 1	OPTION 2	% DIFF	OPTION 3	% DIFF	OPTION 4	% DIFF
Test 1[2]	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Test 2	£1,338,556	£1,338,556	0%	£1,457,083	9%	£1,593,625	19%
Test 3	£732,527	£732,527	0%	£795,618	9%	£870,175	19%

5.2.2 The results of Test 1 show only modest absolute labour supply impacts for Bedford without hybrid working in place, irrespective of service level. This is in line with similar types of modelling work undertaken pre COVID on other schemes. Values often appear low as they are measuring the change in the level of output and employment triggered by improved labour supply. Milton Keynes is notable in that even with EWR in place on average car retains the lowest generalised cost for all but a handful of MSOAs in Bedford and therefore the impact should be seen as neutral.

5.2.3 The results for test 2 and 3 are important as they highlight that hybrid working with an assumed reduction in generalised cost per job per week bring much greater benefits through increased catchment areas for jobs. In these circumstance rail has an increased role as passengers have greater ability to realise costs savings than those travelling by car.

5.2.4 As with agglomeration modelling Option 2 has a modest impact on flows to Cambridge and no impact on flows to Oxford and Milton Keynes, whilst Option 3 has a larger impact on flows to Milton Keynes and Oxford.

5.2.5 Option 4 only shows changes to the results associated with Milton Keynes, where the sensitivity test of a one direct train per hour increases the scale of the uplift from 9% to 19%. This is a sizeable uplift, but may well be understated as this would represent new connectivity by rail in an area with an already established labour market which relies heavily on car.

5.3 Summary

5.3.1 This section has explored the scale of the labour supply impact of EWR on the Bedford area both with and without the impacts of hybrid working. The modelling work has highlighted that hybrid working has the potential to **increase** the benefits of EWR by increasing labour market catchments, supporting the direct high quality connectivity that EWR provides to town and city centres.

5.3.2 The modelling also highlights that Options 3 and 4 have the greatest impact on employment supply benefits overall.

[2] The results for Milton Keynes in Test 1 have been suppressed as they indicated a negative impact on GVA. This was due to rail having a higher generalised cost than car. When the mode share for rail was increased this resulted in a higher average generalised cost. This is a function of the service proposed for Milton Keynes which requires an interchange at Bletchley to reach Milton Keynes from Bedford and indicates that the mode share for frequent commuting may not increase significantly for those people commuting five days per week.

6. HYBRID WORKING & BENEFITS TO HOUSEHOLDS

6.1.1 The COVID-19 pandemic has radically shifted working patterns for employees who were previously office based. After a sustained period of home working through the pandemic a longer term pattern of hybrid working with time split between home and offices is emerging. Different organisations and occupations are taking different approaches to this but home working in some form for most previously office based workers has been normalised.

6.1.2 Across the existing rail network this change has triggered a series of difficulties with large fixed costs of operation for intensive commuter services no longer being matched by previous levels of demand and revenue.

6.1.3 The context of the East West Rail route and the service that will be operated is very different to intensive commuter operations such as those radiating from London. A hybrid working environment may help strengthen the benefits of EWR. The rationale for this hypothesis is that hybrid working allows individuals to live further from their work without incurring the level of cost and journey time disbenefit that they would have previously. Travelling less frequently allows individuals to locate in locations that have a lower living cost or allows them to live in larger homes for the amount they may be paying elsewhere.

6.1.4 On the EWR route housing costs in Oxford and Cambridge are exceptionally high, whilst they are lower in Milton Keynes and Bedford. The connectivity improvements that EWR will bring will make living in Bedford and working in Oxford or Cambridge more practical and attractive. However hybrid working brings an added dimension to this.

6.1.5 In a pre-hybrid working scenario with workers based full time in an office, commuting costs (both financial and time costs) would offset the benefit of lower housing costs. With hybrid working an assumption that desk based workers are typically based at home half the time means that commuting costs fall and the benefits of living in Bedford and working in Cambridge and Oxford are greater. Thus housing development proposed along the length of the Oxford – Cambridge Arc can have a greater role in reducing pressure on housing costs in centres such as Oxford and Cambridge.

6.1.6 Those workers who enjoy a combined lower housing cost and lower commuting costs will have a greater disposable income that in turn will be spent within the local economy. Again hybrid working brings an added dimension to this, with more individuals spending time working from home they are more likely to spend their disposable income in the economy of Bedford rather than spending it in the area in which their job is based.

6.1.7 In the following section we explore the scale of these benefits.

6.2 Modelling the impact of hybrid working

6.2.1 The modelling work we have completed attempts to quantify the benefits to households of living in Bedford in lieu of Oxford, Cambridge or Milton Keynes with and without EWR and with and without hybrid working in place.

6.2.2 The main sources of data for our work have been ONS data on house prices at MSOA level, and ONS data on the average size of mortgages. We have also used estimates from our

work in the previous section to estimate typical financial and generalised costs (i.e. inclusive of time penalties) for key flows on EWR, by road and rail.

6.2.3 To understand the impacts we have completed the following steps:

- Obtained average house price data for MSOAs in Bedford, Oxford and Cambridge
- Obtained data on average mortgage advances as a proportion of sale prices as the basis for estimating housing costs
- Estimated monthly mortgage payments in each location based on as assumed interest rate of 5.6% and a repayment period of 25 years. This is a typical rate for a five year fixed rate mortgage with an average loan to value ratio (68%) in December 2023
- Estimate cash costs of rail services on EWR from Bedford to Cambridge, Oxford and Milton Keynes
- Estimate access time to stations from each MSOA in the BBC area
- Estimate generalised costs (cash costs + time costs)
- Annualise the cash and generalised costs for pre-hybrid and hybrid working scenarios. (pre-hybrid assumes five day per week travel and hybrid assumes an average of 2.5 days travel)
- Add travel costs to mortgage costs in Bedford versus mortgage costs in destinations to estimate change in living costs and establish if a net saving is achievable

6.3 Results

6.3.1 In the following tables we present the average savings per annum per household from the BBC area to Cambridge, Oxford and Milton Keynes, for each service option. Results are presented for rail cash, and rail generalised costs.

Table 8. Changes in household and commute costs BBC area to Cambridge

	WITHOUT HYBRID		WITH HYBRID	
	RAIL CASH	RAIL GC	RAIL CASH	RAIL GC
Option 1	£3,939	-£6,218	£6,955	£1,876
Option 2	£3,971	-£5,885	£6,971	£2,043
% Difference	1%	5%	0%	9%
Option 3	£3,939	-£5,885	£6,955	£2,043
% Difference	0%	5%	0%	9%
Option 4	£3,939	-£5,885	£6,955	£2,043
% Difference	0%	5%	0%	9%

Green = Living in Bedford and commuting to Cambridge is cheaper than living in Cambridge. Red = Living in Bedford and working in Cambridge costs more than living in Cambridge

6.3.2 The table above shows that on a without hybrid working assumption of commuting five days a week living in Bedford and working in Cambridge would reduce cash costs when travelling by rail, but this would be offset by the values of travel time held by passengers. With hybrid working there are real savings for the passengers both in cash and generalised cost terms.

6.3.3 In the case of Cambridge the results for Options 2, 3 and 4 are the same, as the timetable change towards Cambridge is consistent in all options. The results show that whilst in a no hybrid working scenario the time impact of travel offsets the cash impacts, it remains an improvement on Option 1 as all parts of the Bedford catchment have a four train per hour service to Cambridge. In a hybrid working scenario it can be seen that there are both cash and generalised cost benefits, and that these increase by 9% between Option 1 and Options 2 to 4.

6.3.4 With hybrid working and EWR, Bedford would remain an attractive place to locate for people working in Cambridge due to the relatively low journey time and the high cost of housing in Cambridge relative to Bedford, irrespective of which of the three service options were chosen.

Table 9. Changes in household and commute costs BBC area to Oxford

	WITHOUT HYBRID		WITH HYBRID	
	RAIL CASH	RAIL GC	RAIL CASH	RAIL GC
Option 1	£6,230	-£7,403	£9,850	£3,033
Option 2	£6,230	-£7,403	£9,850	£3,033
% Difference	0%	0%	0%	0%
Option 3	£6,230	-£6,862	£9,850	£3,304
% Difference	0%	7%	0%	9%
Option 4	£6,230	-£6,862	£9,850	£3,304
% Difference	0%	7%	0%	9%

Green = Living in Bedford and commuting to Oxford is cheaper than living in Cambridge. Red = Living in Bedford and working in Oxford costs more than living in Oxford

6.3.5 The results for Oxford are comparable to those for Cambridge, with Bedford being most attractive for hybrid workers. Option 2 has no impact as the timetable is consistent with

Option 1. Options 2 and 3 show an improvement of 7% in a without hybrid working scenario and 9% in a with hybrid working scenario. This shows that the journey time changes associated with Marston Vale Line and the consolidated stations option bring measurable benefits to the current and future residents of the Bedford area.

Table 10. Changes in household and commute costs BBC area to Milton Keynes

	WITHOUT HYBRID		WITH HYBRID	
	RAIL CASH	RAIL GC	RAIL CASH	RAIL GC
Option 1	-£3,427	-£15,747	-£1,827	-£7,987
Option 2	-£3,427	-£15,747	-£1,827	-£7,987
% Difference	0%	0%	0%	0%
Option 3	-£3,541	-£14,557	-£1,884	-£7,392
% Difference	-3%	8%	-3%	7%
Option 4	-£3,427	-£13,373	-£1,827	-£6,800
% Difference	0%	15%	0%	15%

Green = Living in Bedford and commuting to Milton Keynes is cheaper than living in Milton Keynes. Red = Living in Bedford and working in Milton Keynes costs more than living in Milton Keynes

6.3.6 Table 10 shows that there are no circumstances where living in Bedford and commuting to Milton Keynes would reduce costs relative to living in Milton Keynes. This reflects the comparable housing costs between the two settlements, which are markedly lower than both Cambridge and Oxford. It can however be seen that Options 3 and 4 both make meaningful differences to the results. This is important as in reality there are a number of factors influencing decisions on where people live which means for some households improved connectivity between Bedford and Milton Keynes could justify living in one and commuting to the other.

6.4 Summary

6.4.1 This analysis has shown that the introduction of hybrid working has the scope to expand the benefits of EWR by increasing the attractiveness of commuting from locations such as Bedford to Cambridge and Oxford. There is increased scope for reducing pressure on housing markets in Cambridge and Oxford whilst increasing spend in the economy of Bedford from those households who benefit from reduced mortgage or rental costs and thus have greater disposable income.

6.4.2 It has also been shown that the revised service patterns proposed by EWR further increases the attractiveness of Bedford for commuting to Cambridge and Oxford, though

this is not the case for flows to Milton Keynes due to the smaller differential in house prices.

7. ECONOMIC CASE COMMENTS

7.1.1 The 2024 public consultation has not provided any update to the business case for the scheme. We have therefore reviewed the documents associated with the 2023 Route Update Announcement, which provides detail on the economic case. This was based around the then proposed service specification from which the two 2024 services specifications have been derived.

7.1.2 Within this section we provide a commentary on the work contained in the Economic & Technical report appendices. It has not been possible to validate the work undertaken by EWR so we have limited our comments to observations on the approach taken and to opportunities for further enhancing the case.

7.2 Appraisal Results

7.2.1 The economic appraisal presented in the 2023 route alignment consultation showed the EWR scheme to represent poor value for money, with no options generating a Benefit Cost Ratio (BCR) in excess of 1.00 (this covers four route alignments). The table below summarises the appraisal results.

Figure 5. Appraisal Results from 2023 Consultation

Table - Appraisal Results for 4 tph Options, High Growth, 2010 PV (£m)

Heavy rail options, High, 4 tph	HR1	HR2	HR3	HR5
Level 1 Benefits (excl. WEIs)	£953m	£970m	£934m	£933m
Level 1 & 2 Benefits (incl. WEIs)	£1101m	£1122m	£1082m	£1081m
Total Costs	-£3851m	-£3407m	-£3764m	-£4308m
Revenue	£716m	£707m	£685m	£712m
Net Cost to Government	-£3135m	-£2700m	-£3079m	-£3596m
Level 1 BCR	0.30	0.36	0.30	0.26
Level 2 BCR	0.35	0.42	0.35	0.30
Land value uplift	£228m	£228m	£229m	£229m

DD Revenue	£1197m	£1193m	£1180m	£1194m
Indirect Tax Loss	-£164m	-£163m	-£161m	-£164m
Move to more/less productive jobs	£294m	£294m	£272m	£272m
Total Benefits	£1459m	£1481m	£1422m	£1418m
Net Cost to Government	-£1938m	-£1508m	-£1900m	-£2402m
Indicative Level 3 BCR	0.75	0.98	0.75	0.59

7.2.2 The Level 1 BCRs which contain transport user and non-user benefits all produce results below 0.40. The addition of Level 2 benefits which cover wider economic impacts have only a small effect on the BCR. However the addition of Level 3 benefits (which are not

typically included in BCRs) and which covers land value uplift and the impact of access to more productive job do have the effect of moving the BCR much closer to 1.00, highlighting the importance of development to the case for the scheme.

7.2.3 This suggests that given the transformational nature of this scheme and the specific association with the delivery of new development Level 3 benefits should be seen as a core part of the appraisal.

7.2.4 In the section below we set out perspectives on how the demand modelling and therefore the appraisal could be improved through the application of sensitivity tests and amended modelling approaches.

7.3 Demand Modelling Approach

7.3.1 EWR state that they have used two differing modelling approaches, the first being a uni-modal gravity model which is used to support the economic dimension. The second is a trip end model designed to support the strategic case, which overcomes the constraints associated with a gravity model.

7.3.2 The gravity model, which is TAG compliant, has a number of limitations that are likely to cause it to underestimate demand for EWR:

7.3.3 **Post Pandemic Working Patterns –** The model is calibrated to 2018/19 data and therefore pre dates the COVID pandemic and the associated changes in commuting patterns. This is addressed through the application of a DfT COVID sensitivity test to reduce demand. This overlooks the potential upside associated with hybrid working that can facilitate longer distance commuting. As highlighted above the nature of the housing markets in Oxford and Cambridge mean that commuting from intermediate locations is financially attractive and is shown to be more viable under circumstances where hybrid working is in place. Therefore whilst the number of trips per person might fall there is scope for a larger number of passengers to be travelling overall, as more people might locate in new development close to the EWR route and commute by rail than has originally bene anticipated.

7.3.4 **Employment –** The model has excluded significant employment growth in the Cambridge area, so the model will be underestimating demand from these sources.

7.3.5 **Modal Constraints** - Being a Uni Modal model it does not consider rail-road competitiveness, which again limits the level of demand that can be forecast, where the road network is constrained and congested and further growth in road use is unrealistic. This will especially be the case for medium/long distance commuting where travel by road will be unrealistic due to the time constraints and journey reliability issues associated with reaching specific destinations.

7.3.6 The trip end model is designed to overcome these issues by providing a narrative on how demand could change in a transformational world.

7.3.7 The limitations around trip end modelling include:

- Inability to capture the impact of service frequency – it would not be possible to assess the Options 2 and 3 relative to Option 1 as described above, only new links or stations could be assessed.
- It can only handle a small number of flows, which will constrain the modelling of impacts to a specific range of flows
- It is prone to bias when choosing benchmarks to support trip rate being used. This is a particular risk with EWR where there are few comparators with similar characteristics.

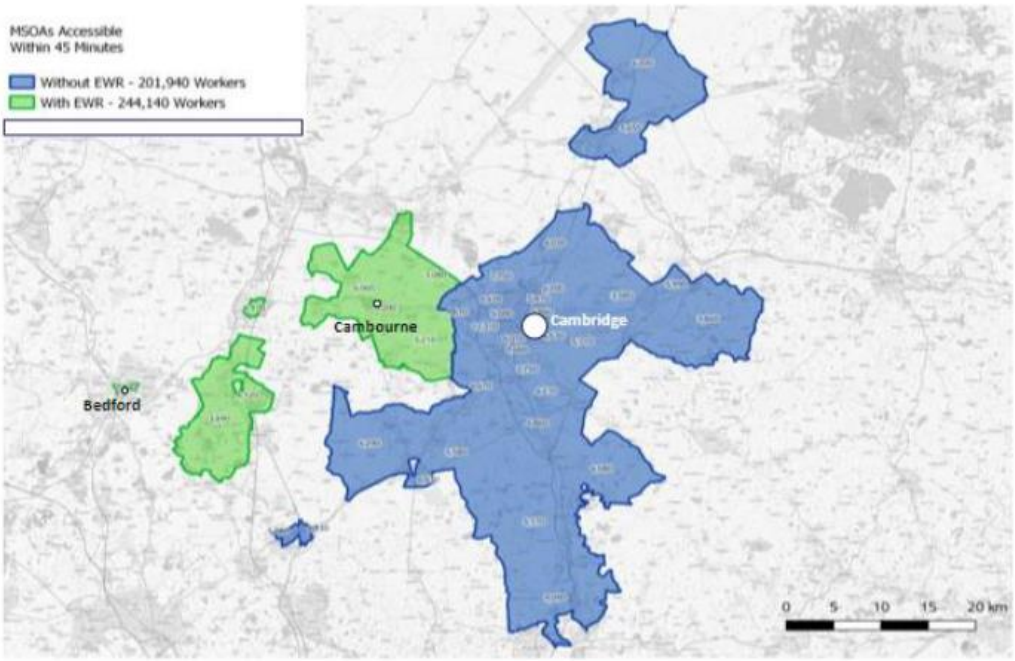
7.3.8 The observations above suggest that in developing the scheme further there is a case for strengthening the modelling with sensitivity tests to include:

- Positive impacts of hybrid working – increased number of commuters offsetting fewer trips per commuter
- Exploring opportunities for greater abstraction form car
- Inclusion of all employment sites in the catchment area.

7.4 45 Minute Journey Times

7.4.1 Much of the assessment of the scheme is based on an assumption that the propensity to commute to a given destination falls rapidly when travel time exceeds 45 minutes. Within the context of EWR and Bedford this means that only small parts of Bedford are seen as being commutable to Cambridge via EWR and Oxford would not be commutable. An example of the 45 minute catchment area from Cambridge with EWR is presented below.

Table 11. Cambridge 45 minute travel band with EWR



7.4.2 It can be seen how only a small portion of Bedford falls within the Cambridge commuting area. In developing the appraisal further providing sensitivity tests that increase travel times, this assessment further when estimating demand would improve the case for the scheme. The justification for this is linked both to existing commuting patterns into cities

such as London where commutes in excess of 45 minutes are commonplace, but also through the impacts of hybrid working which has increased the ability to travel further but over fewer days, in situations where the net impact over a week or year for the commuter has been to reduce costs. Incorporating this into modelling of EWR demand improve the case further.

8. CONCLUSION

8.1.1 Within this note we have explored three different of areas of wider economic impacts that the opening of East West Rail in full between Oxford and Cambridge would deliver. This has been in the context of three different service options for the Bedford area after the opening of EWR, and also within the context of hybrid working opening new opportunities for employment and also commuting patterns.

8.1.2 Our modelling work has shown that in two areas, labour supply and direct benefits to households, the rise of hybrid working may in fact increase the benefits that East West Rail can bring, through a combination of improved connectivity and increased commuting catchments. For the third area, agglomeration benefits, we believe that whilst the nature of agglomeration benefits may change there are both positive and negative impacts, which in combination with the character of the knowledge based economy within the Oxford – Cambridge arc, means that the overall level of agglomeration benefits is unrelated to hybrid working.

8.1.3 The table below summarises the total agglomeration and labour supply impacts for each option, in a single year (at 2023 prices) and a 60 year discounted present value at a 2010 base year in line with DfT TAG guidance. Household benefits have not been included as we lack evidence on the volume of households that would be impacted that are required to aggregate the figures.

Table 12. Summary Table

	OPTION 1	OPTION 2	OPTION 3	OPTION 4
GVA (Single Year)	£11.91m	£12.09m	£12.69m	£13.10m
Labour Supply (Single Year)	£0.960m	£0.962m	£1.03m	£1.10m
Single Year Total	**£12.87m**	**£13.05m**	**£13.72m**	**£14.2m**
60 Year Discounted Present Value	**£240.15m**	**£243.51m**	**£256.01m**	**£261.61m**

8.1.4 The key message from the table above is that in all options EWR would represent a sizeable boost to the economy in Bedford worth between £240m and £261m over 60 years.

8.1.5 Option 2 shows a modest increase above the 2023 service specification. However Option 3 shows a larger impact worth £16m over 60 years. This suggests that overall the consolidated station option (Option 3) would be beneficial to Bedford. This is supported further by Option 4 which shows the provision of direct Milton Keynes service (not currently an EWR specified service) would increase benefits by a further £5m. This would also support wider benefits beyond Milton Keynes with a direct link between Milton Keynes and Cambridge being provided.

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Birmingham – Newhall Street
Lancaster House, Newhall St,
Birmingham, B3 1NQ
T: +44 (0)121 393 4841

Birmingham – Suffolk Street
8th Floor, Alpha Tower, Crowne Plaza, Suffolk Street
Birmingham, B1 1TT
T: +44 (0)121 393 4841

Bristol
One Temple Quay, Temple Back East
Bristol, BS1 6DZ
T: +44 118 208 0111

Dublin
2nd Floor, Riverview House, 21-23 City Quay
Dublin 2, Ireland
T: +353 (0) 1 566 2028

Edinburgh
Prospect House, 5 Thistle Street, Edinburgh EH2 1DF
T: +44 (0)131 460 1847

Glasgow
The Centrum Business Centre Limited, 38 Queen Street, Glasgow, G1 3DX
T: +44 (0)141 468 4205

Leeds
100 Wellington Street, Leeds, LS1 1BA
T: +44 (0)113 360 4842

London
One Carey Lane, London, England EC2V 8AE
T: +44 (0)20 3855 0079

Manchester –City Tower
16th Floor, City Tower, Piccadilly Plaza
Manchester M1 4BT
T: +44 (0)161 504 5026

Newcastle
Floor E, South Corridor, Milburn House, Dean Street,
Newcastle, NE1 1LE
T: +44 (0)191 249 3816

Reading
Davidson House, Forbury Square,
Reading, RG1 3EU
T: +44 118 208 0111

Woking
Dukes Court, Duke Street
Woking, Surrey GU21 5BH
T: +44 (0)1483 357705

York
Meridian House, The Crescent
York, YO24 1AW
Tel: +44 1904 454 600

Other locations:

France:
Bordeaux, Lille, Lyon, Marseille, Paris

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Latin America:
Lima, Mexico, Rio de Janeiro, Santiago, São Paulo

North America:
Little Falls, Los Angeles, Montreal, New-York, Philadelphia, Washington

SYSTRA

From: [redacted]
To: East West Rail
Subject: East West Rail scoping consultation
Date: 20 January 2025 14:52:34
Attachments: image001.jpg
image002.jpg
image003.jpg
image004.jpg
image005.png
image006.png

You don't often get email from [redacted]@idbs.org.uk. Learn why this is important

Dear Sir / Madam,

It is noted that a Flood Risk assessment will be carried out. Paragraph 6.11.23 states that "Maintenance activities are unlikely to have any measurable impact on the water environment, especially where best practice is followed."

Please note that the Board has statutory control over watercourses within its district, some of which the proposed rail corridor will cross. The Board carries out maintenance operations under the "Land Drainage Act" and its access and maintenance requirements must be taken into consideration as part of the FRA. The Board works within a Byelaw which extends 9m from the bank top of any watercourse on both banks. Any discharge of surface water into the land drainage network will require the Board's consent and to be at a rate specified by itself.

It has already been noted that a surface water attenuation feature for the new alignment shown located between Ampthill Road and the A5141 (Progress Park, South of Bedford)is a flood compensation area operated by the Board. Therefore, it is essential that the Board is consulted at an early stage to avoid future conflicts.

Regards

Trevor Skelding MSc IEng MICE
Principal Engineer

Bedford Group of Drainage Boards|Vale House|Broadmead Road|Stewartby|Bedfordshire|MK43 9ND

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suggestions, reccomendations, questions, compliments or complaints, please complete one of our online forms: Feedback Form | Complaint Form

The Bedford Group is a consortium of the Bedfordshire and River Ivel Internal Drainage Board, the Buckingham and River Ouzel Internal Drainage Board and the Alconbury and Ellington Internal Drainage Board.

From: clerk@bladon-pc.gov.uk
To: East West Rail
Subject: Request to be removed from the consultation
Date: 27 January 2025 12:26:20

> You don't often get email from clerk@bladon-pc.gov.uk. Learn why this is important

Good afternoon,

Bladon Parish Council has recently received the Scoping Opinion consultation for comment. After reviewing the information provided it appears that all the areas of upcoming works are a distance from our parish, starting at Kidlington and Oxford and going towards Cambridge, and do not appear to affect the parish.

As the application does not appear to affect the parish Bladon Parish Council would like to request to be removed from this and future consultation on the EW Railway application.

I hope this will be possible.

Kind regards,
Karen

Karen Howe
Clerk to Bladon Parish Council
Tel: 01993 880073

From: [redacted]
To: East West Rail
Subject: Blunham Parish Council Response to Scoping Consultation
Date: 31 January 2025 11:30:49

> You don't often get email from clerk@blunham-pc.gov.uk. Learn why this is important

Thank you for your email of 2nd January regarding the East West Rail Scoping Consultation.

Blunham Parish Council wish to submit the following comments:

The Parish Council would request that any new stations are in the most sustainable location with good road links but that they also feed in to other local public transport such as buses, to enable those that do not drive to access the station easily.

Cycle links to the new station should also be considered from local villages, due to some having to cross the A1.

--
Kind Regards

Jo Graves
Clerk to Blunham Parish Council
[redacted]

From: [redacted]
To: East West Rail
Subject: BNHPC response to Scoping Opininn
Date: 13 January 2025 10:08:21

To whom it may concern

The Planning committee of BNHPC have met and have asked me to submit the following in relation to the Scoping Opinion.

"BNHPC considered this consultation and confirmed that they do not have any comments to make."

Best wishes
Emma Gordon - Clerk
01865 202 192

******* NEW EMAIL AND WEBSITE ADDRESS **********
We have recently updated our email and website addresses to include the word "botley"

www.botleynorthhinksey-pc.gov.uk

Please update your records?

Botley and North Hinksey Parish Council, First Floor, 5 Church Way, Botley, Oxford, OX2 9TH
I work part time. Mon,Wed,Thur 9-2pm and Friday 9-5pm and will respond in those hours.

From: clerk@broughtoncambspc.org.uk
To: East West Rail; [redacted]
Cc: [redacted]
Subject: RE: East West Rail scoping report consultation
Date: 23 January 2025 10:43:21
Attachments: image002.png
image003.png
image004.jpg
image005.png
image006.png

> You don't often get email from clerk@broughtoncambspc.org.uk. Learn why this is important

Dear Sir/Madam,

Thank you for sending the scoping report consultation to Broughton Parish Council. The Council has looked at the document and believes that because the proposed route is so far south of the village, they have no comments at this stage. They would though like to be keep informed of project's progress.

Yours

Ann

Ann Nixon
Clerk to Broughton Parish Council

From: East West Rail <EastWestRail@planninginspectorate.gov.uk>
Sent: 02 January 2025 15:05
To: Wilkinson, Karen [redacted]@planninginspectorate.gov.uk>
Subject: East West Rail scoping report consultation

Dear Sir/Madam
Please see attached correspondence on the proposed East West Railway.

The Applicant for the Proposed Development intends to make an application for Development Consent under the Planning Act 2008. The Applicant has sought a Scoping Opinion from the Planning Inspectorate, on behalf of the Secretary of State, as to the scope and level of detail of the information to be provided within the Environmental Statement that will accompany its future application.

The Planning Inspectorate has identified you as a consultation body to inform the Scoping Opinion and is therefore inviting you to submit comments by 31 January 2025. The deadline is a statutory requirement that cannot be extended.

Further information is included within the attached letter.

Regards

Karen Wilkinson

Karen Wilkinson (She/Her)
Senior EIA Advisor
The Planning Inspectorate
T 0303 444 5072
Helpline 0303 444 5000

@PINSgov The Planning Inspectorate planninginspectorate.gov.uk

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Directorate For Planning, Growth And Sustainability
The Gateway
Gatehouse Road
Aylesbury
HP19 8FF

devcontrol.av@buckinghamshire.gov.uk
01296 585679
www.buckinghamshire.gov.uk

Karen Wilkinson
Environmental Services
Operations Group 3
Temple Quay House
2 The Square Bristol
BS1 6PN

31 January 2025
Our Ref: 25/00013/DCO

Email to: eastwestrail@planninginspectorate.gov.uk

Dear Ms Wilkinson

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulations 10 and 11

Application by East West Railway Company Limited (the Applicant) for an Order granting Development Consent for East West Rail (the Proposed Development)

1. Scoping Consultation and Notification

1.1 I refer to your letter dated 2 January 2025 providing an opportunity for Buckinghamshire Council (BC) as a S43 Local Authority and statutory consultee to provide comments on the EIA Scoping Report to inform the Environmental Statement (ES) for the proposed development referred to as East West Rail – Bedford to Cambridge and Western improvements.

1.2 The following information reflects the views of the Local Planning Authority regarding the information contained within each chapter/ sub heading of the submitted Scoping Report dated 05/12/2024 (received 2 January 2025).

1.3 The structure of the Council's response sets out:

- The environmental topics or areas of which there are likely to be potential impacts which will need to be addressed in the Environmental Statement (ES).
    - Table 1 below provides a comparison of the topics required by Regulation 5 (2)

of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (herein referred to as 'the EIA Regulations') against the topic terminology as used by the Applicant in the Scoping Report.

1.4 Following Table 1, headings are set out for each of the topics required by Regulation 5 (2) of the EIA Regulations. Within each of these topic sections, comment is made relating to:

- How chapters are proposed to be presented in the ES with respect to the topics that the EIA regulations require.
- The geographical area and timeframe over which there is potential for likely impacts.
- Comment on the methods to be used to determine the likely significant environmental effects that will arise due to the construction and operational phases and cumulative impacts.
- The potential impacts to be scoped out as not being likely to give rise to significant environmental effects.

1.5 Following each of the topic sections, a summary and general comments are provided.

1.6 This response has been prepared in consultation with the following internal consultees:

- Arboriculture
- Biodiversity and Ecology
- Heritage
- Highways and Transport (i.e the local Highway Authority)
- Minerals and Waste
- Public Rights of Way.

1.7 The Council has also sought specialist input from consultants in preparing the aspects of its response relating to landscape, environmental protection: noise, air pollution and land contamination, climate, water environment, population, health and cumulative effects.

1.8 Suitably qualified and experienced experts have input into this scoping response letter.

2. Coverage of environmental topics

2.1 Buckinghamshire Council (BC) notes that the EIA Regulations require (at regulation 5 (2)) that the direct and indirect significant effects of a proposed development should be considered (identified, described and assessed in an appropriate manner) within an EIA for a proposed development, covering the following environmental topics:

- Population and human health
- Biodiversity (with particular attention to species and habitats that have relevant protections)
- Land
- Soil
- Water
- Air
- Climate

- Material assets
- Cultural heritage
- The landscape
- The interaction between the above.

2.2 Schedule 4 (5) of the EIA Regulations expands on the impact types that may lead to effects in the context of the topics listed in regulation 5 (2). Schedule 4 (5) includes at (e) the need for the cumulation of effects with other existing and/or approved projects to be duly considered.

2.3 BC have commented on the coverage of environmental topics as proposed by the Applicant in its Scoping Report in the context of the above citations from the EIA Regulations. Table 1 presents BC's interpretation of how the relevant material is expected to be set out in the Environmental Statement, based on the content of the Applicant's Scoping Report. The interpretation set out in Table 1 is used by BC to support comments made regarding the adequacy of the coverage proposed by the Applicant.

2.4 BC notes that generally it would be helpful for the Applicant to provide a clear summary of which topic chapters and associated method statements are intended to map across to the regulation 5 (2) matters.

2.5 Overall, it appears that the topics required by Regulation 5 (2) are present within the Scoping Report.

Table 1 – BC interpretation of Applicant's coverage of environmental topics, relative to the EIA Regulations 2017

ES Scoping report section[1]	**ES method statement listing (page 2 of the Scoping Report)**	**Additional assessments**	**BC interpretation of relationship to EIA Regulations 2017**
Agriculture and Soils (Section 6.2)	Agriculture and Soils		Soil (Reg 5 (2)) Use of natural resources, in particular land, soil Schedule 4 (5) (b)
Air Quality (Section 6.3)	Air Quality		Air (Reg 5 (2)) Emissions of pollutants (Schedule 4 (5) (c)) Risks to human health (Schedule 4 (d))
Communities and Health (Section 6.4)	Communities Human Health	Equality Impact Assessment (Section 7.5)	Population and human health (Reg 5 (2)) Creation of nuisances (Schedule 4 (5) (c))

[1] Document ref: TR040012 - 000019

			Risks to human health (Schedule 4 (d))
Electro-magnetic interference (Section 6.5)	None provided, as noted in the body of the Scoping Report		Population and human health (Reg 5 (2)) Creation of nuisances (Schedule 4 (5) (c)) Risks to human health (Schedule 4 (d))
Land Quality (Section 6.6)	Land Quality		Soil (Reg 5 (2)) Use of natural resources, in particular land, soil Schedule 4 (5) (b)
Socio-economics (Section 6.7)	Socioeconomics		Population and human health (Reg 5 (2))
Sound, Noise and Vibration (Section 6.8)	Sound, Noise and Vibration		Population and human health (Reg 5 (2)) Emissions of pollutants, noise, creation of nuisance (Schedule 4 (5) (c))
Traffic and Transport (journeys and access) (Section 6.9)	Traffic and Transport		Population and human health (Reg 5 (2)) Emissions of pollutants (Schedule 4 (5) (c)) Technologies used (Schedule 4 (5) (g))
Biodiversity (Section 6.10)	Biodiversity	Biodiversity Net Gain (Section 7.2) Habitats Regulations Assessment (Section 7.3)	Biodiversity (Reg 5 (2)) Use of natural resources, in particular biodiversity (Schedule 4 (5) (b))
Water Resources (Section 6.11)	Water Resources Flood Risk	Flood Risk Assessment (Section 7.6) Water Framework Directive (Section 7.7)	Water (Reg 5 (2)) Use of natural resources, in particular water (Schedule 4 (5) (b)) Emissions of pollutants (Schedule 4 (5) (c))
Historic Environment (Section 6.12)	Historic Environment		Cultural heritage (Reg 5 (2)) Emissions of pollutants

			(Schedule 4 (5) (c)) Risks to cultural heritage (Schedule 4 (5) (d))
Landscape and Visual (Section 6.13)	Landscape and Visual	Arboriculture (Section 7.8)	The Landscape (Reg 5 (2)) Use of natural resources (Schedule 4 (5) (b)) Emissions of pollutants (light, nuisance) (Schedule 4 (5) (c))
Carbon (greenhouse gas) emissions (Section 6.14)	Carbon Climate Resilience	Climate Resilience (Section 7.4)	Climate Impact of project on climate, including GHG and climate vulnerability (Schedule 4 (5) (f))
Major accidents and disasters (Section 6.15)	None provided		Population and Human Health Risks to human health (Schedule 4 (5) (d))
Material Resources and Waste (Section 6.16)	Material Resources and Waste		Material assets Disposal and recovery of waste (Schedule 4 (5) (c))

3.0 Introduction - Geographic and Temporal Coverage, and Proposed Methodologies

3.1 As noted above, for each of the following topic sections, commentary is provided on how the EIA Regulations topic (from either Regulation 5 (2) or Schedule 4 (5) of the EIA Regulations) is proposed to be covered within the EIA process, whether the geographic timeframe and temporal coverage proposed to be assessed is considered appropriate, whether the proposed assessment methods are in general accordance with expected industry best practice and relevant recommendations, and whether the aspects within each topic proposed to be scoped out is appropriate.

3.2 Particular focus has been provided for the area of the project that intersects within the Buckinghamshire Council administrative boundary (within Route Section 1 - Oxford to Bletchley), with some higher-level commentary provided on the overall assessment methods proposed.

3.3 The proposed works for Route Section 1 – Oxford to Bletchley are described in Section 3.1 of the ES Scoping Report and are most directly relevant to BC as noted above. In general, going forward, BC is keen that the EIA work is undertaken and reported in a manner that is consistent with legislative requirements yet proportionate to the relevant zones of influence for the various environmental topics. It would therefore be beneficial to BC if the proposed works are described in a more location specific manner in terms of impacts and receptor IDs in order to identify if this

approach to reporting has been undertaken. Generally, because of the generic nature of the proposed works description as listed in Section 3.1 it is difficult for BC to be able to sufficiently grasp the extent of all impacts (for example, the Middle Claydon passing loop is not referenced here and only from route section plans as part of consultation material could BC obtain more detail about the passing loop's location and extent).

3.4 Further, and as an example of the generic nature of works descriptions, it is not clear in section 2.2 which local authorities the route passes through, and which sections. The description of 'types of works' at 2.2.2 is not full in terms of the stations being affected – e.g., Winslow Station is not referenced but appears that it will likely require further interventions depending on projected passenger numbers. The impacts of electrification in terms of land use and appearance are not clarified, including what reference to power lines and cables exactly encompasses and where (therefore it is difficult to understand the extent of overhead lines vs. potentially underground cables and associated impacts e.g., visual). Again, the Middle Claydon passing loop within BC area is also not referenced here, nor in the generic explanation at 2.4.8. More detail needs to be developed about this passing loop and works to Winslow station, and ideally discussed in consultation with BC.

3.5 Generally, more clarity is required with respect to timeframes around the use of diesel trains on sections of the route prior to partial/full electrification. Freight (2.4.13/14) growth is a new addition since the Transport Works and Act Order (TWAO) was approved, therefore more detail on this and suitable coverage in the ES would be expected.

3.6 Further detail on these matters and other key topic specific key points are provided in the sections below for the individual topics as set out by the EIA Regulations.

3.7 Topic specific commentary is also provided in the below sections for the proposed assessment methodologies. In general, Chapter 4 of the Scoping Report provides a general introduction to the EIA context. BC notes this does not explicitly suggest an agreed methodology or generalised approach (e.g., Institute of Environmental Management and Assessment (IEMA) based, or adopting the Design Manual for Roads and Bridges (DMRB) principles) that has been adopted across the topics. Such an addition would add greater confidence that the ES will be undertaken to the latest best practice and help to bring a degree of standardisation to the document as a whole. At present, the detail of the methodologies is presented separately in Chapter 6. The guiding principles set out regarding the way in which impact magnitude and receptor sensitivity will be brought together to determine resultant effects and, moreover, their significance is not connected to an industry recognised source, which is considered a weakness (Section 4.3 and Figure 20 refer).

4. Highways and Transport

4.1 Background

4.1.1 Buckinghamshire Council supports the increased transport connectivity offered by the East West Rail scheme, and the creation of a new station on the line at Winslow. However, the exclusion of the strategic link to Aylesbury is considered to be a significant failing in the scheme, and fails to make it compliant with local and regional policy, (England's Economic Heartland's

Transport Strategy Policies 9, 10 and 11). It is recognised that this link was included within the TWAO application for the construction of the Bicester to Bletchley section and HS2 is undertaking a number of works on this route to facilitate its delivery. These works are summarised as;

- Two new overbridges at Quainton carrying the newly aligned Station Road over HS2 and the Aylesbury Spur
- Demolition of the old Network Rail bridge on Fidler's Field
- A new overbridge on Edgcott Road carrying the realigned road over both HS2 and the Aylesbury Spur
- New rail sidings at the FCC plant
- A new bat structure adjacent to Sheephouse Wood
- A new green overbridge on Calvert Road carrying the road over both HS2 and the Aylesbury Spur.

4.1.2 The Council therefore strongly advocates for a review of the scheme in this regard and seeks inclusion of the Aylesbury spur within the scheme.

4.1.3 It is also noted that the references to the Vale of Aylesbury Local plan 2013-2033 are incorrect, this document was formally adopted in 2021.

4.1.4 EWR and in particular the direct link to Aylesbury forms a key component of providing sustainable transport to the large number of additional homes planned for Aylesbury; it is therefore a significant concern and disappointment to the Highway Authority that this element has been removed from the Development Consent Order (DCO). The scoping document acknowledges that a single-track freight line is in existence on this route. The Council strongly advocates that this should be upgraded to provide the link that has been expected since the granting of the TWAO.

4.1.5 The Highway Authority notes that the EIA scoping document makes reference to the Technical Report, and the Transport Update Report. These documents have not been included within the EIA scoping report. It is the Highway Authority's view that in order to properly understand the impacts of the scheme proposals at this stage it is necessary to review these additional documents in conjunction with the EIA scoping report, and therefore these comments consider the three documents.

4.1.6 The Highway Authority has represented the Council's position regarding the construction of the line between Bicester and Bletchley through the Transport and Works Act Order (TWAO). Through this process the Highway Authority has set out the agreed approach for ensuring that construction traffic is able to use suitable routes to access the line from the strategic and primary highway network. The TWAO agreement also sets out the requirements for work post completion of the scheme, with respect to the Highway Authority being able to determine which of the mitigations should remain and those to which the Highway Authority shall require to be removed. This application should urgently review those mitigations and agree with the Highway Authority the on going status of the mitigations to ensure that any routes that are required to be reused are not removed prior to the scheme being implemented to minimise disruption to the Highway and local users of the highway.

4.1.7 It should be noted that through the TWAO process a provision was made for highway condition surveys to be carried out prior to construction and a responsibility placed on EWR company to ensure that the highway was not adversely damaged as a result of construction traffic using rural routes that are not constructed to a standard suitable for HGV traffic. The Highway Authority's experience through this construction period has been that a number of rural routes were significantly damaged through the construction phase that has taken place, and the required repairs were not carried out with expedience by EWR and their contractors. This has caused significant damage to the standing of the EWR scheme with residents and caused considerable concern for members of the council.

4.1.8 Any additional construction work for the EWR DCO scheme shall only be acceptable to the Highway Authority with full condition surveys of the affected highways, reviewed by the Council's Asset Manager and the highway works be implemented prior to construction works commencing to satisfy the Asset Manager that the route is in a condition that is safe and suitable for construction traffic. On completion of construction activities further surveys will be required and remedial repairs made to satisfy the Asset Manager that the network has been left in a safe and suitable condition for use by the public. The Highway Authority will seek this as a requirement of granting the DCO.

4.2 Scoping Comments

4.2.1 The Highway Authority has reviewed the TA scoping chapter of the scoping note and makes the following comments.

4.2.2 The document focuses on the impacts of the scheme to the east of Bletchley as would be expected, however, due to the size of the scheme and the limited elements of the scheme within Buckinghamshire, it is advised that for expediency the Transport Assessment be broken down into clear sections in order to extract the limited work elements that are to affect Buckinghamshire.

4.2.3 The Highway Authority welcomes the development of a scheme wide strategic model to assess the impacts of the scheme, in both construction and operation. There are however concerns regarding the scale of the model, and the corresponding ability to ensure that the model remains suitable in all areas. It is advised that the council be approached for any suitable assistance that can be provided in ensuring that the best available data is used within the Buckinghamshire area, and to ensure that other strategic infrastructure projects have been properly considered (HS2, Rosefield Solar Farm) in respect to construction traffic. It is requested that the council be engaged through the modelling process to enable agreement to be reached over the calibration and validation of the model prior to submission. The location and numbers of screen lines and journey time assessments should be agreed by all the affected authorities prior to completion of the Local Model Validation Report (LMVR) to secure agreement across the scheme that the model is suitable for use in all areas. Furthermore, the Council advises that Aylesbury should be included within the fully modelled area, taking into consideration the Council's position that the Aylesbury Rail link formed part of the TWAO application and the Council remains committed to seeing that link delivered.

4.2.4 Buckinghamshire Council is also concerned that the assessment years for the modelling do not include a scenario that includes a year when the first phase of the line is operational between Oxford and Bletchley. It is therefore not possible for the Highway Authority to make an assessment of the impacts of the development of the whole line on the Buckinghamshire network over and above those already assessed as part of the TWAO, or if the baseline is being taken without the TWAO impacts being included. It is also not possible to assess the highway impacts accessing Winslow station as a result of increased passenger numbers anticipated at full opening.

The current assessment years are set out to be;
2023 Baseline
2032 Construction
2034 Year of opening
2049 Future Year

4.2.5 It is necessary to understand what construction activities from EWR TWAO were still taking place during the baseline year within Buckinghamshire, as this would have a potential impact on the performance of the A421 and A413 in the Buckingham area, and may double count any construction traffic from this scheme if it is to be simply added to the baseline if construction traffic was still using that route.

4.2.6 There is no assessment to consider the impact of opening the western section of the line between Oxford and Bletchley in the highway modelling scenarios, and therefore this does not provide any understanding to the council as to how travel behaviors are expected to change through the lifetime of the scheme. This has particular importance on the A421 corridor which is identified as being over capacity as part of the scheme assessment. The Highway Authority therefore considers a second baseline scenario (sensitivity test) to be appropriate showing an interim year between the 2023 and 2032 baseline.

4.2.7 The Transport Assessment (TA) should set out the construction movements through the lifetime of the scheme, and the Highway Authority should be able to determine the duration and intensity of HGV movements both arriving and departing the scheme on its network, this should include the preparatory works for the creation of haul roads or compounds as well as construction of rail infrastructure and then decommissioning of compounds or supporting infrastructure.

4.2.8 The Council has a principle objection to the proposed passing loop at Middle Claydon and does not consider the information contained within the documentation to adequately set out the need for this location to be used. However, should the scheme determine to continue with this location it should ensure that the submissions fully evidence how the decision has been reached. Prior to the submission of any construction routing within Buckinghamshire, the applicants should review the agreed construction routes from the EWR TWAO and either reuse appropriate routes or establish alternatives using the same criteria.

4.2.9 The Code of Construction Practice (CoCP) and the Construction Traffic Management Plan (CTMP) should be submitted in draft or framework form as part of the application documents for agreement with the Highway Authority and should address the different elements of

construction activities within each authority area so that it can meet the local needs appropriately. This should reflect the requirements set out regarding surveys and mitigation above, and include compounds, haul roads and construction routes. The Council shall require a fully considered communications strategy to be included within these documents to ensure that local residents, members and officers of the council are kept informed of the impacts of construction activities in order to minimise disruption to daily lives.

4.2.10 The Highway Authority is concerned that there is no certainty regarding the electrification of the line, and the locations of the Traction Power compounds. Two locations within Buckinghamshire have been identified as potential locations for the Traction Power compounds, it is therefore necessary that the Transport Assessment sets out clearly the construction impacts of which ever compound may proceed, and its operational traffic impacts. Furthermore, the connections of these compounds to the line shall require full assessment and description, particularly highlighting routes to be used to facilitate the delivery of the infrastructure.

4.2.11 In a similar way the scoping note is silent on how the overhead electrical services (OLE) and equipment would be delivered. The Highway Authority requires details to be provided as to where OLE is to be used and how it is to be delivered, and what access arrangements are proposed to be made from the highway to support this. If construction compounds are to be reused or created, scale and access arrangements for these shall require assessment to determine the safety and suitability of these accesses.

4.2.12 The Technical Update Report (TUR) suggests that a potential Train Maintenance Depot has been identified between Winslow and Bletchley. This is a major piece of infrastructure, which has an indicative location between Mursley and Newton Longville. The Council considers this to be a significant element of the scheme which at present has no certainty, from assessment of the draft order limits it appears that this location is not being progressed, however the Council seeks confirmation of this as early as possible. If this site should be chosen for a depot engagement at the earliest opportunity would be necessary to ensure that the implications are fully understood and assessed appropriately, particularly given the rural and somewhat isolated location.

4.2.13 With respect to the proposals to open the line to freight movements the Highway Authority has a particular interest in the impacts that this would be expected to bring to the A421 corridor, given the changes in travel patterns expected as a result of the full scheme being implemented and development growth in the area. It is therefore important that the proposals are clearly set out as to the nature of the freight services to be provided. If there are to be no new freight services and the route is for the re-routing of existing services this would need to be made clear, however at this stage that appears to be an option with an alternative option being the provision of new freight capacity on the rail network. The freight proposals should be reflected in the strategic modeling of the scheme.

4.2.14 The Highway Authority is not satisfied that the proposed level of assessment around stations (with particular reference to Winslow) is sufficient. At present it is proposed that the station capacity shall be reviewed and if required additional capacity within the station concourse and carpark would then be provided. Whilst this work is necessary, it does not

adequately address the impacts of increased passenger numbers and therefore the assessment should be expanded. It shall not be acceptable to the Highway Authority for an increase in passenger numbers to be dependent on the private car, or to inflict unacceptable highway impacts on the road network in the area. It is known that Winslow is a small settlement and the station is likely to serve the larger populations of Buckingham and Aylesbury. The A413 corridor is constrained by its junction with the A421, with significant capacity constraints and limited public transport connections between Buckingham and Aylesbury. This is particularly acute during peak hours. The assessment of increased passenger numbers should therefore consider highway impacts, safety, and door-to-door mode share. It is the Council's position that an improved public transport connection from the station to Buckingham and Aylesbury shall be required to support increased passenger numbers and maintaining an acceptable mode share and use of sustainable transport.

4.2.15 Particular consideration should be given to the safe operation of the station with its relationship with Sir Thomas Freemantle school noting that both the station and the school share the same access to the A413 and intensification of vehicle trips has the potential to increase conflicts with pedestrians accessing the school site.

5. Public Rights of Way (PROW)

5.2 The document aims to 'scope in' public rights of way [PROW] in relation to pedestrian journey delays and socio-economic impact during construction. The assessment of EWR on PROWs is covered in the traffic and transport method statement.

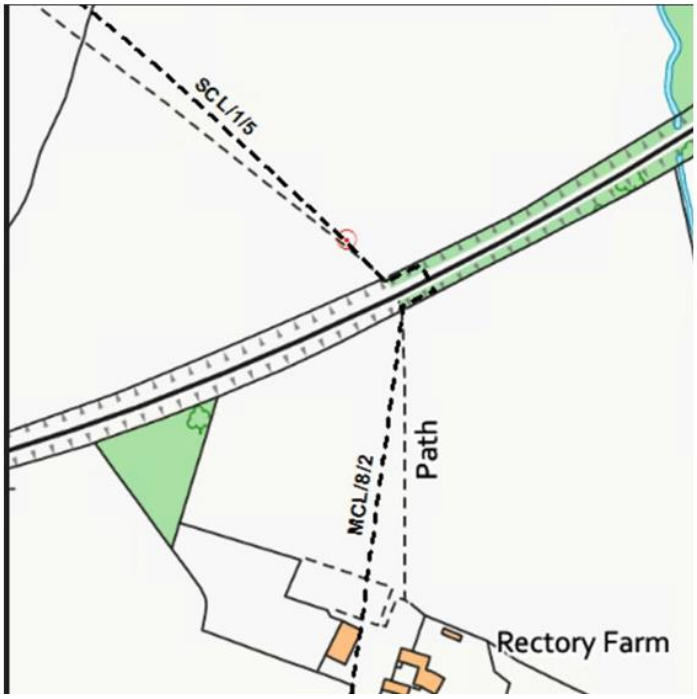
5.3 It is noted that: *'All PRoW diversion routes will be developed in agreement with relevant LA.' [6.7.16 Socio-economics].* However, this section doesn't clarify if the agreements relate to temporary diversions during construction, permanent diversions or both.

5.4 The aim appears to maintain walking, cycling and horse-riding convenience by diverting routes across the wider path network rather than just diverting individual paths; in the document's words, to '*design holistically*' [bullet point - 4 of para 8.2.1]. It is assumed this means maintaining desire lines rather than creating right angle bends close to bridges. If that is the case, then the whole diversion needs encompassing within the red edge, so the wider network can be included in the diversion to create the desire line.

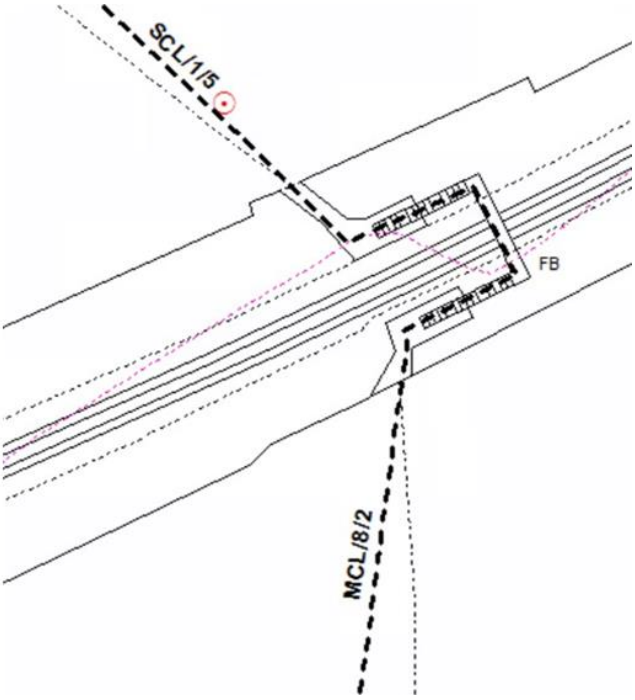
5.5 The Council has identified six main impacts on the PROW network which should be covered in the EIA:

<u>1] Middle Claydon Loop - Footpath MCL/8/2</u>

5.5.1 This is the widening of the line at Middle Claydon beyond the existing extent of Network Rail's boundary to create a 'passing loop'. The document clarifies '*demolition and reprovision'* [para 3.1.2] of the existing bridge, which is satisfactory. The Middle Claydon passing loop impacts Footpath MCL/8/2 [see location below, situated north of Rectory Farm, MK18 2ES], by demolishing it and rebuilding a replacement with a wider span across the additional track width.



Existing



Existing

Proposed

2] Construction depots and haul roads

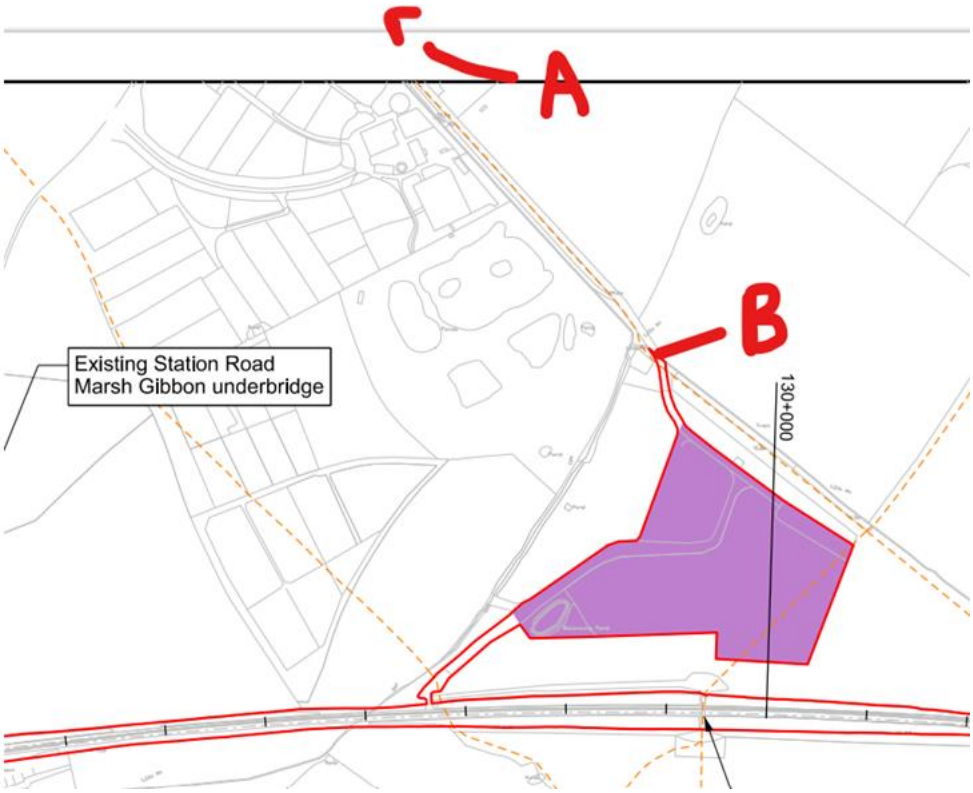
5.5.2 Information is needed in the EIA regarding site access haul roads across fields that may cross or pass along a PROW, to inform and describe the impact on recreational pedestrian

delays if wider temporary diversions or closures are required. Any additional works on the surface of shared farm tracks used for construction need to be mindful of all users and full accessibility for pedestrian (wheeling), cycling or equestrian use post-construction.

5.5.3 Photographic condition surveys of the affected PRoWs will be required prior to construction commencing, and necessary repairs implemented post-construction to the satisfaction of the highway authority, based on further surveys to quantity the damage during construction, such that routes will be safe and convenient for public use. The highway authority will seek this as a requirement of granting the DCO to ensure the Council is not left having to fund additional maintenance because of the EWR scheme.

5.5.4 During each survey it will be important to clarify the existing PROW widths, boundary to boundary, in conjunction with any legally recorded widths, for each permanent and temporary diversion to ensure reinstatement with the same or improved amenity post-construction. In the absence of a recorded width the boundary-to-boundary width should be recorded, irrespective of seasonal overgrowth. Any permanent fencing will need to be closely monitored against paths widths and acknowledgement needed in the EIA that any new gates required for stock control will comply with BS 5709 2018.

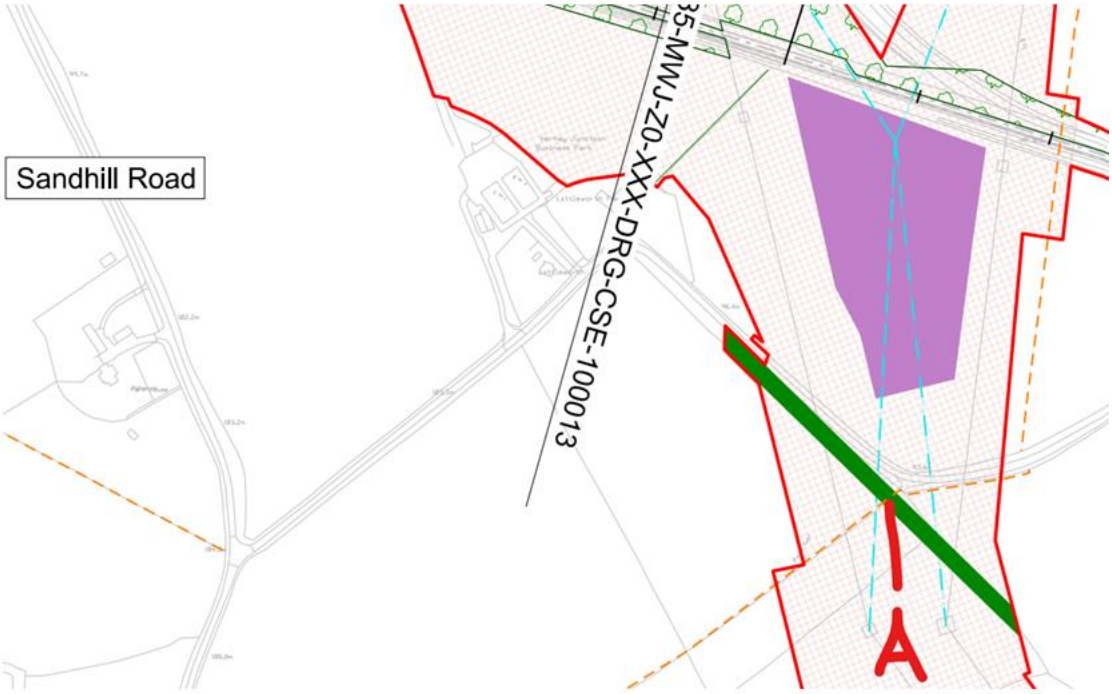
5.5.5 Moreover, the red edge for any new construction depot should extend to the vehicular highway. I have identified one which does not, along a Bridleway TWY/1/1 to Pembridge Farm OX27 9AY, between points A and B which needs to be scoped into the EIA. Bridleway TWY/1/1 may need closing to segregate construction traffic from walkers, horse riders and cyclists, which will have an impact that could not otherwise be assessed if not included in the red edge.



3] Hedgerow Creations

5.5.6 Generally, it is assumed that hedges alone could be planted without the need for a temporary closure, but in this example at Middle Claydon where a hedge is proposed [see thick green line], a wider closure is likely for overhead power line diversions.

5.5.7 A gap in the hedge, compliant with BS 5709 2016, will be needed for pedestrians on footpaths or walkers, cyclists and horse riders on bridleways. The EIA should address the need in each case.

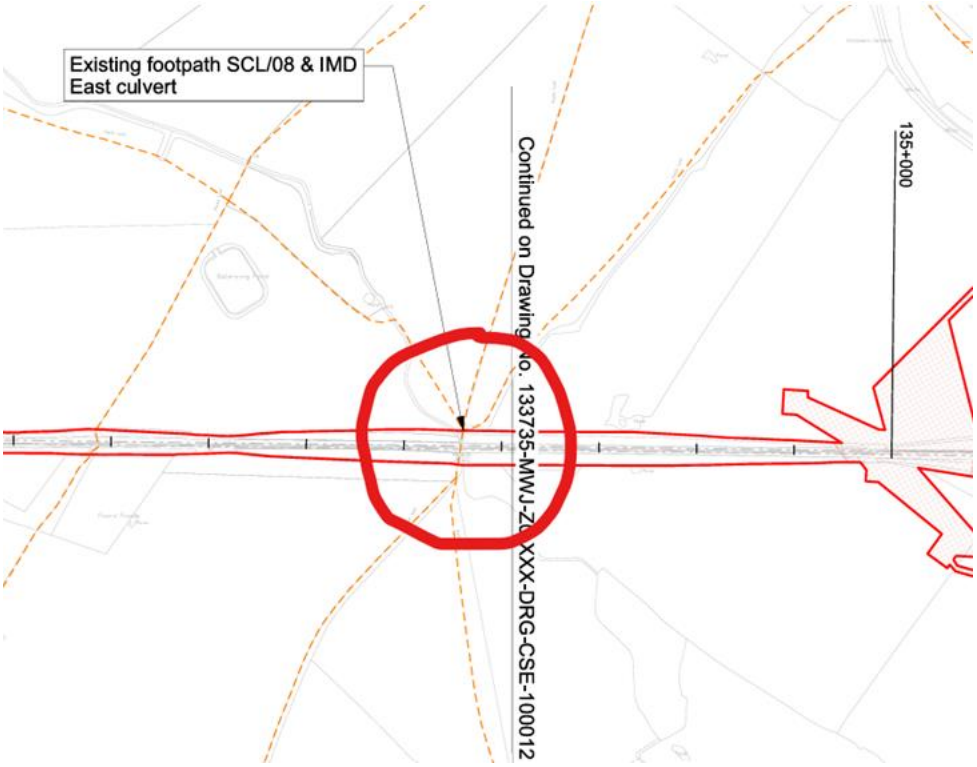


4] Utility Works

5.5.8 The EIA should address the need for a temporary closure in each case, committing to reinstate the surface and general amenity 'as found' or better, quantified by baseline pre-construction surveys with post-construction surveys to ensure reinstatement.

5] HS2 works at Calvert [south-east of Steeple Claydon, MK18 2HA]

5.5.9 It needs to be acknowledged HS2 have designed and maybe constructing a bridge to accommodate a pedestrian crossing of Footpaths SCL/9/1, SCL/8/3 and SCL/7/1 at the location shown on the plan below. This is the same location as the IMD East culvert. It needs to be clear if this bridge needs replacing and how that impacts on the PROW network. I have also included HS2's Schedule 4 diversion route shown with blue-dashed lines on an additional plan.



6] Baseline PROW data

5.5.10 It is important the EIA uses the most up-to-date recording of the public rights of way network. The red edge plan omits some PROWs, for example, Footpath ADD/13/4 is missing west of Verney Road [green arrow], while others have only recently been diverted as a result of the EWR TWAO.

5.6 All alterations to the PROW network need to be designed inclusively providing suitable

options for a variety of users, accounting for disability, and mode i.e. walking, wheeling, cycling and equestrian in the appropriate locations.

5.7 An electronic rights of way dataset should be obtained from the Council's website, titled 'Rights of way data for GIS software' on this page: https://www.buckinghamshire.gov.uk/environment/countryside-and-public-rights-of-way/public-rights-of-way/order-a-copy-of-the-rights-of-way-definitive-map-and-statement-and-statement/

6. Population and human health

6.1 The Scoping Opinion indicates that the ES will include the following topic chapters that BC considers relevant to the umbrella of 'population and human health':

- Communities and Human Health
- Electro-magnetic interference
- Socio-economics
- Sounds, Noise and Vibration
- Traffic and Transport (journeys and access)
- Major accidents and disasters.

6.2 BC considers that the Scoping Report, as currently drafted, does not make it clear how the topic of 'Population and Human Health' (the name used in the EIA Regulations) is to be covered within the EIA process. There are a number of places where topics are introduced and, for this umbrella topic in particular, the grouping and naming in Chapter 6 (Community and Health; and Socio-economics) differs from the list in 4.3.14 (People and Communities) and differs again from the nomenclature used in the method statements.

6.3 In particular, the list at 4.3.14 under the title of 'People and Communities' includes a range of topics that might otherwise be considered standalone (e.g. Air Quality; Sound, Noise and Vibration; Traffic and Transport) and for which specific (and different) methodologies are provided in Chapter 6. Consequently, it is not clear to BC what the rationale driving these groupings is and whether the intention is to consider these contributing topics only through the lens of health (i.e. as determinants of health) or also more broadly – BC would welcome further clarity on this matter.

6.4 Table 25 in Section 8 of the Scoping Report proposes a combined section for each Route Section that is titled Community, Health and Wellbeing. This adds to the ambiguity that exists within the preceding sections. The Scheme-wide topics then introduce Housing and the economy as a further topic that is not explicitly described elsewhere within the Scoping Report but, based on the scope in Chapter 6 of the Scoping Report, would appear to be interrelated in some way. BC wishes to have a fuller understanding of the underlying rationale for this proposed Preliminary Environmental Impact Report (PEIR) and Environmental Statement structure.

6.5 It is noted from section 4 that the Applicant has not yet undertaken any 'people-focused surveys' relating directly to the Population and Human Health topic (4.2.7 – 4.2.11), albeit acknowledging that some of the transport user surveys will be relevant. The latest IEMA guidance

published in November 2022[2,3] regarding the scoping and assessment of health in EIA advocates the use of targeted survey work to better develop the baseline awareness of communities and specifically, the aspects of the communities that can be considered as determinants of health. BC would welcome the addition of suitable people-based surveys to reflect this aspect of the best practice guidance and notes that this may be particularly relevant in locations where station changes are proposed (which includes Winslow within BC). This is also in the context of the Applicant statement in 6.4.5 that this IEMA guidance will be followed for the human health assessment work. A review of 6.4.11 – 6.4.13 does not offer confidence that this aspect of the IEMA guidance will be followed to implementation by the Applicant.

6.6 Noise is a determinant of human health. At 4.2.27 BC infers that the focus of the noise modelling will be on the operational phase. However, from the perspective of a health lens, it is essential to correctly consider the construction phase noise climate and triggers for changes to health, which can be notable from 1dB, rather than the 3dB changes that are more typically considered in the noise assessment methodologies. BC would welcome confirmation that this connection between construction noise and health will be afforded suitable focus within the EIA process, with reference to the IEMA 2022 guidance referenced earlier within this response.

6.7 Section 6.4 is interpreted by BC as suggesting that the final ES will include a combined Communities and Health assessment, but that the methodologies employed to conduct these will differ – two separate method statements are provided. BC considers that it would be helpful for Section 6.4 to signpost the general approach that will be used for the 'Communities' element – 6.4.3 cites the NNNPS (National Networks National Policy Statement); however, this is a policy document rather than a guidance or standard and the topic overview in 6.4.2 aligns more closely to DMRB LA 112. BC would welcome clarity from the Applicant on how this chapter would be developed to bring the two methods together; and direction to where relevant precedent has been identified. In this context, there is a concern that the current approach may result in a lengthy and complex reporting output that might not best present the key issues to consider in determining a future application for a DCO. Allied to this, the proposed scope set out in 6.4.20 onwards does not offer the distinction between the topics, thus there remains some ambiguity around how the findings will come together.

6.8 The study area is outlined at 6.4.14/6.4.15. In general terms a 500m distance from works should typically be sufficient to address the 'communities' element (on the assumption that this is aligned to DMRB LA112 – see earlier comments); and a community-centric approach to consider multiple impacts on health determinants seems proportionate and workable in concept. However, the health baseline assessment is likely to benefit from greater geographic coverage, not least due to the geographic scales at which the relevant contributing data (e.g. from ONS and the former PHE, as well as LA scale data). This is particularly relevant in Winslow, where the impacts of the changes to the station should be considered more widely given the importance of

[2] Pyper, R., Waples, H., Beard, C., Barratt, T., Hardy, K., Turton, P., Netherton, A., McDonald, J., Buroni, A., Bhatt, A., Phelan, E., Scott, I., Fisher, T., Christian, G., Ekermawi, R., Devine, K., McClenaghan, R., Fenech, B., Dunne, A., Hodgson, G., Purdy, J., Cave, B. (2022) IEMA Guide: Effective Scoping of Human Health in Environmental Impact Assessment.

[3] Pyper, R., Waples, H., Beard, C., Barratt, T., Hardy, K., Turton, P., Netherton, A., McDonald, J., Buroni, A., Bhatt, A., Phelan, E., Scott, I., Fisher, T., Christian, G., Ekermawi, R., Devine, K., McClenaghan, R., Fenech, B., Dunne, A., Hodgson, G., Purdy, J., Cave, B. (2022) IEMA Guide: Determining Significance for Human Health in Environmental Impact Assessment.

the new station to the community. BC suggest that this should be reviewed and expanded, which will also benefit the socio-economic assessment work.

7. Sound, Noise and Vibration (Emissions of pollutants, noise, creation of nuisance)

7.1 Notwithstanding the comments noted above with respect to understanding how noise will be assessed from a health perspective, BC agrees in general with the scope and methodologies set out within the Scoping Report and in the Sound, Noise and Vibration Method Statement.

7.2 It is understood that the EWR further works in the Buckinghamshire area covers utility and power cabling diversions, new substations and traction power compounds, a relocated footbridge and the Claydon passing loop including a new crossover.

7.3 It is not clear in the Scoping Report how baseline will be measured and determined to ensure it is representative of pre-EWR environment, since sections of EWR Phase 1 and 2 in the Buckinghamshire area are either under construction or already built. The EWR further works proposed as part of the current DCO should be assessed cumulatively with consented works for EWR Phase 1 and 2, against determined baseline before any EWR works, to ensure potential impacts from the whole EWR Scheme are identified and mitigated, as necessary.

7.4 We agree with the defined study area and the identified types of sensitive receptors that should be considered.

7.5 Regarding sources of impacts, Section 6 of the Sound, Noise and Vibration Method Statement covers all relevant sources for the Buckinghamshire area, however in other areas where there are new or modified stations, fixed plant noise from stations should also be considered (i.e. not limited to PAVA (Public Address and Voice Alarm) noise). Section 6 of the Method Statement also describes calculation methods and source data to be used for construction noise and vibration and operational railway noise. However, it has not stated the calculation method, standard and source data to be used for operational ground-borne noise and vibration. This is of special interest to BC as the proposed Claydon passing loop has a turnout point at the western end located close to existing sensitive receptors at Railway Cottages. Vibration levels from points could result in vibration impacts significantly higher than those from a plain running line. It is also important to BC that the airborne noise transient characteristics generated by trains passing over the turnout is considered and mitigated appropriately.

7.6 BC agrees with the significance threshold values in Table 5 of the Sound, Noise and Vibration Method Statement and can confirm these are in line with what has been applied to other similar projects.

7.7 With regards to the proposed scope in Table 7 of the Sound, Noise and Vibration Method Statement and Table 16 of Section 6.8 of the Scoping Report, the “Permanent airborne noise from operational fixed plant at depots and substations” should also include passing loops and stations. It is important that the noise from stationary trains at the Claydon passing loop is appropriately considered and mitigated.

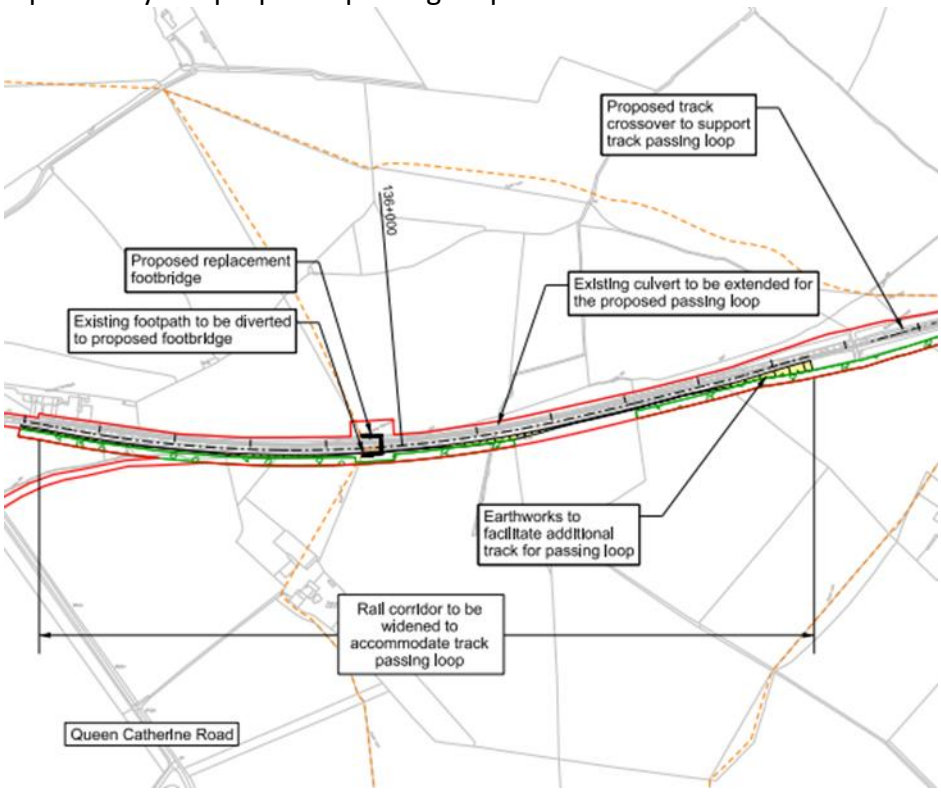
7.8 BC agrees that ground-borne vibration from road traffic and horn noise can be scoped out.

The proposed scope does not include proposed new or altered level crossings within the Buckinghamshire area, so audible warning devices would not be applicable.

8. Biodiversity *(with particular attention to species and habitats that have relevant protections)*

8.1 The existing constructed line of the railway agreed under the East West Rail Transport and Works Act Order Act (TWOA), included within these revised Development Control Order (DCO) plans, encompasses habitat enhancement areas that do not form part of the hard standing railway line facilities. These features form part of the TWAO Biodiversity Net Gain (BNG) calculations required as part of the planning approval for this phase of the railway.

8.2 Works proposed within this DCO area that impact those BNG features will need to be accounted for. How these works impact the BNG score for the Transport and Works Order Act (TWOA) application will need to be established. The submitted documents make no reference to the crossover between these two aspects. Buckinghamshire Council are still awaiting finalised BNG assessments for the TWOA aspect of the EWR development. It is anticipated that habitat established for the TWOA BNG elements along Queen Catherine Road, illustrated below, will be impacted by the proposed passing loop identified.



8.3 BNG impacts to these areas will need to be compensated and accounted for. BNG habitats proposed need to be retained for the 30-year period under BNG legislation. Further compensation sites for those impacted areas will need to be sought for the TWOA element of the proposal and an understanding of what base line condition assessments are to be assigned to these areas for the DCO application, will need to be provided with detailed descriptions on which habitat creation is proposed for each of the two applications.

8.4 Habitats and ecological features of importance will need to be assessed. Hedgerow, woodland

and individual mature trees are present throughout the red line boundary (RBL) of this proposal. Those features will need to be accurately assessed to determine impacts. Compliance with Aylesbury Vale Local Plan buffer areas will be expected.

8.5 Protected species associated with these features will need to be surveyed, including impacts to Great Crested Newts (GCN), Reptiles, Invertebrates, Breeding Birds, Bats and Badger. It is understood GCN matters will be covered by a District License. Evidence this approach is being adopted will be required. The applicant has identified the survey techniques and methodologies that will be applied to assess these various species. Breeding bird surveys are expected to adhere to the 2025 Bird survey guidelines methodologies https://birdsurveyguidelines.org.

8.6 Watercourses and ditches are present throughout the red line boundary. Areas around the Claydons, where spurs from the railway are required to facilitate electrification, may have significant impacts where other species, from those noted, will need to be assessed these include Water Vole and Otter as identified within the DCO reports. The screen shot below illustrates impacts to Claydon Brook marked in blue.

8.7 The Bernwood Site of Special Scientific Interest (SSSI) designation is altering in the Spring of 2025. An increase in area and recognition of Bechstein Bats and Black Hairstreak Butterfly will be included within the SSSI designation. The map below shows the survey sites of woodland that are likely to be included within this designation. Further to this hedge boundaries along many of the identified woodland and farmland connecting Finmere, Runts, Romer, Greatsea & Balmore Woods is also likely to come into the schedule.

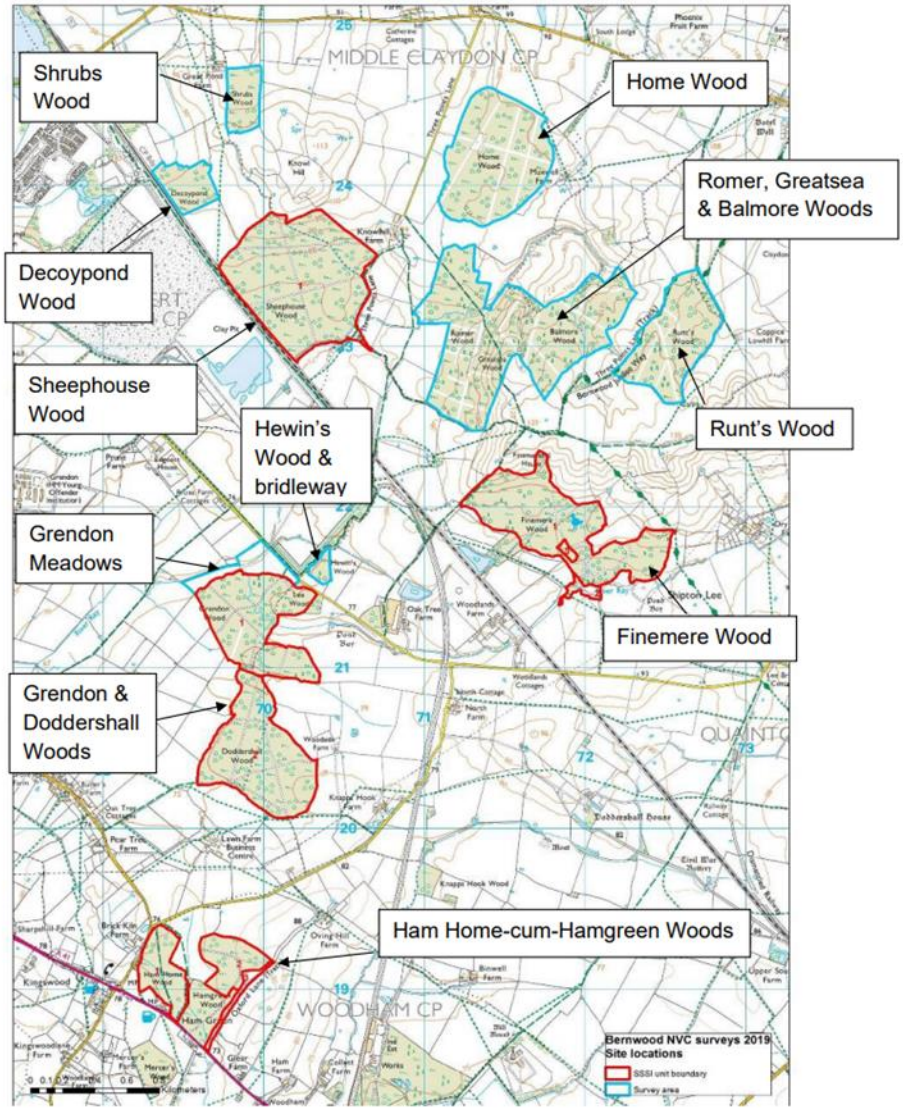


Figure 1 - Location of the eleven sites surveyed: Contains, or is derived from, information supplied by Ordnance Survey. © Crown copyright and database rights 2022. Ordnance Survey 100022021.

8.8 Works within the zone of influence to this series of SSSI's will be required. Bechstein Bat and Black Hairstreak Butterfly surveys will be required within this zone, concentrated around the Claydon's area, to ensure an accurate account of those species is made. Avoidance measures will need to be established to prevent further fragmentation of the habitat these species rely on. Further bespoke compensation and mitigation for both species will need to be provided. No mention of Bechstein bats is made within the bat section of the Scoping report for the DCO. Significant survey data for this species is available. The attached maps illustrate this and form part of the Natural England consultation documents on the proposed SSSI expansion.

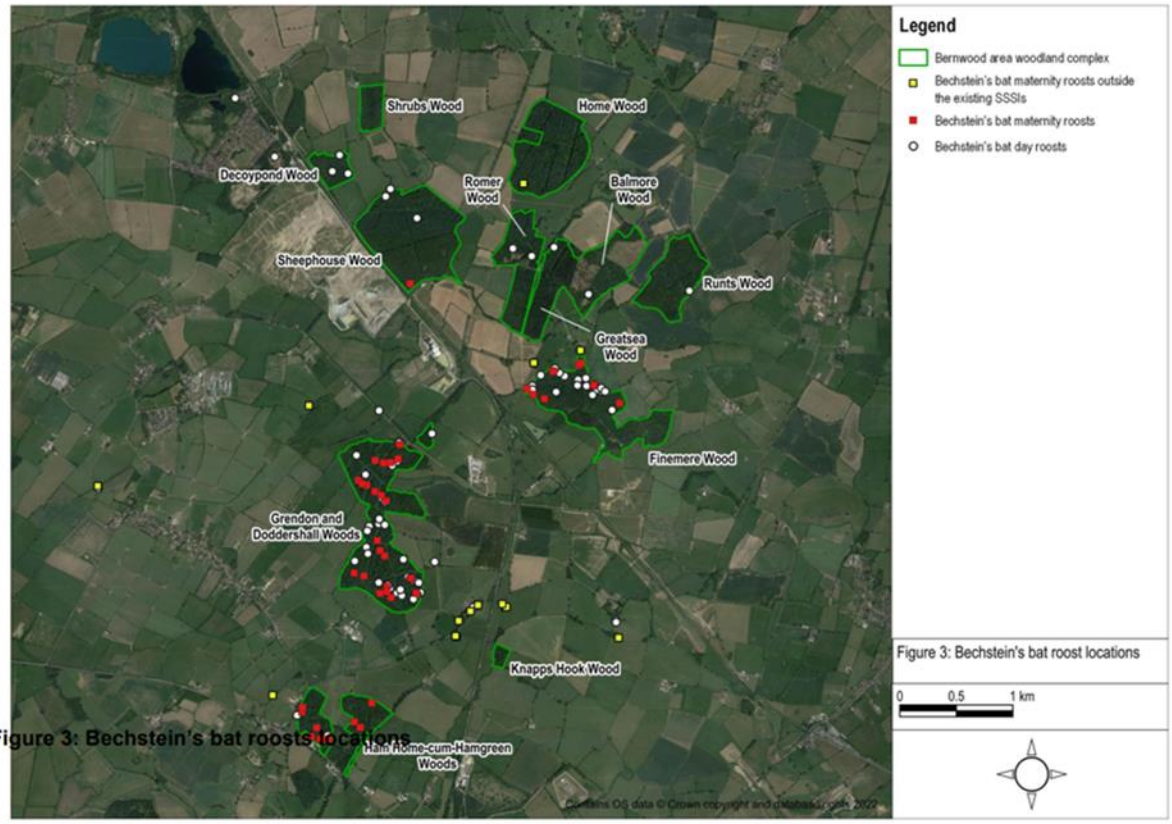


Figure 3: Bechstein's bat roosts locations

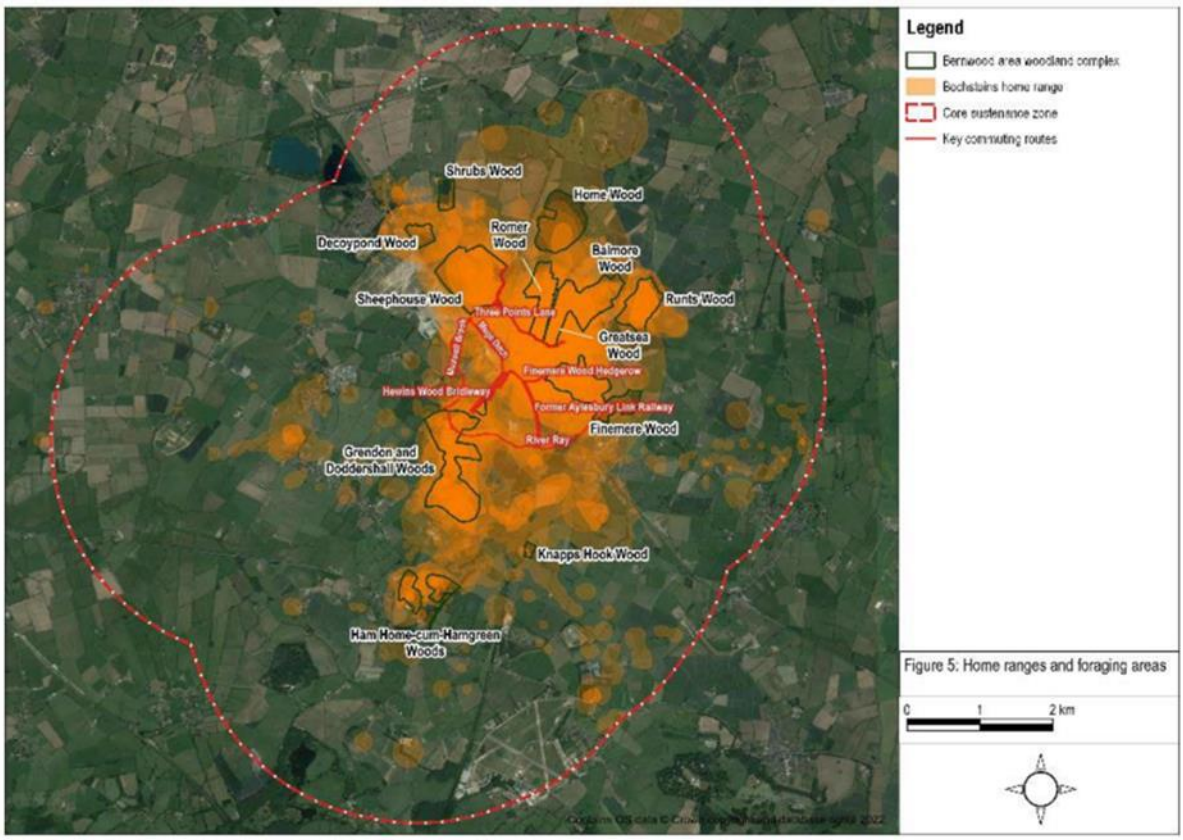
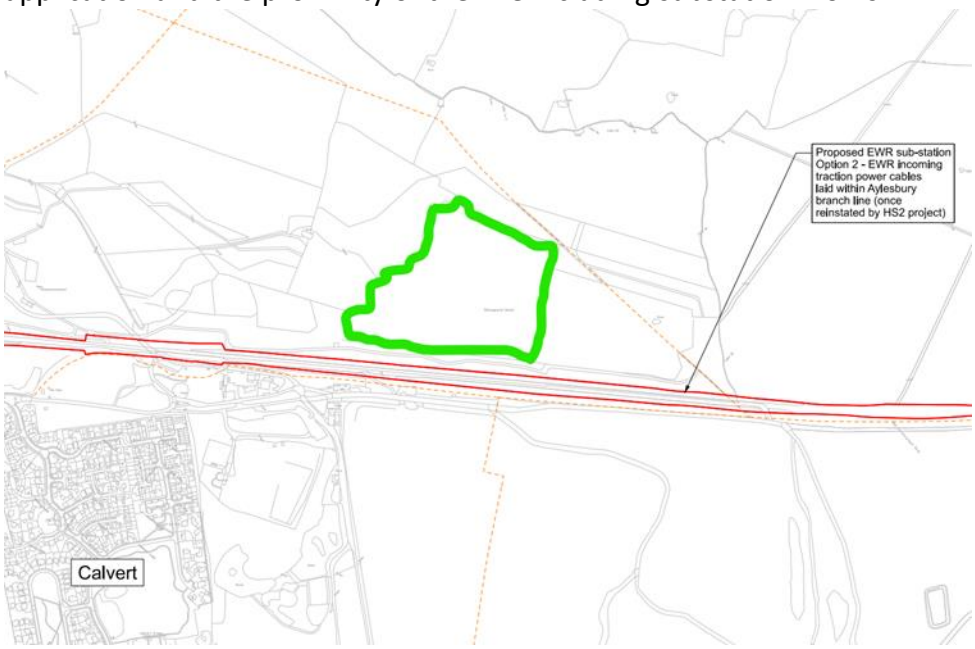
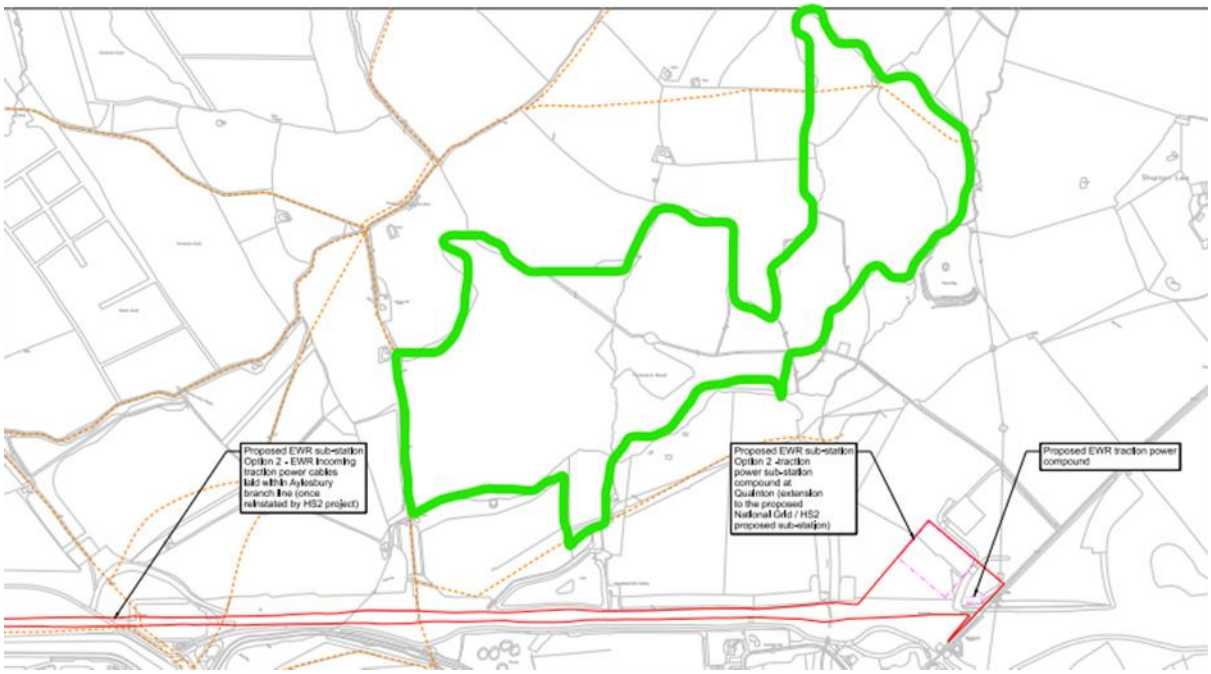


Figure 5: Bernwood area's Bechstein's bat home range and foraging areas

8.9 The attached map below illustrates the location of Decoypond Wood from the DCO application and the proximity of the line including substation works.



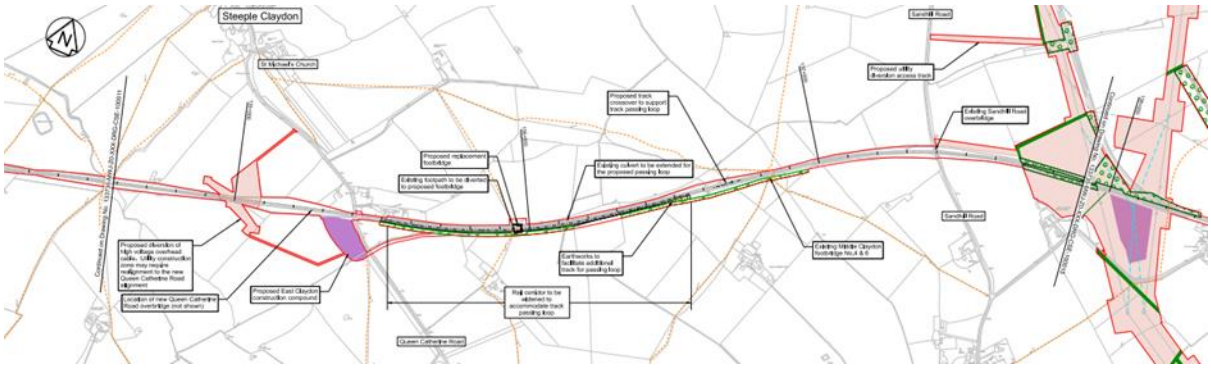
8.10 The following map illustrates the location of Finmere Wood from the DCO application plans with proposed power compound.



8.11 These sections and those that fall within the Bernwood areas Bechstein's bat home range and foraging areas (as illustrated) will need specific assessments for that species. Black Hairstreak butterfly is considered to be present throughout the Bernwood SSSI (proposed extended area zone of influence) within the Blackthorn hedges found throughout that area. Assessments and avoidance measures will be expected along with suitable mitigation, compensation and enhancement proposals provided. Additional information relating to locally designated sites will be expected to be provided with application submission to allow officers to consider any impacts

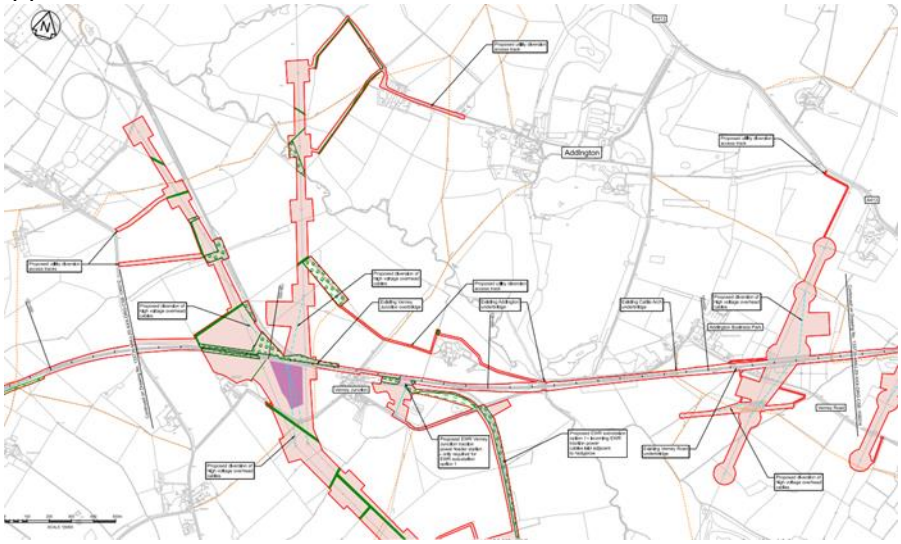
identified.

8.12 Proposed compounds have recently been vacated and will need to be reinstated to facilitate these works. Habitat and species assessments of all these sites will be expected. Examples of compound locations (coloured purple) from DCO application are illustrated below.



8.13 BNG will need to be assessed for this DCO proposal as discussed. How this BNG will be aligned with the TWAO BNG will need to be established as there is significant crossover between the two applications along the constructed railway line, access roads and compounds. A minimum 10% gain will need to be provided as these works are likely to not commence until after the November 2025 date where all National Significant Infrastructure Projects are required to reach this threshold. The DCO application acknowledges this and with significant new areas encompassed within this DCO application, detailed BNG reports will be required prior to works commencing in line with legislation mandating this aspect.

8.14 Example of the increase of red line areas included below from the DCO application with electrification provision expanding beyond the existing railway line consented under the TWOA application.



8.15 The current TWAO applications have still not provided evidence of their BNG requirements under the consented application. It will be critical to understand where the applicant is with this BNG figures for the TWAO application before submitting BNG calculations for this new DCO application.

8.16 Habitat enhancement features have been indicated on submitted plans. These will need to be fully informed after species and habitat surveys have been carried out to ensure they are in appropriate locations and comprise of suitable species.

8.17 The DCO application has acknowledged this and set out the habitats and species that will be covered. The environmental baseline is determined through the habitat assessments that will form part of the submitted Ecological Impact Assessment EcIA and the BNG which would establish the baseline of those features to allow the percentage gains, required to be achieved. The Council's Ecologist would expect to liaise with the applicants' ecologists prior to some of these surveys commencing to ensure all species and habitats are being covered. Further discussions prior submission would also be expected. Further detailed discussions on the BNG issues raised will be required to ensure submitted assessments are considered fit for purpose. It is expected that a full Ecological Impact Assessment EcIA would support this application when submitted including a BNG assessment

9. Arboriculture

9.1 Inclusion of Arboriculture within the DCO Application

9.1.1 Arboriculture is proposed as an appendix to the LVIA, with the Scoping Report stating: *"The arboricultural report will be contained within the LVIA as a technical appendix and support assessment of the landscape impacts.".*

9.1.2 Arboriculture is not only intrinsically linked to landscape impacts, but also to biodiversity and biodiversity net-gain. Therefore, inclusion of this matter wholly as an appendix to the LVIA is not considered acceptable. There are concerns that if this approach is taken, there will not be a coherent application of the impacts or satisfactory conclusion of the significance of effects between all three disciplines.

9.1.3 If Arboricultural information (including an Arboricultural Impact Assessment and Arboricultural Method Statement) cannot form a standalone discipline, then it would be more closely aligned with biodiversity.

9.2 Overall Survey Methodology

9.2.1 In relation to arboriculture, the Scoping Report states that "*Arboricultural surveys in accordance with BS5837:2012 Trees in relation to design, demolition and construction – recommendations, are ongoing. These surveys will provide the baseline data for trees within and adjacent to the Project footprint and identify key arboricultural constraints. The baseline data will then be used to produce an Arboricultural Impact Assessment to determine the arboricultural impact of the Project and identify any tree removal requirements to facilitate construction.".*

9.2.2 Whilst in principle this established methodology would allow a baseline assessment of key arboricultural receptors, it is unlikely to be sufficient for a DCO application where the significance of effects has the potential to be substantial. As trees are dynamic living organisms tree surveys are only usually valid for 12 months and the baseline may have changed significantly from the

TWAO consent.

9.2.3 In October 2024, the British Standards Institute issued a consultation on the current BS5837:2012. Many of the proposed changes will have a material impact on the currently methodology proposed. The most significant are summarised below:

- Changed to a 'Code of Practice';
- Trees will be measured at 1.3m above ground level, rather than 1.5m. This will increase the size of root protection areas; and
- Category A trees will be treated in the same way as veteran and ancient trees (i.e., a buffer zone 15 x the stem diameter at 1.3m will be required).

9.2.4 These changes will come into effect prior to the pre-examination stage of the DCO application, and therefore it is reasonable to expect that these changes should be implemented at this stage to avoid confusion and provide the highest levels of accuracy for arboricultural receptors during forthcoming stages.

9.2.5 Demonstrating accurate positions of arboricultural receptors will also be key to ensuring they are appropriately retained and/or compensated for where impact arises. The methodology to achieve this has not been set out within the Scoping Report. Current BS5837:2012 and the changes under the recent consultation both include that a topographical survey should be undertaken prior to the tree survey to allow accurate positioning. Currently, there is no evidence to show that this would not be possible, however, if considered unattainable, then it must be clearly stated what the proposed methodology is, noting that this should provide accuracy to within one metre. In this sense, drone surveys would not be considered adequate, as this emerging technology cannot currently provide such accuracy, even with combined hyperspectral imaging and LiDAR.

9.3 Policies relating to Arboricultural Receptors

9.3.1 The primary Local Plan Policy for arboricultural receptors is Policy NE8 'Trees, Hedgerows and Woodlands' of the Vale of Aylesbury Local Plan. Within this policy, specific buffers are afforded to hedgerows, woodlands, ancient woodland and veteran and ancient trees. It also includes that *"Development that would result in the unacceptable loss of, or damage to, or threaten the continued well-being of any trees, hedgerows, community orchards, veteran trees or woodland which make an important contribution to the character and amenities of the area will be resisted."*. In this regard, we would seek an evidence-based methodology for establishing the realistic retention of arboricultural receptors where they have the potential to be impacted by the DCO application. The National Planning Policy Framework (December 2024) includes provision for the protection of existing and establishment of proposed arboricultural receptors. These are principally established in paragraphs 135, 136, 162, 164, 187 and 193. At further stages, the DCO application will be assessed against these criteria.

9.4 Ancient of Semi-Natural Ancient Woodland

9.4.1 Although the principle of buffers from sensitive and nationally recognised receptors will be a necessity to mitigate harm, the buffers proposed within the Scoping Report are not sufficient to reduce the significance of effect to an acceptable level. The Scoping Report states that relevant

the buffers will be only 30m.

9.4.2 The Vale of Aylesbury Local Plan, which was examined by the Secretary of State and formally Adopted in September 2021 includes a Policy specific to 'Trees, Hedgerows and Woodlands'; Policy NE8.

9.4.3 Within this Policy, it explicitly includes that buffers/offset to any ancient woodland should be a minimum of 50m. This measurement is based off sound literature and aligns with that articulated by the Woodland Trust. Without a minimum 50m buffer zone around ancient woodlands, the significance of effect is likely to be substantial. The applicant has provided no overriding justification or science-based proof that reducing the buffers from that required (50m) so significantly (to 30m) would not result in the long-term degradation and harm to ancient woodland, likely because this information is not available and a minimum 50m buffer is required. The buffer zones must also reflect consideration of cumulative impact from other developments (e.g., HS2). Salden Wood, Middle Salden Wood, Norbury Coppice and Shrubs Wood are in proximity to the Order limits. These comments should also be read in conjunction with the Ecology Officers comments, as it is likely that buffers beyond the required 50m as mitigation for specific flora and fauna species.

9.5 Veteran and Ancient Trees

9.5.1 The Scoping Report includes that the Ancient Tree Inventory (from the Woodland Trust) has been used thus far to determine the presence of veteran and ancient trees. Although this can be a useful tool, it is a volunteer led scheme which is not an all-encompassing tool. Further details on the methodology for identifying and assessing veteran and ancient trees will need to be included in any further documentation and ensure that these methods are incorporated into and planned or ongoing arboricultural surveys.

9.5.2 Both individual and cumulative effects on these receptors from both EWR and other developments (e.g., HS2) will need to be determined.

9.5.3 Although current Standing Advice from Natural England and the Forestry Commission includes provision of Buffer Zones extending to a minimum of 15 times the diameter of the tree, or 5 metres from the edge of the canopy, whichever is larger, where assessment shows other impacts are likely to extend beyond this distance, the proposal is likely to need a larger buffer zone to facilitate green infrastructure (including BNG provisions) and ecological network connectivity.

9.5.4 Given the volume of veteran and ancient trees that are likely to be present within, or close to the Order limits, it is essential that provision is made for retention and enhancement of connectivity and longevity of such receptors. This will necessitate larger buffer zones that the minimum (as set out above) and direct links between all veteran and ancient trees, which should be kept in a natural and undisturbed state.

9.5.5 As a minimum, we recommend that veteran and ancient trees are given a minimum buffer

commensurate with their height, plus an additional 10m. The rationale for this pertains to preventing damage to proposed infrastructure should failure occur including through the shattering of fallen or windswept wood, which would lead to pressure for excessive pruning (which is likely to cause degradation of receptors) and potentially full removal. It would also provide a sufficient undisturbed area for the receptors, noting the topography and exposure of the site.

9.5.6 A methodology should also be determined to address how damage will be prevented to existing functional habitat connections. Existing connectivity between veteran and ancient trees (and ancient and non-ancient woodlands), which has the potential to lead to significant effects to such receptors.

9.5.7 The measurement of veteran and ancient tree buffer zones will be required from the outer extent of the stems (i.e. not from the centre of the stem) and should be identified with measurements on all plans submitted as part of the DCO application.

9.5.8 Management plans should be individual to all veteran and ancient trees, due to their complexity and sensitivity to development of any kind. This should be supported by an overarching veteran and ancient tree management plan, clearly setting out the goals for the overall management and retention of functional habitat connections between the trees and other receptors (i.e., ancient woodlands, woodlands and trees with future potential to become veteran and ancient trees).

9.6 Maturing Trees with Future Potential as Veteran or Ancient Trees

9. 6.1 Continuity of irreplaceable habitats, including veteran and ancient trees, relies upon the retention and protection of mature or maturing trees which have the potential to become veteran or ancient themselves.

9.6.2 The interrelationship between potential veteran and ancient trees and those already considered to be veteran and ancient is paramount to their longevity. Veteran and ancient trees require other trees within proximity to be managed in a way that will allow existing arboricultural and ecological connections to be maintained, and new ones established.

9.6.3 The Woodland Trust's Ancient and Veteran Trees Assessment Guide recognises that there can be a considerable 'lag' time between the demise of existing veteran and ancient trees and establishing new ones. The DCO application must consider and detail how these lag times will be reduced.

9.6.4 A delay in conservation action will considerably increase the long-term risk of extinction of species intrinsically linked or reliant upon veteran and ancient trees.

9.6.5 Potential future veteran and ancient trees should be identified and treated in the same way as that outlined within the 'Veteran and Ancient Trees' section above. This includes the provision of appropriate buffer zones and direct connectivity channels between receptors. Individual management plans, which may prescribe works to 'veteranise' suitable specimens to enhance

the features available for several flora and fauna species must be produced. An overarching management plan should also be included incorporating all potential future veteran and ancient trees, which will inform significant modifications to the proposed layout. Section 5.1.1 of BS5837:2012 states that *"Certain trees are of such importance and sensitivity as to be major constraints on development or to* justify its substantial modification".

9.7 Traditional Orchards

9.7.1 Traditional orchards are recognised as a 'Priority Habitat' under the UK Biodiversity Action Plan (UK BAP) and are considered an irreplaceable habitat. They often have similar arboricultural and ecological importance to veteran and ancient trees and aid connectivity and function with other sensitive receptors.

9.7.2 The People's Trust for Endangered Species (PTES) details that 90% of traditional orchards have been lost completely since the 1950's and that 45% of those remaining in England are in a state of decline.

9.7.3 Several Traditional Orchards are likely to be present, based on national mapping and the Councils internal database. These include (but are not limited to):

- North of Middle Claydon
- North and west of Verney Junction;
- North of Winslow;
- North of Mursley; and
- South of Little Horwood

9.7.4 Traditional orchards are extremely sensitive receptors and should be given an appropriate buffer, similar to that of ancient woodlands.

9.8 Other Woodlands (Non-Ancient or Semi Natural Ancient)

9.8.1 Policy NE8 of The Vale of Aylesbury Local Plan explicitly includes that buffers/offset to any non-ancient woodland should be 100m, with an absolute minimum of 25m. These buffers are particularly important due to the size of the site and sporadic nature of the identified woodlands. Standalone woodlands are highly susceptible to damage and/or long-term degradation from development and as such should be considered an extremely sensitive receptor.

9.8.2 The DCO application should address how damage will be prevented to existing functional habitat connections. Existing connectivity between woodlands (and veteran and ancient trees and ancient woodlands) must also be adequately considered.

9.8.3 To prevent significant effects, connectivity channels should be incorporated into a DCO application, which should appear as straight buffers, or the shortest undisturbed route possible between receptors.

9.8.4 These comments should also be read in conjunction with the Ecology Officers comments, as it is likely that buffers of between 25m and 100m will be necessary as appropriate mitigation for specific flora and fauna species too.

9.9 Hedgerows

9.9.1 There are a considerable number of species-rich hedgerows within the Order limits and in proximity.

9.9.2 Policy NE8 of the Vale of Aylesbury Local Plan states that a 10m buffer around retained hedgerows is required to prevent damage or degradation to the primary arboricultural and ecological functions. The evidence base for Policy NE8 details that a 10m buffer must be provided for each aspect of the hedgerow. For hedgerows on the boundary of the site, where only one aspect faces the site, the total buffer required would be 10m, however, where both sides of the hedgerow are within a site, a total 20m buffer must be retained in an undisturbed and natural state.

9.9.3 The proposed buffers will need to be both proportionate and aligned with the required embedded mitigation. New trees are indispensable to creation of a resilient mitigation regime and considerable benefits are likely to be obtained over the long-term when those are incorporated into existing hedgerows and their associated buffer zones. Subsequently, hedgerow offsets/buffers must consider the projected growth rates of the trees, based on their species and location. To exemplify this point, if an Oak tree were to be included within a hedgerow as part of embedded mitigation, the buffer should extend beyond the mature crown extents of the tree (where the crown extents could be 30m in diameter).

9.9.4 Where buffers cannot be met, it is likely that the hedgerow will either require removal, or an evidence-based approach to providing mitigation for the hedgerows where their retention is considered achievable.

9.10 Category ‘A’ Trees

9.10.1 Section 6.3.2.3 of the new BS5837 updated the root protection areas afforded to specimens which merit a Category A (high quality) rating. This sees an uplift from 12 times the diameter (BS5737:2012) of the stem, to 15 times. As this will be adopted prior to the completion of the pre-examination stage, we would expect that all Category A trees will be shown with a minimum root protection area of 15 times their stem diameter.

9.10.2 Category A trees are graded as such due to their significant life expectancy and their overall excellent quality and/or condition. Failure to adequately protect these trees will result in reduction of the arboricultural and ecological connectivity and function within the site, noting that these trees are likely to be suitable candidates for future veteran and ancient trees.

9.10.3 Where Category A trees require removal, it should be demonstrated that their retention is not viable, as well as ensuring that any embedded mitigation is proposed as close to the existing receptor as possible, to retain functionality and connectivity.

9.11 Category ‘C’ Trees

9.11.1 Category C trees, like all other trees, represent a material planning

consideration/constraint and the default position should be that these receptors are accommodated throughout the design processes, unless there is an overriding justification for their removal.

9.11.2 Just because trees are Category C (which is subjective in itself), it does not mean that the trees do not have significant future potential or would be easy to mitigate for should they be lost. Many small Category C trees could become the veteran and ancient trees of the future and within the context of this specific development, may be essential to retain for overall arboricultural and ecological function and connectivity.

9.12 Native Black Poplars

9.12.1 The Scoping Report has does not specifically address native Black Poplars, which are nationally rare. The Forestry Commission state that native Black Poplar is Britain's rarest and most endangered tree. It is only found in an extremely small number of places within Britain and is usually found in isolation. Native Black Poplars are however considered endemic to the Aylesbury Vale area, although very few now remain.

9.12.2 These trees are highly susceptible to soil and environmental conditions (including local and national climatic change). They also require both male and female specimens in proximity to reproduce. The Wildlife Trust estimates that only 20% of all native Black Poplars are female, a considerable gender inequality.

9.12.3 Where it is possible that surveyed trees, or those in proximity to the Order limits may be Black Poplars, DNA testing will be required to confirm their presence and gender. This will inform the management objectives of the trees/groups identified. Notwithstanding the above, Policy NE8 of the Vale of Aylesbury Local Plan explicitly states that *"Development should seek to enhance and expand Aylesbury Vale's tree and woodland resource, including native black poplars.".*

9.12.4 The trees/groups (where identified) must be given a buffer congruent with the management objective of the group/species. For the avoidance of doubt, this will include a buffer commensurate with the height of the trees plus 15m as a minimum, to prevent pressure to remove the trees over the lifetime of the development, including through the potential for shattering/windblown wood should the trees fail. The embedded mitigation should also include an additional area for reproduction. This will include natural regeneration (once the presence of females has been established) and cloning. These are the only two mechanisms capable of ensuring the continuity of the species within Britain.

9.13 Deadwood Habitat

9.13.1 The presence of deadwood is fundamental to the protection, enhancement and connectivity of existing arboricultural receptors and those proposed within the embedded mitigation. Therefore, its management and distribution should form a management plan. Deadwood should not be removed from site, rather redistributed where receptors may be impacted (unless diseased).

9.14 Mensuration

9.14.1. At this early stage, it is not expected that such calculations would be made. However, as the DCO application progresses, removed timber volume should be calculated and form a mensuration report. This is seen as an appropriate way to measure timber loss on site and ensure that re-provision of additional timber is provided within the embedded mitigation, which should result in an overall net-gain of timber within the site.

9.14.2 Projects in proximity, namely HS2, has used this model noting that replanting of trees on a 1-1 basis would not provide commensurate timber volume for centuries. This has a direct impact on the carbon storage/sequestration of the embedded mitigation and is a key aspect to ensure there are no adverse impacts in relation to climate change.

9.15 Other Considerations

9.15.1 Both the individual and cumulative impact of the DCO application in relation to arboricultural receptors should be established. This includes re-routing highways and public rights of way (where applicable), utility diversions and re-instatement of former compounds. For example, re-routing of public rights of way are likely to have indirect impacts to potentially sensitive arboricultural receptors and should be treated in the same way as the railway additions and requirements as set out above.

9.15.2 The translocation of smaller trees may be achievable with a comprehensive establishment strategy, however consideration must be given to impacting ground conditions for neighbouring trees.

9.15.3 The Government's 'Keepers of Time' Policy (as reviewed under the England Trees Action Plan 2021-2024) details that intensification of usage and recreational use within or in proximity to such sensitive receptors is likely to:

- Cause compaction and erosion of soil – tree roots and other beneficial organisms and ancient woodland indicator species will not be able to breathe through their roots.
- Suppress ground flora and fauna – reducing the arboricultural and ecological function and connectivity of woodlands.
- Dogs disturb wildlife and their excreta enriches soil – enrichment of soil can 'lock up' some nutrients and cause excessive number of others which will directly impact the flora and fauna (including trees) within the woodland and cause their degradation or demise.
- Removal of fallen dead branches will reduce the arboricultural and ecological function – deadwood is an essential part of normal woodland function and may be particularly damaging to saproxylic species (those that depend on dead or dying wood for their survival).
- Removal of trees or branches for firewood – this can allow excessive light to the woodland floor, impacting flora and fauna species. Pruning wounds can also allow in parasitic organisms which can reduce tree quality and longevity.
- Anti-social behaviour such as vandalism, littering, arson and fly-tipping are known to cause significant destruction to sensitive receptors such as ancient woodland.

- Movement/transportation of non-native or invasive species carried by humans or domestic animals – these can reduce the function of ancient woodlands through degradation of essential species.

9.15.4 Where utility diversions are made in proximity to arboricultural receptors, these should aim to minimise the short and long-term impacts. Consideration must be given to the mature height of existing arboricultural receptors and those included within embedded mitigation. For overhead power lines, pylons should be positioned as far as reasonably practicable away from these receptors and the line height should be above their mature height.

9.15.5 Although considered unlikely, if utilities are to be diverted underground, then a methodology for horizontal directional drilling should be presented where there are likely to be direct or indirect impact when using standard trenching methods.

10. Land

10.1 The proposed methodology for assessing land quality is considered acceptable and in line with available relevant assessment guidance comprising 'DMRB LA109 Geology and Soils' and 'LA113 Road drainage and the water environment' and in consideration of regulatory guidance and industry standards, as referenced in the chapter. Baseline will be established through reference to desk-based sources including British Geological Society (BGS), DEFRA (Department for Environment, Food and Rural Affairs), Multi-Agency Geographic Information for the Countryside (MAGIC), Environment Agency (EA), and Local Authority datasets. The study area has been considered to be within 250 m from the Order Limits for soil, sensitive land uses and surface water, with a 1 km buffer from the Order Limits applied for groundwater. This is reasonable considering the nature of the project as a linear route through rural and urban landscape.

10.2 The initial baseline in the Scoping Report states that the project generally traverses rural areas with light industrial / commercial land use surrounding urban centers. Several historical landfill sites are reported to be present adjacent to the order limits, and land designated as Contaminated Land under Part IIA has been identified within the Study Area. Geological sensitive land uses are reported to be absent within the BC boundaries and generally absent in the remainder of the route, except for a SSSI and Local Geological Site (LGS) in the Comberton to Shelford area.

10.3 High level route-wide initial conceptual site models (CSMs) & potential contaminant source-pathway-receptor linkages (SPRs) have been developed for human health, property, surface water and groundwater receptors. However, these are currently generic and do not consider potential for contaminant sources in specific areas within the Order Limits, which may be disturbed during construction; increased detail in this regard should be included in the final ES.

10.4 Proposed mitigation is reported to comprise measures in accordance with Environment Agency Land Contamination Risk Management guidance and good practice construction methodologies, implemented through the Construction Phase Plan. This is acknowledged as a reasonable approach. It is noted that ground investigation (GI) is currently underway, but the results may not be available for inclusion in the final ES; the findings from this survey would be

reported in a GI report in line with Land Contamination Risk guidance and procedures would be put in place if remediation is required or for dealing with unexpected contamination.

10.5 It is agreed with scoping in of potential effects to geo-conservation related to the identified SSSI and LGS in the Comberton to Shelford area and assessment can be scoped out in the remaining areas.

10.6 The Scoping Report proposes scoping out of land contamination effects during construction on the basis that land contamination is commonly included on a precautionary basis and significant effects are usually not identified. It is considered that this approach is generic and does not consider potential effects from and to the Scheme related to potential existing sources of contamination along the route such as excavation in areas of former industrial or landfilling activity. Therefore, it is suggested that this approach is reviewed and further justification provided for scoping out of this topic.

10.7 It is acknowledged that land contamination effects during operation are proposed to be scoped out considering that contamination sources would likely be localised and small scale and appropriate mitigation would be implemented.

10.8 For the Middle Claydon Passing Loop an extension to the embankment is proposed and BC would expect ground stability to be assessed to facilitate these changes, for example in relation to large structures such as overhead line equipment.

11. Agriculture and Soils

11.1 The scope of the agriculture and soils assessment is defined in Section 6.2, with further detail provided in the Agriculture and Soils Method Statement. The assessment will consider the impacts of the Project on agricultural land (including best and most versatile (BMV) agricultural land), soil resources and agricultural land holdings. This is considered to be satisfactory and covers the main aspects which are relevant to the agriculture and soils topic. However, it is noted that the Agriculture and Soils Method Statement provides additional detail about soil health and natural capital assessments that are not referred to in Section 6.2.

11.2 The Study Area for the agriculture and soils topic will include both temporary and permanent land take and any holding that has land partially or completely within the draft Order Limits, which is considered to be appropriate.

11.3 The proposed methodologies for the assessment of agricultural land and land holdings are satisfactory, but clearer confirmation is needed that soil/Agricultural Land Classification (ALC) surveys will be carried out wherever detailed maps do not exist.

11.4 The proposals for assessing soil health lack a methodology for the timing and location of sampling and the proposed application and benefits of this exercise; these aspects need to be addressed. Soil health investigations are intensive and potentially expensive and there needs to be clarity as to how sampling will be carried out on the 6,500ha of affected agricultural land along the route.

11.5 The Agriculture and Soils Method Statement provides a detailed methodology for the proposed assessment including the provision of preliminary baseline information. The assessment of agricultural land will be based on the MAFF ALC guidelines and the significance of the effects will be evaluated using the IEMA EIA guidance. Published ALC maps have been used to compile a preliminary baseline and will be supplemented by detailed ALC surveys, which will be undertaken to inform the ES. The proposed assessment methodology including the soil/ALC surveys is satisfactory. However, confirmation is needed that soil/ALC surveys will be carried out wherever detailed maps do not exist.

11.6 Section 4.1.3 states that detailed field surveys will be undertaken *'where required and where practicable'*. This statement needs clarification. Soil/ALC field surveys, on a project of this scale, will be required where detailed post 1988 surveys do not exist, to identify BMV land and inform the Soil Management Plan. Further details are provided in Natural England's 'Guide to assessing development proposals on agricultural land'. This is a key reference that is missing from the Scoping Report.

11.7 As set out in section 5.2.2, only 364 ha out of 6,500 ha have previously been mapped. The soil/ALC survey will be needed to assist with minimising loss of BMV land and the production of a robust Soil Management Plan which should include restoration of disturbed land to its original quality where agriculture is the end use. Paragraph 8.1.5 indicates that the whole route will be surveyed (apart from the existing 364 ha where detailed ALC data is currently available) and this needs to be stated more clearly in paragraph 4.1.3.

11.8 The agricultural land holdings assessment will be undertaken in accordance with guidance published by HS2 and will consider impacts to the farm business and impacts to the land used for production. Farm business interviews are being conducted with landowners and occupiers who may be potentially affected by the Project. The proposed methodology including the farm business interviews is considered appropriate and in line with the relevant best practice guidance. Once assessment of impacts has been completed following more detailed proposal development appropriate mitigations would be expected to be assessed for example compensation for significant business impacts.

11.9 Soil resources will be considered in relation to agricultural land as well as other sensitive ecosystems. The significance of the effects will be evaluated using the IEMA EIA guidance. Preliminary information on soil properties will be supplemented by more detailed soil data obtained from soil resource surveys, including soil health assessments to inform the ES.

11.10 Measuring soil health is complex, because of the natural variability of soil, and the need to consider soil biology, as well as the physical properties of soils. No methodology has been presented in terms of timing and location of sampling to provide a '*holistic baseline for soil health'*. The scope (temporal and area) needs to be set out clearly. Given the variability of soils and farming practices across the 6,500 ha, only a field-by-field survey would provide comprehensive results. This is clearly not feasible and would be unnecessary in areas of permanent land-take. Therefore, the Scoping Report needs to specify a sampling methodology that takes account the spatial and temporal differences in survey results across the Study Area. The methodology also needs to state how the results will be utilised, given that, for reasons of cost and timing, it will not be possible to sample the whole area field by field.

11.11 Then the question arises as to what is to be done with soils that are found to be 'unhealthy'. Any soil health remediation programme, post restoration, would be time consuming, and potentially costly, and have to be with the landowners' permission and cooperation. Therefore, the expected applications and benefits of establishing a soil health holistic baseline need to be explained here.

12. Water (Water Resources and Flood Risk Assessment)

12.1 Water Resources

12.1.1 The general approach to Scheme assessment is fine, being based on DMRB LA113 (Road drainage and the water environment), although there should be acknowledgement in the Water Resources Approach that the assessment is mostly for rail infrastructure so will need a departure to the methodology for some aspects - for example the use of ballast rather than the positive drainage that is generally used on major road schemes. This is stated in the Method Statement, but not explicitly the differences in application of the method.

12.1.2 As a note, in section 6.11.4 the title of the next section seems to be included at the end of this paragraph.

12.1.3 In terms of impacts (6.11.5) only very generic examples are laid out for the principal sources, there is no tailoring to the likely scope of the scheme – this could at least include some likely examples here in order for Buckinghamshire Council to be able to fully understand if the methodology is appropriate.

12.1.4 The likely engineering requirements for the scheme have been included within the consultation documents, so some indication of the likely effects should be possible to make the scoping exercise more relevant. This is mirrored in the Method Statement. Permanent effects in this section should relate to the main areas of change that are proposed, an example would be the potential passing loop at Middle Claydon where culvert extensions would be required - this sort of impact is not even included in the generic list. For temporary effects, it is not clear why a five-year limit has been referenced. It seems an arbitrary period that needs some explanation - is it the time for implementation of mitigation enhancements or equilibrium of groundwater levels for example?

12.1.5 Mitigation focuses on embedded mitigation, but there is nothing listed for impacts that may need to be offset, for example culvert lengthening with watercourse realignments that can be opportunities for increased length and enhancements. There could be more than a stated aim to link to biodiversity and BNG by including some examples where the scheme could implement this approach and reference specific sections of other chapters.

12.1.6 As with the list of generic impacts, it is not clear where the types of mitigation stated in the Method Statement apply, for example with links to tunnels and cuttings - are these part of the scope for this phase of the scheme?

12.1.7 Where reference is made to areas where no works are proposed (6.11.20), these could be identified in greater detail for the water environment scope, for example relating to watercourse crossings (that are not to be affected) and could be based on the initial designs that are proposed. This would lead to some more informative examples for impacts and mitigation.

12.1.8 There is reference (6.11.18) to a standalone WER (Water Environment Regulations) assessment. Assuming this is referring to a Water Framework Directive (WFD) compliance assessment, this needs to be correctly referenced and should be linked to the WFD Regulations, 2017 - this would make all the references to WFD and the water body designations much clearer. This should be added to the glossary in place of WER, with the date linked to the correct Regulations. In the Method Statement (3.1.6) the same reference is made to the WER including a list of assessment areas that directly mirrors the water resources scope. This needs to be changed to WFD compliance assessment as well, and the differentiation made in the approach to this over and above the EIA requirements.

12.1.9 In addition, section 9.1.4 of the Method Statement outlines the assessment for hydromorphology, although not explicitly, and it is not made clear how this relates to the so-called WER assessment and how the outcomes of each will be used for the EIA. The cumulative effects section (9.5) should also include WFD compliance which needs cumulative assessment requirements at the water body scale.

12.1.10 The water resources method statement contains references to other statements (e.g., flood risk, land quality, climate change) but as the statements are not numbered it makes it difficult to look up these references.

12.1.11 It is noted that Buckinghamshire Council is not listed under stakeholders, and this should be corrected to include BC as a stakeholder.

12.1.12 In the Method Statement the baseline section is extremely high level - it should really include or at least reference all the water features that are within the study area. As this is a linear feature, some idea of whether the water features are crossing the route or just within the 1 km study area would be useful to give a sense of relevance. Similarly in the detailed appendix it is not comprehensive on water features - for example ordinary watercourses are mentioned for some sections but not listed, same for ponds. As above an indication of location within the study area would be good to indicate the relevance of the features. In the detailed appendix the terminology for main rivers and ordinary watercourses needs to be consistent and some care on referencing to numbers - for example description of 'several ponds' does not relate to 'about 100 ponds'.

12.1.13 In the operation far future text (6.10.9) it is not clear how water quality changes from reduced flows will actually be taken into account.

12.1.14 In the proposed scope within the Method Statement (Table 9) it is not clear how it is possible to have assessment items with lines that say "none" for significant effects but then have additional lines with single specific effects scoped in - it would be better to list the elements that are scoped out.

12.1.15 In the opportunities section (11.3) this is the first mention of created wetlands and realigned watercourses - these elements should be included in the mitigation section as they could be needed to offset the scheme impacts. The sections need to hang together and also link to requirements for WFD and BNG.

12.2 Flood Risk Assessment

12.2.1 Coverage of topic

12.2.1.1The Scoping Report considers the potential effects on fluvial (main rivers and ordinary watercourses), surface water, groundwater, reservoirs and other artificial sources and we are happy that these are all scoped into the assessment.

12.2.1.2The ES Scoping Report provides a very high-level overview of the approach to be taken which includes a combination of qualitative and quantitative methods which will be applied depending on the risk that the works pose when interacting with flood risk receptors. Whilst the proposed approach to considering the effects on sewer, reservoir and artificial flooding are provided, they are later excluded from the proposed scope tables in Section 10 of the Method Statement. We would expect any impacts on sewer, reservoir and artificial flooding to be included in the ES Report.

12.2.1.3 The baseline assessment for flood risk is limited, with no specific details of which watercourses / ponds may be affected. Not all of the watercourses within the RLB are identified in the ES Scoping report. Whilst flood maps are provided there are no specific details of the works that are likely to have potential impacts and their location.

12.2.2 Geographic and temporal coverage

12.2.2.1 We accept that the extent of potential flood risk impacts at this stage is difficult to predict and would agree with an initial study area of land within the draft Order limits plus land within an approximately 1km buffer of the draft Order limits. The scoping report is also not clear at this stage on the specific mitigation that may be required for (i.e. for fluvial and surface water) and whether this is included within the RLB at this stage.

12.2.2.2 Following the assessment of impacts as part of the ES / FRA we would agree with extending the extent of the study area should this be deemed necessary, with evidence to support provided in the ES / FRA.

12.2.2.3 Our understanding of the proposals, based on the limited Project information in the Scoping Report, is that for the most part within BC's boundary, the Project will utilise the existing track, with the exception of a new passing loop at Claydon. With the exception of culvert extensions for the passing loop, we are not anticipating any new permanent watercourse crossings or works to watercourses. We anticipate that there may be some works in the vicinity of watercourses as part of the temporary works, however these are unclear at this stage. From a geographic perspective, BC's areas of interest for flood risk is focused on the works for the passing loop at Claydon, the upgrades to the Winslow station, the siting and management of the construction compounds, haul roads and any new substation infrastructure located within areas

of flood risk. It is expected that these will be covered in more detail in subsequent assessments.

12.2.2.4 The temporal coverage of up to 5 years for the assessment of temporary impacts seems a reasonable starting assumption, however we would expect this to be evidenced in the ES / FRA with further details of the construction programme, phasing and mitigation required.

12.2.2.5 The assessment of permanent impacts over a design life of 120 years is considered robust and acceptable from a flood risk perspective.

12.2.3 Proposed assessment methodologies

12.2.3.1 The proposed methodology for the ES and FRA is in line with current professional guidance (NNNPS, DMRB - LA 113 and NPPF) and is considered acceptable. We also agree with the adapted version of the DMRB LA104 (Environmental assessment and monitoring) significance of effect matrix proposed.

12.2.3.2 The scoping report does not specifically identify all the flood risk receptors, however it is accepted that the project design is still evolving and this is currently unknown. It does, however, give some indication of the type receptors that will be considered and how they might be assessed at a high level.

12.2.3.3 For fluvial flood risk, the proposed approach for determining the need for hydraulic modelling following a 4-tier decision tree is considered proportionate. We would however welcome discussion with the applicant to confirm the approach being adopted to assess the potential impacts for our areas of interest which specifically relate to the culvert extension for the passing loop at Claydon and any other areas where extensions / changes to ordinary watercourse crossings are proposed within BC's boundary. For fluvial flood risk we agree with the proposed approach for assessing future flood risk by using the Upper End climate change allowances for the 2080 epoch.

12.2.3.4 The proposed approach for assessing the impacts to surface water flow paths and site runoff are high level and lacking specific detail in the scoping report, in particular in relation to the drainage strategy that will be prepared. We would advise the applicant to ensure the surface water drainage strategy is in line with the Council's guidance that is available on our website.

12.2.3.5 Our initial concerns regarding surface water relate to the upgrades proposed at Winslow station and we would ask that the proposed approach for assessing these impacts is confirmed with Buckinghamshire Council prior to work commencing once interventions at Winslow are better developed.

12.2.3.6 The proposed assessment methods for groundwater, sewer and reservoir / artificial flooding are limited with an initial qualitative assessment proposed followed by further quantitative assessment if deemed necessary. The details of any quantitative methods are not provided at this stage. We would therefore welcome discussion on the need for any assessments identified once the qualitative assessment has been concluded.

12.2.3.7 We agree with the mitigation hierarchy proposed which includes avoid, reduce and

manage and mitigate, and we would welcome early conversion with the applicant on the approaches being proposed for the works within Buckinghamshire Council. We also agree with the design principles set out in the ES Scoping Method Statement.

12.2.3.8 We agree with the proposed approach for excluding consideration of climate change for the assessment of temporary works, however we would expect any works within the 1% AEP (Annual Exceedance Probability) floodplain to be quantitatively assessed and not just those within the 3.3% AEP outline. We appreciate the aspiration of applying a proportionate approach to mitigating temporary impacts and we would welcome discussion with the applicant on this once the potential impacts have been confirmed. Whilst we acknowledge the aspiration to locate temporary works outside of the 1% AEP floodplain as far as practicable, we expect the impacts for any works located within the 1 % AEP to be identified and fully quantified.

13. Air

13.1 The air quality chapter and method statement references suitable assessment methodologies and guidance including DEFRA's local air quality management technical guidance (LAQM.TG(22), National Highway's Design Manual for Roads and Bridges (DMRB) LA 105 Air Quality, Environmental Protection UK (EPUK) and the Institute of Air Quality Management (IAQM)'s 'Land-use Planning and Development Control: Planning for Air Quality' (2017), IAQM Construction Dust Guidance for assessing construction dust effects (2024), IAQM guidance on air quality impacts on designated nature conservation sites and IAQM Guidance on the Assessment of Mineral Dust Impacts for Planning (2016), which are considered good practice and commonly used by air quality practitioners. The scoping documents Air Quality Method Statement however omit consideration of local government planning policy or guidance and relevance to the Project.

13.2 Relevant air quality standards have been provided in the Air Quality Method Statement with new Government targets for $PM_{2.5}$ included. The applicant should note that Defra's recently published $PM_{2.5}$ interim planning guidance (November 2024) may be relevant for certain Project activities and requires applicants to demonstrate exposure to and sources of $PM_{2.5}$ have been considered in site selection and Project design and that mitigation has been considered to reduce $PM_{2.5}$ exposure and reduce emissions of $PM_{2.5}$.

13.3 The proposed definition of the study areas for construction dust (to be consistent with IAQM Construction dust guidance), construction and operational vehicle emissions and operational diesel train emissions are considered to be acceptable. The application of the DMRB LA 105 Air Quality traffic screening criteria is considered adequate within Buckinghamshire given the impacted locations are likely to be in rural areas with relatively good air quality. Other administrative areas may require the more stringent IAQM traffic scoping criteria be applied in more built up urban areas.

13.4 Potential sensitive receptors have been identified simply as ecological and human. There is no further detail provided on specifics of what constitutes a human health or ecological receptor for the assessment, (e.g schools, hospitals, residential areas, nationally or locally designated sites). Furthermore, the scoping documents provide no detail on the location of sensitive receptors relative to the Project.

13.5 Baseline data is presented in the Scoping documents referencing suitable data sources (scheme specific monitoring, local authority Air Quality Management (LAQM) data and Air Quality Management Area (AQMA) declarations, Air Pollution Information System (APIS), Defra and EA). Baseline information has been presented in the Air Quality Method Statement; however, data has been presented for all local authority areas without sufficient analysis of relevance to the Project. For example, monitored exceedances of objectives have been identified but no commentary has been provided regarding the location relative to the Project or whether locations of exceedance are likely to impacted by the Project proposals. Updated baseline data is to be presented in the EIA.

13.6 Section 6.3.6 (and 6.1.1 of the Air Quality Method Statement) provides a comprehensive list of potential impacts of the proposed Project and Table 10 (and table 31 of the Air Quality Method Statement) sets out those potential impacts which are scoped in and out of the air quality assessment. It is agreed that operational and construction phase road traffic emissions, diesel freight train emissions and construction dust should be scoped into the EIA. It is also agreed that emissions from combustion sources associated with heating and power generation can be scoped out on the provision that there will be no on-site combustion in the operational phase i.e. any proposed facilities will utilise technology such as photovoltaic panels and Air Source Heat Pumps (ASHP) for heating and cooling requirements. This design element should be reiterated in the EIA to confirm such mitigation is inherent in design and thus no associated air quality impacts are anticipated. It is also agreed that odour effects can be scoped out as no significant odour sources have been identified.

13.7 Passenger diesel train services have been scoped out of the assessment, however paragraph 2.4.4 states that diesel powered passenger trains may run on the section of railway within BC (Oxford to Bletchley/Milton Keynes). Operational passenger diesel train services should therefore be considered within the operational air quality assessment, especially where diesel trains may be idling at stations and passing loops.

13.8 The scoping documents are inconsistent in conveying if qualitative assessment of emissions from construction plant and non road mobile machinery (NRMM) will be included in the EIA. Where available, information on construction plant and NRMM should be screened and assessed.

13.9 The methodology for the assessment of vehicle emissions as presented in the Air Quality Method Statement is considered to be suitable, with appropriate dispersion modelling software (ADMS-Roads), tools (and datasets (current at the time of assessment). Suitable guidance has also been referenced for the assessment of significance of effects.

13.10 Application of IAQM methodology for the assessment of construction dust whereby only those areas identified as high risk will be assessed further in the ES, following IAQM guidance, is considered proportionate and appropriate. Sufficient justification should be provided in the EIA for those locations scoped out as low or medium dust risk for which standard best practice mitigation should be sufficient in ensuring no adverse effects at sensitive human health or ecological receptors. Dust mitigation measures appropriate to a medium risk site should be secured within a CEMP (or CoCP) for the Project. Given the size of the Project, it is expected that works specific dust management plans will be appended to the CEMP for identified high risk

locations. The strategic routing of construction traffic to avoid sensitive areas such are AQMA is welcomed.

13.11 In conclusion, it is recommended that EIA should include appraisal of operational and construction phase road traffic emissions, diesel train emissions (both freight and passenger services), construction dust and construction plant and NRMM emissions. Scoping out of emissions from combustion sources associated with heating and power generation and odour is agreed. As indicated in Section 4.5.2 of the Scoping Document, the potential for cumulative air quality effects in combination with other projects should also be considered in the EIA.

14. Climate

14.1 Climate Resilience

14.1.1 Within the main body of the EIA Scoping report, BC has the following comments with respect to climate change:

- Section 7.4.6 (pp-158): BC disagrees with the use of (Representative Concentration Pathways (RCP) 6.0 and 8.5, alone this would be insufficient. Sensitivity testing should be applied to RCP 8.5 to ensure the resilience is robust taking account of the current trend whereby RCP 8.5 is increasingly seen as "business as usual" and scenarios worse than 8.5 are plausible.
- Section 7.4.19 (pp160): BC disagrees with elements of this statement. Climate change is likely to cause increased average surface temperature; higher air temperature leads to greater capacity for the air to hold water and may well have an effect on humidity. Therefore, humidity should not be excluded. Additionally, extremes of temperature, high or low, may increase with climate change. Low temperature should not be excluded either.

14.1.2 BC has the following comments related to climate resilience, with reference to sections throughout the EIA Scoping Method Statement – Climate Resilience (appended to the EIA):

- Section 1.1.5 should state the source of the adopted methodology for the Climate Resilience EIA Method Statement, for example IEMA.
- Section 1.1.6 – This paragraph should clarify that this is an In-combination Climate Change Impact (ICCI) Assessment and that it will consider how climate change could affect all of the impacts considered by all disciplines in the ES.
- Section 3 – Very little relevant legislation is presented. BC would expect consideration to be given to relevant local policies, including the council's Climate Change & Air Quality Strategy.
- Section 4 – The time period and Relative Concentration Pathway (RCP) that will be presented should be defined and justified within the method statement, and could be appropriate to cover in Section four, with a cross reference to 4.4.3.
- Section 4 – Discussion regarding the baseline from this Section should also include

records of climate events that have affected the study area, e.g., droughts and floods.

- Section 4.4 – The study area is defined as the "draft Order limits". This needs to be clarified as to whether areas used during construction are also considered – construction compounds for example should not be excluded.
- Section 5.1 – The content in this section is relevant for a national scale. BC expects that the ES will have data more relevant to the study area.
- Section 5.3, Table 3 – BC would encourage the Applicant to consider whether the information in this section and for future reports will be easier to interpret by a wider audience if it is plotted on a graph.
- Section 5.3.15 – Sea level rise and storm surge information should be taken out of the baseline.
- Section 6.1.5 – There does not appear to be sufficient justification for scoping out construction impacts provided in this section. Further justification should be provided, which could be presented with information earlier in the report.
- Section 6.1.6 – This paragraph should make clear that assessment of these impacts will be included in the ES.
- Table 4 – A sufficiently wide range of potential impacts is listed, and a commitment is made (in Section 6.1.5 and the table note), that this is not an exhaustive list and, should the need to include others impacts arise as the design develops, this will be updated. This is considered appropriate.
- Section 7 – This appropriately sets out best practice for developing resilience within the design.
- Section 8 – The method presented adheres to best practice.
- Section 8.1.6 – As noted above with respect to comments for the main body of the report, BC considers that the assessment could take a more precautionary approach and use RCP 8.5 along with sensitivity testing for all impacts.
- Section 8.1.16 – If adaptive capacity is to be used to moderate the consequence categories, then this must be clearly stated and justified in the ES. Justification for all categorisations of likelihood and sensitivity should be included in the ES.
- Section 8.1.19 – BC disagrees with the proposal presented regarding adopted RCP scenario – Sensitivity testing against RCP 8.5 should be undertaken for all potential impacts; and especially for minor impacts which could become moderate or major.
- Section 9.2 – BC disagrees with the statement made in this section and that this assessment should consider climate change and extreme weather. Extreme weather has a very real potential to impact construction and if it is not covered elsewhere, it should not be scoped out here. Otherwise, some further detail about how the CoCP secures proposed climate vulnerability mitigation for construction should be provided.
- Section 9, Table 9 – BC agrees with the scoping proposal for operation of the Project.
- 10.3.1 – EWR could consider here whether there are some potentially beneficial climate change impacts. For example, related to reduced freeze thaw action damaging underground assets.

14.2 Greenhouse Gas Emissions

14.3 The proposed methodology for assessing the effect of the scheme on climate (Green House

Gas (GHG) emissions) is considered acceptable and in line with the guidance set out in IEMA GHG guidance and PAS2080:2023. The study area and elements scoped into the quantification of GHG emissions are appropriate and the methodology to quantify these elements is considered to be rational and acceptable for this stage of the scheme.

14.4 The assessment of significance of GHG emissions follows the guidance set out in the IEMA GHG guidance and Buckinghamshire council agree with the approach to compare the scheme's whole life carbon emissions with the UK Government and sectoral carbon budgets. We note that no such carbon budgets exist for Buckinghamshire Council and that the county is targeting net zero emissions in 2050, aligned with the UK Government's 2050 net zero target.

15. Material Resource and Waste

15.1 The whole Material Resource and Waste section of the EIA Scoping Report seems to heavily feature landfilling, giving the impression that the scheme will rely on it as its method of waste management. This would go against the principles of the waste hierarchy. Whilst it is welcomed to see at 6.16.21 the reuse of suitable site-won materials and implementation of circular economy principles and the other mitigation measures embedded mitigation should include the management of waste in accordance with the waste hierarchy at the highest appropriate facility.

15.2 This will ensure that waste is managed as the best appropriate facility and reduce the scheme reliance on landfill. Paragraph 6.16.8 – Landfills and other waste management infrastructure. This should be rewritten to waste management infrastructure and landfills as this better reflects the waste management hierarchy, with landfilling being the last resort. This would also better reflect the priorities for the project as stated in paragraphs 6.2.4 of the Method Statement – Material Resources and Waste and 2.1.31 of the Technical Appendix - Resources and Waste "Reuse, recycling and recovery of wastes will be prioritised within the Project, following the local policies on sustainable development.".

15.3 Paragraph 3.1.4 of the Method Statement – Material Resources and Waste misses the inclusion of the National Planning Policy for Waste (NPPW), this would suggest that this part of National Policy has not been considered as part of the drafting of the EIA Scoping Report.

16 Cultural Heritage

16.1 The assessment of the impact on Built Heritage (Listed Buildings (LBs), Registered Parks and Gardens (RPGs) and Conservation Areas (CAs)) and Archaeology is included within the Historic Environment section of the Scoping Report. We welcome the addition of Cultural Heritage within the EIA and agree in general with the approach proposed but wish to highlight the following concerns with the works to date and those proposed to assess Built Heritage and Archaeology. Paragraph references relate to the *EIA Scoping Method Statement – Historic Environment* unless otherwise specified.

<u>16.2 Archaeology</u>

- The Historic Environment summary says that heritage information <u>will be</u> derived from

other development projects in the vicinity of EWR. We are surprised this was not done to inform the SO, and in particular the lack of reference of works already undertaken for EWR seems a strange omission. Para 5.3.22 suggest there have been 47 archaeological investigations undertaken along the whole route whereas nearly 100 individual pieces of archaeological fieldwork were undertaken as part of the enabling works through Buckinghamshire alone between 2018 and 2021. Please ensure the EIA considers the results of these works.

- The archaeological works already undertaken for EWR on the Oxon/Bucks border appear to have identified evidence of Roman viticulture (vines for wine production). The EIA should consider how the archaeological investigation of isolated areas along the route can add to an understanding of the whole historic landscape, and where necessary bring in results from other excavations slightly further afield than the study area (eg Wretchwick east of Bicester).
- Care must be used with the term "non designated heritage assets". Section 10.1.1 final bullet point suggest that it is used here to define all data on the HER which is not designated, which is incorrect. Only assets which have been assessed in line with HEAN 7 should be given this classification. The assets listed at 5.3.17 are SOME of the affected assets which are on the Buckinghamshire Local Heritage List and are Non-designated Heritage Assets. These should be clearly differentiated from other HER records which do not have this status. This list should also be regularly reviewed as inclusion to the Buckinghamshire Local Heritage List is an ongoing process. It should also be made clear that the Local Heritage List is not solely buildings, Addington Manor for example, is a park and garden.
- The *EIA Scoping Method Statement – Historic Environment* appears confused in places as to which county/area it is focussing on. Due to the different level of works already undertaken/proposed within each section, and the varying archaeological backgrounds of each section, the EIA must consider the specific impacts of works within each county/area and not make general statements.
- The consultation provided to Buckinghamshire Council (as referred to in Table 2) was not county specific and did not address any Buckinghamshire concerns.
- 5.3.19 is a sweeping statement which is factually inaccurate. Significance or heritage value is not defined solely on period, but takes into account numerous factors such as scale, state of preservation, rarity etc. The EIA must ensure it does not take such a simplified approach.
- It is not clear how the author concluded the location of potential in para 5.3.24 – this should be further considered and expanded on within the EIA.
- We are aware of geophysical surveys currently being undertaken across Buckinghamshire within those sites to be impacted. The EIA should be informed by the results of these ongoing works.
- Para 7.1.4 should have also considered mitigation for physical impacts to buried archaeology.
- 10.1.1 – should this say no historical mapping for the Oxford to Bletchley section of the route *has been reviewed*? There is plenty of historic mapping for this section.

<u>16.3 Built Heritage</u>

- Part of the EWR line passes close to the northern boundaries of the Winslow Conservation Area (CA). There is a concentration of non-designated heritage assets (NDHA)/Local Heritage Listed (LHL) assets in this area to be aware of, and the Winslow Conservation Area Appraisal is also currently in the process of being updated.
- Please be aware/refer to Buckinghamshire's Local Heritage List website for the most up-to-date list of locally listed heritage assets. Many assets have now been formally adopted through the project and a further tranche of assets is due to be adopted soon.
- Para. 5.3.17 – There are more non-designated heritage assets that may be affected than the three listed here. Please see the Buckinghamshire Local Heritage List website for further details. It should be noted that it is the parks associated to Addington Manor and Horwood House which are NDHAs (Addington Manor no longer survives and Horwood House is Grade II listed).
- The following is a non-exhaustive list of some of the heritage assets (designated and non-designated) located along the railway line that we have identified so far which may be impacted by the scheme and may need further consideration. A more thorough assessment of the heritage assets located along the railway line through Buckinghamshire is likely to be required, as well as providing impact assessments on these and any other assets that may be identified. The list of assets should be updated regularly as the status of these assets can change, particularly when it comes to NDHAs and the Local Heritage List, where new additions are frequent.
    - Shepards Furze Farm – Grade II listed building – proposed sub-station located to the south-west. Consider mitigations to limit the harm to the listed building's setting. Idem. for the proposed traction power compound to the east along Addison Road.
    - Rosehill Farm & Outbuildings – Grade II listed buildings – Proposed traction power compound to the east along Addison Road. Consider mitigations to limit the harm to the listed farm's setting.
    - Claydon Park (Grade II Park), and Middle Claydon Conservation Area – potential additional impacts on northward views from these assets resulting from the new passing loop upgrades to the railway line.
    - Verney Junction – small cluster of historic buildings from the late 19th century, likely associated to the construction of the original railway line, would be considered NDHAs and potential Local Heritage List candidates – large compound to the west and proposed traction power feeder station planned.
    - Addington Manor Park and Garden – NDHA and LHL asset – abuts the railway line at its southern boundary, potential additional impacts on views.
    - Winslow Conservation Area – northern boundary close to railway line (Station Road), concentration of NDHAs/Local Heritage List assets in this part of the conservation area, railway line a key part of the setting of these assets and the conservation area.
    - Horwood House Park and Garden – NDHA – abuts the railway line at its southern boundary, overhead cable diversions and a compound to the south-east planned.

    - Horwood House – Grade II – idem. – impact on key views from the house.
    - Lower Salden Farm – Grade II – largely unobstructed views from the farm towards the railway line to the south, potential additional impacts on views.
    - Milestone on A413 at Winslow railway bridge – NDHA – way finders are often overlooked but can have heritage interest and should be considered along the route.
- Regarding landscapes and visuals, where these pertain to historic, designed landscapes (i.e. parks and gardens) and historic streetscapes within settlements, the council's heritage team would require impact assessments. In particular, where key views from heritage assets located in Buckinghamshire may be affected, such as from the Winslow Conservation Area, Addington Manor Park, Horwood House Park, Claydon Park and the Middle Claydon Conservation Area, etc. Key verified views and visualisations would be most helpful. Both night and day visuals from key locations are expected to be provided as a minimum.
- The council's heritage team will need to gain a better sense of the visual impact of any new and/or upgraded powerlines, overhead cabling, bridges, overbridges and footbridges along Buckinghamshire's section of the railway line in order to understand what the potential impact might be where these affect the setting of heritage assets. Impact assessments should be provided with further details and visualisations where heritage assets may be affected.
- Included in impact assessments, we will need to understand what light use mitigations are in place (e.g. minimum light levels necessary, activated only when necessary, etc.), particularly where this may affect key heritage assets with longer distance views.
- There are emerging/updated Conservation Area Appraisals for East Claydon/Botolph Claydon to be aware of, and there may be some cumulative impacts on the setting of these assets from additional sub-stations and overhead cables to the north-east.

17. The Landscape

17.1 The proposed methodology for Landscape and Visual Impact Assessment (LVIA) is in line with current professional guidance (Guidelines for Landscape and Visual Impact (GLVIA3) and DMRB) and is acceptable. In terms of study area this has been set out as 2km in rural areas and 750m in urban areas, this is considered acceptable but most likely could be reduced with greater understanding of the full works required and vegetation clearance. The scoping report does not specifically define visual receptors, but gives an indication of what type of receptors will be considered. Figures 147 to 150 indicate representative viewpoints but it is not clear which receptors these viewpoints represent and, without fully understanding the extent of the works required within BC, it is not possible to state whether the viewpoints are appropriate or sufficient. The scoping report notes that a zone of theoretical visibility (ZTV) will be produced as part of the EIA and final receptors and photomontages will also be agreed with the relevant statutory bodies. Therefore, BC will withhold approval of visual receptors until a ZTV has been produced and a better understanding of the works within BC, including vegetation clearance, has been provided.

17.1 If there is a need to alter existing structures, such as bridges, to facilitate the proposals the environmental statement needs to adequately consider the impacts on the landscape for what could become very large engineered structures that will typically be in very rural locations. All options should be considered to minimise changes to existing structures.

18. Cumulative effects

18.1 BC welcomes the use by the Application of the latest PINS guidance on this from September 2024. However, in Section 4.4 it is not clear how the EIA process and EIA reporting would capture combined effects that result from impacts that derive from two or more different topics. As currently proposed, there could be scope for repetition if these are reported in each relevant topic chapter; or cross-topic combined effects may be overlooked if there is no intention to capture as part of the cumulative effects assessment (CEA) reporting. BC would welcome clarification of the Applicant's intentions for this type of cross-topic combined effect and assurance that it will be captured within the proposed methodology.

18.2 The general approach proposed for the assessment of cumulative effects of the development with other projects is recognised by BC as current best practice (Section 4.5 refers). The logic within the proposed approach is complex but supported in principle. In order to explore whether it works in practice, BC would be keen for the Applicant to progress to a suggested long list of other projects – this should be shared with all relevant consultees to ensure that the methodology and criteria to be applied is leading to the identification of the other development projects that each respective local planning authority deems to be relevant.

18.3 Stages of EWR are presented as Figure 1 in Section 2.1.1 of the Scoping Report. Connection Stage 2 attained consent (via a Transport and Works Act Order) in 2020 and is currently on site – construction completion is scheduled for 2030. It is possible that there would be temporal overlap between the completion of EWR Connection Stage 2 and EWR Connection Stage 3, to which this Scoping Report relates. BC considers it important that the potential for impact interactions to occur should be addressed within the CEA for the Proposed Development.

18.4 BC would like to be consulted as the list of projects for Cumulative Impacts is developed per the approach reference above. This will assist BC in further understanding the assumptions EWR has made about timeframes for various project stages to arrive at the projects that will finally be subject to cumulative assessment. As an initial indications projects that BC consider relevant for cumulative assessment within the BC boundary include: High Speed 2 (HS2) overlap; earlier parts of EWR overlap as noted above; potential Luton Airport junction loading concerns; planning consent for a solar farm at Tuckey Farm on the northern boundary of Granborough (Bucks Council Planning reference 19/00983/APP); a proposal for a solar farm at Wings Farm (Bucks Council Planning reference 23/01939/SO); proposed development for a solar farm and battery storage known locally as The Rosefield development (The Planning Inspectorate reference EN010158) and Socio-economic drivers/needs for workforce pipelines/specific sectors. Any overlap with HS2 is considered to be particularly relevant and the established approach taken with regard to cumulative impacts within the Rosefield Solar Farm Preliminary Environmental Impact Report (PEIR) should also be referred to (Cumulative Impacts are considered within Volume 1: Chapter 18). It is noted that there is a proliferation of renewable energy projects in the locality including battery energy storage systems and currently these are all at different

stages in the planning process.

19. General comments and Summary

19.1 Overall, from a BC perspective, the document was relatively complex given the appended method statements did not exactly match up to topic chapters. In the main body of the document, while BC appreciates the applicant was trying to simplify the reporting, due to the very high-level nature of the proposed works listed in the 'Route Section 1' works description section, it was difficult to match the figures and proposal to the actual locations and isolate the impact interactions that may be of relevance to BC. Some further detail was found in route section plans which form some of EWR consultation documents, however, this was not part of the Scoping submission.

19.2 There does not appear to be a single baseline description for the topics and overall, methods are generic and non-spatially specific. However, as set out in the above topic sections, best practice methods have been generally proposed with exceptions as BC has considered throughout this response.

19.3 It is the view of Buckinghamshire Council that the information provided for consideration makes it difficult to identify the likely significant impacts and effects of the project. It has been difficult to determine the spectrum of likely significant effects, or whether there were potential gaps, and therefore it may be considered the Scoping Opinion does not adequately address EIA Regulations (10) (3) (C) ''*an explanation of the likely significant effects of the development on the environment'.* For example, a number of the responses provided by technical consultees note that there is no certainty regarding electrification of the line, and the location of compounds and bridges, therefore it has not been possible to assess whether the effects of these parts of the proposal have been fully understood. Specific impacts as opposed to impact types only, and location specific receptor information needs to be developed further, and BC would wish to consider this information. It is respectfully requested that PINS requests further information before issuing a scoping opinion.

19.4 The exclusion of the strategic link to Aylesbury is considered to be a significant failing of the scheme - this element of the scheme is important for Buckinghamshire as it would provide sustainable transport to many homes in Aylesbury. Justification for the removal of this part of the scheme should be revisited.

19.5 Buckinghamshire Council requests that freight trains are powered by hybrid arrangements rather than fossil fuels due to the polluting impacts from noise, dust and fumes. This approach is also beneficial as it would allow the use of overhead lines to be minimised and lessen landscape/visual impacts. The potential for future advances, for example in electrification and battery power, should be elaborated on and further detail on how other technologies can be used. However, it should be recognised that electricity capacity taken from East Claydon Sub Station will necessitate an expansion of the facility which in itself would have environmental impacts.

19.6 BC notes the acknowledgement of the Applicant in Section 2.5 of the need for more detailed construction information. Specifically, the deficiencies cited in 2.5.4 (construction traffic routes not yet defined; and worker numbers not yet defined) are of interest to BC and the authority is willing and keen to be engaged in discussions on these and related matters as the Applicant progresses the proposals. On this point, BC welcomes the commitment made in 2.5.7 by the Applicant to consult local highways and planning authorities on logistics proposals and in 2.5.8 to engage on temporary highway and PRoW closures – BC officers are keen to engage on these matters and would encourage the Applicant to open and maintain dialogue.

19.7 Alternatives Assessment and Indicative Construction Management methods have been provided in Appendix A and Appendix B, respectively, which address those relevant information requirements of the EIA Regulations in addition to the specific topics and other matters addressed in the main body of the report.

19.8 The experience of the Highway Authority through the EWR construction period is that rural routes were significantly damaged and required repairs that were not carried out with expedience. Proposed haulage routes and the location of compounds is required to allow consideration of these activities, their impacts and the need for remediation. Cumulative impacts resulting from other major developments using these roads for construction activities must also be considered. It is understandable that further works are of concern to residents and full condition surveys of affected highways will need to be reviewed by the Highway Authority to ensure routes are safe and remedial works will be promptly undertaken. The acceptability of the granting of the DCO is reliant on this concern being addressed.

19.9 With respect to Winslow Station the Council is concerned that it needs to be fit for purpose from day one and the assessments need to show not just any required changes to the station building and car park but also the highway network and station access to achieve the aims of sustainable travel.

19.10 With respect to the Alternatives Assessment, the passing loop at Middle Claydon is of primary concern to BC and BC would welcome more information to be provided on, and the council engaged on, how the location of the passing loop was determined and alternative assessment considered. All other options considered should be elaborated on and the justification for locating the passing loop at Middle Claydon explicitly provided. This would also be expected to be assessed in more detail through the EIA process, it is considered by BC as insufficient to date based on information that has been provided as part of the consultation process. Residents of BC have expressed concern about freight trains and associated noise and diesel fume emissions due to the use of the passing loop.

19.11 Allied to the EIA, BC would like to take the opportunity to also raise concerns around the Power Connection to East Claydon and seek clarity on how electricity supply issues are being addressed. Cumulative impacts would need to be considered in relation to other energy schemes including but not limited to proposals at Rosefield Solar Farm and Battery Energy Storage System (BESS) and Solar Farm applications within the locality.

19.12 The principles of the waste hierarchy do not appear to have been considered, more information is required in this respect and any waste to landfill minimised.

19.13 I trust this letter clearly sets out the position of the Council in respect of the Scoping Report submitted by the applicant.

Yours sincerely

Steve Bambrick

Steve Bambrick
Corporate Director – Planning, Growth & Sustainability

Caldecote Parish Council
Comments on EWR's ES scoping process 2025

The village of Caldecote is located approximately six miles west of Cambridge and three miles east of Cambourne. It consists of the older part of the village to the south and the newer development of Highfields Caldecote to the north. Old Caldecote is recorded in the Domesday Book and lays lower down in the Bourn Valley. The village of Highfields Caldecote is a prime example of how the sub-division and re-organisation of agricultural land in the late nineteenth century created a community originally based on self-sufficiency and market gardening.

The nature of the clayey landscape on which Highfields Caldecote is built means that any disruption to surface and sub-surface water courses, of which there are many, will significantly increase the risk of flooding to both Highfields Caldecote and Old Caldecote.

Highfields Caldecote and the surrounding area will be severely impacted by the construction and running of the proposed railway, especially as the construction method proposed is Cut and Cover as opposed to a Mined Tunnel. The proposed route literally runs through the village, with residents left very close on either side of the line. The railway line will bring no benefits to the village, only negative consequences to the population, wildlife, land and water. Although, in the long-run, operational disruption will be less in the village itself as the current proposal is for a tunnel, during the construction of the railway, there will be significant detrimental noise, vibration, air and visual pollution, travel and business disruption and the destruction of farmland, and a local business.

In addition, the single track lane between the two parts of Caldecote is already designated as unsuitable for heavy traffic, and past experience has shown that flooding and/or blockages can render the road impassable for lengthy periods and may restrict access to emergency vehicles. Disruption to the exit routes from either Highfields Caldecote or Old Caldecote will isolate both parts of the village and make normal life, including access to schools, workplaces, medical practices and other services impossible.

Caldecote Parish Council has read the East West Rail Environmental Impact Assessment Scoping and has raised the following concerns. This is not a comprehensive list, however, given the short amount of time to raise such concerns, especially coinciding with the non-statutory consultation, it is the best we could do in the circumstances. We hope that EWR will keep assessing its methodology within its Environmental Impact Assessment (EIA) and continue to challenge itself to produce better than best practice action on all environmental issues. We reserve the right to comment further as plans evolve.

Air Quality

1) The Air Quality Statement has a couple of baseline measurements at the A428, but there is no monitoring within Highfields Caldecote itself.

2) 6.4.20 shows that Temporary land requirement affecting ancillary residential uses (e.g. gardens, garages, parking spaces) affecting fewer than five residential properties in a location is scoped out.

Consideration for the Scoping Opinion: Air quality ought to be recorded in the affected settlements and a monitoring device placed within the village itself. Data should not rely on a single recording of a device outside of the village, on a major A road, as this is a distortion of facts. Locations of air quality monitoring and noise receptor locations should be made publicly available to ensure data

transparency, and the ability for Parish Councils to comment on these locations should be provided.

Why scope Out emissions from construction plant? It is very likely that plant will be diesel and will have an effect on air quality. Just one resident impacted in their garden, considering the duration of the project is many years, is one too many and this should be scoped back IN.

Agriculture and Soils

The land take that EWR is planning is mainly grade 2 and 3a highly productive cereal growing land. Looking at evidence of other development sites (HS2, World War II airfields) where topsoil is scraped away and at a later date returned, yields may be reduced by as much as 50%. This is an area of very heavy clay soil that is highly susceptible to damage, especially by heavy plant. In a time of ensuring food security and relying more on domestic production, rather than imports, this is a very worrying figure for the whole UK population.

Consideration for the Scoping Opinion: What are EWR plans to return the land to farmers in a condition that will enable yields similar to when EWR took them from the farmers?

Biodiversity

1) The Barbastelle bat communities. The known roosting sites at the Eversden and Wimpole Woods Special Areas of Conservation and Hardwick Wood (Site of Special Scientific Interest) need to be protected along with their foraging routes and flight paths.The ancient Water's Wood at Highfields Caldecote is an important part of the functional habitat for the Barbastelles from the nearby Hardwick Wood SSSI maternity roost as it provides vital cover for safe commuting as well as foraging opportunities. Barbastelle bats (and many other varieties) have been located north of the A428 and their flight paths tracked from Hardwick Woods and the maternity roost, travelling on either side of Caldecote following tree lines to Waters Woods, and over the A428 to Childerley and beyond. The cut and cover tunnel crossing the A428 and Highfields Road crosses these routes in several places and can only have a detrimental effect on the bats flight paths, fanning and foraging behaviour. There is no evidence that the mitigation planned for Highfields Road (bat bridge, tree/sapling planting) actually works. Plus, the time it takes to construct the railway, before mitigation is in place, could well decimate/obliterate the already rare Barbastelle. The rail line then continues south, having crossed Caldecote, across the fields within only 700m of the maternity roost in Hardwick Woods. The compound lighting, vibration and noise from construction will be hugely detrimental and cause an existential threat to the maternity roost.

2) Water Voles. Environmental Surveys for the C2C busway on Bourn Airfield have identified the presence of Water Voles. The loss and disturbance to wildlife habitats, fields, farmland, water courses etc. will decimate the biodiversity of the village and surrounding area. The mitigation offered by EWR is inadequate and could well see species of fauna and flora disappear from dust, water, air pollution, noise or vibration.

3) The proposed tracks and construction are immediately adjacent to Water's Wood.

Consideration for the Scoping Opinion:

6.10.20 does not explicitly list Water Voles and it should do as they have been found to be present on Bourn Airfield and are legally protected.

Veteran, ancient and notable trees to be identified and baseline surveys to be provided for winter months when vegetation is not in leaf.

How does EWR plan to mitigate the environmental destruction during construction of the railway? Caldecote will lose established hedgerows, ditches, trees, farmland and wetland habitats – all of which could be fundamental to the existence of species such as the Barbastelle bat and water vole. While some permanent loss is inevitable with a project of this size, that loss can only be effectively mitigated when all its component parts are fully recorded.

The compounds are currently located across the Barbastelle bat flight paths and immediately adjacent to the ancient woodland of Waters Wood. How will species, such as Barbastelle bats, survive before mitigation is in place? How will EWR monitor such fragile species during and post-construction? Ecological reports and survey data should be maintained and methodology updates followed to ensure survey validity. Particularly important for mobile species such as barbastelle bats. The document mentions desk based research used in compiling evidence. What proportion of wildlife research will be done from a desk? Will EWR ensure that wildlife is properly researched, in situ, by specialist, independent groups? Will this research become publicly available to view?

There are so many environmental impacts that could be addressed by a mined tunnel construction as opposed to the currently proposed destructive Cut and Cover method. What are EWR plans in this respect?

Communities and Equality

1) Children, older people and disadvantaged groups with limited transport are all relevant equality groups, and will be disproportionately affected but they will not be uniquely affected. The whole community will suffer, due to the nature of the impact to our only access road to the village, our only shop and our only bus stop.

2) During construction, who would want to move into the village? That is very likely to lead to falling school rolls, loss of money to the school, and the area that would suffer would be SEND.

Consideration for the Scoping Opinion: Since the impacts here will be on all people in the village needing to access health services, shops, schools and public transport, the Study area should be the whole village, not just within 500m, and for all residents, not just those covered by the Equalities Act 2010.

Scope should be expanded to assess the impact on schools due to a fall in population,and reduced number of children coming to the village, during the period of construction.

Flood Risk

Sewer flood risk here is high when combined with surface water flooding, because of the combined sewers and pumping station.

Consideration for the Scoping Opinion:
6.11.11 states a study area of 1km from the centreline of the proposed or existing railway for consideration of all groundwater, surface water, hydromorphological and flood risk effects. All assessments should include the whole of the village, not just 1km, as proposed works include an

area of the village where the groundwater overflows, which floods the rest of the village overloading the sewers causing the sewers to flood also.

Historic Environment

Highfields Caldecote lies between two contrasting historic environments. The north of the village lies on a Cambridgeshire clay landscape that is known to have been occupied and farmed for two and a half thousand years. To the south is the unique landscape of the Bourn Valley. Occupation across these two differing landscapes has been identified from the early Iron Age through to the medieval period, with evidence for settlement and agriculture, including rare Roman 'lazy-bed' cultivation and medieval ridge and furrow, and field organization that is still visible in the landscape today. The disturbance caused by the cutting of the EWR tunnel and the creation of the surrounding compounds will destroy much of what remains of this historic landscape.

Consideration for Scoping Opinion: What will EWR do to protect this special landscape? Will there be an archaeological assessment of the area?

Human Health

1) So far, EWR has not published any assessment of the detriment of overall community amenity and quality of life for those living in Highfields Caldecote. The project severs the only real entrance to and exit from the village, and separates residents from their only shop and bus-stop. There has been no information regarding the likely impact of noise, vibration, pollution and lighting on those in the immediate vicinity and no information on how far these impacts will reach.

2) 6.4.14/15 states that baseline data will be gathered within 500m of the Project draft Order limits for locations where the land use of receptors is likely to change. The Scoping document allows for expansion of the study area where access between communities and their facilities is affected.

Consideration for the Scoping Opinion: We strongly request that baseline data be gathered for the whole community and not just within 500m given the scenario, highlighted above, facing Highfields Caldecote. Understanding the negative consequences of building this railway and available mitigation needs to be properly assessed and formally brought into the EIA.

Land Quality

Land Contamination - As a former military airfield, where undetonated munitions have previously been found, Bourn Airfield ought to be assessed for contaminants and explosives prior to any work commencing.

Consideration for the Scoping Opinion: Include Bourn Airfield in Table 4.1.

Landscape and Visual

Caldecote's landscape impacts are not just visual. The village sits on top of a hill and the very name of the village means 'cold dwelling'! Trees and hedges act as windbreaks. Walking to the

garage in winter, assuming a suitably distanced walking route is provided, without hedges will be bitter.

Consideration for the Scoping Opinion: Natural windbreaks should be reinstated after construction, and necessary mitigation provided during construction.

Will EWR consider careful positioning of railway infrastructure with consideration of overhead power supply and its impact on landscape sensitivity views. And especially with a view to the visual impact at the entrance to the village.

Sound, Noise and Vibration and Electro-magnetic Interference

Given the proximity of the proposed railway to a high density of residents in Caldecote, on both sides of the line, estimated to be 200 houses within 300m, and the fact that the baseline in the Sound, Noise and Vibration Statement shows this is a very quiet area, Caldecote Parish Council considers the negative impacts of sound, noise, vibration and electro-magnetic interference on the village as unacceptable. The study areas, outlined on p113 of the document, state that operational airborne noise will be 300m from the project railway, whilst ground borne rail noise will be 125m from the project railway. Construction noise will reach 300m from the closest construction activity.

Consideration for the Scoping Opinion: Firstly, why only 50 metres for electro-magnetic interference? Comberton Village College is located next to the proposed railway. What kind of environmental impact will this have on the school? What kind of mitigation will be put in place? What about the electro-magnetic interference emitting from the signalling masts, one of which is located in Caldecote? It is not recommended that masts be located near bat flight paths, yet the one in Caldecote is positioned on the flight path itself. It seems as if this issue has not been researched or explored thoroughly. Currently the proposed study areas do not take into consideration the majority of housing in Caldecote, even though most of the village will be severely affected by noise and vibration. We hope that the statement in 6.8.13 assessment 'may need to consider impacts outside these buffers where noise modelling suggests a need for this' becomes a reality.

Traffic and Transport

1) Highfields Caldecote will be significantly impacted during both construction and operation of the railway. During construction there will be road closures that will seriously impact active travel, preventing residents without cars from being able to leave the village, including to access health care, and a real threat to the village's one bus service impacting students and workers' access to colleges and places of work, also the elderly who rely on the public bus service to access Cambridge Town Centre. We trust these impacts will be properly considered.

2) Caldecote is positioned close to the Cambourne station and, once the rail line is operational, risks the real threat of commuters from southern villages using the village as a rat run. The entrance to the village from the south is severely restricted, being a windy, single track, protected road in the old part of the village and is often impassable. But any increase in traffic using this road will result in chaos, such as recently when a lorry and bus met, couldn't pass and blocked the road for over an hour causing school children to have to walk home on a road with no pavement. Any increase in traffic due to local road closures over the years has always resulted in accidents and blockages. Road safety is a real issue here.

3) EWR are promoting housing growth as an economic reason for building the railway. The railway is promoted as a way to stimulate housebuilding for 94,000 additional people along the route between Bedford and Cambridge. EWR estimate regular passenger numbers of circa 5000 per day. The other 95% will use the roads and an EWR report (Environmental and Technical Report, figure 4.1, Appendix 4, May 2023) confirms there will be more cars on the road.

4) Delivery of C2C risks being delayed or disrupted.

Consideration for the Scoping Opinion:
6.9.19 showing the proposed scope for Traffic and Transport shows Road Safety scoped out. We strongly request that this needs to be scoped back in.

What are EWR plans to mitigate road traffic congestion and the significant carbon emissions that will result? How will EWR ensure that Caldecote is not used as a route through to the station post construction, or as a diversion due to road closures, however temporary, during construction.

Could EWR provide a detailed plan for each affected village outlining how bus services, schools and access to other services will be maintained throughout the construction phase.
What are the identified routes for construction? Has the risk to roads and buildings been assessed?

Water Resource

1) The village drainage system is hydrologically connected to the project by the road. Previous flood events have included water running down the road. Plus the removal of the 'soggy field' to the west of Highfields Road, currently identified for a compound, will remove the natural attenuation area, and increase the probability of surface water flooding through the village.

2) It should also be noted that the sewer flood risk here is high when combined with surface water flooding, because of the combined sewers and over-stressed pumping station.

3) Because of very heavy clay soils and high water table locally, land here is very sensitive to damage.

4) The Environment Agency is opposed to all new building in Cambridgeshire until the water supply problem is resolved. Building a railway and EWR 'dependent development' for 94,000 people in addition to those already in the local plan will put significant additional pressure on water. Water scarcity is a real issue and future housing cannot be guaranteed drinking water until extra reservoirs and desalination plants are built at more cost in 2040 and beyond.

5) The railway will utilise great amounts of water during construction.

6) The Bourn Brook is a vulnerable course of water.

Consideration for the Scoping Opinion:

Groundwater and surface water receptors should be scoped back in.

The area of study requires to be greater than 1km and should include further down the hill, to include the pumping station, Bourn brook and the ditch system to Hardwick Wood.

Mitigation requires SUDS. Clay is impervious, hence the high risk of surface water flooding. Landscape effects to see how well mitigation is working should be evaluated far earlier than year 15. There should be evaluations in Year 3 so that any problems can aid mitigation adaptation sooner.

What are EWR plans to minimise the use of water during the construction of the railway and how do they plan to supply water for the new housing in the interim? Residents are worried.
Further detail needs to be put forward about the water courses and springs, how they are to be assessed and monitored, especially during construction of the proposed railway.

Wider development and cumulative effects

Any new developments, including Bourn Airfield, Bourn Quarter, Phase 2 Angels Park, C2C busway and EWR dependent housing to north of Cambourne to be considered in relation to the potential cumulative impact of the Project.

Greater Cambridge Shared Planning
The Guildhall
Market Square
Cambridge
CB2 3QJ

www.greatercambridgesharedplanning.org

PINS reference: TR040012 - 000019
Contact: Rachel Lambert
Principal Planner (Strategic Sites)
[redacted]@greatercambridgeplanning.org

31 January 2025

FAO: Karen Wilkinson
Environmental Services
Operations Group 3
Temple Quay House
2 The Square
Bristol
BS1 6PN
eastwestrail@planninginspectorate.gov.uk

Electronic submission only

Dear Ms Wilkinson

Consultation response on EIA Scoping Report – relating to application by East West Railway Company Limited (the Applicant) for an Order granting Development Consent for the East West Rail (the Proposed Development) (PINS ref: TR040012- 000019)

Introduction

This response is provided on behalf of Cambridge City Council ("the Council") in response to the EIA Scoping consultation request issued by the Planning Inspectorate (PINS) on 2 January 2025 for the East West Rail Development Consent Order (DCO).

The Council is identified as a 'consultation body' as defined in the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (as

amended) and has therefore been consulted prior to PINS adopting its Scoping Opinion. The deadline for consultation responses is 31 January 2025.

EIA Scoping Report

The Applicant commissioned an Environmental Impact Assessment (EIA) Scoping Report, dated 5 December 2024, in accordance with Regulations 10 and 11 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017.

The Council has reviewed the EIA Scoping Report and has provided technical comments as detailed in Table 1 of Appendix A appended to this letter.

The Council has identified key areas for further dialogue with the Applicant to shape the scope of the EIA and ensure comprehensive identification and assessment of the proposal's impacts. These areas include, but are not limited to:

- **Access and connectivity**: Addressing the social, economic and environment effects of the railway on existing communities to fully capture opportunities and impacts (e.g., upgrading the pedestrian bridges at Coldham's Common and The Tins to accommodate cycles). Understanding the implications of temporary and permanent road and path closures, new structures, and interactions with local routes.

- **Approach to powering the trains:** Assessing the differential impact of discontinuous electrification versus full electrification on railway structures, mitigation requirements and landscape.

- **Biodiversity impacts**: A need for comprehensive surveys and a requirement for scoping on further surveys.

- **Combined effects:** Evaluating the interface with other committed development and infrastructure projects and existing planned mitigation, as well as related projects (e.g. Cambourne to Cambridge busway, Cambridge South Railway Station and strategic growth sites [North East Cambridge, Cambridge East] etc.)

- **Construction disruption:** Assessing the potentially significant disruption to Cambridge City (including access to schools) during the construction phase, whilst drawing upon lessons learnt from other major infrastructure projects (e.g., HS2). Additionally, concerns raised regarding the wider socio-economic, environmental and economic effects on the impacts of travel to work patterns, particularly disruption to routes throughout the construction phase.

- **Design and landscape/visual impact:** The assessment of the effects of decisions on the detailed design, including the vertical alignment of the railway,

including embankment heights, cutting lengths/depths, and potential for extended tunnel lengths, having regard to the design and impact of the railway and key structures on landscape, wildlife, and visual amenity. This includes a comparative assessment needed of the construction, landscape and visual impacts of cut-and-cover versus bored tunnel options.

- **Environmental baseline:** Further information and data required to fully assess environmental impacts of the scheme.

- **Freight:** Analysing the impact of introducing and intensifying freight traffic on residential amenity, for communities located close to existing and new rail lines focusing on noise, vibration, and air quality impacts from diesel-powered trains.

- **Road and path closures:** Understanding the implications of temporary and permanent road and path closures, new structures, and interactions with local routes on community and social cohesion.

- **Scope of DCO:** Considering the exclusion of a new station at Cambridge East from the current scope, and the resulting unaddressed impacts and opportunities

The comments provided are made on a without prejudice basis and having regard to the material provided. The Council reserves the right to offer further comments on the scope of the Environmental Impact Assessment (EIA) in future submissions. This includes, but is not limited to, feedback on the Preliminary Environmental Information Report (PEIR) and other instances where insufficient information may have led to certain impacts being excluded from consideration. In such cases, the Council retains the right to challenge the adequacy of the EIA Scoping.

If you have any queries regarding this submission or require any further information, please contact nsips@greatercambridgeplanning.org

Yours sincerely

Stephen Kelly
Director of Planning & Economic Development
On behalf of Cambridge City Council

cc. Robert Pollock (Chief Executive)

Enclosures
Appendix A: Consultation response on EIA Scoping Report (Cambridge City Council)

Appendix A

Consultation response on EIA Scoping Report – relating to application by East West Railway Company Limited (the applicant) for an Order granting Development Consent for the East West Rail (the proposed development) (PINS ref: TR040012- 000019)

Table 1: Response to EIA Scoping Report

This table sets out comments from Cambridge City Council (**the Council**) in relation to the EIA Scoping Report and associated documents (as listed in Table 2).

ID	Section of report	Description	Comments	'Scoped out' assessment items to be scoped in
General comments				
EWR-MWJV Technical Partner Routewide – Environmental - EIA Scoping Report				
GEN.1	4.2	Defining the environmental baseline: Landscape and historic environment surveys	Understanding how criteria for short-term, medium-term and long-term, as well as permanent and temporary effects can vary among settings (urban and rural) is essential for the assessment outcome and its feasibility. More details of how these criteria will be structured to capture level of impacts/effects in such varied settings should be discussed and agreed with the local planning authority once surveys and data gathering are completed.	-

GEN.2	4.5	Wider development and cumulative effects	The proposed route may intersect with or impact other projects, including strategic growth sites, as well as other initiatives. Given that work on these projects might commence concurrently with or prior to the EWR project, it is crucial to establish communication with the respective project teams. This collaboration will facilitate a comprehensive understanding of the cumulative effects, as each project may have varying environmental priorities.	-
GEN.3	4.5	Wider development and cumulative effects: Defining other developments and monitoring area	The Council would welcome early sight of the gathered GIS data and projects shortlisting through the four stages.	-
GEN.4	-	Artificial lighting	There is reference to the use of lighting for construction (including for security purposes or to illuminate working areas) and operation in the CoCP and Landscape and Visual Method Statement - however, no specific detailed lighting assessment or strategy has been included at this stage. Along with the other improvements and newly installed infrastructure, it is noted that there would be a need for artificial lighting to be provided for various assets and activities along the route. Most of the lighting would be needed for depots and maintenance activities. In addition to these areas, there would be a need for lighting to be provided for stations, car parks and railway junctions/compounds. It is stated that all lighting would comply with standards and best practice for the safety of passengers and staff. Low-level lighting would be used where possible to illuminate walkways and working areas and directed to minimise light pollution beyond railway boundaries. Consideration would be given to motion and	-

			timer-activated lighting where applicable, so lights do not remain on unnecessarily. This approach is noted. In terms of light pollution and human impacts any artificial lighting levels off site should be assessed in accordance with and should meet the levels recommended in the Institution of Lighting Professionals (ILPs) - 'Guidance Note 01/21- The reduction of obtrusive light, 2021 (GN01-21). Artificial lighting can have adverse impacts on health and quality of life / amenity. ILPS PLG04 – Guidance on Undertaking Environmental Lighting Impact Assessments, 2013 may also be relevant to any Es assessment. This document outlines good practice on lighting design and provides practical guidance on production and assessment of artificial lighting impacts within new developments. It is required to establish the impact of lighting on the surrounding environment that details are provided of any artificial lighting of the site and an artificial lighting impact assessment is undertaken with predicted lighting levels at existing residential properties. Artificial lighting on and off site must meet the Obtrusive Light Limitations for Exterior Lighting Installations contained within the Institute of Lighting Professionals Guidance Notes for the Reduction of Obtrusive Light - GN01/20 (or as superseded). The artificial lighting impact assessment will be required to establish lighting during pre and post curfew, in accordance with the ILP guidance notes. The assessment of light intrusion into receptor windows as vertical lux levels is also required.	
Environmental assessment topics: Landscape and visual				
EWR-MWJV Technical Partner Routewide – Environmental - EIA Scoping Report				
LV.1	6.13	Landscape and visual	Whilst no specific detailed lighting assessment has been included at this stage, it is expected that more detailed assessment will be carried out before the planning application stage. This should include consideration of any artificial lighting impacts in	-

			accordance with the Institute of Lighting Professionals “Guidance Notes for the Reduction of Obtrusive Light”. It should be made clear for easy reference where the artificial lighting is to be installed and an assessment will need to be presented within the document. When comparing the existing site and its lighting environment against the proposed development’s lighting requirements, by virtue of the nature, size and location of the proposals there will be an increase in the lighting levels on site This will result in a change of the existing lighting environment. However, the Council appreciates this will be considered more at the detailed design stage, but it would be beneficial to consider impacts as early as possible. The proposed study, assessment and mitigation approach to the ES appears satisfactory at this time from an Environmental Health perspective. However, further consideration needed regarding other impact / effects on other environments such as businesses, other interested organisations such as Astronomy Organisations (sky glow), ecology (wildlife / animal behaviour & breeding), drivers on public highway, landscape or secured by design requirements. These effects should be considered by respective specialists in those areas.	
LV.2	6.13	Sources and types of impact	The approach for considering impacts within 500m distance of the route/area of intervention, and up to 1km for areas with designated historic assets and up to 2km when assessing impacts upon landscape or townscape is welcomed. The Council would welcome an opportunity to have early sight of how this impact distance was determined in some locations to help us better understand the potential impacts & effects on landscape and townscape character of these areas and the practicality and effectiveness of the mitigation measures that will be implemented. Additional viewpoints are likely to be required once the data is gathered and more detailed information on the design	-

			of the extension to Cambridge city station and associated structures are available.	
LV.3	6.13	Proposed scope	Generally, the scope is acceptable; however, the Council reserves the right to amend the lists of criteria based on survey results, site walkovers, local knowledge and collaborative consultation with local authority officers.	-
Routewide – Environmental - EIA Scoping Method Statement – Landscape and Visual				
LV.4	1.1.7	Method Statement – Landscape and Visual	Section 1.1.7 is too limiting regarding landscape impacts. It correctly identifies the impacts on landscape character but fails to identify impacts to other landscape designations both national and local which may exist.	-
LV.5	1.1.8	Method Statement – Landscape and Visual	Section 1.1.8 identifies people and groups of people as the visual receptors for the assessment but does not include an indication of the differing sensitivities of different groups of people and their activities which is an important facet of a Landscape and Visual Impact Assessment (LVIA). It is understood that the above are just introductory statements about landscape and visual differences, but more detail would give clarity to the text.	-
LV.6	5.2.4	Landscape baseline	Impact to designated landscape features must also be included along with the National and Local Landscape Character Areas which are mentioned. Designations may come at a variety of scales (national to local) and sensitivities along the route and must be considered and assessed (e.g., the Greenbelt, nature reserves, TPOs etc.).	-
LV.7	5.2.11	Townscape baseline	Reference to the Cambridge Inner Green Belt Boundary Study (2015) is acceptable. However, reference and weight should also be given to the Greater Cambridge Greenbelt Assessment (2021) that forms part of the evidence base for the emerging Greater	-

			Cambridge Local Plan. It covers more areas than the previous document and is more up to date.	
LV.8	5.2.21	Photography	The Council questions the need to reference use of a tripod at this stage. There may be views where a tripod may be needed to ensure consistency and focus on the subject.	-
LV.9	6.2	Landscape and townscape sensitivity	The proposed rail corridor is next to areas of existing transport infrastructure and routes/infrastructure that are in construction stages (e.g., A428 and Cambridge South station). The baseline assessment and sensitivity of these parts of the east west rail corridor should consider the conditions before and after other adjacent projects in construction. The Council reserves the right to amend or alter the sensitivity criteria and assessment based on further survey and desktop work alongside local knowledge.	-
LV.10	6.2	Landscape townscape and visual elements	The text should include a description of the Cambridge North area and the areas around Coldham's Common, Cambridge East and Cherry Hinton which are distinct from other parts of the city alongside the rail corridor.	-
Book of Figures				
LV.11	Figures 155 to 159	Visual receptors	Additional and amended viewpoints are likely to be required once the baseline data is available and more detailed information on design of the corridor and associated structures are available. More detailed drawings showing viewpoint locations are required. The Council reserves the right to amend and request additional viewpoints.	-

Environmental assessment topics: Historic Environment				
EWR-MWJV Technical Partner Routewide – Environmental - EIA Scoping Report				
HE.1	6.12	General	The Council would like to have early sight of the work on the historic environment assessment to assist in better understanding, and where appropriate help inform, the design and mitigation strategies to reduce the impact of the proposal on the historic environment. The methodology for assessing the impacts and effects of the construction and operation of EWR are understood.	-
Method Statement– Historic Environment				
HE.2	3.3	Standards and guidance	There is no mention of Historic England Good Practice Advice Note: The Setting of Heritage Assets (GPA 3).	-
HE.3	4.3	Study area	The provision of the baseline data within 1 km of the draft order for designated assets and 500m for NDHA is accepted with the acceptance that any other assets outside these areas that are highlighted by stakeholders may also be included.	-
HE.4	5.8.18	Heritage assets-non-designated heritage assets	The Council understands that Cambridgeshire County Council's Historic Environment Team provided a GIS dataset to EWR Co which included a dataset for local heritage listings for both Cambridge City Council and South Cambridgeshire District Council. This showed the status of buildings as Locally Listed, Candidate Ready and Candidate in Preparation for the preferred route plus a buffer of 4km. This information needs to be included within the scoping report.	-

Environmental assessment topics: Air Quality				
EWR-MWJV Technical Partner Routewide – Environmental - EIA Scoping Report				
AQ.1	6.3	Air Quality	The report confirms that the proposed development will introduce four passenger trains per hour each way into Cambridge with a commitment of full electrification if discontinuous electrification was not found to be possible. Section 2.4.4 confirms there are no plans for diesel powered passenger trains to operate on this stretch even in the short to medium term. Very limited information on potential freight train movements is included in Section 2.4.13; although it is assumed this information will be available at the full application stage as there is a commitment in Section 6.3.12 to assess the potential impact of freight trains in accordance with LAQM.	-
AQ.2	6.3	Proposed scope	The proposed scope of the report is considered acceptable.	-
Method Statement – Air Quality				
AQ.3	6	Air Quality	At the time of this consultation 2023 data is available with 2024 data likely to become available in June 2025. The Council would expect the most up to date monitoring data to be used for any future assessment. It is also worth noting that automatic monitoring data for $PM_{2.5}$ is also available for Montague Road within the 2023 ASR. The assessment of diesel trains in accordance with LAQM is noted, the Council expects an assessment of $PM_{2.5}$ exhaust emissions in addition to SO2 and NO_2. in accordance with the Environmental Targets (Fine Particulate Matter) Regulations 2023 exposure reduction targets. This legislation requires a reduction in $PM_{2.5}$ even where compliance with the annual target is achieved. The impact of the proposed development, most notably potential emissions from diesel freight trains needs to be considered as part of the assessment. The conclusions of the Air Quality Assessment will	-

			only be supported once methodology and trip generation figures have been agreed for the Transport Assessment as air quality impacts are intrinsically linked to changes in vehicle movements. The impact of potential changes in vehicle movements around Cambridge Station; most notably along Great Northern Road should be considered as part of the assessment given the sensitivity of this site due to it being the only access road into the station and the proximity of sensitive receptors.	
Environmental assessment topics: Communities and health				
EWR-MWJV Technical Partner Routewide – Environmental - EIA Scoping Report				
CH.1	6.4	Communities and health	The assessment should involve relevant resident associations, the Council's Communities Team and relevant community groups including affected schools/colleges.	-
CH.2	6.4.2	Communities and health	As per government guidance, EWR may result in changes to existing geographical boundaries defining communities and may result in the need for community governance reviews.	-
CH.3	6.4	Sources and types of impact	Emphasis must be made to the importance of mental health impacts that begin at the planning consultation stages; whilst temporary, the effects to human health will be long-term and therefore should be a main focus of the evaluation on communities and health.	-
CH.4	6.6.8	Sources and types of impact	Any reduction in walking/ cycling can impact on social cohesion by reducing opportunities for interaction, this impact should be considered.	-
CH.5	6.4	Establishing the baseline	The applicant should make reference to Cambridgeshire Insight which hosts a range of Joint Strategic Needs Assessments including District Summaries and Ward profiles. The applicant is	-

			also directed to the public health data held on the PHE Fingertips webpage.	
CH.6	6.4.12	Establishing the baseline	Surveys should also be used to determine the impact on other areas of impact not selected areas of public space alone. The Council should be consulted on which community infrastructure will be impacted and surveys on identified infrastructure completed.	-
CH.7	6.4	Evaluating effects	The Council agrees with the approach to evaluating effects of the proposal, which must consider age, socio-economic status and/or pre-existing health conditions.	-
CH.8	6.4	Proposed scope	Changes in demand for public services should be included in scope. The sustainability of rural public services can be sensitive to changes in numbers of service users. EWR changes may result in changes to access of public services which may affect viability. As per comments above community structure and institutional arrangement should be included within the scope.	Changes in demand for public services and community structure and institutional arrangement to be scoped in.
Method Statement – Communities				
CH.9	4.3.1	Surveys and stakeholder engagement	Community surveys should be undertaken for all community facilities.	-
CH.10	4.3.2	Surveys and stakeholder engagement	Affected residents as well as community receptors should be engaged in the development of a shared understanding on the impact of EWR on community facilities.	-
CH.11	5.2.4	Community elements	Public rights of way should be considered both as part of travel and transport and as community infrastructure, these routes are	-

			frequently used for recreation and amenity such as dog walks or ways of spending time with friends/ family and serve a wider use than a path. Sites of ecological value should also be considered as community receptors as they hold much significance for communities.	
Environmental assessment topics: Land quality				
EWR-MWJV Technical Partner Routewide – Environmental - EIA Scoping Report				
LQ.1	6.6	Land quality	The Scoping Report identifies the issue of land quality as an issue of potential concern and a well-informed preliminary (desk-based) assessment (Section 6.6) has been undertaken. This initial assessment proposes to scope out land quality as an Environmental Statement issue due to the nature of the project and the lack of exposure of rail users to potentially contaminated soils. This conclusion is entirely reasonable. The Scoping Report presents a robust approach to the general issue of environmental assessment and there is a very welcome emphasis on the embedding of mitigation measures into the construction works at an early stage. The Scoping Report proposes to use a Code of Construction Plan (CoCP) and material management plans (MMPs) as a way of mitigating/controlling any land quality issues. The structure, content, and approach of these proposed plans have been presented in Appendix B of the Scoping Report, specifically in the EIA Scoping Method Statement – Land Quality document. These methodologies robustly follow well established best practice and are entirely appropriate to the development. As such, the Council supports their use through the use of suitably worded conditions/agreements on the DCO in due course.	-

Environmental assessment topics: Sound, noise and vibration				
EWR-MWJV Technical Partner Routewide – Environmental - EIA Scoping Report				
SNV.1	6.8	Sound, noise and vibration	The approach as detailed is substantively in accordance with national and industry standards and best practice guidance and in our view generally meets the requirements of the EIA Regulations. However, there may be some omissions / shortcomings as detailed below: • There appears to be no specific reference to and or assessment of impacts for the EWR route '*alternatives'* such as the Northern and Southern approach options to Cambridge City Central Station and how the final approach has been selected. To comply with EIA Regs this should be included. Also, alternatives for the proposed Cherry Hinton turning point should be considered and assessed to fully justify the location in a noise sensitive location surrounded by residential. • There appears to be no specific reference to the '*Nationally Significant Infrastructure Projects: Commitments Register'* advice note- Nationally Significant Infrastructure Projects: Commitments Register - GOV.UK. The advice is that from EIA scoping and drafting of application documents at the pre-application stage of the NSIP process through to the end of examination, commitments to a number of measures are likely to be required to ensure that good design objectives will be secured and implemented. This is to ensure that potential environmental effects arising from the project are mitigated as far as possible and in accordance with the mitigation hierarchy. It is suggested that these commitments should be recorded on a 'live' Commitments Register. To maximise the benefits of the Commitment Register, it is recommended that versions of the register are agreed with relevant stakeholders	-

			and submitted to PINS at various milestones of the planning process, including at the EIA Scoping stage. General requirements are in the submissions in various statements; however, collating them into one Register allows for transparency and ease of reference for all stakeholders.	
Method Statement - Sound, Noise and Vibration				
SNV.2	1.1	Introduction	Clear definitions for '*sound and noise'* should be clearly provided to explain relationship and difference in meaning / context.	-
SNV.3	3	Relevant standards and guidance	It is recommended that reference is also made to the following: • To satisfy and discharge Environmental Health conditions relating to artificial lighting, contaminated land, noise / sound, air quality and odours / fumes, any assessment and mitigation shall be in accordance with the scope, methodologies and requirements of relevant sections of the Greater Cambridge Sustainable Design and Construction SPD, (Adopted January 2020) www.cambridge.gov.uk/greater-cambridge-sustainable-design-and-construction-spd and in particular Section 3.6 Pollution, as well as the following associated appendices: ○ 6: Requirements for Specific Lighting Schemes ○ 7: The Development of Potentially Contaminated Sites in Cambridge and South Cambridgeshire: A Developers Guide ○ 8: Further technical guidance related to noise pollution • Governments 'A Green Future: Our 25 Year Plan to Improve the Environment, 2018', commitment to significantly cut all forms of pollution and ease the pressure on the environment…ensure that noise and light pollution are managed effectively.	-

			• Noise Action Plan: Railways Environmental Noise (England) Regulations 2006: Defra, 2 July 2019. It is stated that this Action Plan will be of relevance to the Department for Transport, the rail industry, and local authorities including those with environmental, transport and planning responsibilities, and interested members of the public. Refer to relevant sections e.g. Planning controls sections 6.14 to 6.17. • International Union of Railways (UIC), Sustainability, Nuisance and Health Impacts of Railway Noise (NOVITÀ project), 2022.	
SNV.4	4	Establishing the baseline	The approach, scope including study areas for establishing baseline sound, noise and vibration levels are acceptable.	-
SNV.5	5.9	Cambridge	It is noted that there is reference to Noise Important Areas (NIAs) associated with road traffic on parts of Hills Road and with rail traffic on the West Anglia Main Line just south of Hills Road. It is stated that the introduction of a new railway and additional services is not expected to greatly affect the acoustic character of this area. Further information, explanation and assessment is required as these NIAs are considered the worst one percent in England in terms of existing railway noise, so any minor increase in noise levels may be considered a significant adverse impact. The noise and vibration impact of trains passing the below facilities is an important focus of ongoing assessment. • Addenbrooke's and Royal Papworth hospitals • St Marys School Playing Field • Long Road Sixth Form College	-

			• Various commercial facilities • Biomedical campus (including the Microbiological Research Centre laboratory and the Ann McLaren Building) It is not clear why Scholars Court is the only noise sensitive residential type premises specifically identified as been assessed for the need for potential noise mitigation. There are numerous other residential type premises (mainly flats / apartments) in this area at similar distances from the existing railway track as Scholars Court. This includes residential type premises entering Cambridge before and after Hills Road bridge and around Cambridge Central Station.	
SNV.6	6	Sources of impact	*'Table 3– Sources of noise and vibration impacts,* is generally acceptable. However, in our view '*Ground-borne noise and vibration'* should be included and assessed under the section '*Maintenance activities …**etc.**',* source – Permanent. The approach detailed to predict / calculation noise and vibration levels from construction and operation is acceptable. It should be clear at all times whether predicted noise levels to receptors are near (at or near facades) or free field levels.	-
SNV.7	7	Potential impacts and effects	The Council is concerned about the proposed Cherry Hinton turnback location - with housing on both sides. It appears that these properties currently experience infrequent train movements at very low speeds, so any current operational railway noise is likely to be very low level. A significant change in the acoustic character of the area may therefore be significant. Due to concerns about long term significant adverse noise impacts in this area, consideration should be given to any other available turnback locations in this area, which are less densely populated by residential and where any adverse noise / vibration impacts and or the numbers of properties potentially impacted could be	-

			reduced. Residential receptors would be likely to experience increases in noise levels both during construction and operation due to the stopping and starting of trains at this location at any time of the day including nighttime, the most sensitive time of the day.	
SNV.8	7	Potential impacts and effects	There is no specific reference to health impacts. The health effects of exposure to environmental noise are well researched and include annoyance, sleep disturbance and longer-term physiological conditions including cardiovascular health effects. Self-reported sleep disturbance and annoyance are two of the key priority health outcomes for transportation noise with a robust evidence base. Consideration to also be given to cardiovascular disease, cognitive impairment, metabolic outcomes, hearing impairment and tinnitus, quality of life, well-being and mental health. Use of Lden and Lnight are shown to be suitable for assessing long-term health effects. It is appreciated that this will be further considered within the 'EIA Scoping Method Statement-Human Health'. However, a clear cross reference should be made accordingly within each method statement.	-
SNV.9	8	Assumed mitigation	Approach acceptable. See comments above regarding no specific reference to the 'Nationally Significant Infrastructure Projects: Commitments Register' advice note - Nationally Significant Infrastructure Projects: Commitments Register - GOV.UK.	-
SNV.10	8.2	Mitigation	Provision of noise mitigation to the east of Cambridge North station is to be clarified following ongoing assessment. The proposed relocation of Chesterton Sidings at Cambridge north station and upgrade to the existing Milton Railway feeder electricity substation may have an impact on the existing and emerging development in the area.	-

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<tr><td>SNV.11</td><td>9</td><td>Evaluating significance</td><td>The Council does not agree with the LOAEL, SOAEL and UAEL criteria chosen for these impacts (e.g., LOAELs of 65 dB $L_{Aeq,12h}$ day 55 dB $L_{Aeq,4h\ evening}$ 45 dB $L_{Aeq,8h\ ni,\ ght}$ SOAELs etc. for construction airborne noise impacts).

Ground borne vibration criteria detailed acceptable.

Airborne noise effect levels should align more with the criteria, time periods and guidance in the code of practice for noise and vibration control on construction and open sites (BS5228-1). The below criteria is suggested for consideration.

Construction airborne noise effect levels for permanent residential buildings (outdoor at the façade)

<table>
<tr><th>Day</th><th>Time (hours)</th><th></th><th>Averaging Period T</th><th>LOAEL LpAeq,T(dB)</th><th>SOAEL LpAeq,T(dB)</th><th>UAEL LpAeq,T(dB)</th></tr>
<tr><td>Mondays to Fridays</td><td>0700 - 0800

0800 - 1800

1800 - 1900

1900 – 2200</td><td></td><td>1 hour

10 hours

1 hour

1 hour</td><td>60

65

60

55</td><td>70

75

70

65</td><td>To be agreed for time periods

10 dB above any of the noise levels for SOAEL</td></tr>
<tr><td>Saturdays</td><td>0700 - 0800

0800 - 1300</td><td></td><td>1 hour

5 hours

1 hour</td><td>60

65

60</td><td>70

75

70</td><td>To be agreed for time periods</td></tr>
</table>
</td><td>-</td></tr>
</table>

	1300 - 1400 1400 – 2200		1 hour	55	65	
Sundays & Public Holidays	0700 – 2200		1 hour	55	65	To be agreed
Any night	2200 – 0700		1 hour	45	55	To be agreed

In line with BS5228 -1 significant adverse effects on health and quality of life are expected to occur when SOAELs are exceeded for at least the time periods set out in Appendix B. In addition, where existing ambient levels exceed the SOAELs set out in Table 1, significant adverse effects on health and quality of life are expected to occur when construction noise levels are at least equal to the current ambient level and are exceeded for at least the time periods set out in Appendix B - Paragraph 2. Similar construction airborne noise impact levels for noise sensitive non-residential type buildings, outdoor living spaces and shared community open areas or similar (outdoor free field) should also be considered and agreed separately. These do not appear to have been considered.

In terms of any mitigation a '*Noise insulation and temporary re-housing type policy',* should be developed for when SOAELs are exceeded for at least the time periods set out in Appendix B - Paragraph of BS5228-1 and for buildings and occupiers who may be eligible under any such policy. Similar construction airborne noise impact levels for noise sensitive non-residential type buildings, outdoor living spaces and shared community open areas or similar (outdoor free field) should also be agreed. This approach would be consistent with the likely significant effects

			that may arise at noise sensitive receptors as a result of the project. Ground borne vibration and ground borne noise threshold criteria acceptable. Airborne noise (railway and road traffic): The logic for the establishment of the daytime SOAEL is unclear and appears that the use of ProPG: Planning and Noise, has been made to support this - however, this is a standard applicable to new residential development (i.e., assessing a noise climate to determine its suitability for introducing new residential dwellings rather than introducing a new noise source to existing residential developments)). The critical difference being that new residential can be designed to minimise the impact of noise whereas existing residential are, as is the proposal here, stuck with whatever level is imposed on them. The Council would consider the daytime threshold of 65dB 16 hr to be too high, not only because it would exceed the outdoor level of 55dB LAeq 16 hour for gardens, the level identified by WHO for significant annoyance but also because allowing 15dB noise mitigation for an open window, internal levels would exceed the recommended 35dB daytime level set out in BS8233, a level which according to the noise data submitted, many properties are presently enjoying. In keeping with WHO standards and BS8233 and the recognition that single event noises such as the passing of a train at high speed could wake someone up, a criteria for this has been included. The levels set out for this at 80dB Lmax at façade would result in internal levels of circa 45dB for typical well installed double glazing, higher levels for poor installations. The WHO guidelines for community noise identifies 45dB LMax as the level at which single event noises may wake an individual or disturb their sleep.	

			Further clarification and justification required and the Council requests further discussion with the Applicant and their acoustic team to agree a way forward in terms of acceptability / assessment criteria.	
SNV.12	10	Proposed scope	The summary of the impacts scoped in and out of the sound, noise and vibration assessment as set out in Table 7 are acceptable. However, as stated above in our view '*Ground-borne noise and vibration'* should be scoped in and assessed under the section / for '*Maintenance activities …**etc.',*** source – Permanent.	Ground-borne noise and vibration should be scoped in.
SNV.13	-	Other	As part of the ongoing development of options, further assessments should be undertaken to determine the likely impacts / effects, their significance and appropriate sound, noise and vibration mitigation strategies to address these as necessary.	-
SNV.14	-	Other	It is understood that existing formal railway sidings in this area are divided by Mill Road Bridge into a 'north yard' and 'south yard'. There may be other informal type sidings not used for any specific purpose. New train reception, parking / stabling and carriage servicing sidings / platforms (effectively like new platforms) were recently constructed in the 'south yard' sidings on the eastern far end of the main station on railway land (under and to either side of the Carter Cycle / Pedestrian Bridge) and became operational in March / April 2021. Since commencement of operation, the Council service has received a number of noise complaints from residents living directly opposite and overlooking the railway in this area. The noise complaints are subject to an ongoing statutory noise nuisance investigation. Any potential increase in the intensification of use of these new train reception, parking / stabling and carriage servicing sidings / platforms and facilities as a result of any additional EWR services should be included in any noise impact assessment as part of the ES (e.g. new platform and station arrangements). The Applicant should	-

			work closely with Network Rail and other service providers (Greater Anglia and Govia Thameslink Railway) to consider and seek to secure any such environmental improvement opportunities in relation to this noise and reduce existing adverse noise impacts.	
SNV.15	-	Other	A relocated / new train wash enclosure has recently been completed immediately to the north of Mill Road on railway land that was previously sidings and is likely to become operational in early 2025. Any increase in the intensification of use of the new train wash as a result of any additional EWR services should be included in any noise impact assessment as part of the ES. The Applicant should work closely with Network Rail in relation to this source of noise and reduce potential existing and future adverse noise impacts to contribute to the improvement of health and quality of life.	-
Method Statement – Human Health				
SNV.16	3.2	Guidance	There should be full reference to the 'WHO - Environmental Noise Guidelines 2018 for the European Region', which recommends day / evening / night (L_{den}) and separate nighttime noise levels parameters in terms of health impacts. These parameters should be calculated separately - different levels for road and train sources. The main purpose of these guidelines is to provide recommendations for protecting human health from exposure to environmental noise originating from various sources: transportation (road traffic, railway and aircraft) noise. Reference should also be made to the 'EIA Scoping Method Statement - Sound, Noise / vibration'. The following documents may also be relevant:	-

			• Advice on the content of Environmental Statements accompanying an application under the Nationally Significant Infrastructure Planning Regime, (Public Health England, March 2021) • International Union of Railways (UIC), Sustainability, Nuisance and Health Impacts of Railway Noise, (NOVITÀ project, 2022).	
Method Statement – Approach to Code of Construction Practice				
SNV.17	-	Approach to Code of Construction Practice	This is an overarching document with commitments to assess various environmental impact / effects as detailed. See comments above regarding construction airborne noise effect levels for permanent residential buildings (outdoor at the façade) etc.	-
Environmental assessment topics: Traffic and transport				
EWR-MWJV Technical Partner Routewide – Environmental - EIA Scoping Report				
Environmental assessment topics: Water resources				
EWR-MWJV Technical Partner Routewide – Environmental - EIA Scoping Report				
WR.1	4.5.22	Environmental priorities	Para 4.5.22 bullet point one notes that water scarcity is a critical issue in this part of the UK and could be exacerbated by cumulation of projects each with their own demands on potable water supply. Measures to reduce potable water consumption will also need to be included with the Code of Construction Practice (CoCP), and I would recommend that this be included within Section 1.15 of the Method Statement for the CoCP.	-
WR.2	6.11	Water Resources	Section 6.11 on water resources and the associated Water Resources Method Statement do not appear to include an	-

			assessment of the potential impacts on water resource availability in light of potable water requirements associated with both the construction and operational phases of EWR and the likely mitigation measures that could be implemented.	
WR.3	6.11	Proposed scope	Given this recognition of water scarcity, and especially in light of the levels of water scarcity facing the Greater Cambridge area, the Council recommends that consideration of potable water supply and the water requirements of EWR both at the construction and operational stages be included in the proposed scope as outlined in Table 19, with reference to the latest Water Resource Management Plans. If impacts on water resource availability are to be scoped out of the EIA, further information is required to understand the reasoning behind this decision and to ensure that this issue is addressed as part of the wider sustainability commitments of the project.	Consideration of potable water supply and the water requirements of EWR both at the construction and operational stages to be included in the proposed scope.
Environmental assessment topics: Carbon (greenhouse gas) emissions				
EWR-MWJV Technical Partner Routewide – Environmental - EIA Scoping Report				
CE.1	6.14	Carbon (greenhouse gas) emissions	The general methodology for assessing the projects impact on climate change through the changes it causes in the emissions of greenhouse gases (ghg) as outlined in Section 6.14 and the EIA Scoping Method Statement – Carbon, is welcomed.	-
CE.2	6.14.5	Sources and types of impact	It would be helpful to understand early on whether the assessment of ghg emissions from changes in traffic flow referenced in paragraph 6.14.5 has been applied to the assessment to different station location options in terms of the emissions associated with commuting to and from those stations, to help ensure that the best option from a ghg perspective is chosen.	-

CE.3	6.14.10	Mitigation	The use of the carbon reduction hierarchy, as outlined at paragraph 6.14.10 is welcomed. The Council would welcome early sight of the Carbon Management Plan as this is developed to help us better understand, and where appropriate help inform, the mitigation measures that will be implemented to reduce ghg emissions.	-
CE.4	6.14	Proposed scope	No comment – all areas scoped in.	No comment – all areas scoped in.
Method Statement - Carbon				
CE.5	3.3.1	Local policy	Note that at paragraph 3.3.1 of the Carbon Method Statement, reference should also be included to South Cambridgeshire District Council's Zero Carbon Strategy (2020) and Cambridge City Council's Climate Change Strategy, 2021 to 2026.	-
Environmental assessment topics: Biodiversity Net Gain				
EWR-MWJV Technical Partner Routewide – Environmental - EIA Scoping Report				
BNG.1	7.2	Biodiversity Net Gain	The key consideration of what habitats to create and where should take into consideration two very important factors. Firstly, is the habitat proposed suitable for the location? Grasslands, woodlands, and wetlands can require specific environmental resources to grow and, for example, turning a habitat such as cropland into high distinctiveness habitat is likely to take more than 30-years, therefore, unlikely to be a feasible option. Secondly the applicant will need to consider who will be responsible for the management of these habitats. Will they remain within the Network Rail estate, or with they be given back to landowners? Each of these created habitats may require a form of legal agreement to manage them for the required 30-year	-

			period. This will be through either a S106 agreement with the relevant authority or a Conservation Covenant with a Responsible Body. The agreement will be with the landowner (or their tenant with permission from the Freeholder), and given the length of the scheme and possible number of landowners there is the possibility that this will be a complicated process. Monitoring data will need to be given to the relevant body on a regular basis as they will have the responsibility of reporting such matters to Central Government through their new duty required by the amended NERC Act (section 40a). The ongoing management of the newly created and enhanced habitats could be secured under Requirements of the DCO; however, without further legal agreement the responsibility of collecting monitoring data would, presumably, fall to the Planning Inspectorate. There are several areas where the scoping document has fallen short of expectations: • Insufficient justification for scoping out reptile surveys. • Use of generic passages where details are required (e.g., HRA process). • General use of generic passages, for example, stating there are existing railways within sections where are none. • BNG requirements for monitoring have not been considered when describing potential post intervention outcomes. The requirement for legal agreements will have a significant impact on the delivery of enhanced and created habitat.	
Method Statement - Biodiversity				
BNG.2	4.3.5	Surveys	The document scopes out reptile surveys as populations were assumed to be low. This needs further justification, for example, publishing survey results from 2020-2021 (methods, limitations,	-

			data gaps etc.). Reptile population tend to take one of three routes in the general area of EWR: 1. no reptiles 2. low populations spread out over large areas 3. high populations found in localised areas Unless the applicant can provide data and a clear justification of scoping out reptile surveys, they must remain in scope. Many of those population comprise of common lizard and grass snake and the applicant will need to have a clear plan of how impacts will be mitigated. For example, avoiding the breeding bird season to clear vegetation does not avoid the hibernation season for reptiles, so potential conflicts of mitigation need to be identified, and alternatives recommended.	
BNG.3	5.9.1 – 5.9.3	Cambridge: Designated sites	The section states that there are no statutory protected sites within 2 km of the project; however, Local Nature Reserves (LNR) are classed as statutorily protected and Nine Wells LNR is within the 2 km buffer. This must be amended and Nine Wells LNR included within any analysis on indirect and direct impacts to statutory sites. This must include in-combination impacts with proposed busways currently under TWAO application and Greenway applications that will be coming forward in the next 12 months, both of which will lie adjacent to the project boundary and have possible direct and indirect impacts to Nine Wells LNR.	-
BNG.4	8.1.2	Proposed scope	Only mentioned great crested newt as scoped out due to the provisional agreement to take part in the District Level Licensing Schemes in both Bedfordshire and Cambridgeshire. There is no mention of reptile surveys being scoped out (see BNG.2).	All species to be scoped in unless sufficient justification is provided.

BNG.5	9.1	Assumptions	If the entire length of the route does not have completed surveys, then, other than great crested newts, no species should be scoped out. For example, the submitted document scopes out further reptile surveys without sufficient justification, if a complete set of surveys already undertaken has not informed this decision, then the decision to scope out surveys appears to be unjustified.	-
Environmental assessment topics: Habitat Regulations Assessment				
EWR-MWJV Technical Partner Routewide – Environmental - EIA Scoping Report				
HRA.1	7.3	Habitats Regulations Assessment	The only HRA that is likely to take place specifically focusses on Eversden and Wimpole Woods SAC which is designated for the presence of an Annex II species and not habitat. Therefore, this section appears to be a very generic description of HRA analysis rather than focusing on the relevant issues concerned with the relevant SAC.	-
HRA.2	7.3.9	Habitats Regulations Assessment	“A number of Habitat Sites relevant to HRA have been identified…”. This is far too generic and does not focus on the revenant sites as identified in the document.	-
Environmental assessment topics: Climate resilience				
EWR-MWJV Technical Partner Routewide – Environmental - EIA Scoping Report				

CR.1	5.4	Designing for a changing climate	The approach outlined for designing for a changing climate and the development of the Climate Change Resilience Assessment is welcomed.	-
CR.2	7.4	Climate resilience	Section 7.4 of the report and the EIA Scoping Method Statement – Climate Resilience outline the assessment of climate change resilience in more detail, and the approach to assessing both the RCP 6.0 (medium) and RCP 8.5 (high) scenarios as part of the climate projects is welcomed. The Council would welcome an opportunity to have early sight of the work on the Climate Change Resilience Assessment to help us better understand, and where appropriate help inform, the mitigation measures that will be implemented to reduce climate impacts and enhance the climate resilience of East West Rail.	-

Table 2: List of documents submitted by PINS to EWR Co.

This table lists all documents submitted by the Applicant to the Planning Inspectorate in relation to the EIA Scoping Opinion Request.

Document	Document number	Date published	Prepared by
EWR-MWJV Technical Partner Routewide – Environmental - EIA Scoping Report	133735-MWJ-Z0-XXX-REP-EEN-000035	5 December 2024	Mott MacDonald WSP-Joint Venture (MWJV)
Routewide – Environment - EIA Scoping Method Statement – Air Quality	133735-MWJ-Z0-XXX-REP-EEN-000016	5 December 2024	Mott MacDonald WSP-Joint Venture (MWJV)
Routewide – Environmental – EIA Scoping Method Statement – Agriculture and Soils	133735-MWJ-Z0-XXX-REP-EEN-000015	5 December 2024	Mott MacDonald WSP-Joint Venture (MWJV)
Routewide – Environmental - EIA Scoping Method Statement – Biodiversity	133735-MWJ-Z0-XXX-REP-EEN-000019	5 December 2024	Mott MacDonald WSP-Joint Venture (MWJV)
Routewide – Environment - EIA Scoping Method Statement – Carbon	133735-MWJ-Z0-XXX-REP-EEN-000030	5 December 2024	Mott MacDonald WSP-Joint Venture (MWJV)
Routewide – Environmental - EIA Scoping Method Statement – Climate Resilience	133735-MWJ-Z0-XXX-REP-EEN-000032	5 December 2024	Mott MacDonald WSP-Joint Venture (MWJV)
Routewide – Environmental - EIA Scoping Method Statement – Communities	133735-MWJ-Z0-XXX-REP-EEN-000021	5 December 2024	Mott MacDonald WSP-Joint Venture (MWJV)
Routewide - Environmental - EIA Scoping Method Statement - Flood Risk	133735-MWJ-Z0-XXX-REP-EEN-000023	5 December 2024	Mott MacDonald WSP-Joint Venture (MWJV)
Routewide – Environmental – EIA Scoping Method Statement – Historic Environment	133735-MWJ-Z0-XXX-REP-EEN-000022	5 December 2024	Mott MacDonald WSP-Joint Venture (MWJV)
Routewide - Environmental - EIA Scoping Method Statement - Human Health	133735-MWJ-Z0-XXX-REP-EEN-000024	5 December 2024	Mott MacDonald WSP-Joint Venture (MWJV)
Routewide – Environmental - EIA Scoping Method Statement – Landscape and Visual	133735-MWJ-Z0-XXX-REP-EEN-000029	5 December 2024	Mott MacDonald WSP-Joint Venture (MWJV)
Routewide – Environmental - EIA Scoping Method Statement – Land Quality	133735-MWJ-Z0-XXX-REP-EEN-000025	5 December 2024	Mott MacDonald WSP-Joint Venture (MWJV)

Routewide – Environmental – EIA Scoping Method Statement – Material Resources and Waste	133735-MWJ-Z0-XXX-REP-EEN-000018	5 December 2024	Mott MacDonald WSP-Joint Venture (MWJV)
Routewide - Environmental - EIA Scoping Method Statement Technical Appendix - Resources and Waste	133735-MWJ- Z0-XXX-REP-EEN-000044	5 December 2024	Mott MacDonald WSP-Joint Venture (MWJV)
Routewide – Environment - EIA Scoping Method Statement – Socio-economics	133735-MWJ-Z0-XXX-REP-EEN-000026	5 December 2024	Mott MacDonald WSP-Joint Venture (MWJV)
Routewide – Environmental - EIA Scoping Method Statement - Sound, Noise and Vibration	133735-MWJ-Z0-XXX-REP-EEN-000017	5 December 2024	Mott MacDonald WSP-Joint Venture (MWJV)
Routewide - Environmental - EIA Scoping Method Statement – Traffic & Transport	133735-MWJ-Z0-XXX-REP-EEN-000028v	5 December 2024	Mott MacDonald WSP-Joint Venture (MWJV)
Routewide- Environmental - EIA Scoping Method Statement – Water Resources	133735-MWJ-Z0-XXX-REP-EEN-000036	5 December 2024	Mott MacDonald WSP-Joint Venture (MWJV)
Routewide – Environment - EIA Scoping Method Statement Technical Appendix – Water Resources	133735-MWJ-Z0-XXX-REP-EEN-000046	5 December 2024	Mott MacDonald WSP-Joint Venture (MWJV)
Routewide – Environmental - EIA Scoping: Approach to achieve Biodiversity Net Gain	133735-MWJ-Z0-XXX-REP-EEN-000031	5 December 2024	Mott MacDonald WSP-Joint Venture (MWJV)
Routewide – Environmental – EIA Scoping Method Statement – Approach to Code of Construction Practice	133735-MWJ-Z0-XXX-REP-EEN-000041	5 December 2024	Mott MacDonald WSP-Joint Venture (MWJV)
Routewide – Environmental – EIA Scoping - Approach to Equality Impact Assessment	133735-MWJ-Z0-XXX-REP-EEN-000027	5 December 2024	Mott MacDonald WSP-Joint Venture (MWJV)
Routewide – Environmental – Social Baseline	133735-MWJ-Z0-XXX-REP-EEN-000040	5 December 2024	Mott MacDonald WSP-Joint Venture (MWJV)
EWR-MWJV Technical Partner Book of Figures	133735-MWJ-Z0-XXX-REP-EEN-000063	5 December 2024	Mott MacDonald WSP-Joint Venture (MWJV)

Cambridgeshire County Council

My ref: EWR-EIAS25/1
Date: 29 January 2025
Contact: Nav Panesar
Email: NSIPs@cambridgeshire.gov.uk

Frank Jordan, Executive Director
Place and Sustainability
Environment, Planning and Economy

Consents Team
PO Box 761
ALC2660
Huntingdon
Cambridgeshire
PE29 9QR

Sent via email to:
EastWestRail@planninginspectorate.gov.uk

Dear PINS,

Environmental Impact Assessment (EIA) Scoping consultation by East West Rail Company ("the Applicant") for East West Rail Development Consent Order (DCO) proposals

I am writing on behalf of Cambridgeshire County Council (the Council) in response to your request dated 02 January 2025 regarding the Applicant's EIA Scoping Report for the East West Rail proposals. The Council understands that the Applicant for the Proposed Development intends to make an application for Development Consent under the Planning Act 2008, and that the Applicant has sought a Scoping Opinion from the Planning Inspectorate (PINS), on behalf of the Secretary of State, as to the scope and level of detail of the information to be provided within the Environmental Statement (ES) that will accompany its future application.

The Council acknowledges that it has been identified by PINS as a consultation body to inform the Scoping Opinion. Attached to this letter is a table containing the Council's views on this matter.

Due to the limited information in some areas of the EIA Scoping Report provided by East West Rail Company, the Council has been unable to provide a full response. This has been highlighted in our response below.

If you have any queries regarding this submission or require any further information, please contact NSIPs@cambridgeshire.gov.uk.

Yours faithfully

Frank Jordan
Executive Director

East West Rail: Comments on the Applicant's EIA Scoping Report

This document sets out the comments by Cambridgeshire County Council (the Council) regarding East West Rail Company's EIA Scoping Report for the East West Rail proposals.

The following table contains comments across a number of technical specialisms.

Specialism	Proposal aspect referred to	Comments
Air Quality		The Council would expect East West Rail Company to consult Huntingdonshire District Council, South Cambridgeshire District Council and Cambridge City Council on this matter. Notwithstanding the above, the Council has concerns related to air quality impacts from the proposal and therefore reserves the right to comment on this subject through technical working groups and future consultation, in particular where it relates to Health.
Communities, Skills, Employment, Socio-economics	Environmental Impact Assessment Scoping Report	**Consultation strategy** - The Council recommend that the communities who are potentially affected by the proposals should be consulted on all matters that concern them and are scoped into the EIA. A consultation strategy should be developed to ensure that all accessible surveying methods are considered and presented to the communities to enable as many to participate as wish to. Communities affected by this project should be involved in any possible way to mitigate the impacts on them and their environments. The mitigation ideas should be a collaboration between the communities' voice and the developer to come to a satisfactory result. **Education and community enhancement** - educational opportunities should be maximised to leave lasting positive benefits. E.G. Local nature groups and projects developed in line with the new landscaping and vegetation associated with the project. Community funding offered to help the community decide what positive legacy can come from the negative effects that will be associated with this project, in line with community enhancement.

Specialism	Proposal aspect referred to	Comments
		6.7.17 - training and career development - Development of a Training, Skills and Employment strategy would ensure local communities benefit from the work opportunities this project offer. The Council recommends including engagement with local schools and colleges in the area to interest students in the career options linked to this project, thus developing new skills and opportunities for local young people. Apprenticeships to be offered as part of this strategy in line with this skill development. A scheme to look at equitable opportunities should be offered to those who have had their job put at risk as an effect of the project giving loss of business. This should consider appropriate training to re-skill those affected into new employment within the project where possible. **6.7.19** Crime and safety being scoped out of the EIA - The Council are a statutory partner in the local Community Safety Partnerships and from this position disagree that crime and safety are scoped out of this report. The effects surrounding possible rise in crime need to be considered from this project. The project sites are likely to attract increased interest from those wishing to gain from them using crime. Failed attempts at theft from the project sites due to good security may redirect the crime to the nearby properties (residential / commercial/ community) to gain from instead. New transport links into the County also brings new routes that criminals can travel on, opening up access to smaller towns and villages that were harder to access before. This brings with it the issue of County Lines drug dealing. County lines dealers travel in from larger towns and cities to smaller outer lying places in order to create new markets for their drug dealing. They target younger and vulnerable people, often using places like railway stations at school commute times to befriend and recruit these young people into the dangerous world of drugs and carrying out the local dealing for them. Carrying weapons often is associated in this criminal behaviour type and contributes to the rise of knife crime we see. Recommendation to scope crime and safety into the EIA and to partake in close relationships with the Police and local Community Safety Partnerships, so partnership working can be participated in to mitigate against these issues.
Noise		The Council would expect East West Rail Company to consult Huntingdonshire District Council, South Cambridgeshire District Council and Cambridge City Council on this matter.

Specialism	Proposal aspect referred to	Comments
		Notwithstanding the above, the Council has concerns related to air quality impacts from the proposal and therefore reserves the right to comment on this subject through technical working groups and future consultation, in particular where it relates to Health.
Climate and Carbon		**EWR-MWJV Technical Partner Routewide – Environment - EIA Scoping Method Statement – Carbon** At paragraph 3.3.1 there has been a confusion between the Climate Policy for Cambridgeshire County Council [the title of the document listed] and the link provided [which is the climate policy for Cambridge City Council]. The applicant must ensure that the correct local policy for Cambridgeshire County Council has been applied to this EIA Scoping and all other current and future documentation in relation to this application and that all future references to local climate policy are correct and accurate. The applicant should also ensure that other relevant local policy from the Cambridgeshire District Councils who are affected by their application are reflected – both South Cambridgeshire District Council and Cambridge City Council have climate policies in place. The Council agrees in general with the proposed approach to the baseline emissions outlined at 4.13 and 4.14. At 5.2.6 the applicant should ensure that appropriate models for the uptake of low emission road vehicles are utilised within the baseline over the 60-year appraisal period to enable robust comparison of baseline and project emissions. Paragraph 6.2 lists sources of potential greenhouse gases emissions during the construction phase. This list should be expanded to include the change in emissions arising as a result of changes in road and rail travel where these are anticipated to be affected by the construction phase (e.g. should there be periods where existing rail travel cannot continue and bus replacement services are required or where road traffic requires diversions etc). This should also be reflected at 7.2.1. **EWR-MWJV Technical Partner Routewide – Environmental - EIA Scoping Method Statement – Climate Resilience** The approach to Climate Risk Assessment appears satisfactory.
Health		

Specialism	Proposal aspect referred to	Comments
		East West Rail Routewide - Environmental - EIA Scoping Report From a Public Health perspective, the Council has concerns around the need to encourage and not discourage active travel, ensuring that accessibility and connectivity for local communities is improved, with no additional barriers to discourage cycling and walking. Any solution to existing level crossing for example, should not result in community severance and new stations should carefully consider the needs of those with mobility issues. Despite being raised in the supplementary document *Routewide - Environmental - EIA Scoping Method Statement - Human Health, (11.2 Opportunities),* these issues need raising further in the core ES. We have concerns that there is no reference to a Health Impact Assessment (HIA) for the scheme within the ES. Chapter 6.4 Communities and Health should illustrate clear links to an HIA for a scheme of this size. The *Routewide - Environmental - EIA Scoping Method Statement - Human Health* supplementary document also makes no mention of an HIA or the local Joint Strategic Needs Assessment (JNSA) as source of data relating to health. **Chapter 3.5** **Roxton to east of St Neots** The proposed new station at Tempsford is to the west of the Cambridgeshire boundary and is proposed as an interchange with the East Coast Main Line (ECML). Consequently, this is likely to be busy station for travellers to and from Cambridgeshire stations. Accessibility for passengers with mobility issues will require careful consideration as the proposed alignments are up to 22 meters above ground level. **Chapter 3.6** **Croxton to Toft construction of a new railway and station** As with all sections of the proposed line, this section raises several issues of concern to Public Health, in relation to the schemes impact on health and wellbeing of the local residents. In particular, those living close to the proposed alignment who will experience disruption and noise during construction process. The impact on mental health of these residents could be considerable and we would welcome discussions with East West Rail regarding the planned measures to minimise the likelihood of residents experiencing such issues.

Specialism	Proposal aspect referred to	Comments
		People living and working close to the proposed station and the surrounding area, as well as the finally agreed alignment of the line will be impacted. The latter is particularly important as unlike the initial phase of construction from Oxford, which will mainly rely on the upgrading of existing track, the phase of the programme within Cambridgeshire will be mainly on new laid track, potentially having greater impacts on a rural population across wide areas of the county. **Chapter 3.7** **Comberton to Shelford** Maintaining connectivity is essential. We would welcome a more detailed explanation of how this will be achieved between Harston and Newton for example. Further consideration needs to be given to the potential impact on local residents in Newton, in terms of access to services such as the GP surgery in Harston and the local village post office and local convenience store that serve both villages. The impact on local business and potentially local employment due to the closure of the level crossing needs further consideration for example, a national building supplies business is located adjacent to the crossing at Station Road, Harston. The business uses Heavy Goods Vehicles (HGVs) for deliveries and the rerouting of these vehicles is likely to impact on both the business and the local residents. More detail of how the ES will consider issues such as this would be welcome. Further detail of the inclusion of the new accessible foot bridge to the east of the existing Harston level crossing East West Rail are considering would be appreciated. Currently, cyclists travelling from Newton, south of the railway north through Harston and beyond have a direct route. The proposed bridge is 400 meters to the east and could be seen as barrier to active travel. The growth of active travel has major health benefits and any barriers that discourage cycling and walking should not be included in the scheme and therefore, the installation of a footbridge at Hauxton we feel is essential if no loss of connectivity for cyclist/ walkers to destinations beyond the village is to be ensured. **Chapter 6.3 Air Quality** We are concerned that Table 10 scoped out emissions to the air from construction plant Non-Road Mobile Machinery (NRMM). The scheme is likely to use a significant quantity and range of such equipment often close to local receptors. We believe the ES should set out a minimum standard for NRMM partially with the many developers agreeing to use low emission equipment and improve maintenance.

Specialism	Proposal aspect referred to	Comments
		Supplementary documents **Chapter 6 Environmental Assessment topics** **9.4 Severance** Paragraph 9.45 and Table 26 requires further explanation and ideally an illustration, with examples of successful schemes where this method of assessment has been used to establish the impact of severance previously. **Routewide - Environmental - EIA Scoping Method Statement - Human Health** 4.5 .1 We welcome the statement "*on going consultation to inform the assessment of human health as the DCO application progresses"* along with the useful tables: 2/3/7, Potential Operational Construction Health Pathways , Elements of Human Health Assessment.
Geodiversity (biodiversity team)	Section 6, Scoping Report	6.6.24 We welcome confirmation that geodiversity remains within the scope of the EIA, due to the presence of Barrington Quarry Site of Special Scientific Interest (SSSI) and Nine Wells Local Geological Society site. Consideration should also be given to Coldham's Common Local Geological Site (recent designation). We would also recommend contacting Cambridgeshire Geological Society, which has an active programme to identify candidate Local Geological Sites (LGS) and assessing potential LGS, to ensure that any potentially new LGS within the Draft Order Limit are adequately considered in the EIA.
Biodiversity	Scoping Report	Table 18 - The scoping report is very high level and therefore it is very difficult to scope out any ecological receptors at this stage. We do not agree with scoping out of Ancient Woodland for the "Roxton to east of St Neots" section of the scheme, given Sir Johns Wood is located immediately adjacent to the Draft Order Limit. This should be scoped into the assessment. We are also unclear why wildlife sites and other species have not been considered as to whether these species will be scoped in or out of the biodiversity assessment. Given the lack of information provided as part of the EIA scoping report, or based on assumptions set out in the Biodiversity Method Statement for which the Council disagrees (see response below), we recommend the following ecological receptors be scoped in: - Sites of Special Scientific Interest - Local Sites (County Wildlife Sites, City Wildlife Sites and Local Geological Sites) - Reptiles

Specialism	Proposal aspect referred to	Comments
		- Breeding birds, including schedule 1 (as required) - Wintering birds - White-clawed Crayfish
Biodiversity	Routewide – Environmental - EIA Scoping Method Statement – Biodiversity, Scoping Report (pdf p270-312)	**4. Establishing the Baseline** 4.1.2. The following information should also be utilised to establish the baseline for biodiversity, as well as cumulative impact: • Cambridge South-East Transport Scheme (CSETS), including farmland species (Grey Partridge, Corn Bunting and Brown Hare) • Cambridgeshire Guided Busway, including notable flora • Sawston Greenway, including bats • Cambridge North Station, including open mosaic habitat and reptiles • Residential development of Cambridge North, including notable flora / invertebrates (please refer to invertebrate mitigation shows in Ecological Design Strategy for phase 2) • Chesterton Bridge, including water voles • Chisholm Trail, including toad, reptile, water vole • Cambridge Waste Water Treatment Plant Relocation project including water vole 4.3.2. The Council is concerned on the over-reliance on Great Crested Newt (GCN) district level licensing and that no eDNA GCN surveys have been completed. A contingency may be required, should there be insufficient capacity within the District Level Licencing (DLL) scheme to deliver compensatory ponds. Table 5 – the 2km search area for Habitats Sites is considered inappropriate and should be expanded to 10km. 4.3.6 The Council does not agree with the assessment that the *"boundary of the Project was considered likely to support low populations of common reptile species only"* and scoping out of reptiles. There is potential for some isolated areas with medium & high populations of common reptiles that could be considered of district / county importance. Particularly along the existing railway corridor and railway sidings (Cambridge and Comberton to Shelford sections) and also arable field margins and grassland, particularly within South Cambridgeshire. Given the large-scale loss of such habitat (e.g. Frogs Hall Drift County Wildlife Site (CiWS) and Cambridge North sidings), we would expect reptiles to be scoped into the assessment and surveys undertaken.

Specialism	Proposal aspect referred to	Comments
		5. Preliminary baseline description The preliminary baseline description does not accurately reflect the species, habitat and wildlife sites that are located within the Draft Order Limit or its Zone of Influence. The Council is therefore concerned the EIA scoping is based on inaccurate data: 5.6 Consideration must be given to the importance of Royston to East of St Neots section for notable arable flora and veteran trees, particularly given that these were recorded within the A428 Black Cat to Caxton Gibbet improvement scheme. 5.6.6. The Council disagrees with the statement that there are no Ancient Woodland Inventory sites within the Roxton to St Neots section. Sir Johns Wood (Bedfordshire) ancient woodland is located immediately adjacent to the Draft Order Limit. 5.7 Consideration must be given to the importance of the Croxton to Toft section for notable arable flora and reptiles. 5.7.3 The Council disagrees with the statement that *"there are no non-statutory designated sites which intersected with the Project. One non-statutory designated site (Frogs Hall Drift CWS) was recorded within the ZoI."*. The Applicant provided the Council with a GIS layer of the Draft Order Limit as part of the non-statutory consultation (Dec 2024). We have identified Frogs Hall Drift County Wildlife Site (CWS) within Draft Order Limit and Knapwell Road RSV CWS / Protected Road Verge S23 located in the Zone of Influence. In addition, Protected Road Verge S08 is located within the Draft Order Limit. 5.8 Consideration must be given to the importance of the Comberton to Shelford section for notable arable flora and reptiles. 5.8.2 Consideration should be given to Whittlesford - Thriplow Hummocky Fields SSSI located within 2km of the scheme, for which the SSSI Impact Risk Zone identifies rail projects as having a potential impact on this SSSI. 5.8.3. The Council disagrees with the statement that *"There are no non-statutory designated sites that intersected with the Project"* because it does not match with the GIS layer of the Draft Order Limit supplied to the Council by the Applicant. We have identified four County Wildlife Sites (CWS) within the Draft Order

Specialism	Proposal aspect referred to	Comments
		Limit, namely Hoffer Brook Pollard Willows (North) CWS, Cambridge - Bedford Disused Railway (Harlton) CWS, River Cam CWS and River Rhee CWS. In addition, there is a potential County Wildlife Site being considered at Westfield Farm, Comberton (to be considered by Local Sites Panel in 2025). In addition, Protected Road Verge S17 is located within the Draft Order Limit. 5.8.4 The Council is concerned there has been no assessment of the presence / absence of white-clawed crayfish from the watercourses impacts by the Comberton to Shelford section of the scheme. A few small population of white-clawed crayfish are still present within the catchment and therefore, white-clawed crayfish must be surveyed. 5.8.14 Greater consideration must be given to bird assemblages supported by the arable landscape, which support large flocks of wintering birds. In addition, land adjacent to the railway between Shelford Junction and Cambridge is known to be important for farmland birds, including Grey Partridge and Corn Bunting. 5.9 Consideration must be given to the importance of the Cambridge section for reptiles and notable flora has not been considered, particularly associated with work within the railway corridor and railway sidings at Cambridge North station. 5.9.2. Little Paxton Pits SSSI is not located within 5km of Cambridge section of the scheme (however, it is likely to be located within 5km of the Roxton to East of St Neots section). 5.9.3 Hobson's Park also contains landscape and ecological mitigation area LEM O for Cambridgeshire Guided Busway, which falls within the Draft Order Limit. LEM O is managed as a receptor site for translocated notable flora. It is also being utilised for planting wild liquorice as part of project to expand population of Liquorice Piercer moth. 5.9.4 The Council has identified the following City Wildlife Sites (CiWS) that are located within the Draft Order Limit (using the GIS layer provided by the Applicant) and must be considered as part of the EIA, namely Barnwell Pit, Cherry Hinton Brook, Coldham's Lane Old Landfill Sites, CU Officer Training Corps Pit, Ditton Meadows, Hobson's Brook South, Hobson's Conduit / Vicar's Brook, Hobson's Park, Long Road Plantation, Norman Cement Pits and Stourbridge Common City Wildlife Sites. It should also be noted that the location of ecological mitigation within Ditton Meadows and Coldham's Common for other development (Chesterton Bridge and Chisholm Trail) are located within the Draft Order Limit. And that Barnwell Pit CiWS is a breeding pond for common toad.

Specialism	Proposal aspect referred to	Comments
		5.9.6. Triangle North of Long Road CWS also contained landscape and ecological mitigation area LEM N for Cambridgeshire Guided Busway receptor for notable flora, with the northern and eastern section managed as grassland to support the translocated plants. **6. Potential Impacts and Effects** Table 7 (row 1) – ecological receptors should be expanded to include wildlife sites, reptiles, notable flora (including arable flora) and aquatic flora & fauna. Table 7 (row 3) – ecological receptors should also include flora / fauna associated with the terrestrial and aquatic habitats identified, particularly aquatic species or those vulnerable to change to water quality or quantity. Table 7 (row 4) – the impact of works to ditches / streams / ponds etc. on aquatic flora and invertebrates must also be considered **7.5 Habitats Regulations Assessment** 7.5.3 It will be important that the Habitats Regulations Assessment undertakes a comprehensive review of other projects and plans, when assessing the cumulative impact of the scheme. This should include projects listed above (see 4.1.2). The Council is concern about the impact of the scheme on the barbastelle bat population of the Wimpole and Eversden Woods Special Area of Conservation given the proposed route alignment will fragment the Core Sustenance Zone for the designatory species. It will be important that the Habitats Regulations Assessment provides sufficient evidence to address the following concerns: - Demonstrate that design options have been chosen to avoid impact to the barbastelle bats, such using mining rather than 'cut and cover' technique to create tunnels to help preserve bat flight lines within the Core Sustenance Zone (e.g. Cambourne – Toft and Chapel Hill). - Adequate bat survey work to identify all bat flight-lines across the Draft Order Limit and map how barbastelle bats are utilising the landscape. - There will be significant delays in reinstatement of temporarily bat foraging/ commuting routes due to the long construction period and subsequent time taken for newly planted trees/ hedges to establish.

Specialism	Proposal aspect referred to	Comments
		- Cumulative impact of EWR and A428 road improvement schemes will result in severance of the landscape for bats between St Neots – Cambourne. This is further compounded by the lack of bespoke bat crossing points within Cambridgeshire section of the A428 scheme, with mitigation relying on usage of pedestrian underpasses providing sub-standard bat crossing points and tree planting along the A428. - The A428 bat tunnel (Bedfordshire) providing connectivity to Boys Wood / Sir Johns Wood falls within the Draft Order Limit. The EWR scheme, particularly the construction phase, could impact the effectiveness of this wildlife corridor and delay in 'early guide planting'. - Detailed designs of all bat crossing structures should be provided to demonstrate they meet best practice guidelines. - Demonstrate how mitigation measures will be delivered. For example, delivery of early planting and other tree / hedgerow planting, particularly given that high levels of new tree planting associated with both residential and national road schemes in Cambridgeshire have failed. **8. Proposed Scope** 8.1.2 We are unclear how Great Crested Newt (GCN) District Level Licence (DLL) will be secured as part of the application. We assume that the Applicant will be submitting a letter to the Planning Inspectorate to confirm that DLL can be applied for this scheme. If a guarantee cannot be demonstrated, then a contingency approach following a traditional route will need to be taken, including the inclusion of GCN within the EIA. Table 9 – common reptiles and notable flora should be scoped into the EIA for the Cambridgeshire sections of the scheme until further information is provided to demonstrate the importance of the Draft Order Limit to these taxa. Table 9 (row 2) – ancient woodland should be scoped in for 'Roxton to St Neots East' given the location of Sir Johns Wood ancient woodland immediately adjacent to the Draft Order Limit Table 9 (row 10) – we support the scoping out of hazel dormouse from the Cambridgeshire sections of the scheme
Biodiversity	Routewide – Environmental - EIA Scoping: Approach to	4.4.1. Strategic significance for Biodiversity Net Gain (BNG) within Cambridgeshire should take into consideration the Cambridgeshire and Peterborough Local Nature Recovery Strategy, with draft document to be published in 2025. For more information, see https://naturalcambridgeshire.org.uk/lnrs/. However, in the interim period, we recommend consultation with interim Huntingdonshire Nature Recovery Network,

Specialism	Proposal aspect referred to	Comments
	achieve Biodiversity Net Gain, Scoping Report (pdf p931-944)	produced within Huntingdonshire District Council's Huntingdonshire Priority Natural Landscapes Report. (As well as Cambridge Nature Network, which has already been identified).
Archaeology and Historic Environment	Scoping Report, Book of Figures and Historic Environment Method Statement	The Historic Environment Section of this Scoping Report is very high level, with most of the detail contained in the Historic Environment Method Statement. However, the latter is also lacking detail. Firstly, no Historic Environment figures or maps have been included. This is highly unusual, and may be a mistake, as Historic Environment figures/maps are listed in the relevant Table of Contents for the Book of Figures. Regardless, not having maps/plans of designated and non-designated heritage assets is insufficient, and precludes comment on historic environment assets by any statutory consultee that does not have that data – Cambridgeshire's Historic Environment Team (CHET) is fortunate that it does have the relevant data, and can therefore comment. Secondly, insufficient detail is included regarding the scope of archaeological surveys that will be produced to support the ES chapter. The wording in 9.2.2 is vague, and does not wholly commit to the broad actions that it lists. This makes it difficult to comment or advise. The Council seeks confirmation if the results of intrusive and non-intrusive evaluation (i.e. trial trenching and geophysical survey) of the entire Order Limits will be included in the ES? We would strongly advise this to be the case, as it is difficult to see how the impact on the historic environment can be appropriately assessed without that data, and inform appropriate mitigation measures. Given the scale and below ground impact of this scheme, there is considerable potential for nationally significant below ground archaeological assets to be encountered and impacted. Survey work needs to identify as many new assets as reasonably practicable, and define better the significance of known assets, to enable an appropriate ES chapter to be written. Comments on the Historic Environment Method Statement (HEMS): 4.4.2 of HEMS – the Council appears to be missing. We have been consulted throughout the process and consistently provided comments. This list appears to be all built heritage related. 5.8 – This baseline is currently very basic. The Applicant will also need to add A428 excavation data.

Specialism	Proposal aspect referred to	Comments
		9.3.1 - off site BNG - how will this be considered and will there be provision for evaluation/mitigation?
Landscape and Visual		The Council would expect East West Rail Company to consult Huntingdonshire District Council, South Cambridgeshire District Council and Cambridge City Council on this matter. Notwithstanding the above, the Council has concerns related to the landscape and visual impacts from the proposal and therefore reserves the right to comment on this subject through technical working groups and future consultation, in particular where it relates to users of public rights of way.
Land Use, Quality, Soils and Agriculture		Notwithstanding the above, the Council has concerns related to the Land Use, Quality, Soils and Agriculture impacts from the proposal and therefore reserves the right to comment on this subject through technical working groups and future consultation, in particular where it relates to mineral and waste provision.
Minerals and Waste	EIA Scoping Report; Document Number: 133735-MWJ-Z0-XXX-REP-EEN-000035; dated 05/12/2024)	**6.16 Material Resources and Waste** The Council are in general support for Proposed Scope of Material resources and waste (Section 6.16), but believe that there are additional topics that should be scoped in: **Cumulative Minerals Requirement** The demand for aggregates from this project has yet to be quantified, it is therefore important that an approximation of the aggregate demand is estimated, and that this demand is then considered in the context of existing and predicted future demand from other local and national projects. For example, the Lincs Reservoir and Fens Reservoir projects are likely to be constructed at a similar time and have a large demand for aggregates. Sand and gravel tend is typically locally sourced, with harder rock requiring transportation from other areas. This is likely to put significant demand on a small number of specific quarries both nearby the project, as well as further away. This topic should be scoped in and addressed as part of the Environmental Impact Assessment. If borrow pits are being proposed, these should be addressed within the Environmental Impact Assessment, and we would encourage early discussions with the Minerals and Waste Planning Authority (MWPA). **Safeguarded Minerals and Waste Sites**

Specialism	Proposal aspect referred to	Comments
		The Cambridgeshire and Peterborough Minerals and Waste Local Plan (2021) (MWLP) forms part of the development used in the determination of planning applications. When preparing the Planning Statement and Environment Statement, East West Rail will wish to have regard to the MWLP. Whilst there will be several policies relevant, at this time the Council would like to highlight Policy 16 of the MWLP which seeks to safeguard minerals and waste management facilities. It states that development within a Consultation Area will only be permitted where it is demonstrated that the development will not prejudice the existing or future use of the area for which the Consultation Area has been designated. This sits alongside paragraph 200 of the National Planning Policy Framework which sets out the 'agent of change' principle. The proposed Draft Consent Order Boundary lies within the Consultation Areas for the Cambridge Northern Fringe Aggregates Railhead, the Cowley Road Waste Management Site, and the Cambridge Waste Water Treatment Works; all of which are located in the Cambridge North East Fringe area. The Boundary also lies within the Consultation Area for a site known as 'South west of Addenbrooke's Hospital, between Robinson Way and Addenbrooke's Road, Cambridge, Cambridgeshire'. Please note that Anglian Water are seeking to relocate the Cambridge Waste Water Treatment Works. As part of any Environmental Impact Assessment the consideration of effect of the proposed development on these safeguarded facilities should be scoped in under Materials and Resources and / or Traffic and Transport as appropriate.
Water Resources and Flooding	EIA- Scoping Method Statement - Flood Risk	**2.5 Construction** 2.5.2 states a combination of main and satellite compounds. Attention should be drawn to the location of construction compounds as several villages are concerned with localised flooding which may be exacerbated by these compounds, it is recommended that temporary surface water drainage be included within the compounds subject to Lead Local Flooding Authority (LLFA) review. Using the GIS layers provided it is clear that most of the selected sites are appropriate although care should be taken to reduce runoff and downstream pollution from the compounds. It is clear that several sites are chosen around the village of Comberton particularly those next to the river, this area is already at risk of flooding so the location of compounds next to the village is not advised. Additionally, the proposed locations upstream from Haslingfield are not recommended due to past flood events within the village.

Specialism	Proposal aspect referred to	Comments
		3.5.11 ECML Logistics Hub The proposed hub lies in an area with heightened flood risk in many places, appropriate flood plain compensation must be provided where the proposed site encroaches into a flood plain. Overland flows must not be blocked or restricted. **Flood Risk** **4.5 Consultation** It is important that the surface water flood risk is considered early in the process otherwise it may hold up the planning process at a later stage. **7.6 Flood risk assessment** 7.6.3 It does not appear that surface water flood risk and drainage planning has yet been undertaken and thus the LLFA cannot fully comment. It is understood that a large number of wetland areas and ponds are planned in addition to the large amount of space within the redline boundary means that there should be sufficient capacity for surface water flows. An emphasis on including sustainable drainage systems is encouraged and it is noted that large number attenuation ponds and wetland areas are proposed which the LLFA are supportive of. As no flood risk assessment has yet been provided, the LLFA would usually ask for the following in such a report: - Existing and proposed impermeable areas - Flood Risk Assessment - Greenfield/ brownfield runoff rates - Drainage general arrangement plans outlining location/ diameters of all pipes/ infrastructure along with discharge points -Hydraulic modelling od surface water networks using up to date rainfall data (FEH) and climate change data. - Use of SuDS where possible.

Specialism	Proposal aspect referred to	Comments
		- Maintenance plans It is also recommended to consult the updated National Planning Policy Framework (NPPF) 2024. **9.3. Approach to the assessment of flood risk: potential temporary construction effects** 9.3.1 The LLFA would ask the Applicant to model with 1%AEP for temporary compounds as with the rest of the permeant construction areas.
Traffic and Transport	EIA transport Scoping Method - Traffic and Transport	**Chapter 6 Environmental assessment topics** **6.9 Traffic and transport (journeys and access)** **Mitigation** 6.9.17 operational impact reference is made to Upgrades to Highway Networks and Highway access routes to stations. There is also reference to upgrade or provision of station access facilities for walking and cycling but there is no mention of improvements to routes in the surrounding area for these modes to ensure high quality access to EWR stations by non-car modes. This should be included. There is also no mention of the need for all contractors employed by EWR to adhere to the Construction Logistics and Community Safety (CLOCS) standard which should be a requirement. **Table 17 proposed scope** - This should include for Permanent effects on Non-Motorised Users (NMUs) new and improved routes created and the benefit of these routes for station access. The Council were told that a feasibility study was underway for lineside NMU provision but there is no mention of this potential inclusion in any part of the EIA. For temporary effects vehicle occupants' severance impacts due to construction needs to be detailed. Active travel routes to and within temporary construction compounds should also be identified, promoted to staff (where existing) and improved where feasible. Cycle parking should be provided where there is likely to be demand. **EWR_MWJV Technical Partner Routewide - Environmental – EIA Scoping Method Statement – Traffic and Transport.** **4.2.3 surveys.** The surveys undertaken for the Transport Assessment (TA) and the EIA should be the same to ensure continuity between the two.

Specialism	Proposal aspect referred to	Comments
		4.2.4 NMU/Public Rights of Way (PROW) surveys should include NMU routes which are not on PROW paths such as shared use paths adjacent to the carriageway. **4.4 Study Area** 4.4.1 The document states that *"the study area is not fixed yet; it will be based on the extents of the Highway models that will be used to determine the impact of the scheme".* – Clarity is sought as to how the model extents were derived as the area of impact should be informed by the early modelling that made use of South East Regional Transport Model (SERTM). 4.4.3 Sets out the thresholds to be used in assessing the level of impact of the scheme on the local road network. It is proposed to use a 30% increase as the threshold with some more sensitive areas being assessed if a 10% impact is suggested. However, there are some areas that have very low levels of flow so a 30% increase may be triggered by a low number and therefore this may not be a particular issue whereas there are some areas that already see congestion where a level of increase less than 10% may need to be assessed and mitigated. The Council would welcome discussions to agree the area of impact of the scheme. 4.4.5 TABLE 4 Row 1 2032 Construction Year Assessment The thresholds for construction are suggested to be the same as set out above but it is possible that the thresholds may need to be different for the construction and operational phases as any increase in HGV traffic will need to be mitigated during construction particularly in areas of residential development if they cannot be avoided completely. Row 2 This again relies on the percentage impact set out above but as previously stated this needs to be refined and agreed prior to assessments being undertake. **4.5 Receptors** **Table 5** Row 1 – The operational impacts that will need to be mitigated will extend to all the areas impacted by the scheme and not just the access to the stations. Diversions of either highway (including foot/cycleways) or PROW routes. This section needs to refer to all users including pedestrians and cyclists. **5. Preliminary baseline description**

Specialism	Proposal aspect referred to	Comments
		5.6. Roxton to east of St Neots **NMU Network** The Council would like to clarify the Applicant's approach regarding NMU routes that are not part of the PROW Network. **Baseline highway network** Baseline Highway Network Figures are based on flows in 2022, this should be checked and reviewed against more recent data as 2022 was still impacted by the aftermath of the Pandemic and traffic patterns were still settling down. Department for Transport (DfT) guidance suggested avoiding using 2022 data without sensitivity tests. **5.7. Croxton to Toft** **NMU Network** The Council would like to clarify EWR's approach regarding NMU routes that are not part of the PROW Network. **Baseline highway network** Baseline Highway Network Figures are based on flows in 2022, this should be checked and reviewed against more recent data as 2022 was still impacted by the aftermath of the Pandemic and traffic patterns were still settling down. DfT guidance suggested avoiding using 2022 data without sensitivity tests. **5.8. Comberton to Shelford** **NMU Network** The Council would like to clarify EWR's approach regarding NMU routes that are not part of the PROW Network. **Baseline highway network** Baseline Highway Network Figures are based on flows in 2022, this should be checked and reviewed against more recent data as 2022 was still impacted by the aftermath of the Pandemic and traffic patterns were still settling down. DfT guidance suggested avoiding using 2022 data without sensitivity tests.

Specialism	Proposal aspect referred to	Comments
		5.9. Cambridge **NMU Network** The Council would like to clarify EWR's approach regarding NMU routes that are not part of the PROW Network **Baseline highway network** Baseline Highway Network Figures are based on flows in 2022, this should be checked and reviewed against more recent data as 2022 was still impacted by the aftermath of the Pandemic and traffic patterns were still settling down. DfT guidance suggested avoiding using 2022 data without sensitivity tests. 5.9.7 There is a typo here - this should refer to Babraham Park and Ride. **5.10. Future baseline** Continued engagement on the future base line is welcomed as we will need to agree the elements within the future baseline. **7. Potential impacts and effects** **7.2. Potential permanent and operational effects** **Table 20** The NMU section needs to include the impact on all routes not just the PROW network. **7.3. Potential temporary construction effects** **Table 21** The NMU section needs to include the impact on all routes not just the PROW network. **8. Assumed mitigation** The exact nature of the mitigation proposed should be discussed and agreed with the Council and the Cambridgeshire and Peterborough Combined Authority (CPCA). Table 22. Upgrades to highway network for access routes to stations should mention upgrades for NMU routes within public highway in particular.

Specialism	Proposal aspect referred to	Comments
		8.3.1 This should also include monitoring of traffic flows on diversion and other routes around construction activity to better understand diversion routes and the impacts of construction on local communities. The monitoring sites should align with existing data to enable a comparison. 8.3.3 Mitigation should include the requirement for contractors to adhere to the Construction Logistics and Community Safety (CLOCS) standard. **9. Evaluating significance** **9.3. Journey time and/or distance (NMUs)** The Council would like clarification regarding the rational for the assessment criteria set out in Table 25. **9.4. Severance** The Council would like clarification regarding the rational for the assessment criteria set out in Table 26. **9.5. Journey time (vehicle occupants)** 9.5.3 The Council would like clarification on the rational for determining that only diversions over 2km will be considered. **9.6. NMU journey amenity** There are some locations where increases of less than 50% in traffic flows could be significant for NMU users such as areas already experiencing congestion. **9.8. Impacts on station access routes and facilities** Whilst it is agreed that some local plan allocations do not qualify as 'near certain' or 'more than likely', in line with Transport Analysis Guidance (TAG) Unit M4 'Forecasting and Uncertainty' (Department for Transport, 2019), sensitivity tests should be undertaken including larger sites to help inform the mitigation that will be required from these sites should they come forward. Table 31. This should also include under construction severance effect and redistribution of trips and use of alternative routes for vehicle occupants as well as for NMUs as some roads may be severed during

Specialism	Proposal aspect referred to	Comments
		construction leading to long diversion routes. This could also include improvements to NMU trips due to improvements to routes to key stations that benefit NMUs. It is imperative that any future forecasts relating to traffic volumes, and associated impacts used in the EIA, are consistent with those used in the Transport Assessment. Where forecasts are updated as part of the consultation process, these must be consistently maintained between the two documents with both being updated to reflect any changes.
Public Rights of Way (PROW)	Routewide EIA Scoping Report	6.9.1. Traffic and Transport 'journeys and access' assessment. The Council wishes to understand if this assessment will consider the impact on non-motorised user journey times of temporary closures/diversions during construction, as well as permanent PROW closures and diversions. 6.13.8. Alterations to the rural landscape and to views from PROW will cause a change in the public's enjoyment of the countryside and may impact upon propensity to use PROW. This may have negative impacts on physical and mental wellbeing. The Council expects the applicant to demonstrate its understanding of these concerns and to provide appropriate mitigation.
Public Rights of Way (PROW)	Routewide EIA Scoping Method Statement - Communities	8.2.1 & 11.2.3. These paragraphs refer to 'loops' being provided in relation to promoted walking routes. Loops are popular in relation to all PROW and NMU leisure routes and this scope should be broadened to include all PROW. Local circular routes offer important leisure opportunities and these might be overlooked if focus is solely on promoted walking routes, which may not always be the most well-used route in a community.
Public Rights of Way (PROW)	Routewide EIA Scoping Method Statement - LVIA	5.1.3. The Council would welcome an opportunity to be involved in the selection of representative viewpoints to be used for the PROW network. 12.3. Opportunities. This section overlooks the opportunity to provide improved connectivity for PROW users by providing enhanced roadside facilities for non-motorised users. This will enable pre-existing and new PROW infrastructure to be better joined-up, offering a wider range of leisure routes and utilitarian connections.
Public Rights of Way (PROW)	Routewide EIA Scoping Method Statement -	Table 20 and Table 21 refer to the 'potential permanent and operational effects' and the 'potential temporary construction effects' of redistributing journeys to different parts of the highway network as a result of road/PROW closures. The council asks for clarity as to whether this assessment will consider the impact on

Specialism	Proposal aspect referred to	Comments
	Traffic & Transport	adjoining PROWs, which may, as a result of the redistribution of journeys onto adjoining PROW or NMU routes, carry increased traffic and therefore require greater maintenance intervention. 9.3. The Council are keen to understand the impact of changes to journey lengths as a result of the temporary and permanent closures to PROW and NMU connections. Draft PROW Management Plan - the Council requests engagement in the development of the Plan. The anticipated equalities impacts of introducing a large number of new bridges and underpasses onto the PROW network needs to be understood; any diminution of accessibility – particularly where a route is in proximity to centres of population – is undesirable. Any PROW Management Plan should include measures to minimise disruption to users during construction, as well as requirements to engage with the Local Highways Authority (LHA) at key junctures in the planning for and development of the scheme – for example in relation to temporary diversion routes, programming of temporary closures and noticing requirements, widths, surfaces, accessibility measures and reinstatement criteria. Code of Construction Practice (CoCP) - the Council requests engagement in the development of the CoCP. The CoCP should include a requirement for pre-construction condition surveys of PROW and provisions to reinstitute pre-existing or improved conditions for all PROW that are physically impacted by construction.
Emergency Planning		It would be constructive to ensure liaison with the Cambridgeshire and Peterborough Local Resilience Forum to ensure that aspects of emergency response are considered regarding both the facility, and sites that may be in the vicinity. Cambridgeshire County Council encourages the applicant to engage with Cambridgeshire Fire and Rescue Service.
Cumulative Impact		Notwithstanding the above, the Council has concerns related to the cumulative impact of the proposal and therefore reserves the right to comment on this subject through technical working groups and future consultation.

By email only

Your ref:
Our ref:
Date: 30/01/2025

Dear Sir/Madam,

East West Rail – Scoping Opinion

Thank you for your letter notifying Central Bedfordshire Council of this consultation. The Council welcomes the opportunity to consider and review the level of detail to be provided within the Environmental Statement. Our response has been detailed in the attached appendix (Appendix 1) which reviews the submitted material by each specific subject.

We trust that the information within the appendix is self-explanatory however, if any further information is required, then please do not hesitate to contact us.

Yours sincerely

Lorna Carver
Deputy Chief Executive and Director of Place and Communities

Direct telephone 0300 300 4521
Email [redacted]@centralbedfordshire.gov.uk

Appendix 1

Subject	Comments
Minerals and Waste	Paragraph 4.1.2 refers to the 'Central Bedfordshire Minerals and Waste Local Plans: Strategic Sites and Policies'. This title should be corrected to 'Bedford Borough, Central Bedfordshire and Luton Borough Councils' Minerals and Waste Local Plan: Strategic Sites and Policies'.
Traffic and Transport	Main Text 2.1.1 – This section does not clearly explain that Connection stage 2/ The Transport and Works Act Order (TWAO) enables the acceleration of the initial Oxford to Bedford services (2 x Oxford to Milton Keynes services in each direction per hour 1 x Oxford to Bedford service in each direction per hour). This requires further detail to explain the interface between the TWAO and the DCO in this summary. 3.2.7 - There needs to be a reference to CBC local plan Policy EE10. 3.2.25 - We note the reference to the replacement of the Marston Road Level Crossing with a bridge by Network Rail. At present it appears that this scheme is unlikely to be compatible with the proposed relocation of Lidlington Station (and in particular proposals to provide a connecting road back onto Station Road). Whilst there may be scope to connect this elsewhere, this would impact upon the redline boundary for the DCO and so should be confirmed at the earliest opportunity. CBC would also note that the redline order limits around Lidlington (page 23 of the Book of Figures) would not appear to currently allow scope for alternate connection to the east of any relocated Station. For the Tempsford Options, it is currently unclear how these would coordinate with the A421 / Black Cat scheme, including the proposed road bridge on Barford Road and the impact upon existing properties on Barford Road to the north of the A421 Bridge. 4.2.25 – Strategic modelling is proposed as the main tool used to assess traffic impacts, with a subsequent bearing on air quality, noise, and vibration impacts. As such it is important that the model validates well for those roads expected to be impacted by the proposed development, or that a further means of assessment is included for those local roads most heavily impacted, and which may not be well represented within a strategic level model. Some examples of this would include the routes through settlements such as Lidlington and Ridgemont, which will

	contain sensitive receptors. These may be reasonably expected to experience environmental effects, but which are less likely to be accurately replicated within a strategic level model. The study area for Air Quality is defined by 200m of the ARN (affected road network), with the ARN defined as: 1. Change in AADT of 1,000 or more 2. Change in HGV of 200 or more 3. Change in speed of 10kph or more 4. Change in road alignment of 5m or more The ES should cover how mitigation will be provided at more remote locations (including those on the ARN) which appear likely to be outside of the DCO redline (and which are unlikely to be identified for some time). <u>Section 6.9 Traffic and Transport</u> 6.9.13 – This section defines the study area based upon the IEMA guidance but currently excludes reference to the Rule 2 10% threshold for sensitive locations (although reference to the assessment team determining further locations which may warrant assessment is made). CBC would expect both Rule 1 and Rule 2 of the IEMA guidance to be referenced and applied, particularly considering the likelihood of links with high sensitivity within the project area. The Council would also request active involvement in the review and agreement of sensitive locations as part of the EIA scoping process, as per para 1.29 of the IEMA guidance. Further comment is made later in this response with regards to the definitions applied within the Traffic and Transport Method Statement when considering sensitive receptors and the identification of local receptors. Safety of highway users has currently been scoped out of the assessment. This does not appear appropriate, as the scheme may have safety implications (both positive and negative), for example associated with the closure or diversion of current routes crossing the rail line. As such CBC would advise that safety remains scoped into to the EIA. It is noted that pedestrian and driver delay areas of assessment as included within the IEMA guidelines have been replaced with journey length and journey time. This may not provide a full replacement. It is also noted that no reference is made to the hazardous / large loads area of assessment. Whilst it is not immediately expected that

	significant movements of hazardous loads will take place, there appears to be a reasonable likelihood of large / abnormal loads associated with the project (particularly where major structures are proposed), and which should therefore be accounted for (with an associated bearing on some of other areas of assessment). 6.9.16 - The bullet-point list, with respect to construction impacts, refers only to 'soft' measures, such as timing of construction vehicle movements and the routes they take. However, it may be necessary for physical works to be undertaken to facilitate appropriate access for construction vehicles where there is little choice but to use a route which may currently be unsuitable. Such works would need to be secured via the CTMP. Any physical highway works required to facilitate construction, or in relation to the operational phase of the scheme, would need to be delivered via an appropriate mechanism with the local highway authority, such as Section 278. 6.9.17 - 'Access Routes to Stations' is referenced in terms of potential highway upgrades, CBC would wish to be involved in determining what the potential access routes are and the DCO should allow for mitigation on the extent of these routes affected in terms of the red line boundary. Appendix B- We request some reference is made to *'legal mechanisms to remediate damage caused to existing highway'* to link to comments below on section 8.4 (Code of Construction Practice). Legal mechanisms for other technical areas have been referenced elsewhere <u>Traffic and Transport Method Statement</u> 3.2 - Reference to LTN 1/20 does appear to be an omission from the list of national policy documents and would need to be used in developing the access strategies for the stations along the route. Thresholds for assessment – CBC would note that the IEMA guidelines state that for effects upon Air Quality, Noise, Road Safety, and Driver delay, the direct application of Rule 1 (30% or HGV component) or Rule 2 (10% in sensitive areas) may not applicable, and a separate study area and assessment criteria should be agreed with the relevant stakeholders. CBC would be happy to engage with the applicant team on this. The receptors detailed in Section 4.5 (Table 5) identify impacted user groups but don't include or define other sensitive locations or receptors

	(i.e.: village centres, schools, places of worship, collision cluster sites, roads over capacity etc). At present the definitions within 4.5 would appear to exclude these from assessment. CBC appreciate that, for a project of this scale, it would be difficult to include a list of receptors within the current scoping document. However, CBC would request that the document commit to the production and agreement of a list of receptors (including sensitive receptors) relevant to each section of the proposed route prior to any assessment work being undertaken. A further source of impacts, not currently included in paragraph 6.1.4, is the increase in downtime at barrier-controlled crossings, which could potentially be relevant to driver delay, pedestrian delay, severance, and safety. 7.1 – Regarding Impacts, the same comments as provided on the main body text would apply, with regards to the need to Scope in Safety and Large Loads and a query over how well journey length and time would replicate / replace pedestrian and driver delay. CBC agree with the effects detailed in Section 7.2, but are of the view that this list isn't exclusive or exhaustive, with further effects likely, including: • Driver and pedestrian delay (as a result of increased traffic levels on links or junctions or as a result of increased barrier down time at barrier-controlled crossings). • Effects upon driver and NMU safety (positive and negative) as a result of changes to crossing form & location and / or increases in barrier down-time. • Changes in levels of severance. It is noted that Table 20 does include a more comprehensive list of impacts (although these appear to be a combination of permanent and temporary rather than purely temporary as suggested within the preceding text). 8.1.4 - 'Providing attractive walking routes into stations to encourage active travel to stations' is highlighted as a likely embedded mitigation. Whilst this is given as an example, the absence of reference to cycling here does appear to be an omission. Where new access roads are provided to relocated / new stations, there would be an expectation that cycle provision would be provided as part of the new

	infrastructure, with improvements also made along existing routes where necessary and appropriate. Whilst it is appreciated that the measures outlined in Section 8.4 (Code of Construction Practice) are generic, and will be refined as the project develops, CBC would expect future iterations of the plan to include: 1. Condition surveys on construction routes (and an undertaking to make good any damage caused by construction traffic). 2. Construction routing / signage strategy. 3. A fund which can be drawn down by impact authorities for dealing with the impacts of any long-term diversions. 4. An undertaking to work with the Council's Streetworks and Road Space Booking processes. 9.1.4 - *'Proportionate mitigation for significant adverse impacts identified by the TA on transport network connectivity, capacity and safety will be developed in accordance with relevant TA guidance and not covered in the ES'*. This statement is confusing. Any significant adverse impacts identified by the EIA would need to have mitigation identified, even if this is also reported on in the TA. 9.2.2 - It is proposed that all vehicle occupants, as receptors, would be prescribed a 'Low' sensitivity. This would mean that it would take a 'Major' magnitude of impact in journey time before it could be considered Significant, which may not be appropriate. Different types of vehicle occupant (e.g. public bus users), routes, time of day (e.g. peak hours) and availability of suitable alternative routes, could require a different level of receptor sensitivity. There is concern that potentially large delays incurred to users could be too easily dismissed due to a rather crude blanket assumption that the vehicle occupier has low sensitivity. 9.3.4 – the assessment of impacts upon journey time, it is not clear how a percentage impact would be applied (i.e. to the journey as a whole, or just the section of the journey which has altered as a result of the scheme). It would appear potentially more measurable to equate the changes in journey length to a comparable period of time (using an average walking speed, for example, of 80m/minute). This would give bandings of circa (broadly rounded): • Negligible – less than 40 seconds • Minor – between 40 seconds and 3 minutes • Moderate – between 3 minutes and 6 minutes • Major – over 6 minutes

	Albeit this would largely replicate the impacts identified using the comparable journey distance bandings. CBC would wish to see appropriate sensitivity / gradation applied with regards to the assessment of severance and would agree with the proposed application of a qualitative approach in some cases. The application of the 8,000 AADT value from DMRB to downgrade the magnitude of impact would otherwise result in the downgrading of the significance of severance effects on many rural or minor roads, including where level crossing changes or closures are proposed, and which may still experience (potentially significant) severance as a result of the proposed development. CBC would not agree with the approach to the assessment of changes in journey time for highway users. The filtering of assessment of driver delay based upon only including junctions with a degree of Saturation exceeding 0.85 on any arm would exclude, for example, locations where increased barrier downtime would result in delay, as it is based purely upon the operation of junctions rather than links. It is also likely that a strategic model would not validate at an individual junction level, and as such, whilst the v/c metric would provide an initial means of filtering down a large number of junctions to a more manageable level, CBC would wish to see sufficient flexibility within the approach to allow for other junctions or links to be included within the assessment of driver delay, where there is local knowledge and evidence to demonstrate the need for inclusion (for example where other assessment work has identified issues of capacity or delay). 9.6 - There is an intention to use traffic flow doubling / halving criteria to assess this, but the IEMA guidelines state *'Thresholds are expressed as a starting point for any assessment and typically have been derived from studies of major changes in traffic flow and therefore should be used cautiously in any assessment. The assessment of amenity should pay full regard to specific local conditions'*. A more qualitative approach may be needed in relation to some receptors and locations. With regards to pedestrian fear and intimidation, whilst the hazard scoring approach is supported, the metrics detailed within this section are based upon the tables in the IEMA guidance, which states that those

	examples can be adapted to reflect local conditions. It is noted that, for example, the total 18hr HGV flow would need to exceed 1,000 per day to be classed above resulting in a 'small' level of fear and intimidation. However, in a rural village with narrow footways, HGV flows significantly less than 1,000 per day could reasonably be expected to have an impact. As such CBC would request that an alternate set of metrics is agreed for minor and village roads to ensure a practicable level of assessment proportionate to local context, with the example metrics currently proposed retained only for major roads. As an aside, it should be confirmed that the first column of Table 27 relates to two-way flows per hour (average over 18 hours), and that average speed (column 3) is mph (assumed). 9.8.4 - If some potential impact/ mitigation identification is being deferred to the station travel planning process due to timetabling being agreed post DCO as the text suggests, then commitment to this and the funding mechanism is still to be outlined in the relevant section of the DCO, albeit the impacts were not known at the time of EIA scoping <u>Traffic and Transport Method Statement Appendix A</u> Whilst it is proposed that Road Safety is scoped out, as it would be covered within the Transport Assessment, as outlined previously CBC are of the view that there will be potential safety implications (positive and negative) associated with elements of the scheme such as the closure or relocation of crossings and the increase in barrier downtimes, that would not be reviewed within a typical Transport Assessment, and which would therefore be appropriate to retain for assessment within the EIA.
Public Rights of Way	<u>Section 6.4 Communities and Health</u> 6.4.16 - The avoidance of impact on property and community facilities is a tenet of the design strategy. Any impairment of access to property and facilities, either temporary or permanent, should be mitigated where feasible by provision of an alternative either through diversion to another existing route or through reprovision by a new access route. <u>Section 6.9 Traffic and transport (journeys and access)</u> 6.9.1 - The assessment of effects on journeys and access due to traffic and transport impacts should consider how the Project could affect the amenity and ability of people in making journeys and getting to their destinations. It considers changes in journey times and journey length for users of roads, footpaths and Public Rights of Way (PRoW). This includes motorised users such as drivers and passengers of vehicles

	including cars, HGVs, and buses; and non-motorised users (NMU) such as walkers, cyclists and horse riders. 6.9.6 - It may be necessary to temporarily or permanently close, restrict access to or divert roads and PRoW, which would increase journey length or journey time. The local public rights of way network is a recognised amenity and is used by the public. Looking forwards, the Martson Villages development will see up to 5000 new homes plus leisure/amenity and employment centres being created which will all be linked by and will access the public rights of way network. This development will see a significant rise in use of the public rights of way affected by the East-West Rail Project and so the detrimental impact of the Project through network severance needs to be considered within the EIA: specifically, the removal of existing routes that would link the Marston Villages development area to the north with the promoted Greensand Ridge and its walks and amenities to the south. <u>Section 6.10 Biodiversity</u> The public rights of way network provides green corridors which are protected from development and, to some degree, from regular farming activities. These routes provide additional biodiversity corridors through agricultural and post-mineral extraction landscapes. Their value should be included in the baseline surveys and the public rights of way network protected from undue degradation by the EWR Project. The Project will also need to consider the requirement for it to provide and accommodate the Bedford-Milton Keynes Waterway (under CBC Local Plan Policy EE10) which will provide a blue and green corridor through parts of the Project site. Accordingly, the Project will need to consider the route of the waterway and surrounding green space (which includes public right of way), the effect of their development on it (both construction and operation phases) – including public access, and issues such as bird-strike and run-off, contamination etc. <u>Section 6.11 Water resources</u> The Project will also need to consider the requirement to provide and accommodate the Bedford-Milton Keynes Waterway (under CBC Local Plan Policy EE10) which will provide a blue and green corridor through parts of the Project site – notably between Aspley Guise and Lidlington

	parishes. Accordingly, any drainage and/or run-off modelling will need to include the future presence of the waterway in its scope. Section 6.13 Landscape and visual The Project will affect the landscape by the construction of proposed new stations at Woburn Sands, Ridgmont, Lidlington and Tempsford which would be constructed on greenspace and affect the public rights of way network in the stations' localities. Mitigation in the ES should include preservation of the current rural nature of the affected public rights of way by providing the alternative routes of these and their proposed extensions alongside the station access roads within green corridors to mitigate against the urbanisation of the stations and car parks and to provide additional biodiversity net gain, as well as providing more enjoyable user-friendly multi-user routes along the station access routes which would promote active travel (first-last mile) and mental wellbeing. Where balancing ponds are proposed as SWAB/SUDS any public right of way could run alongside these within an appropriately wide corridor to provide additional interest/amenity for path users. Section 7.2 Biodiversity Net Gain As referred to above (see Biodiversity and Landscape & Visual), the establishment and/or retention of public rights of way through the Project area allows green corridors to be established which provide opportune adjacent areas for natural planting to complement the BNG targets of the Project. Section 7.5 Equality impact assessment Currently the public rights of way network within the Project area crosses the Bedford-Bletchley railway line generally at grade via level crossings; although it is acknowledged that some of these being on embankments are access via steep flights of steps. The provision of any new bridge used as mitigation for a public right of way closure or diversion must provide access for less abled users and wheelchairs via ramps or lifts and these must be accessible 24/7/365 as required under the Council's and EWR's Public Sector Equality Duty. Section 8.2. Design principles

	CBC welcomes a holistic approach to mitigating against public rights of way network severance but the Project must accept that the diversion of public rights of way along roads negates the directness and off-road purpose of the affected public rights of way and, consequently, these more direct off-road routes need to be retained where possible. The Council accepts that some areas of the Project site have a high density of public rights of way, some of which may be superfluous. However, where solitary routes provide connectivity – especially to amenities, communities or employment centres – these must be retained (even if on a diverted route to make use of station bridges). CBC welcomes EWR's recognition that the public rights of way network plays a significant part in the locality's landscape character and scenery and is considered of "high sensitivity". The current and affected public rights of way network should be harnessed for its landscape character, biodiversity and protected for its public health benefits and for its carbon reducing active travel potential. Consequently, any revised or new routes for public rights of way need to be in green corridors and screened appropriately from EWR Project development. <u>Section - 12.3 Opportunities</u> CBC welcomes the opportunity to increase the green infrastructure connectivity by enhancing the public rights of way network through creating new routes as well as working towards minimising network severance caused by the closure of the level crossings. The proposed Bedford-Milton Keynes Waterway will provide a new leisure/active travel route as well as a blue infrastructure waterway park. Adjoining wetland areas could act as overflow control areas and provide the opportunities to provide BNG locally. The provision of overbridges to accommodate horses and cyclists, as well as disabled users, is welcomed and would be a significant local asset for the 5000 homes to be built as part of the Marston Villages development. <u>Section 4.2. Surveys</u> The Traffic count baseline analysis predates the occupation of the 5000-home Marston Villages development which will generate significant active travel, commuter and leisure use of the public rights of way network within the Project site and over the level crossings. This future use needs to be considered and accommodated within the EWR plans for the level crossings and affected public rights of way.

	4.4.4 - When the assessment is undertaken, the extent of the highway model will be of a sufficient size to capture impacts and effects caused by: • Construction traffic movements; • Temporary or permanent closures, restrictions, and diversions of roads and PRoW during construction of the Project; • Permanent closures, restrictions, and diversions of roads and PRoW during operation of the Project; and • Changes in rail passenger demand2 (increases in patronage on the railway) and its associated impacts (such as increases in travel to/from stations). EWR will need to provide temporary alternative routes for those public rights of way being closed during the construction phase along with, where appropriate, temporary footbridges over the railway lines or temporary level crossings. <u>Section 7.2. Potential permanent and operational effects</u> The permanent degradation of the public rights of way network caused by network severance due to level crossing closure must be mitigated by the creation of appropriate (i.e. direct and vehicle-free) routes. These should cater for all non-motorised user (NMU) classes i.e. wheelers, walkers, cyclists and equestrians and should be appropriately located and have safe road crossing points. NMU classes should not be forced onto the local road network by closure of public rights of way: instead, new public rights of way need to be provided. <u>Section 9.6. NMU journey amenity</u> This section needs to recognise that the public rights of way network is used by NMUs for leisure, active travel and commuting to differing degrees and their use will be significantly increased following occupation of the 5000 homes in the Marston Villages development. Consequently, the EWR Project must aim to retain, protect and enhance the current public rights of way network or, where new stations provide safer crossing points, change the local path network to provide direct links with unfettered access to station bridges. This will help reduce diversion distances and times, reduce severance. The provision of surfaced routes and sympathetic screening planting for biodiversity/BNG will also improve NMU amenity. <u>Section 11.3 Opportunities</u>

	11.3.3 - The introduction of mitigation such as improved station access, cycle parking and upgraded PRoW would facilitate and support increased active travel movements and use of the bus network and remove reliance upon private vehicles. Improved station access and the new station access routes should have parallel green corridors for NMU public rights of way to facilitate leisure and active travel for walkers, cyclists and equestrians. Additionally, for the Project sites between Aspley Guise and Stewartby, consideration should also be given to non-standard travel modes utilising the Bedford-Milton Keynes waterway.
Historic Environment (Archaeology)	<u>General Comments</u> The Archaeology Team are broadly content with the proposed assessment methodology and note the amendments made following our comments on the initial draft Scoping Report in 2021. <u>Book of Figures</u> Section 4 of the Book of Figures is entitled "Landscape and the Historic Environment". However, the only historic environment features that appear on these maps are Conservation Areas and Registered Parks and Gardens which have been assigned as "Designated Landscape Features". There should be maps which indicate show the designated historic environment features as well as known non-designated archaeological and built heritage sites. Additionally, it is noted that some of these figures include "visual receptors" (Fig 145-159), but it is unclear whether any of these receptors represent heritage assets. Given the previous comments by CBC relating to the need for correlation between any ZTVs and heritage assets, the reference to the use of ZTVs in section 9.3 and the absence of dedicated Historic Environment figures, this is an area which requires further explanation. <u>Section 5.0 - Preliminary Baseline Description</u>. Accepting this is only a summary of the known historic environment resource, we are somewhat disappointed that the descriptions for each route sections fails to identify where there are designated heritage assets outside the route corridor but in close proximity to it, the significance of which could be impacted upon by virtue of development within their setting. A particular example of this is the Fenny Stratford to Kempston section of the report (5.4), where the route corridor and potential upgrades to Lidlington Station are approximately 150 metres from the Thrupp End Scheduled Monument (NHLE1010364) but it is not identified as a specific receptor, because we must assume it falls into

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	the category of "within the 1km study area". Given sections 6.2.5 and 6.2.11 discuss likely temporary and permanent impacts on the significance of heritage assets by virtue of the project falling in their settings, those assets should be identified in the preliminary baseline description. This is also at odds with the description of locally designated buildings (in some areas) which are identified by name within 500m of the route. Section 5.7 - Roxton to St Neots It is unclear from this section whether the Late Neolithic to Bronze Age Barrow Cemetery at Tempsford Scheduled Monument (NHLE1491633) has been considered. We also question why the likelihood for prehistoric ceremonial and funerary remains has not been included in the archaeological potential paragraphs of this section. The proposal for the route corridor passes through the valley of the River Ouse where there are significant monumental Neolithic - Bronze Age landscapes, some of which (as above) are nationally protected archaeological sites. Section 5.11.6 Future Baseline and Future Planned Developments The acknowledgement of potential cumulative impact of the project and other future developments on heritage assets is welcome, we note that the example given fails to discuss the A428 Black Cat to Caxton Gibbet Improvement Scheme and the strategic site allocation of SA2: Marston Vale New Villages. Of particular concern is that no mention is made of how the project will integrate with mitigation programmes already agreed for these two schemes. This includes preservation in situ of archaeological remains. This needs to be addressed in the EIA. Section 7.2.4 Code of Construction Practice The General provisions should include arrangements for preservation in situ of archaeological remains and should not assume that preservation by record (excavation) will be the only acceptable form of mitigation. Section 9.2 Resources for the ES It is unclear from the list of resources whether the specific Bedfordshire Resource Assessment and Research Agenda and Strategy will be consulted. This document needs to be consulted and considered. Section 9.2.2 Surveys Given the project may impact on non-designated above ground archaeological earthworks it should be clear in the methodology whether the baseline data will also be informed by analytical earthwork survey.

	Section 9.1 Historic environment: Methodology This is acceptable in principle but will need to be more detailed for the EIA. While I agree that the heritage assets identified will need to be assessed for impacts, both direct and setting, other assets will also need to be considered including potential Non Designated Heritage Assets (NDHAs), which may include non-listed station buildings. Section 9.2.2 Millbrook Station and Ridgmont Station are Grade II Listed Buildings (LB) (NHLE: 1321648/1114037) and therefore any direct works to the buildings will need to be assessed for impacts to their significance. It is unclear whether the Crossing House, also a Grade II LB (NHLE: 1386644) still forms part of the current station, but any direct works would also need to be assessed for any impact to its significance. Section 9.2.4.2 Option 1 for the construction of a new Ridgmont station would need to consider the impact of the development upon the significance of nearby heritage assets through changes to their setting. These include (but are not limited to) Listed Buildings in Aspley Guise (in particular Dove House Cottage NHLE: 1312066; and The Manor NHLE: 1321714) and Church End (in particular Crawley Hall NHLE: 1114038; Crawley Hall Barn NHLE; 1321679; and Henry VI Cottage NHLE: 1311779) as well as the Aspley Guise and Husborne Crawley (Church End) conservation areas. Consideration would also need to be given to alternative uses for Ridgmont station and other listed station buildings such as Millbrook, to ensure their future viability. Section 9.2.4.2 Option 2 for the expansion of the existing Ridgmont station would need to be sensitively designed to mitigate any potential harm arising to the significance of the listed station building, both directly and in its setting. Section 10.1.1 Assumptions and limitations at the scoping stage This section abruptly stops, it appears there is text missing. The error should be corrected. Section 13.1 Historic Environment: Same comments as for 9.1. Sections 13.3/13.4

	Both options for alignments B and C will need to consider the impact upon the significance of the Tempsford (Langford End) Conservation Area and associated LBs as well as other heritage assets in the vicinity. Section 13.6 The above comments for alignments B and C also apply to the proposed station, especially in light of the associated infrastructure and the proposed viaduct which may have a significant visual impact upon nearby heritage assets and affect their setting. It is expected that robust mitigation will be proposed to offset any harm arising to the significance of heritage assets. Section 13.7 The above comments for alignments B and C and Tempsford station also apply to the proposed logistics hub, especially in light of the associated infrastructure, while robust mitigation will be required to offset any harm arising to the significance of heritage assets. General Comments: associated infrastructure such as pylons, substations and roads will need to be considered when assessing impact upon significance of heritage assets. Rerouting and extinguishing public footpaths and other routes may impact the setting of heritage assets and will also need to consider when assessing both significance and impact.
Historic Environment (Built Heritage)	Environmental Update Report Chapter 4 - We Agree with proposed guidance, The Planning Inspectorate's Advice Note 17. Section 4.5.19 - We agree with the proposed methodology in principle though no evidence yet of a proposed study area which will be necessary for the EIA Sections 6.2.37/6.2.38 References to specific LBs are welcome though more will need to be assessed for the EIA. Sections 6.2.43/6.2.44 Proposed mitigation for impacts to the significance of heritage assets is welcome in principle but would need to be considered alongside an assessment of their wider heritage interest in the EIA to fully assess their appropriateness.

	Table 6.5 Option 1 for 'the historical and cultural environment' requires more detail while option 2 does not consider direct impacts upon the heritage asset. Tabel 6.7 for 'the historical and cultural environment' acknowledges limited impact of direct works upon LBs however more detail is required. Sections 9.2.36/9.2.37 makes no references to the history of adjacent settlements. Section 9.2.38 reinstatement of historic landscape features may enhance the setting of adjacent heritage assets and would be supported. Section 9.2.39 Specific heritage assets would need to be identified and assessed, while the description of setting impact here is generic. Table 9.1 Comparison of options 1b and 1c for 'landscape and historic environment' lack any consideration of specific heritage assets and their significance, which is imperative. Tabe 9.2 Comparison of options B and F for 'landscape and historic environment' lack any consideration of specific heritage assets and their significance, which is imperative. Historic Environment Document We are largely supportive of proposed methodology in principle although there does not appear to be any reference to a study area, which is imperative for the EIA. Supportive of enhancements to the historic environment in principle though will depend on both the specific assets and the works proposed.
Landscape and visual	General Comments The Council are broadly content with the proposed Landscape and Visual Section. Several comments on this section have been included below. Section 6.13.6 - Temporary haul routes and logistic hub, alignment options 1b & 1c to be included within Landscape Visual Impact Assessment (LVIA). Section 6.13.7 - Any offsite utility diversions and highway works are to be included within LVIA. New PROWs are to be included within LVIA.

	Section 6.13.8 - Construction Period - include construction lighting. Operational Period – Changes to Tranquillity resulting to activity and noise generated during operation should be included. Section 6.13.12 - Include the landscapes condition, the way the landscape is experienced and the value attached to it. Include Land cover, including different types of vegetation and patterns and types of tree cover Section 6.13.14 - The visual baseline will also establish the area in which the development may be visible, the different groups of people who may experience views of the development, the places where they will be affected and the nature of the views and visual amenity at these points. Also include the number of different groups of people who will be affected by the changes in views or visual amenity. Visual receptors, viewpoints and views that have been identified as unlikely to experience significant visual effects to be noted, with reasons given for their exclusion. Section 6.13.19 - A number of existing woodlands contain ash and suffer with ash dieback. Landscape and visual assessment to consider ash dieback effects both onsite and offsite during the short- and long-term operational phase. Section 6.13.20 - 15 year operation effects to be captured both winter and summer as per recommendations within Guidelines for Landscape visual impact assessment (GLVIA). Section 6.12.22 - Materials of stations and highly visible features are to respect and reflect the local distinctiveness and to be included. Careful location and design of lighting features (columns and lanterns) and glow colour. Section 6.13.24 - with the magnitude of effect – include size and scale, geographical extent of the area, the duration and reversibility. Section 6.13.25 - The significance of effects to also include the magnitude and evaluated in terms of its size or scale, the geographical extent of the area influenced and its duration.

	Section 6.13.24-6.13.26 - Where landscape effects are judged to be significant and adverse, proposals for preventing/avoiding, reducing or offsetting or compensating for them should be described. The significant landscape effects remaining after mitigation should be summarised as the final step in the process. Section 2.5.2 Decommissioning of Temporary Construction Compounds are to be included within the LVIA and how they are to enhance with landscape measures. Route wide – Environmental - EIA Scoping Method Statement The Landscape Team are broadly content with the proposed Method Statement and have the following comments: Section 5.1.3 - Bedfordshire Scenic Route is a one way loop around Central Bedfordshire signed as 'Scenic Route' and to be included when assessing the effects of the Project on the views of receptors (people passing through on road on a promoted route) in the study area. The River Great Ouse is navigable. Views from the river are to be considered when travelling through the landscape. Tranquillity Strategy - tranquillity to be assessed using Central Bedfordshire Tranquillity Strategy, Landscape Institute Tranquillity – An overview Technical Information Note 01/2017, Health Impact assessments and ecological surveys to assess visual, noise and biodiversity impacts (e.g. on bats and invertebrates) respectively. Section 5.2.21 - The LVIA should include visual representations of both the baseline view and the view incorporating the Proposed Development as per recommendations in Landscape Institute's Technical Guidance Note 06/19: Visual Representation of Development Proposals, 2019. Existing and new distinctive landscape features to be indicated upon photographs. Predicted changes to be described in the text. Section 12.1 - Assumptions - All woodland, trees and hedgerows removed on land occupied temporarily during construction will be replaced; and enhanced. A residential visual amenity assessment will not be carried out. It is unclear why this is the case and it should be included. It is also unclear why there is to be unmanaged woody

	vegetation. All landscape mitigation measures, or replacement planting is to be maintained and managed Section 12.2 - Risks – the agreed Tempsford alignment route 1b and 1c is not yet confirmed
Flood Risk and Drainage	Section 4 We will expect the pending National Flood Risk Assessment (NaFRA) 2 mapping updates be accounted for and this scoping document informed accordingly. The Environment Agency is undertaking a catchment wide assessment of modelling and risk called the 'GOSIS' project and we expect this to be accounted for and this scoping document informed accordingly. Section 4.1.3 We expect that this encompasses the most recent widespread flooding in January and September 2024 to inform this work, ensuring that data already sought does not miss this out and the project sis informed by up to date records and events, and changes in risk and resilience, through the development of the projects lifecycle. Section 4.14 This element should work with the Drainage and Wastewater Management Plans (DWMP) process and future Asset Management Plan (AMP) cycle planning, this should be made clear as to the approach. Section 4.1.5 Groundwater data is likely to be limited in terms of geographical coverage and accuracy. Bespoke borehole monitoring may be necessary, with a programme developed for its delivery. Similarly, river telemetry may require a tailored approach to collect and monitor data at specific locations, ensuring greater accuracy in project deliverables compared to reliance on generic data collection or the existing data network. We would like to see commitment to this. Sections 4.2.1 and 4.2.2 No survey work has yet been undertaken to support flood risk assessments. We are therefore concerned about the viability of the options already presented for consultation. We request that this be developed in collaboration with the Lead Local Flood Authorities (LLFA),

	Internal Drainage Board (IDB), and Environment Agency (EA), with outputs shared in a timely manner. Section 4.3.1 The comments in the paragraph above are also relevant to this section. Section 4.4.1 We understand the intention is to apply a 1km buffer, however as referenced the impact of flood risk up and downstream will reach beyond this defined spatial boundary. We ask that a bespoke approach to considering catchment level implications be provided and agreed in consultation with the LLFAs, IDB and EA. Section 5.3.2 Data has been requested with regards to non-main rivers from the IDB and LLFAs, however this information will be limited and the project should undertake its own surveys and modelling to address this data source/project input. Section 5.4.1 Surface water as a source of flood risk is only briefly addressed. The mapping provided by the EA, alongside the pending NaFRA 2 data, offers sufficient information to identify critical flow paths and drainage areas related to surface water. We recommend this be reviewed to better inform the baseline. Section 5.7 Regarding the future baseline, while climate change scenarios are considered, the cumulative impact of new developments, including housing and town growth, should also be factored in. This should include changes in land use management, increased runoff due to altered catchment characteristics, and the loss of natural flood management features. Section 8.2.2 This section states that the preferred approach is to avoid flood risk areas. However, the proposed options already consulted on are situated within areas of known fluvial flood risk (Flood Zones 2 and 3) and surface water risk. This raises concerns about whether this principle has been applied with integrity. This likewise applies to statements in 8.2.4 ("Reducing interaction with areas of Flood Zone 2 and Flood Zone 3 as far as practicable"). 8.2.4 should also go further by requiring flood betterment. This should include ensuring no net increase in flood risk

	from any source, providing compensatory measures not only for fluvial losses but also for surface water impacts. Additionally, it should promote wider catchment benefits in flood risk management through the delivery of the proposed measures and infrastructure.

Planning and Development

David Peckford, Assistant Director – Planning and Development

Cherwell DISTRICT COUNCIL NORTH OXFORDSHIRE

Karen Wilkinson
Senior Environmental Impact Assessment Advisor
on behalf of the Secretary of State
Environmental Services
Operations Group 3
Temple Quay House
2 The Square
Bristol, BS1 6PN

By email to: eastwestrail@planninginspectorate.gov.uk

Bodicote House
Bodicote
Banbury
Oxfordshire
OX15 4AA

www.cherwell.gov.uk

Please ask for:	***Caroline Ford***	Direct Dial:	***01295 221823***
Email:	[redacted]***@cherwell-dc.gov.uk***	Your Ref:	***TR040012- 000019***

30th January 2025

Dear Sir/ Madam

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulations 10 and 11

Applicant's Name:	East West Railway Company (EWR Co)
Proposal:	Scoping consultation and notification of the Applicant's contact details and duty to make available information to the Applicant if requested
Location:	East West Rail – focussing on Route Section 1 – Oxford to Bletchley (within the Cherwell District)

Thank you for consulting Cherwell District Council (CDC) as Local Planning Authority (LPA) regarding a Scoping Opinion for the next phase of East West Rail.

This letter is the Council's response under the Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulations 10 and 11 relating to an expected application by East West Railway Company Limited (the Applicant) seeking an Order granting Development Consent for the next phase of East West Rail (the Proposed Development).

The Scoping Report outlines for Oxford to Bletchley (the section of the proposal which passes through Cherwell District) that the proposed works are as summarised below:

- *Track upgrades at Oxford.*
- *Potential alterations and upgrades at Oxford, Oxford Parkway, Bicester Village, Winslow, and Bletchley stations to accommodate increased East West Rail passenger numbers. The changes required would depend on the results of passenger demand forecasting and pedestrian modelling, as well as other future operational requirements.*
- *Closure of the level crossing at Bicester London Road and the construction of an accessible replacement crossing for pedestrians, cyclists and other users of the crossing, either via a footbridge or an underpass.*

- *Widening of the rail corridor to the east of Islip and at Middle Claydon to create passing loops, resulting in the demolition and reprovision of existing footbridges at both locations to maintain public rights of way (PRoW).*
- *Utility and traction power works to accommodate overhead line equipment (OLE) across the route, with the largest two diversions to electrical infrastructure at Oxford Parkway station and Verney junction.*
- *Connections with the Quainton substation or the East Claydon substation, to provide power for East West Rail trains.*

Quoted verbatim from the scoping report, although please note that the closure of the London Road level crossing for vehicular traffic is a highly contentious matter for the residents of Bicester. There are strong community views and concerns that the proposed closure would effectively cut-off one half of the town from the other. In the Council's recent response to the Non-Statutory consultation, we set out our expectations around the detailed examination of the impacts in this respect before the Council can comment formally in due course.

We comment as follows in respect of aspects within Cherwell District:

Overall scope

It is recommended that the Environmental Statement required for the proposed development should cover the format and topics as proposed by the applicant. CDC has considered the scope of each chapter to remain in the Environmental Statement and provides advice below as to where that scope should be widened.

The EIA should be undertaken in accordance with current legislation, national, regional, local and neighbourhood plans as relevant to the environment. The Environmental Statement should demonstrate the ways in which it complies with that requirement.

The relevant documents of the Development Plan for Cherwell District Council's area should be considered and comprise the following:

Cherwell Local Plan 2011-2031 Part 1 (CLP 2031 Part 1)
Cherwell Local Plan 2011-2031 Part 1 (Partial Review – Oxford's Unmet Housing Need)
Cherwell Local Plan 1996 Saved Policies (CLP 1996)

The Council are currently consulting at Regulation 19 stage on its Cherwell Local Plan Review 2042.

Committed Developments

The Scoping Report does not provide a list of planning permissions or allocations taken account of in the Council's district area but it does note the criteria planned to be used to identify cumulative projects. The Local Planning Authority would highlight the allocations in the above mentioned Local Plans.

The Local Planning Authority would also highlight that the proposals appear to impact on Stratfield Brake playing pitches and include areas of Oxford Green Belt.

Further the proposals to relocate Oxford United Football Club are currently under consideration under planning application reference 24/00539/F. Given the proximity of the proposals to Oxford Parkway Station these should be factored into the consideration of the Environmental Statement.

Establishment of links to Begbroke Science Park and enhancement of pedestrian and cycle connections and public transport to the wider area are important. The project should also support the potential for a new Station at the Science Park with land being safeguarded as part of planning application 23/02098/OUT.

The Council notes that the Environmental Statement will seek to include consideration of committed developments and welcomes this consideration. However, without a full list, the Council cannot consider whether all committed developments have been considered and included.

The Council recommends that a list of committed developments is agreed at an early stage to ensure that the Environmental Statement forms an appropriate assessment.

EIA Scoping Method Statements:

We have received limited technical input from our Internal Consultees on the chapters set out or the proposed methodology to be adopted at this stage but the Council reserves its right to comment further upon receipt of the EIA. Planning Officers make the following comments:

Mitigation

It is noted that embedded mitigation (including the requirement for a code of construction practice, designs to allow for changing climate scenarios amongst others) will be assumed to be an integral part of the project and its impacts assessed on this basis.

Agriculture and soils
It is agreed that this topic should be scoped into the EIA. The LPA have no comments on the proposed scope but would highlight that impacts within the Cherwell District are likely to be limited to impacts relating to the Islip passing loop (widening of existing railway corridor) and the London Road level crossing, depending on the option chosen there (unless other proposals involve ground works) given that the line is otherwise in place within this District. Comments from consultees where the line is not yet in place should be taken into account.

Air Quality
It is agreed that this topic should be scoped into the EIA as set out. The LPA have no comments on the proposed scope. Please note Cherwell District Council currently have two designated air quality management areas (AQMA), one is an area around Kings End, Queens Avenue, Field Street and St. Johns, Bicester. An air quality action plan has been developed which aims to reduce the level of air pollution in this AQMA to below the national air quality objective. This is available on the Council's website and should be taken into account given the proposals to divert traffic in Bicester due to the current proposals to close the London Road level crossing to vehicles.

Communities and Health
It is agreed that this topic should be scoped into the EIA as set out. The LPA have no comments on the proposed scope.

Electro-magnetic interference
It is agreed that this topic should be scoped into the EIA as set out. The LPA have no comments on the proposed scope.

Land Quality
It is agreed that this topic should be scoped out of the EIA and this notes the work related to contamination planned to be undertaken separately to the EIA process and, specifically for the Cherwell District, takes into account that the majority of the line is in place within this District (other than as set out above).

Socio-economics
It is agreed that this topic should be scoped into the EIA as set out. The LPA have no comments on the proposed scope. Please note our comments under traffic and transport with regard to the London Road level crossing in Bicester.

Sound, noise and vibration
It is agreed that this topic should be scoped into the EIA as set out. The LPA have no comments on the proposed scope.

Traffic and transport (journeys and access)
The LPA agree that this topic should be scoped into the EIA. Comments from Oxfordshire County Council as the Highway Authority who would advise Cherwell District Council should be taken into account in defining the scope of this topic.

The Council would stress that consideration needs to be given to both the environmental and socio-economic impact of closing the London Road level crossing in Bicester and diverting traffic to other routes.

Biodiversity
It is agreed that this topic should be scoped into the EIA as set out. The LPA have no comments on the proposed scope.

Water resources
It is agreed that this topic should be scoped into the EIA as set out. The LPA have no comments on the proposed scope.

Historic Environment
It is agreed that this topic should be scoped into the EIA as set out. The LPA have no comments on the proposed scope but would highlight the presence of heritage assets throughout the Cherwell District, including a listed building 'Station House', immediately adjacent to the London Road level crossing in Bicester and would highlight the historical and cultural links in respect of London Road, Bicester and the assessment of the impact that would arise from the proposals.

Landscape and visual
It is agreed that this topic should be scoped into the EIA as set out. The LPA have no comments on the proposed scope and note reference to impacts between Oxford and Bedford being contained to more discrete locations where changes to the line are proposed.

Carbon (greenhouse gas) emissions
The LPA are concerned about the areas scoped out for carbon for the Oxford to Bletchley line. Whilst the works may be more minor in this area compared to those elsewhere, there would still be proposed works that would have impacts on carbon which should be considered (including new passing loops, alterations at stations and a solution at the London Road level crossing which is not yet defined). The areas proposed to be scoped out should be scoped in, in our opinion.

Major accidents and disasters
The LPA have no concerns with this topic being scoped out of the EIA due to significant effects being mitigated through compliance with requirements set through other regulatory processes.

Material resources and waste
It is agreed that this topic should be scoped into the EIA as set out. The LPA have no comments on the proposed scope.

<u>Other Assessments</u>

We understand these to be outside the scope of the EIA but are related to and supportive of the wider environmental assessment and many of the EIA workstreams.

BNG
The LPA is pleased to see that the approach to BNG has been developed with consideration to the mandatory BNG requirements. The LPA is supportive of the approach to achieve a 10% net gain and will expect to see full details as to how this is to be achieved. The monitoring of BNG is an important aspect and we are interested to know more about this.

Habitat Regulations Assessment
The LPA have no comments on the content of the scoping report in relation to this topic.

Climate resilience
The LPA have no comments on the content of the scoping report in relation to this topic.

Equality impact assessment
The LPA have no comments on the content of the scoping report in relation to this topic.

Flood Risk
Following input from the Council's Land Drainage Engineer, I can confirm that the Council is satisfied with the applicant's approach to flood risk as set out on pages 162 – 163 of the Flood Risk Assessment section of the EIA Scoping Document. This Statement satisfactorily addresses how flood risk from all sources will

be considered. We would also expect comments from the Lead Local Flood Authority at Oxfordshire County Council and the Environment Agency to be taken into account.

Water Framework Directive
The LPA have no comments on the content of the scoping report in relation to this topic.

Arboriculture
The LPA have no comments on the content of the scoping report in relation to this topic.

Cherwell District Council is broadly in agreement with the Environmental Statement topic areas set out and the identified areas of environmental impact. We hope our comments made above are helpful in a scoping opinion for this development being adopted.

Yours faithfully

Caroline Ford
Development Management Team Leader (South Area Major Projects)

Clapham Parish Council

Response to the Planning Inspectorate's Environmental Statement (ES) Scoping consultation on East West Rail (EWR)

Table of Contents

Introduction

Thank you for consulting Clapham Parish Council (CPC) on the scope, and level of detail, of the information to be provided in the Environmental Statement relating to the Proposed Development.
CPC members have reviewed the documentation and have made a number of suggestions about areas we would consider to be in scope due to the considerable impact of the scheme on Clapham and its locality. As stated in our formal response to the non-statutory consultation, Clapham has been overlooked in terms of the impact EWR will have on it.

We would also highlight that the EIA scoping may need to change should additional receptors and potential impacts be identified as further project details emerge.

Please note that this response should also not be taken to imply any acceptance of the planning merits of the scheme and simply sets out the Council's response to the Scoping Consultation as it currently exists.

The Council is not a technical expert and given the consultation timescales have not been able to commission consultants to review the documents. CPC has made a number of detailed comments, by subject area and by detailed references to tables/sections in the scoping documentation.

On the combined impacts of the scheme, CPC suggests that interactions between the specialist topics is essential to the production of a robust assessment, and the ES should not be a collection of separate specialist topics, but a comprehensive assessment of the cumulative impacts of the proposal and how these impacts can be mitigated. This will help to ensure that the ES is not a series of separate reports collated into one document, but rather a comprehensive assessment drawing together the impacts of the proposed development.

Construction Environment Management Plan

CPC consider that a Construction Environment Management Plan must be submitted with the application. This will need to include appropriate amenity and highway safety mitigation measures.

Decommissioning

CPC considers that a draft decommissioning plan should be included within the application once construction is complete to provide some certainty that the decommissioning measures and waste recycling measures and site safety measures have been fully considered and are in place.

Air Quality

CPC questions whether as part of the assessment of Air Quality, there should also be a monetary valuation of air quality impacts. Air quality is known to have an impact on human health, wellbeing and the environment, and a damage cost calculation would seem an appropriate way to guide mitigation efforts and ensure resources are allocated to reduce harm.

Photomontage

With reference to sections 5.2.24ff, CPC considers visual impact of the proposed viaduct, the embankment and cutting to be significant. Sufficient photomontages prepared for key viewpoints should be undertaken to fully understand the impact of the proposals. This needs to be assessed from a number of viewpoints, and agreed with the Council

CPC would like to emphasise the importance in assessing the visual effects on Clapham and its environs and landscape together with any physical effects of the development, such as changes in topography. Changes in characteristic views may need to be considered.

Pollution

CPC requests that pollution prevention measures are considered throughout the process, with all precautions taken to avoid discharges and spills to the ground both during and after construction.

Mitigation

CPC requests that only mitigation measures which are a firm commitment and can be shown to be deliverable should be taken into account as part of the assessment. It would be helpful if the mitigation measures proposed could be cross referred to specific provisions and/or requirements proposed within the draft development consent order.

Consideration of Alternatives

CPC expects that the ES should set out an outline of the main alternatives studied by EWR and an indication of the main reasons for the applicant's choice, taking account of the environmental effects.

Health Impact Assessments

CPC note that there are currently no Health Impact Assessments (HIA). We understand HIAs inform the likely health impacts a development may have, judging if those impacts will be positive or negative and suggests how the effects of positive impacts could be increased, and negative impacts reduced. CPC suggest they are undertaken.

Historic Buildings

Section 5.6.13. lists locally listed assets within Clapham. There is no mention of the Church of St Thomas of Canterbury (also Clapham Parish Church) which was listed as a Grade I listed building in 1964. This is an omission.

Bats

Section 5.5.2 states there were no statutory designated sites with birds as a qualifying feature within 5km or bats as a qualifying feature within 10km of the Project within this section.

It is important to note that the recent planning application, now consented for the new Greenacre School along Manton Lane, which is accessed via Clapham Road, included a bat survey report. The report highlighted significant number of bats in the area. It is important that any surveys take into account the ways animals move through the area and what effects the new route would have. Therefore, consideration should be given to conducting crossing point surveys and landscape scale transect surveys for bats. Impacts on bats should therefore be in scope.

Specific references to tables/sections

6.3.19 Air Quality (Table 10)

All areas should be scoped in.

The impact on our community and locality of emissions and odours from operational diesel trains, including those from over five years of construction plant cannot be ignored and should be scoped into the Report.

6.4.20 Human health and communities (Table 11)

All areas should be scoped in.

The influx of workers, temporary and permanent, will have an enormous impact on public services, and infrastructure, including the impact of the demand for emergency services.

Accessibility as per the Equalities Act 2010 needs to be considered an in scope.

This is likely to have an impact on the demand for future housing and/or local employment. Safety and security of our local community, both permanent and temporary needs to be consider and scoped in. See also 6.7.24.

6.5.14 EMI (Table 12)

All effects on wildlife should be scoped in.

6.6.23 Land Quality effects (Table 14)

Geodiversity – temporary and permanent operational effects need to be scoped in.

The potential for land contamination due to construction, also needs to be scoped in, due to the nature of materials used in construction.

6.7.24 Socio-economic effects (Table 15)

Increased demand for accommodation and community facilities due to an influx of workers should be scoped in. It is known from other major infrastructure projects that there has been an increased demand for local accommodation during construction, putting pressure on the local community members seeking accommodation, and driving costs higher.

Crime and safety should be scoped in. An influx of people, workers, is likely to have an impact on potential anti-social/criminal activity and should be scoped in.

6.8.20 Sound Noise and Vibration (Table 16)

All areas should be scoped in. Evidence from other major infrastructure projects has demonstrated the impact on local community of noise and vibration during construction and beyond into operations and is likely to have a high level of disturbance on people and places in and around Clapham.

CPC questions why temporary and permanent airborne noise due to horns/audible warning devices are out of scope. Current trains running along the Midland Mainline by Clapham create audible sound, and this is likely to be the same for the new railway. Therefore, CPC suggests this needs to be in scope. Noise from temporary and permanent disturbance from construction and operation should be in scope due to the high level of impact this is likely to have on Clapham and its locality.

6.9.19 Traffic and Transport (Table 17)

The consideration of road safety is critical and should be included. Extra congestion during construction is inevitable and Clapham has historic evidence of the impact of local engineering work during previous construction activity in the area.

All areas of table 17 should be in scope.

6.10 Biodiversity

Clapham is pleased to see the ancient woodland in our vicinity is in scope.

6.11.19 Flood risk and Water resources

All areas should be in scope due to the particular vulnerability of Clapham to flooding, as demonstrated by the increasing frequency and extent of flooding in the Clapham locality, including land and properties, in recent years. Groundwater and surface water receptors are critical to monitoring the growing risk of flooding. **This is the most critical risk to Clapham in the short, medium and longer term.**

CPC would expect there to be a robust methodology for addressing impacts on loss of floodplain storage capacity, together with an approach outlined for mitigating the effects of the proposed viaduct, when under construction and following completion. Flood flow routes across the flood plain will be interrupted as a direct result of the proposals. Please note there are locations where residential properties and businesses are within the flood zone.

We consider an integrated approach is critical to develop the site and river/flood storage areas. We would like to see the project fully implement Water Framework Directive, and the developed flood plain could form a priority wetlands Biodiversity Action Plan (BAP) habitat, which will help to improve water quality, such as through filtration. We would wish to see the area as an environmental asset to the people that live there.

From: [redacted]
To: East West Rail; [redacted]
Cc: info
Subject: FW: East West Railway notification of scoping report consultation
Date: 06 January 2025 10:41:52
Attachments: image001.png
image007.png
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image006.jpg
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You don't often get email from [redacted]@cngservices.co.uk. Learn why this is important

Karen

Thank you for your e-mail.

CNG Services does not believe that it needs to be included as a consultation body with respect to this project and will therefore not be making any comments.

Kind regards

Colin Brewster
Business Development Director
Email : [redacted]@cngservices.co.uk
Phone : [redacted]
https://www.cngservices.co.uk/

ENGINEERING NET ZERO THROUGH RENEWABLE GASES

Colin Brewster

From: East West Rail <EastWestRail@planninginspectorate.gov.uk>

Sent: 02 January 2025 15:01
To: [redacted]@planninginspectorate.gov.uk>
Subject: East West Railway notification of scoping report consultation

> You don't often get email from eastwestrail@planninginspectorate.gov.uk. Learn why this is important

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Dear Sir/Madam
Please see attached correspondence on the proposed East West Railway.

The Applicant for the Proposed Development intends to make an application for Development Consent under the Planning Act 2008. The Applicant has sought a Scoping Opinion from the Planning Inspectorate, on behalf of the Secretary of State, as to the scope and level of detail of the information to be provided within the Environmental Statement that will accompany its future application.

The Planning Inspectorate has identified you as a consultation body to inform the Scoping Opinion and is therefore inviting you to submit comments by 31 January 2025. The deadline is a statutory requirement that cannot be extended.

Further information is included within the attached letter.

Regards
Karen Wilkinson.

Karen Wilkinson (She/Her)
Senior EIA Advisor
The Planning Inspectorate
T 0303 444 5072
Helpline 0303 444 5000

@PINSgov The Planning Inspectorate planninginspectorate.gov.uk

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DPC:76616c646f72

Coton Parish Council
Cambridge

29 January 2025

Karen Wilkinson
Senior Environmental Impact Assessment Advisor
Planning Inspectorate
Environmental Services
Operations Group 3
Temple Quay House
2 The Square
Bristol, BS1 6PN

By email: eastwestrail@planninginspectorate.gov.uk

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulations 10 and 11

Application by East West Railway Company Limited (the Applicant) for an Order granting Development Consent for the East West Rail (the Proposed Development)

Scoping consultation and notification of the Applicant's contact details and duty to make available information to the Applicant if requested

Thank your letter of 2 January 2024 (TR040012- 000019). You have written as follows:

"The Planning Inspectorate has identified you as a consultation body which must be consulted before adopting its Scoping Opinion. The Planning Inspectorate would be grateful if you would:

- Inform the Planning Inspectorate of the information you consider should be provided in the ES; or

- Confirm that you do not have any comments."

Coton Parish Council considers that the following information should be considered in the Environmental Assessment of East West Rail:

- The comparative environmental impact of the proposed Northern Route, compared with EWR's current preferred Southern Route. Coton Parish Council supports the development of EWR. But Coton Parish Council understands that the Northern Route has been calculated to have a significantly lower environmental impact. Given that the purpose of EWR is to connect the "golden triangle" of London-Oxford-Cambridge, Coton Parish Council would request that the option of a route entering/leaving via the North of Cambridge and then continuing to (and from) London, should be the preferred route, and certainly remain an option.

Yours sincerely,

David Cairns
Transport Lead, Coton Parish Council

cc:

Tristan Lincoln-Gordon
Head of Environment
East West Rail Company
The Quadrant,
Elder Gate,
Milton Keynes
MK9 1EN
[redacted]@eastwestrail.co.uk

From: [redacted]
To: East West Rail
Subject: Consultation on Scoping Report (25/00008/CON)
Date: 29 January 2025 14:22:08
Attachments: image001.jpg

You don't often get email from [redacted]@dacorum.gov.uk. Learn why this is important

Dear Planning Inspectorate,

Thank you for consulting Dacorum Borough Council regarding the content of the Scoping Report for East West Rail. The Council do not have any comments to make in relation to this case.

Kind regards

Robert Freeman (he/him)
Lead Planning Officer
Dacorum Borough Council

T: 01442 228663 (ext.2663) or [redacted]
E: [redacted]@dacorum.gov.uk
A: The Forum | Marlowes | Hemel Hempstead | HP1 1DN

Visit our website for more information, news and events – www.dacorum.gov.uk

cid:image002.jpg@01DB2E9E.DA6D53B0

www.dacorum.gov.uk

The borough of Dacorum is in West Hertfordshire serving the towns of Hemel Hempstead, Berkhamsted and Tring and surrounding villages.

East Cambridgeshire District Council

www.eastcambs.gov.uk
ContactUs@eastcambs.gov.uk
01353 665555

Karen Wilkinson
The Planning Inspectorate
Environmental Services
Operations Group 3
Temple Quay House
2 The Square
Bristol
BS1 6PN

Via email only to:
eastwestrail@planninginspectorate.gov.uk

This matter is being dealt with by

Holly Durrant

Email: [redacted]@eastcambs.gov.uk

Phone: 01353 665555
My reference: EXT/00001/25
Your reference: TR040012-000019
Date: 31 January 2025

If you require this letter in large format, please email ContactUs@eastcambs.gov.uk.

Dear Ms Wilkinson,

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulations 10 and 11

Application by East West Railway Company Limited (the Applicant) for an Order granting Development Consent for the East West Rail (the Proposed Development)

Scoping consultation and notification of the Applicant's contact details and duty to make available information to the Applicant if requested

I write in relation to the consultation on the Scoping Opinion for the above development on behalf of East Cambridgeshire District Council as a relevant authority under Section 43(2) of the Planning Act 2008.

East Cambridgeshire District Council has reviewed the applicant's EIA Scoping Report and appendices (prepared by East West Rail and Mott MacDonald WSP-Joint Venture, dated December 2024).

The proposed Draft Order Limits and Draft Order Limits 2km buffer do not fall within East Cambridgeshire District Council's administrative boundary. The nearest settlement within the Council's boundary to the Proposed Development is Bottisham, c.4km to the east.

Comments from the Council's internal departments and specialist officers have been sought to inform this response. It is understood that Cambridgeshire County Council, Cambridge City Council

and South Cambridgeshire District Council as well as other relevant authorities have been consulted separately with opportunity to comment, and this response therefore seeks to comment on only those matters within the jurisdiction and specialisms of this Council and its functions.

Given the proximity of the Proposed Development from the Council's administrative area and nature of the Proposed Development, the Council does not request the inclusion of any additional information provided in the Environmental Statement than already outlined in the scoping documents.

Aside from the above comments, the Council defers to Cambridgeshire County Council regarding specialist advice on water/flood risk, archaeology, traffic and transport, human health, and waste and minerals. The Council also defers to all other relevant authorities as defined by Section 43 of Act for any matters within or affecting land within their administrative boundaries.

Yours sincerely,

Holly Durrant MRTPI

Major Projects Planning Officer
Planning Department
East Cambridgeshire District Council

cc: David Morren, Strategic Planning & Development Management Manager (ECDC)

From: clerk@eltisleyparishcouncil.co.uk
To: East West Rail
Subject: East West Rail - Eltisley Parish Council comments
Date: 27 January 2025 14:15:47

Dear Sir/ Madam

Eltisley Parish Council sent a representative to the St Neots consultation event in January and have asked me to make the following comments regarding the East West Rail proposal:

- Poorly designed scheme
- Destruction of landscape
- Impact on the environment
- Environmentally unfriendly
- Noise pollution
- Further industrialisation of the landscape

Kind regards
Alison
Alison Jackson

Parish Clerk

Eltisley Parish Council

Tel:01480468451

Privacy Notice- When you contact us.

The information you provide (personal information such as name, address, email address, phone number, organisation) will be processed and stored so that it is possible to contact you and respond to your correspondence, provide information and/or access our facilities and services. Your personal information will not be shared or provided to any other third party.

A copy of the Councils email privacy notice is available on the website

East West Rail
The Quadrant
Elder Gate
Milton Keynes
MK9 1EN

Our ref: AC/2024/132521/01-L01
ENVPAC/1/EAN/00131

Date: 31 January 2025

Dear Sir/Madam

EAST WEST RAIL - SCOPING OPINION

Thank you for consulting us on your Scoping report. Please find our comments below:

Flood Risk

Fluvial vs surface water flood risk

Although the Environmental Impact Assessment (EIA) scoping provides a more comprehensive assessment of surface water flood risk than normal, there is a big disparity between the level of detail proposed for the assessment of fluvial flood risk than flooding from surface water overland flows. We are concerned that there is no clear organised process around surface water modelling. There is a clear process for determining the need for fluvial modelling but for surface water the document just states that a qualitive assessment will determine the need. There is no justification provided as to why the same process for fluvial flooding cannot be applied to surface water flooding. There is a significant risk with this approach, although fluvial modelling is more complex, there is more detailed modelling already available. Surface water modelling is mostly based upon broadscale nationally indicative modelling, even the new national surface water model is indicative and broadscale. Therefore, the Flood Risk Assessment (FRA) is starting at a weaker starting point than fluvial modelling.

The climate change allowances used for fluvial assessment is clearly set out, whereas the allowances to be used for surface water has been left to a later date. Given the allowances and guidance is similar to those available to fluvial and tidal source, we do not understand why more detail has not been provided.

The EIA repeatedly refers to Flood Zones (FZ), where it should refer to areas of very high, high, medium or low flood risk. This is an inclusive term and should be used when referring to issues that relate to all sources of flood risk. This is in line with the National Planning Policy Framework (NPPF) and the Planning Practice Guidance (PPG). FZs should be used when referring only to issues only effecting fluvial or tidal flood risk i.e. the FZ compatibility test.

New Vs existing – wider benefits of assessing the operational risks to the line.

We understand the limitations of the scope of the FRA/ Environmental Statement (ES) regarding only assessing the areas where new assets are being constructed. We want to work with you to determine how the Development Consent Order (DCO) process can create a better awareness of the flood risks posed to the entire line and create a programme of

opportunities that can be instigated when opportunities arise either in the construction of new assets or over the operational lifetime of EWR. This will result in a continuous increase in resilience of the line and provide a structure to enable managed adaptation measures to react to the uncertain impacts of climate change.

With extreme weather increasing in frequency and impacts, it is sensible to consider the cost benefit of undertaking options now, that will safeguard the future of this key piece of infrastructure.

Assessment Factors
Within the *EIA Scoping Method Statement - Flood Risk, Tables 4 and 5* set out broad examples of the definitions of receptor importance and Magnitude of impact. In reality, these are not fit for purpose and a more detail set of defining characteristics will be needed going forward. For example, less vulnerable uses, such as commercial properties are only of medium importance but one of the key objectives of EWR is to stimulate economic growth. The examples of the magnitude of impact relate to fluvial flood levels, ignoring a host of other key criteria such as frequency and rate of onset of flooding.

The Design Manual for Roads and Bridges (DMRB) LA 113 is a good framework to base the assessment off. However, it is not directly compatible and is 5 years old. We would like to work with you and your technical partners, to develop a comprehensive set of assessment factors, that reflect the current situation and the objectives of the Oxford to Cambridge Corridor.

Modelling scope
We agree that the highest priority watercourses for modelling, based upon the scale of works being proposed, will be within the new sections of the rail line (Bedford to Cambridge). We are concerned, given the timeframe of the project and the acceleration of the Milton Keynes to Bedford section, that there are works being carried out that will meet the requirements for modelling as set out in this scoping document i.e. The expanded river crossing of the River Ouzel and the creation of passing loops over the Gallos Brook.

This is a significant concern given the timescales involved in creating and technical assuring modelling.

The use of the A428, with development, modelling is appropriate for the baseline scenario for this scheme. It should not be assumed that it will be fit for purpose. However, it should be technical assured, updated and modified to reflect the requirements of this scheme.

We agree with the approach to set a 1 km boundary from the draft order of limits, with scope to expand them where necessary. However, this poses a risk of delivery as this is likely to be identified at a late stage. We would also like to promote the expansion of model extents upstream and downstream where this would benefit nearby communities.

Awarded Watercourses
The Draft Order of limits includes watercourses that area classified as ‘Awarded Watercourses’ which fall under the Local Authorities (LA), although the Lead Local Flood Authority (LLFA) are still the consenting body. Mapping of Awarded watercourses can be found here: https://www.cambridgeshire.gov.uk/business/planning-and-development/flood-and-water/watercourse-management

Use of surface water mapping as a proxy for fluvial flood risk
This is an appropriate approach to provide an indication of the level of risk but should not be utilised as a definitive assessment of risk. There are too many assumptions within the modelling for it to be a reliable reflection of the current and future risk.

The release of the new national models for fluvial, tidal and surface water will improve these datasets and this approach will need to be reviewed once available.

Surface water flood risk linked to existing watercourses
The EIA Scoping Method Statement - Flood Risk 5.4.1 states that “As most watercourses also follow natural topography the most significant mapped surface water flood risks are also indicated to be associated with watercourses.” This is mainly true, but not universally in this catchment, especially in upper reaches or where the catchment is flat, or the risk is linked to high groundwater levels. We have experienced significant surface water flooding in areas not directly associated with existing watercourses.

Definition of significance.
It is a common issue with the practices of carrying out the EIA, that EIA refers to the significance of the impact, which allows for non-significant impacts. Where as, the NPPF and The National Networks National Policy Statement (NNNPS) state that the proposal should not increase the risk of flooding to third parties and strive to reduce risk where possible. Therefore, strictly speaking, even non-significant impacts will need to be mitigated for, if they impact third parties (post development so can include areas within the order of limits if the land will be sold on/given back). This is a common point of disagreement between Risk Management Authorities (RMA) and Applicants. We would like to come to a place of common ground on this issue as soon as possible.

Combined flood risk
The assessment will need to reflect how all the different sources of flood risk interact within a flood event. This includes how groundwater levels increase the impact of surface water flooding.
Climate change may exacerbate these interaction i.e. prolonged wet winters leading to higher ground water levels into summer periods that are at higher risk of intense storms.

Future baseline
We are pleased to see that climate change has been comprehensively covered within the flood risk scoping statement, but this is not the only change that is likely to change outside of EWR. This corridor is already an area of concentrated growth (both housing numbers and economic), which often outstrips the Local Plan allocations. EWR will likely accelerate this pattern of growth. There will be potential flood risk implications of this growth, and some consideration will need to be given to how this is reflected in the future baseline scenarios.

A catchment-based approach will also need to be considered in future scenarios. The Great Ouse’s response to storms is related to how each tributary feeds into the main channel. Currently the modelling is focussed upon distinct areas of impact but there will be a need to determine how the changes derived by climate change at a catchment scale, will impact the routes operation.

Climate Change Epoch used
The *EIA Scoping Method Statement - Flood Risk 5.8.5* identifies a minimum lifetime of 120 years. This is beyond the current climate change maximum epoch. We would welcome further discussion on how this issue will be resolved within the FRA and design.

The design principles differ between the assessment of the impact of flooding to the line to that of the impact from the line. We would welcome discussions on justifying this and way to bring together the two aspects under a single deign principle.

Mitigation including climate change allowances
The *EIA Scoping Method Statement - Flood Risk 8.1.4* states “It is assumed that mitigation measures are designed which take climate change into account,”. We are unsure why this is an assumption given the policy around this requirement.

Permanent Features effecting flood risk
We would welcome opportunity to work with EWR to ensure all permanent and temporary activities are scoped into the assessment. The illustrative list provided in the *EIA Scoping Method Statement - Flood Risk 7.1.2* is not comprehensive.

Scope of surface water drainage
We would like to see the design of the surface water drainage scheme to include more controls that those on the rate and volume of run off. We would like to see greater control of the reaction time of the system. Large scale drainage scheme results in a decrease in the reaction time of smaller watercourses which needs to be mitigated by EWR.

Draft Order of limits
The *EIA Scoping Method Statement - Flood Risk 8.1.3* refers only to flood compensation areas being included within the draft order of limits. We would like this expanded to include all mitigation measures.

Consideration will need to be given as to how net gain measures (biodiversity and flood risk reduction) can be integrated within the order of limits, given the DCO limitations on this issue.

Design Principles
The *EIA Scoping Method Statement - Flood Risk 8.2* lays out the flood risk design principles. We support them in principle but there is a lack of detail regarding the drainage strategy and how EWR will be approaching flood risk reduction to downstream communities. However, we welcome the commitment to enhance watercourses in terms of it flow profile, existing character and ecological value.

Design principles for temporary works.
We would welcome discussions on the proposal to utilise the 3.3% Annual Exceedence Probability (AEP) as the design flood event for temporary activities. We understand the principle behind this proposal but are concerned that this will be difficult to define and poses a residual risk to local communities.

Modelling fluvial flood risk groups
We are in general agreement with these groupings. But, would welcome further discussion to ensure that the implications are understood. The *EIA Scoping Method Statement - Flood Risk 9.2.1* group 2 refers to receptors being affected. This loose definition means that any likely impact on any 3rd party land will result in modelling. Figure 1 refers to 'vulnerable' receptors which provides more detail but is still not sufficiently defined.

Group 4 refers to straightforward crossings, with no existing flood risk issues. We need to understand what is classed as straightforward crossings are and how you can determine whether there are existing flood risk issues without some level of evidence.

We are pleased to see that the modelling principles include the identification of wider benefits.
The lower standard for the modelling of temporary works will need to be considered in areas where the 3.3% extent is not known or is uncertain. However, most temporary work sites will be in close proximity to permanent work sites, so they might be limited benefits in differentiating the modelling scope for these areas.

Land Contamination

It is proposed to scope the land contamination element of the land quality discipline out of the Environmental Statement (ES). We have concerns about this approach and consider that land contamination should be scoped in, as a minimum, where construction works are

proposed in proximity to landfill sites. This is due for the potential for such works to mobilise leachate from the landfills, or to mobilise groundwater already polluted by the landfills.

We are particularly concerned about the historic landfills at Coldham's Lane in Cambridge. We are aware that leachate escaping from these hazardous landfills is already causing or contributing to pollution of groundwater and surface waters for a range of contaminants including Perfluoroalkyl and Polyfluoroalkyl Substances (PFAS).

Project-related construction works in close proximity to these landfills are proposed and if undertaken could exacerbate this pollution. For example, if construction-phase dewatering were to be implemented. Regardless of scoping, we expect the potential risks to controlled waters from land contamination within the designated study area to be managed (as already proposed) in line with best practice and current guidance including the https://www.gov.uk/government/publications/land-contamination-risk-management-lcrm.

We understand that Preliminary Risk Assessments (PRA) for some sections have already been prepared, although these have not been provided.

Water Resources

Catchment Information

The location of this development is in an area of serious water stress (as identified in our report Water stressed areas - final classification (*https://www.gov.uk/government/publications/water-stressed-areas-2021-classification*).

Any water required as part of the construction and operation and its source needs to be considered. Water availability is dependent on the catchment. Most water related construction activities, including dewatering and dust suppression (which is considered a high loss fully consumptive activity) are licensable activities and as such, early consideration should be given to where the water can be sourced from. It is welcomed that all de-watering water will be returned to ground wherever possible.*

New consumptive groundwater licenses are not available, and surface water is restricted to high flows only. Maps noting the preferred route for this instillation intersects with two East Anglia catchments. Information on water availability can be found in the relevant Abstraction Licencing Strategy (ALS).

- Cam and Ely Ouse: https://www.gov.uk/government/publications/cam-and-ely-ouse-abstraction-licensing-strategy
- Upper Ouse and Bedford Ouse: https://www.gov.uk/government/publications/cams-upper-ouse-and-bedford-ouse-abstraction-licencing-strategy

Abstraction and Protected Rights

It should be noted that in Bedford there is a locally important sands and gravel aquifer as well as the principal Oolite aquifer with a number of smaller abstractions from it. (e.g. Queen's park allotments). The sands and gravel aquifer along the River Great Ouse corridor (e.g. from Bedford to St Neots) also has groundwater abstractions from it.

When approaching us for data, de-regulated abstractions (non-private water supplies) under 20m3/day, as well as other licensed abstractions should be requested. Data may also exist for private water supplies, although as correctly indicated in the assumptions section this data is mainly sourced from the LA. *EIA Scoping Method Statement – Water Resources, 11.1.1* has acknowledged that this data has not yet been received but will be studied in detail as the EIA progresses.

Development of the EWR should not detrimentally affect local water features (including streams, ponds, lakes, ditches, or drains) and this includes both licensed and unlicensed abstractions. Any disruption to surrounding abstraction licenses during and after construction and operation of the EWR must be avoided or mitigated.

The Scoping Report

We are in agreement with the items scoped in for this project (*EIA Scoping Report, Table 19*). It is important to note that temporary and permanent disruption to hydrological regime both from construction and operation of EWR should be assessed separately, which the *EIA Scoping Report, Table 19* does differentiate between. However, we note that for item 3 (Ground water receptors) in the *EIA Scoping Report, Table 19* there should be a similar statement for surface water (e.g. Surface water receptors – Temporary change in surface water quantity and quality arising from construction activities). We note though that these aspects may be covered by assessment items 4, 5, 6, 7, 8 and 9 in Table 19.

It is noted that unproductive strata is scoped out. It is not clear how unproductive strata will be defined. Is it based on site specific information or just British Geological Survey (BGS) mapping? Site specific information is preferred as relying on BGS mapping alone is not a very robust method to scope something out as it is not always accurate at a localised level. This is especially relevant if works at a significant depth below ground level is needed for construction in areas of 'non-aquifer'. Therefore, we do not consider that unproductive aquifers should be scoped out entirely. Shallow or unproductive aquifers may have licenses or small private supplies connected to them and should be considered.

The report notes that groundwater abstractions, surface water abstractions, groundwater – surface water interaction (springs and sinks) and discharges have been identified as receptor types (*EIA Scoping Method Statement – Water Resources, 6.1.3*) and thus the assumption is made that these are scoped in as surface water and groundwater receptors in *EIA Scoping Report, Table 19*.

The *EIA Scoping Report* has shown evidence that it is considering impacts to licensed and private groundwater and surface water abstractions, groundwater/surface water interactions (springs and sinks), and licensed discharges to groundwater or surface water (*EIA Scoping Report, 6.11.1*).

Groundwater and surface water abstractions are also noted as being identified as receptor types as part of the EIA process (*EIA Scoping Report*, 6.1.3). The project notes that detailed information regarding groundwater and surface water abstractions within the study area will be sought from us (*EIA Scoping Method Statement – Water Resources, 5.2.1*).

The *EIA Scoping Method Statement – Water Resources 6. Preliminary baseline description* details abstraction licenses located within the study area section by section. Abstractor information and impact must be fully understood ahead of any construction and we encourage early engagement with us to establish this. The licenses identified must not be affected by the construction and operation of the EWR. Any impacts on water quality, drainage, or hydrological flow caused during construction and operation may impact local and downstream licence holders and their ability to abstract and must be avoided. The impacts of the construction and operation of the EWR on these abstractions should be investigated, and if there are likely to be impacts, derogation agreements will need to be sought in order to, support any abstraction licence applications.

The report notes the sources that will be used to establish a baseline for the purposes of the water resources assessment (*EIA Scoping Method Statement – Water Resources, 5.2.1*). Notably detailed information regarding groundwater and surface water abstractions within the study area.

The *EIA Scoping Method Statement – Water Resources 6.1.11* mentions a 1km search radius as standard from the 'central line for looking for receptors. It is welcomed that a wider search area will be considered in 'more sensitive' locations e.g. over chalk aquifer or where significant de-watering for structures is required. However, it is not clear how this 'more assiduous' approach will be defined. We would suggest that a 1km search distance is a minimum distance along the whole route, and where principal (chalk or Oolite) or secondary sands and gravel aquifer is present this area is substantially increased. We would welcome further engagement with us on this methodology as the scheme progresses.

The EIA should fully assess whether any de-watering will be required in order to lay subsurface infrastructure/ foundations. If de-watering may be required, the amount (rates and duration) of dewatering required for each associated infrastructure (or specified length of infrastructure) should be assessed. Methods of de-watering to lay infrastructure should also be detailed. It should then be assessed as to whether the de-watering for the construction of the infrastructure will require an abstraction licence (as per the Water Act 2005) or whether it will be covered by the construction de-watering exemption regulations (2017). This should be assessed at the ES stage to avoid issues further down the line and bearing in mind the process to gain any abstraction licence required for construction de-watering can be lengthy.

Construction and Operational Water Supplies

The water used during the construction phase needs to be considered separately to the water to be used during the operational phase of the development. Early consideration should be given to where the water can be sourced from where the water company isn't the provider due to limited water availability. If sourced from water companies, then engagement is required from EWR to ensure that this supply has been considered in their latest draft or published Water Resource Management Plan (WRMP) 2024. We would expect to see this evidenced. Designs should consider where the water supply will be sourced from as various water companies utilise transfer schemes to pipe water from distant catchments. Consequently, additional water supply may not necessarily be abstracted within the catchment and impacts from increased demand may extend beyond the locality of the project. Consideration should be given to the phasing of the installations and whether this can match the water companies' ability to supply sustainably. We also encourage the phases to consider accommodating for any strategic measures mentioned in the relevant WRMP.

Most water companies are heavily reliant on the success of demand management measures to maintain supplies until new strategic sustainable supplies can be developed. Therefore, greater water efficiency and re-use should be incorporated into designs wherever possible to help water companies meet their water efficiency targets, and we would expect to see this evidenced. It is possible that you will be required to secure water efficiency and re-use schemes or further detail through Requirements will be recommended.

Any buildings constructed that require a domestic supply to operate (e.g. water for operation, stations, cafes, toilets etc) need to be considered separately. We would expect non-domestic buildings to achieve full credits in the Building Research Establishment Environmental Assessment Methodology (BREEAM) water-related categories (WAT01, WAT02, WAT03 & WAT04) to ensure water efficiency in the design, meeting the 'Excellent' standard and pushing for 'Outstanding'. Any new demand will require discussion to take place between EWR and Anglian Water Services (AWS)/Cambridge Water Company (CWC) to ensure water can be sustainably supplied and is factored into their respective WRMPs. It is noted that further stakeholder engagement with water companies is scheduled to take place (*EIA Scoping Method Statement – Water Resources, 5.3.1*). You will need to show evidence that you are reviewing and acknowledging water company WRMPs to help deliver targets. Additionally, AWS have adopted a Non-Domestic Water Requests Policy for which it asks of applicants who require non-domestic water supply to complete a Water Resource Assessment (WRA) to understand water demands, water efficiency measures and to effectively forecast water supply requirements. We would expect to see this evidenced. Note

there is a recent statement from AWS regarding their non-domestic policy and restrictions to supplying some new connections: https://www.anglianwater.co.uk/siteassets/developers/new-content/pre-dev/aws-non-domestic-demand-policy-sm.pdf. Therefore, we advise that you engage in conversation with AWS to ensure that supply can be achieved for the development's needs.

Licensing Requirements

The *EIA Scoping Report, 6.11.13 & Water Resources Method Statement, 7.2.1, 7.3.1* mentions various activities that may temporarily and/or permanently alter surface and groundwater hydrological regimes (e.g. water course diversion, over-pumping, dewatering, surface and subsurface activities/instillations) you will need to consider what type of licences/permits (abstraction, transfer, impoundment, discharge) will be required to facilitate these activities. We strongly encourage that you to engage with us well in advance of the construction activities to determine a licencing/permit plan for the various phases of the project.

Information on whether a licence is required and the type of licence you may need can be found here: https://www.gov.uk/guidance/check-if-you-need-a-licence-to-abstract-water.

Note that dewatering may need to demonstrate that it is non-consumptive to the local environment for it to be licensed, which is noted in the report (*EIA Scoping Report, 6.11.12*). Any temporary and/or permanent field drains that affect dewatering of the site need to consider the effect on the hydrological regime and impact on protected rights. Where licences/permits are required, an enhanced pre-application should be submitted to allow adequate time for determination by us.

A parallel tracking approach between planning and permitting is highly recommended. If de-watering is or may be required then a Hydrogeological Impact Assessment (HIA) should be produced as part of the ES to show the potential impact on identified water features and protected rights (including licensed and unlicensed abstractions). Construction methods should be adopted that minimise the amount of de-watering that will be required.

**If dewatering is required, the applicant may require an abstraction licence if it doesn't meet the exemption in The Water Abstraction and Impounding (Exemptions) Regulations 2017 Section 5: Small scale dewatering in the course of building or engineering works.*
If the applicant does not meet the exemption and requires a full abstraction licence, they should be aware that some aquifer units may be closed for new consumptive abstractions in this area. More information can be found on our website: Abstraction licensing strategies (CAMS process) - GOV.UK (www.gov.uk) and Apply for a water abstraction or impounding licence - GOV.UK (www.gov.uk)

WFD and Water Body Protection

Developments should not negatively affect any Water Framework Directive (WFD) waterbodies. In addition, no deterioration should occur in any Sites of Special Scientific Interest (SSSI) or Ramsar sites covered by the Habitats Regulations (HR). The WFD assessment should highlight the two key objectives of no deterioration in waterbody status with the ultimate aim of improving all waterbodies to 'Good' status. Any activities on-site could have an impact upon local wells, water supplies and/or nearby watercourses and environmental interests. It is noted that WFD will be facilitated by a standalone Water Environment Regulations (WER) assessment which will take place as a separate screening and scoping exercise, which should include relevant engagement with stakeholders (*EIA Scoping Report, 7.1.1 & 7.7.2*). Where the project intersects with or has a proximity to WFD and HR sites, extra care or evidence may be required relating to the impacts when applying for a water resources licence. The applicant should note that ensuring dewatering is non-consumptive will also support achieving WFD outcomes.

Additionally, the development area includes several Source Protection Zones (SPZs). Sensitive areas such as these surrounding public water groundwater abstraction points must be kept free from any sources of contamination.

Groundwater and surface water effects (both temporary and longer term) are noted and are separately distinguished (*EIA Scoping Report, Table 19 & 6.11.21*). It is important to note that temporary and permanent disruption to hydrological regime both from construction and operation of EWR should be assessed separately. Permanent installations (tunnelling, diversion of water courses, culverts, embankments) may alter the hydrological regime and thus have impacts for ecology and protected rights.

Assessment of temporary disruption should consider how long the temporary impact lasts and whether/how soon the hydrological regime will return to pre-activity status and the relevant derogation agreements are in place to protect abstractors. If long-term/permanent effects are anticipated, we would expect a full assessment of the likely risks to associated groundwater and surface water receptors.

9.3.2 of the *EIA Scoping Method Statement – Water Resources* does acknowledge direct impact, indirect impact and no predicted impact on water resources. *EIA Scoping Method Statement – Water Resources 9.5.1* identifies that cumulative effects will also be considered. We would encourage this approach, factoring in all the different types of impact that may arise from the project.

It is noted further stakeholder engagement (including with us) for documentation evidence in order to inform water resource assessments is scheduled to take place (*EIA Scoping Method Statement – Water Resources, 5.3.1*). We would encourage this engagement to take place well in advance of any construction phases to establish a suitable water resource assessment of the study area.

EIA Scoping Method Statement – Water Resource 6.9.1 – Cambridge it has been highlighted that Nine Wells chalk springs could be a possible receptor to potential contamination. This should also be extended to all recognised chalk streams/rivers/waterbodies located along the route and classed as possible ecological sensitive areas.

12.3 Opportunities – EIA Scoping Method Statement – Landscape and visual. It is mentioned that wetlands will be used to filter surface water runoff, allowing it to recharge the aquifer in chalkland areas. There is no mention of where these wetlands would be so it would be helpful for these sites to be identified to see if they would be in areas that would allow such recharge and if they are in locations that would beneficial (i.e. around the headwaters of chalk streams). It is also mentioned that EWR would like to explore opportunities to improve flows to Nine Wells and Hobsons Conduit. Although, it would be good to improve the flows, the stream is already augmented by Cambridge Water Company, so consultation on any work would need to be carried out between East West Rail, the water company and us.

Water Quality

The report has considered all of the necessary aspects that we would expect at this stage**.**

Biodiversity Net Gain

EIA Scoping Report 7.2.1 It is discouraging to note that the EWR project has no aspirations to improve upon the minimum of 10% Biodiversity Net Gain along the route. Given the scale of the project, as well as the project being in the pre-design stages, it would be encouraged at this stage to aim higher than the obligatory amount of 10%.

EIA Scoping Report 7.2.7 The 5th bullet point states, "…*through habitat retention, creation and enhancement, generating a minimum 10% increase in habitat units*…". It is suggested that this is amended to remove the word "retention", as habitat that is retained can not be included in a net gain figure for biodiversity.

EIA Scoping Report 7.4 focuses solely on the impact of climate change to the project in terms of assets as receptors of increasing risk. A project with this level of likely public scrutiny may wish to consider investigating the impact of the project on the climate, and how it may be mitigated. This is associated with the section 7.2 regarding biodiversity net gain and the role that may have in reducing climate impacts through carbon sequestration.

EIA Scoping Report 7.6.2 refers to terms that require definition and agreement thereof, relating to flood risk: "…*significant watercourses*…": what is regarded as "significant"? and "…*straightforward crossings*…": what is meant by "straightforward"?
EIA Scoping Report 7.6.5 It is encouraging to note that the surface water drainage assessment will take account of predicted increases in peak rainfall intensity. We would suggest that not only changes in intensity, but also in length of peak intensity, as well as event frequency be assessed as well, commensurate with patterns identified by The Intergovernmental Panel on Climate Change (IPCC), UK Climate Impacts Programme (UKCIP) and other recognised bodies.

Please do not hesitate to contact me for any further information or detail on the comments provided.

We look forward to the provision of more detailed plans and assessments, and the ability for further engagement with you on all matters within out remit.

Yours faithfully

Neville Benn
Planning Specialist
Sustainable Places
[redacted]
Direct e-mail [redacted]@environment-agency.gov.uk

From: [redacted]
To: East West Rail
Subject: East West Rail EIA Scoping Consultation - TR040012
Date: 29 January 2025 15:38:42
Attachments: image001.jpg

Thank you for consulting the Forestry Commission on this proposal.

As a Non-Ministerial Government Department, the Forestry Commission provide no opinion supporting or objecting to an application. Rather we provide advice on the potential impact that the proposed development could have on trees and woodland including ancient woodland.

There are no ancient woodlands within the proposed order limits and we acknowledge these have been avoided as much as possible. However there are several adjacent to the order limits or in close proximity. Those in close proximity to the existing sections of line would experience less of a change in air and dust pollution for example, than those ancient woodlands in proximity to the new proposed sections of line as the development would represent a bigger change in environmental conditions. The scoping document does not identify any ancient or veteran trees, however there may be some that are as yet unidentified by the Ancient Tree Inventory.

Ancient Woodland is an irreplaceable habitat. As highlighted in paragraph 5.62 of the National Networks National Policy Statement which states:

"Ancient woodland and ancient and veteran trees are irreplaceable habitats. England's ancient woodlands and ancient and veteran trees support high levels of biodiversity. They are home to a quarter of England's priority species for conservation and once lost they cannot be recreated. They also deliver many ecosystem services including clean water and healthy soils, carbon storage, support for people's wellbeing and their long-standing cultural values. The Keepers of Time published in 2022 updates the government's policy to recognise the value of England's ancient and native woodlands and ancient and veteran trees. It restates the government's commitment to evaluate the threats facing these habitats and sets out updated principles and objectives to protect and improve these habitats for future generations."
We would particularly refer you to further technical information set out in Natural England and Forestry Commission's Standing Advice on Ancient Woodland – plus supporting Assessment Guide and "Keepers of Time" – Ancient and Native Woodland and Trees Policy in England.

The Standing Advice states that proposals should have a buffer zone of **at least** 15m from the boundary of ancient woodlands to avoid root damage which can result in loss or deterioration of the woodland. Where assessment shows impacts are likely to extend beyond this distance, you're likely to need a larger buffer zone. For example, the effect of air pollution from development that can result from a significant increase in traffic or dust from construction.
Where possible, buffer zones should contribute to wider ecological networks and be part of the green infrastructure of the area. They should consist of semi-natural habitats such as including woodland, scrub, heathland and wetland. There is a need to consider both the direct and indirect impacts resulting from construction.

Direct impacts can include, but are not limited to, damaging or compacting soil,

damaging functional habitat connections and changing the woodland ecosystem by removing the woodland edge or thinning trees. Indirect impacts can also include increasing the amount of dust, light, air or soil pollution and changing the landscape character of the area.

We would expect to see a detailed assessment of any impacts to the ancient woodland, including details of measures to be taken to reduce and mitigate any effect. Protection measures include taking care not to cut tree roots (e.g., by trenching) or causing soil compaction around trees (e.g., through vehicle movements or stacking heavy equipment) or contamination from poisons (e.g., site stored fuel or chemicals) and fencing off these areas to prevent unintended incursions into the root protection zone as well as dust prevention measures to reduce any potential impact of dust pollution.

Priority Habitat:

We note there are numerous areas of mixed deciduous woodland within the site area.

Mixed Deciduous woodlands are on the National Forest Inventory and the Priority Habitat Inventory (England).

They were recognized under the UK Biodiversity Action Plan as being the most threatened, requiring conservation action. The UK Biodiversity Action Plan has now been superseded but this priority status remains under the Natural Environment & Rural Communities Act 2006. (NERC) Sect 40 "Duty to conserve and enhance biodiversity" and Sect 41 – "List of habitats and species of principle importance in England".

Section 5.11.27 of EN-1 of the Overarching National Policy Statement for Energy states:

"*Existing trees and woodlands should be retained wherever possible…….The applicant should assess the impacts on, and loss of, all trees and woodlands within the project boundary and develop mitigation measures to minimise adverse impacts and any risk of net deforestation as a result of the scheme. Mitigation may include, but is not limited to, the use of buffers to enhance resilience, improvements to connectivity and improved woodland management. Where woodland loss is unavoidable, compensation schemes will be required, and the long term management and maintenance of newly planted trees should be secured"*

We acknowledge there will inevitably be come loss of deciduous woodland and note the significant planting proposals to compensate for the losses.

Fragmentation is one of the greatest threats to mixed deciduous woodland. Woodlands can suffer loss or deterioration from nearby development through loss of connectivity, damage to soils, roots and vegetation and changes to drainage and air pollution from an increase in traffic or dust, particularly during the construction phase of a development.

For any woodland within the development boundary, land required for temporary use or land where rights are required for the diversion of utilities, the Root Protection Zone must be taken into consideration. The Root Protection Zone (as specified in British Standard 5837) is there to protect the roots of trees, which often spread out further than the tree canopy.

Protection measures include taking care not to cut tree roots (e.g., by trenching) or causing soil compaction around trees (e.g., through vehicle movements or stacking heavy equipment) or contamination from poisons (e.g., site stored fuel

or chemicals) and fencing off these areas to prevent unintended incursions into the root protection zone.

It is expected that there will be a thorough assessment of any loss of all trees within the project boundary. Hedgerows, individual trees and woodlands within the site should also be considered in terms of their overall connectivity between woodlands affected by the development. Perhaps with the creation of some larger woodland blocks and hedgerow/hedgerow trees between the existing woodland blocks on site, to link them and ensure maximum gains to increase habitat connectivity, to make woodlands more resilient and to benefit biodiversity across the whole site.

Tree Planting:

The species and provenance of new trees and woodland needs to be considered to ensure a resilient treescape which can cope with the full implications of a changing climate. The biosecurity of all planting stock also needs to be considered to avoid the introduction of pests and diseases, particularly in areas where there are ancient woodlands.

Plans should also be in place to ensure the long term management and maintenance of new and existing woodland, with access also needing to be considered for future management.

If you need any further information or would like to discuss planting proposals further, please do not hesitate to contact me.

Best wishes

Sandra

Sandra Squire

Local Partnership Advisor
East & East Midlands

Tel: [redacted]
Sandra.Squire@forestrycommission.gov.uk

Disclaimer

GREAT & LITTLE EVERSDEN PARISH COUNCIL

To: eastwestrail@planninginspectorate.gov.uk

Dear Planning Inspectorate,

East West Rail Company Limited for East West Rail - Bedford to Cambridge and Western improvements - Environmental Impact Assessment Scoping Report

I am writing on behalf of Great & Little Eversden Parish Council, an identified Consultation Body, in response to the Planning Inspectorate's consultation on East West Rail's Environmental Impact Assessment (EIA) Scoping Report, which closes on January 31, 2025.

Given that East West Rail's (EWR's) EIA Scoping Report runs to 1011 pages, was released at the same time as the latest non-statutory consultation on the overall route and that the Parish Council had just a few weeks to study the material included in the Scoping Report, it has been a considerable challenge to study the report and identify gaps in the scope of the material included. However, as this project will have an extremely detrimental impact on our local environment, we have made every effort to identify key points that we feel should have been included in scope but appear to have been omitted. However, we trust that we can raise further issues as appropriate given the lack of time to carry out a complete assessment of this report.

This Parish Council considers that information in the Environment Assessment Topics raised below should be provided in the Environmental Statement (ES) produced by East West Rail.

General Comment:

First, we would like to make a general comment. No Strategic Environmental Impact Assessment was done before the Southern approach route from Cambourne to Cambridge was chosen over the Northern approach from Cambourne to Cambridge. Neither route has a credible business case and both the Northern and Southern approaches of EWR to Cambridge will have an environmental impact However, the

northern approach would be cheaper, would generate less embedded carbon, would be quicker to build and would still allow connection to the Cambridge Biomedical Campus, a stated priority of EWR. In terms of environmental impact, the Northern approach impacts only 2 villages compared with around 13 villages on the southern approach, including the Eversdens.

Given the EWR project's clear alternative from the outset of the less environmentally damaging Northern approach, we feel that the EWR project should really have been subject to a Strategic Environmental Assessment (SEA), albeit not legally compulsory for a NSIP.

However, the required EIA for a NSIP like EWR, which will have significant environmental impacts should, according to best recommended practice (https://www.iema.net/articles/considering-alternatives-during-the-eia-process/), incorporate considerations of alternatives (including, but not limited to, site location, development scale and scheme design) similar to an SEA within the broader context of the project. Moreover, where no alternative sites are considered, **best practice dictates that the reason why alternative sites were not feasible should be explained**. **We feel this should be in scope.**

We do not find such considerations or explanations in EWR Co's Environmental Statement and this omission has serious implications for the Eversdens. Regarding alternative 'scheme design', instead of an embankment (imposing a risk to commuting bats and quadruped mammals, as well as generating excessive noise pollution) we urge consideration of trenching the track from just North of the B1046 Toft-Comberton Rd, south to the A603, i.e. run the A603 over **t**he railway instead of vice versa. From the A603 south, we envisage the track at the same grade or slightly below grade level across Harlton, with road over rail there, then into the tunnel at Chapel Hill.

Environment Assessment Topics

The key topic of biodiversity is covered first, the remainder are in alphabetic order

BIODIVERSITY

Wimpole and Eversden Woods SAC

This SAC encompasses a maternity roost of Barbastelle bats and their associated foraging areas. On all the evidence we have examined, we have good reason to believe that the proposed route alignment will have a severely detrimental impact of severance on the foraging flight paths, as well as being a major collision risk from Barbastelles having to surmount the (up to) 11m high embankment (plus the additional height of any security and noise abatement fencing) running just east of the Eversdens. The threat of collision risk is compounded by the high volume of rail traffic (passenger and freight) that the Southern approach to Cambridge (SATC) is now proposed to carry. The cumulative risks in the Barbastelles' Core Sustenance Zone amount to serious concerns for the maternity roost in the Eversden and Wimpole Woods SAC.

The inadequacy of mitigation and post-construction monitoring to address threats and risks lead us to conclude that EWR Co cannot guarantee beyond all reasonable scientific doubt that the construction and operation phases of the SATC scheme will not adversely affect the integrity of the very small (ca 20 adult females) maternity roost in the Eversdens and Wimpole Woods SAC. This risk is heightened given that there is no known evidence that Barbastelle bats will use the proposed underpass bat crossings in the hinterland of the Eversdens, and that construction will last several years before the track and any mitigation measures are even operational. At the recent non-statutory consultation drop-in events, EWR's own environmental team admitted they did not know if the proposed green bridges and underpasses would actually be successful mitigation measures.

Additionally, EWR's own trapping and radio-tracking surveys (not, however, in the public domain) have identified a second, and previously unknown, maternity roost of Barbastelle bats in Hardwick Wood SSSI. Given that

there is functional connectivity (overlapping foraging areas) between the SAC and Hardwick Wood SSSI, this latter site will also be impacted by both the construction and operation of the railway line, not least because Hardwick Wood SSSI is only 700m from the nearest construction area, creating a real risk of the roost being abandoned during the years of construction alone. As such, monitoring and mitigation of Hardwick Wood SSSI should, therefore, also be included in scope.

Biodiversity Net Gain

Other (albeit smaller) infrastructure projects in Cambridgeshire have a Biodiversity Net Gain (BNG) target of 20%, compared to EWR's stated 10% goal. We feel a target of 20% BNG is more in line with local and national aims for Nature Recovery.

Before the Southern approach was chosen, The Bedfordshire, Cambridgeshire and Northamptonshire Wildlife Trust (BCNWT) pointed out that a Northern approach to Cambridge is much less damaging to wildlife sites than a Southern approach (https://www.wildlifebcn.org/sites/default/files/2021-02/EWR%20WT%20Response.pdf). We therefore would like the ES to include information on how EWR's 10% BNG will be allocated, i.e. what proportion of the 10% applies to the Southern approach to Cambridge where the anticipated environmental risks and habitat loss are high, in particular around the Eversdens, which are situated closest to the SAC?

With regard to EWR's BNG policy we would like to know how sites are chosen for BNG purposes? What is the strategy for choosing sites? Why destroy an established wildflower meadow to plant trees for example. Similarly, one of the proposed bat mitigation measures in Caldecote is to plant trees to provide a connectivity path for various bat species during/after construction, but if these are saplings, then it will be years before they are big enough to substitute as functionally useful habitat for those bats. Provision of BNG would have had to have been initiated years before the construction and operational phases of EWR begin, and even then would be unlikely to provide like-for-like substitution. More clarity is

needed on the mitigation of the huge environmental impact that EWR will cause.

While BNG is a laudable aim, in looking at the wildlife in the area there is no mention or reference to the valuable data held at the (CPERC) Cambridge and Peterborough Environmental Records Centre. Some things are irreplaceable - like the Elms along the route. Brian Eversham, CEO of BCNWT, has been studying the elms in Cambridgeshire and has identified numerous local species, far more than previously realised, that are very specific to certain areas. These should be brought into scope.

Priority habitats

We are concerned about the effect of EWR on priority habitats as a result of the construction and operation of the line cutting links and making remaining habitat so small as to not be sustainable.

No mention is made of the breeding birds, e.g. Corn Bunting, Grey Partridge and other red-listed species, found at Westfield Farm, which is run by the Countryside Regeneration Trust (CRT). The CRT considers that the impact of the proposed route alignment will be 'devastating' for the biodiversity they have restored and nurtured for years (https://www.thecrt.co.uk/news/crt-response-to-ewr-non-statutory-consultation#). EWR's BNG policy will not prevent the loss of this rich biodiversity from CRT land, as the subtlety of its ecological needs defies attempts at habitat creation. These habitats and species should all be brought into scope.

Protected species

The potential adverse impact on protected species other than bats (see red-listed birds in Priority habitats, above), including water voles, needs to be carefully identified. The ES should include detailed descriptions of any mitigations. Such mitigation needs to be separate to providing 10% Biodiversity Net Gain.

AGRICULTURE AND SOILS

Eversdens farmers are in despair about the loss of prime farmland from construction of EWR, and indeed the viability of their businesses, at a time of growing national demand for food security. Some parts of their land will be cut off from other parts, requiring increased diversion of heavy machinery (e.g. combines) on to crumbling roads which will already have massive additional use by EWR-generated HGVs.

The report states that a new round of Farm Business Interviews (FBIs) has commenced, but there is no detail provided about any assessment of the impact of land loss on these farm businesses or the impact of loss off access to fields for farm machinery. This should be in scope. There is also no indication of how the loss of this prime agricultural land will affect the UK's food security.

AIR QUALITY

No measurements have been taken near the Eversdens especially near Lowfields, just one measure on the A603/Harlton according to the ES.

Emission to air from diesel trains should include passenger trains in scope as the line is proposed to be discontinuous electrification, leaving open the possibility of passenger as well as freight trains using diesel in the early stages. Similarly, we feel emissions to air from construction plant and NRMM should also be in scope.

COMMUNITY

The Eversdens anticipate massive disruption to residents' access to the primary and secondary schools, shops, post office, dentist, and other amenities in Comberton. Additionally, our doctor's surgery is actually a satellite of the Comberton surgery and many residents often have to travel to Comberton for medical care. Our children travel on school buses to the schools there. Many of our older residents also have family living in other rural villages nearby as we are part of the local network of small rural communities in

this region. We have two main routes into Comberton: Royston Lane/Comberton Road connecting to the A603 and Little Eversden and the B1046 from Toft connecting via Kingston with Great Eversden. Both of these routes will be affected by the construction of EWR.

EWR's Environmental report states that population is a factor that should be considered in the Environmental Impact Assessment. But, we found that there is only a small section on the impact on communities, and we are not aware of any community surveys thus far, meaning EWR has not collected any information on topics such as key locations of public and private resources, modes and routes of access, commuting routes, population structure and so on.

We therefore feel that it is very important that the EIA brings this population data into scope. In particular, we would ask for clear information about the impact of road closures during the construction phase on road safety for drivers, cyclists, horse riders and pedestrians, as well as expected travel delays. Regular public consultations should also be included in the EIA.

LANDSCAPE AND VISUAL

The 11 meter high embankments passing the Eversdens will have a huge impact on the visual landscape. We hope that this will be covered in detail in the EIA. We would welcome a focus on improved construction design, such as trenching the railway from Toft to Harlton to reduce the impact of this.

NOISE, VIBRATION AND LIGHT

EWR Co has made it clear that the railway is intended to cater for a high volume of freight as well as passenger trains, and because 'discontinuous electrification' does not work for freight, noisy polluting diesel trains - often 700m+ in length - will be passing close to the Eversdens 24/7. We anticipate a particularly heavy volume of freight at night to enable the line to be freed up in daylight hours for priority passenger trains. The noise pollution for the Eversdens will be especially high given that trains will be passing on an

exposed 11m-high embankment and the topography between the route alignment and the Eversdens is flat and open, offering no natural sound barrier. In all these regards it is an understatement for paragraph 5.8.1 (Comberton to Shelford) of the Environmental Statement to conclude 'The introduction of a new railway would affect the acoustic character of the western part of this area.' Paragraph 6.1.3 of the EIA Scoping Method Statement states: *The noise and vibration levels from construction will be calculated at selected locations which are considered representative of all noise-sensitive receptors in the study area*. The Eversdens should be one of their selected locations to assess the impact of the noise and vibration from trains passing over the embankment.

The Eversdens are also likely to suffer significant impact from vibration, but there is nothing in the report to explain how this impact will be managed, especially given the proximity of The Eversdens to the Mullard Radio Astronomy Observatory, which is sensitive to vibration.

The section on mitigation principles states that throughout the development of the route design, the horizontal and vertical alignments will be selected such that they achieve the greatest possible separation from sensitive receptors as well as keeping the alignment low in the environment. However the latest design still includes unacceptably high embankments of up to 11 metres running next to The Eversdens.

We would like to see concrete evidence in the EIA of how the impact of noise, vibrations and light pollution will be assesses both during construction of the line and operation of it. For example, The Eversdens currently are a “dark” community, and we need to see what impact light pollution from construction and operation will have on our community.

TRAFFIC AND TRANSPORT

We also have concerns about the effect of heavy construction traffic on roads (already in a poor state of repair) and safety concerns about navigating B roads alongside heavy construction traffic. Sight lines between Royston Lane and A603 are already difficult, and it is not clear how the proposed re-routeing of Washpit Lane will affect this.

These are not hypothetical concerns as they have precedent in a report by Buckinghamshire County Council on EWR impacts experienced, e.g. '*HGV construction traffic using B routes not suitable for them, damaging roads and verges*'. Their report also expressed concern about excessive ballast dust posing a risk to human health, especially in dry weather and summer

WATER RESOURCES

Chalk streams

We have concerns about the impact of EWR on the chalk streams and their associated habitats, as well as the aquifers found along the Southern approach route, both during and after construction. In particular, we are concerned about the effect of extra runoff from the huge proposed EWR embankments for instance, as well as pollution from construction. For example, the Lowfields area in Little Eversden already experiences problems with backing up of sewage from the pumping station on Royston Lane/Comberton Road. The railway will be built over the pipes that connect the Eversdens to the pumping station. We are concerned about the ability of the system to cope with additional runoff both during and after construction. How this extra runoff will be managed and mitigated needs to be clearly communicated.

Regarding paragraph 6.11.21 (and associated Table) in the Environmental Statement, we would discount a 7-year construction phase (which is how long EWR Co told Highfields Caldecote residents it would last in their village), with its associated compounds, farmland grab, haul roads and habitat loss, as having just 'temporary effects' on the 'water environment'. Compacting of the soil will put construction areas out of agricultural use for years and affect the drainage of surface water. In our opinion these water environment issues should be in scope.

CONCLUDING REMARKS

Going forward, we feel that it is crucial that East West Rail engages in effective community consultation and is open and transparent with members of the public and their community representatives. Given the scale of this development, and the major impacts that it will have on the communities along its route, ongoing consultations with community members must be brought into scope. So far, this lack of effective consultation has meant that there is data that has not been brought into scope in the EIA, and this needs to be rectified. For transparency, the publication of the responses received in the November 2024-January 2025 non-statutory consultation and the analysis of those responses should also be included in the scope of the EIA.

Great & Little Eversden Parish Council 31/01/2025

GREAT BARFORD PARISH COUNCIL

Clerk to Council: Mrs Joanne Lee c/o The Parish Council Office, Green End Farm, Green End Road, Great Barford, Bedfordshire MK44 3HD (by appointment only)
Tel: 01234 870245 e-mail: clerk@greatbarford.org.uk

27 January 2025

EWR Environmental Statement Scoping Opinion Comment

The East West Rail (EWR) scheme is entering a phase of Proposed Development that is a Nationally Significant Infrastructure Project. As such, there is a requirement to submit an Environmental Statement (ES) with the application for development. An ES scoping process will identify the topics that are considered to have potential impacts and likely significant effects on the environment.

Here follows a selection of topics that are considered to warrant inclusion in any Environmental Impact Assessment.

Bedford Town

As the basic Oxford to Bedford track-bed already exists, the upgrading of this section will have only minor impact. It is realignment, and additional track through Bedford that will have more impact, with demolition of several dwellings and new infrastructure and facilities. The works within the town of Bedford will have an impact on not only the displaced households, but development will impact on disturbance, pollution and infrastructure. The St Johns station area will have direct impact on the adjacent hospital, its loss of surface car-parking, and the additional noise generated from use of the railway.

Bedford to Cambridge Topography

The original ‘varsity line’ track that ran from the south side of Bedford to Cambridge, has long since been dismantled and track taken up. The new proposed route between Bedford and Cambridge does not mirror the previous southern route across mainly flat land, instead opting for a new northern alignment across undulating land, and has no existing track-bed. This section will present the most impact and change to the environment.

Because of the very undulating topography of the EWR’s preferred route alignment, it will necessitate huge amounts of cuttings, embankments bridges and elevated viaduct structures. Such constructions will create immense visual impact along the route, particularly on the sections between Bedford and the St Neots / Tempsford area, where long lengths of high viaducts are proposed. The route just north from Bedford is particularly torturous, with a steep gradient that would require an extensive cutting to reduce the incline in the Clapham area.

Overall, this section will present the most impact from development from disturbance, pollution, access, visual intrusion, and construction of infrastructure. The historic environment and heritage assets will also be impacted, with particular influence on landscape character, loss of trees and hedgerows, and impacts on areas of local biodiversity. Changes to watercourses and surface water outfalls can have detrimental impact on areas downstream, even without considering the effects of future climate change.

Much of the elevated sections will be of concrete construction viaducts. The cement industry is considered by many to be one of the main producers of carbon dioxide, a greenhouse gas blamed for climate change. Concrete causes damage to the most fertile layer of the earth, the topsoil. Concrete is used to create hard surfaces which contribute to surface runoff that may cause soil erosion, water pollution and flooding.

Traction

Tractive power may have a goal to be electric, or discontinuous electrification hybrid battery-electric, but the proven technology is not readily available. The electrical power generation and distribution infrastructures do not exist for the Bedford to Cambridge section, so there will be additional environmental impacts during construction and future use. Electricity generation and distribution to provide supply must be considered as a supporting infrastructure, with its own environmental impacts.

Even the Oxford to Milton-Keynes to Bedford section will need diesel trains to start with, creating extra sources of air pollution and noise, as overhead electrification still has to be installed.

Noise

Trains, no matter what motive power for traction is used, will create noise. This may not have a too significant impact on existing track bed sections between Oxford to Bedford. But where new track has to be laid between Bedford to Cambridge, all noise generated from use will be additional to low level background ambient that currently exists across large swathes of open countryside.

Green Belt

Cambourne to Cambridge will cut through the significant area of designated Green Belt area surrounding Cambridge. If development consent is given, then the development corridor must be minimised and follow existing transport corridors to minimise destruction of the Green Belt protected environment.

Drainage

Construction of new large structures will alter the natural water-table, potentially altering surface water drainage, to the detriment of existing watercourse outfalls. Significant Sustainable Drainage Systems will be required to mitigate the effect of new hard-surfaces, and surface water runoff in general. Flood risk, especially in the context of future climate change, is a serious consideration.

Bats

New structures, especially viaducts and station buildings, will present elevated configurations that will have adverse impact on Bat flight lines and their natural feeding areas.

Kind regards

Great Barford Parish Council

Parish Council Offices
Green End Fram
Green End Road
Great Barford
Bedfordshire
MK44 3HD

01234 870245

From:	clerk@greatpaxton-pc.gov.uk
To:	East West Rail
Subject:	Application by East West Railway Company for an Order granting Development Consent: Scoping Consultation (Your Reference: TR040012-000019)
Date:	21 January 2025 12:56:06

Dear Ms Wilkinson,

Thank you for your letter dated 2nd January in respect of the above.

On behalf of Great Paxton Parish Council (relevant 'consultation bodies'), I can confirm that at their meeting last evening, 20th January 2025, the Parish Council agreed that they did not have any comments to make on the Environmental Statement (Scoping Opinion).

Yours sincerely,

Christine Brandon
Clerk, Great Paxton Parish Council

Harlton is a small, but historically significant village in South Cambridgeshire. Its existence as a settlement is almost certainly from the iron age onwards, as evidence of prehistoric land division has been recorded to the north of the village. The village continued as a settlement with the Roman road (A603) running close by and was recorded in the Domesday Book, 1086.

Whilst the whole of Harlton will be affected by the railway, over 50% of the village will be severely impacted by the proposed route, land take, construction and running of the railway. The proposed route runs very close to the village and will bring no benefits, only negative consequences to the population, wildlife, land and water. During and post-construction of the railway, there will be detrimental noise, vibration air and visual pollution, travel and business disruption and the destruction of farmland and historic landscape.

Harlton Parish Council has read the East West Rail Environmental Impact Assessment Scoping document and has raised the following concerns. This is perhaps not a comprehensive list, however given the short amount of time to raise such concerns, especially coinciding with the non-statutory consultation, it is the best we could do in the circumstances. We hope that EWR will keep assessing its methodology within its Environmental Impact Assessment (EIA) and continue to challenge itself to produce better than best practice action on all environmental issues.

Air Quality

EWR monitored the A603 near Harlton for air quality in 2021 (see page 203/1011 in the EIA Scoping Report). There was no monitoring of air quality in the village itself.

Consideration for the Scoping Opinion: If EWR want a recording of air quality in the village of Harlton, a monitoring device should be placed within the settlement. It should not rely on a single recording of a device outside of the village as this is a distortion of facts.

Agriculture and Soils

The land take that EWR is planning is mainly grade 2 and 3a highly productive cereal growing land. Looking at evidence of other development sites (HS2, World War II airfields) where topsoil is scraped away and at a later date returned, yields may be reduced by as much as 50%. In a time of ensuring food security and relying more on domestic production, rather than imports, this is a very worrying figure for the whole UK population.

Consideration for the Scoping Opinion: What are EWR plans to return the land to farmers in a condition that will enable yields similar to when EWR took them from the farmers?

Biodiversity

1. The vulnerable barbastelle bat communities known roosting sites at the Eversden and Wimpole Woods Special Areas of Conservation and Hardwick Wood (Site of Special Scientific Interest) need to be protected (by law) along with their foraging routes and flight paths. Barbastelle bats (and many other varieties) have been located as far as Haslingfield and Grantchester. The overbridge between Harlton and Haslingfield and the embankments close to the village can only have a detrimental effect on the bats flight paths, fanning and foraging behaviour. No mitigation has been planned near Harlton, and mitigation planned for Eversden (bat bridge, tree/sapling planting) is a little researched stab in the dark. Plus, the time it takes to construct the railway, before mitigation is in place could well decimate/obliterate the already rare barbastelle.

2. The proposed railway, plus its enormous (up to 11 metres) embankments passing the Eversdens and the A603 before gradually reducing in height to the north of the village. The visual and noise impact is significant

3. Other wildlife under threat from EWR include red kites, buzzards, water voles, badgers, deer and game birds. The loss of wildlife habitats, fields, farmland, water courses will decimate the biodiversity of the village and surrounding area. The mitigation offered by EWR is inadequate and could well see species of fauna and flora disappear from dust, water, air, noise or vibration pollution.

Consideration for the Scoping Opinion: There are so many environmental impacts that could be addressed by a tunnel directly from Cambourne to Cambridge South. What are EWR plans in this respect?
How does EWR plan to mitigate the environmental destruction during construction of the railway? Harlton will lose hedgerows, ditches, trees, farmland - of which could be fundamental to the existence of species such as the barbastelle bat. How will species, such as barbastelle bats, survive before mitigation (if any) is in place? How will EWR monitor such fragile species during and post-construction? The document mentions desk based research used in compiling evidence. What proportion of wildlife research will be done from a desk? Will EWR ensure that wildlife is properly researched, in situ, by specialist, independent groups? Will this research become publicly available to view? Harlton Parish Council would be happy to assist in the stewardship of species found in its environs.

Historic Environment

The diversion of Washpit Lane due to the location of the proposed railway is through an area of prehistoric land division and ancient pasture, which is present along the Bourn valley. It is also very close to ancient earthworks, listed as a scheduled monument under the Ancient Monuments an Archaeological Areas Act 1979. By diverting the road through this landscape, the visual and historic nature of the land will be lost forever.
The Church of the Assumption of the Blessed Virgin Mary is celebrating its 650th anniversary this year. This ancient structure will suffer from noise and visual disturbance of the landscape

Consideration for Scoping Opinion: What will EWR do to protect this special landscape? Will there be a thorough archaeological assessment of the area? Will the scheduled monument area be protected by the land disturbance/road building?
How will EWR protect the setting of the church and the scheduled monument in the landscape when a huge embankment is proposed, cutting off vistas and permanently altering the historic scenes. A 1km ‘Zone of Theoretical Visibility’, is not enough in a predominately flat landscape, such as the area to the north-west of Harlton.

Human Health

So far, EWR has not assessed the detrimental state of villagers’ health with the possibility of the railway looming over us.

Consideration for the Scoping Opinion: Ongoing consultation, understanding the negative consequences of building this railway and mitigation, needs to be properly assessed and formally brought into the EIA. The assessment of villagers’ responses allied to their geographical location to the non-statutory consultation should be included and responded to as part of the EIA.

Landscape and Visual

The impact of huge raised embankments on the visual aspect of Harlton has not been properly assessed.

Socioeconomics

Businesses and venues located within the village and on Washpit Lane and farms need identifying, contacting and working with as the construction and running of the railway will severely impact their work. Little to date seems to have been done by EWR.

Sound, Noise and Vibration and Electro-magnetic Interference

Given the typology of the land and the proposed elevation of the railway to the north-west of the village, Harlton Parish Council considers the negative impacts of sound, noise, vibration and electro-magnetic interference on the village as unacceptable. The study areas, outlined on p113 of the document, state that operational airborne noise will be 300m from the project railway, whilst ground borne rail noise will be 125m from the project railway. Given that the land is typically flat close to Harlton, these distances don't seem to be very far away from the noise and that many of the houses in the village will be able to hear the same level of noise from their gardens and from their houses, c.500m-1km away.

On page 98, the document states that EWR will only consider effect of electro-magnetic interference on schools/homes that are within 50m of the track.

In EWR's Environmental Update Report, Nov 24, 11.2.5, it states that 'residents are few until south of the A603 Cambridge Road, so potential impacts from noise are likely to be limited.' To brush off the disrupting noise of a railway and the far reaching pollution that the proposal will inevitably bring is shameful. The introduction of a new noise in a rural environment will be a blight on all the rural population, no matter how few. EWR need to acknowledge this and mitigate accordingly.

Consideration for the Scoping Opinion: Firstly, why only 50 metres for electro-magnetic interference? Comberton Village College is located next to the proposed railway. What kind of environmental impact will this have on the school? What kind of mitigation will be put in place? Secondly, what about the Mullard Radio Astronomy Observatory? How will this sensitive site withstand the electrical interference and vibration? What about the electro-magnetic interference emitting from the signalling masts, of which there are two between Comberton and Harlton? It seems as if this issue has not been researched or explored thoroughly. In the document, EWR state the design will have the 'greatest possible separation from sensitive receptors and keeping the alignment low in the environment'. Currently, the proposed design across the fields of Harlton is on unacceptably large embankments. Not only will the electromagnetic interference be an issue, so will vibration, noise, sound and air pollution. Currently the proposed study areas do not take into consideration the majority of housing in Harlton, even though most of the village will be severely effected by noise and vibration. We hope that the statement in 6.8.13 assessment 'may need to consider impacts outside these buffers where noise modelling suggests a need for this' becomes a reality.

Traffic and Transport

1. EWR are promoting housing growth as an economic reason for building the railway. The railway is promoted as a way to stimulate housebuilding for 94,000 additional people along the route between Bedford and Cambridge. EWR estimate regular passenger numbers of circa 5000 per day. The rest will use the roads and an EWR report (Environmental and Technical Report, figure 4.1, Appendix 4, May 2023) confirms there will be more cars on the road.

2. There are no stations planned near to the villages between Cambourne and Cambridge. This means driving miles to the nearest station which defeats the object of the railway.

Consideration for the Scoping Opinion: What are EWR plans to mitigate road traffic congestion and the significant carbon emissions that will result?

Harlton along with many other small villages has narrow roads and the community is worried that there could be a significant increase in heavy traffic through the village (one of the three access roads being single-track) during construction (due to road severance or temporary closure) and post-construction (with the increase in car users due to extra house building, from EWR's dependent development plans). Journey times by car, bus, foot or bicycle are likely to be extended significantly, are likely to be more dangerous (especially for pedestrians and cyclists) and there will be a decrease in economic growth (due to length of time travelling to access school, work, facilities).

The risk of a regular and reliable bus service during the ten years of construction is a huge issue. Children in further education need to get to Comberton Village College or into Cambridge, plus villagers need to access places of work.

Consideration for the Scoping Opinion: Could EWR provide a detailed plan for each affected village outlining how bus services, schools and access to other services will be maintained throughout the construction phase?
What are the identified routes for construction? Has the risk to roads and buildings been assessed? There are 16 listed buildings in Harlton, some are made with Clunch. These will not withstand huge amounts of change to vibration from construction and increased heavy traffic mobilisation.

Water Resources

1. The Environment Agency is opposed to all new building in Cambridgeshire until the water supply problem is resolved. Building a railway and EWR 'dependent development' for 94,000 people in addition to those already in the local plan will put significant additional pressure on water. Water scarcity is a real issue and future housing cannot be guaranteed drinking water until extra reservoirs and desalination plants are built at more cost in 2040 and beyond.
2. The railway will utilise great amounts of water during construction.
3. The Bourn Brook and various springs between Harlton and neighbouring villages are vulnerable courses of water.
4. The proposed route runs very close to an historic mustard gas storage site and a storage facility for explosives, near the A603.
5. 'The assessment will use a study area of 1km from the centreline of the proposed railway.' What about during construction, when huge swathes of land either side of the line will be used as compounds, construction zones and haul roads?

Consideration for the Scoping Opinion: What are EWR plans to minimise the use of water during the construction of the railway and how do they plan to supply water for the new housing in the interim? Residents are worried.
Further detail needs to be put forward about the water courses and springs, how they are to be assessed and monitored, especially during construction of the proposed railway.
Has EWR assessed the area around the explosive manufacturing facility and the WWII chemical weapon storage area and scoped into their plans the possibilities of disturbing contaminants that could pollute ground water and soil/farmland?
EWR, in the document, 6.11.11, states assessment of water will be 1km from the centreline of the railway. What about the construction zones, which could be in place for up to 10 years? The scope of water assessment should cover construction zones/compounds/haul roads too. In 6.11.21 EWR states that 'many impacts scoped in for assessment would take place during construction and

potentially result in temporary effects'. To assume longer term effects on hydro morphology would be accommodated into the design and are therefore scoped out assumes too much. They should be scoped in to cope with every eventuality and consequence of disruption to the water environment.

Conclusion

Harlton Parish Council is perplexed by EWR's insistence to proceed with this proposed route, when even their own research demonstrates that other routes into Cambridge are less environmentally damaging.

From: [redacted]
To: East West Rail; [redacted]
Cc: [redacted]
Subject: East West Rail Scoping Report Consultation
Date: 31 January 2025 14:36:46

> Some people who received this message don't often get email from [redacted]@harstonparishcouncil.gov.uk.
> Learn why this is important

To the Planning Inspectorate

Many thanks for asking the Harston Parish Council to respond on the Scoping for the Environment Survey to be carried out on the proposed East West Railway project no TR040012.

Due to the complexity of the project in our area and our limited resources, we are not able to make comments on the documents presented to date.

We do however note that the documents have been drawn up by professionals well versed in this area and we would expect them to have covered the major issues in line with Generally Accepted Best Practice considering both residents and the environment and the complexity of the project.

We do however reserve our right to revisit this in the light of information or events that become known to us, or as the project is refined, or as it will be presented later for the Development Consent Order et seq.

Yours

Rupert Pearce Gould for

Dom Bellamy

Chair of the Parish Council

Comments from Haslingfield Parish Council on the Scope of data included by East West Rail in their Environmental Impact Assessment (EIA).

(Words in italics are taken directly from the report)

Introduction

Given a few weeks to digest and identify the adequacy or otherwise of the Scope of material that East West Rail has included within its EIA (Environmental Impact Assessment) report of 1011 pages has been a challenge for Haslingfield Parish Council, an identified Consultation Body. However, due to the serious detrimental impact that this project will have on our local environment, we have gone through the report and attempted to identify key material that should be in scope, but appears not to have been included. However this should not be considered a complete assessment and we trust that we can raise further issues when appropriate.

One of our key questions in looking at this report is why the EIA is being considered after decisions have been made on the *preferred route* between Shelford and Cambridge. We have no doubt that a comprehensive assessment of both route options; the northerly and southerly, would have indicated that the environmental impact of this southerly route is far greater in relation to its impact on local communities, in terms of its visual impact, traffic disruption, noise, vibration and air pollution during both the construction and running of this new rail line, as well as the long term loss of BMV (Best and Most Versatile) farmland and the destruction of a landscape of historical, geological and ecological significance.

ENVIRONMENTAL ASSESSMENT TOPICS

(In alphabetic order, not order of importance**)**

Agriculture and soils

There is no indication of the extent of FBIs (Farm Business Interviews) that have been carried out since the proposed route change in 2021 or the extent to which the impact of loss of land or critical access to fields for agricultural machinery has been assessed. The only statement is that *a new round of FBIs has commenced*.

Air Quality

Air monitoring needs to be more comprehensive than the one specific site selected on Haslingfield High Street; EWR AQ-030; co-ordinates 500459, 252126. This position does not provide the optimum air quality measurement. Additional ones need to be taken on key

entry and exit routes on Barton Road and Haslingfield Road; with the highest current road usage.

Biodiversity

There is no mention of the significance of the Haslingfield Clunch Pit at the top of Quarry lane. This is a Country Wildlife Site of specific interest in relation to the ecology of the chalk ridge, containing a variety of orchids including the rare Man Orchid and other chalk loving flora and fauna such as the Helix Pomatia; a protected species of Roman snail.

There is no mention of the variety of local bat species and birds of prey including kestrels, tawny owls and barn owls; all of whom nest/roost within the vicinity of Haslingfield and whose future will be impacted by this development.

In looking at wildlife in the area there is no mention or reference to the valuable data held at the (CPERC) Cambridge and Peterborough Environmental Records Centre.

These should all be brought into scope.

Communities

As stated in the report, *The 2017 Infrastructure Planning EIA Regulations identify population as a factor to be considered in the assessment process.* However the section that looks at evaluating the impact on the community is minimal and *no community surveys have been undertaken to date.*

There is no evidence of data to be gathered on key issues such as population structure, daily commuting patterns or location of key public and private sector resources, current routes and modes of access and the importance of connectivity. We find this unacceptable as the location of the development work will have a serious community impact. Haslingfield is one of a network of small rural communities which are interdependent in relation to accessing key facilities.

In relation to education, the pre-school and Haslingfield primary school catchment area extends to Harlton with additional attendees from Barrington. To access secondary education, pupils need to commute to Comberton or beyond using a school bus that must be able to visit all villages in its catchment area twice a day. In relation to medical facilities, pharmacies, local GP and dental practices, patients attend Harston, Comberton and Little Eversden and ease of access to Addenbrookes Hospital and emergency services is particularly critical for a population with higher than national average number of residents over retirement age.

The majority of those in employment rely on commuting by car to their place of work or to access public transport; such as Park and Ride or train stations, as the public bus service is

very limited. There are also a number of small businesses within the village with employees coming from outside.

It is therefore critical that the EIA brings into scope this data, including the impact of the construction phase on road closures and travel delays and the safety of those who rely on travelling by foot or on bike. In addition the EIA needs to include public consultations on a regular basis.

Historic Environment

In identifying assets that could be impacted by this development there is no statement on which existing roads will be used by construction vehicles. Haslingfield is a historic village that has a conservation area and over 50 listed building, many of which are close to the roadside and vulnerable to vibration damage.

There is also a lack of assessment on the destruction of the wider environment; an area of historic importance with finds from the Roman and Anglo-Saxon period featuring in a number of museum collections and the presence of with burial mounds on Money Hill.

Landscape and visual

There is insufficient EIA on the impact of cuttings and enormous raised embankments on one of the most famous view over Cambridge. There is also lack of focus in relation to improved construction design to reduce the impact of this.

Socio-economics

Other than information that may be gathered in the context of the NSC (Non Statutory Consultation) there is no evidence to date of identification of, or contact made with, any of the numerous small businesses that run within the village to assess the impact of travel disruption. This should be in the scope of the EIA.

Sound, Noise and Vibration

Other than a mention that the Mullard Radio Astronomy Observatory is *sensitive to vibration*, there is no explanation of how this will be managed, nor information given in relation to discussions with the University as to how this will be resolved. This is despite the fact that the proposed rail line is within this protected area which has inhibited any past development.

In the section on mitigation principles it is stated that throughout the design development one of the measures will be *selecting the horizontal and vertical alignments to achieve the greatest possible separation from sensitive receptors and keeping the alignment low in the environment.* There needs to be concrete evidence in the EIA of how this is going to be assessed and achieved when the latest modelling still includes unacceptably high

embankments and cuttings in close proximity to the village and the inevitable pollution in relation to sound, vibration and air quality during construction and when trains are running.

Traffic and Transport

The EIA states that *consultation will be ongoing to inform the assessment of traffic and transport as the DCO application progresses.* The only evidence of any consultation is the NSC commenced in November 2024.

As pointed out in the section on communities, the impact on traffic and transport is of major concern to residents of Haslingfield. However predicted level of disruption, which should be in scope by now have not yet been assessed.

The village itself has narrow poorly maintained roads with bends, junctions and a narrow humpbacked bridge on the road in from Barton, not suitable for the use of construction vehicles. None of this has been taken into account in the EIA. It is therefore critical that identifying access routes for construction, the risk to buildings, other road users and further deterioration of roads is brought into scope, to facilitate planning that identifies the unacceptable risk of construction vehicles entering the village.

Water Resources

In the EIA it is recognised that there are *multiple springs from Comberton to Shelford in the study area*. However they are still waiting for more details about these *when superior digital data becomes available*. There is therefore no understanding of the importance of the chalk spring within Haslingfield, which feeds the moat around the Manor House and which was a major factor in relation to historic settlement within this area. Further details therefore need to be presented within the EIA to identify and assess the vulnerability of this spring, and comparable ones that flow on the fields between Harlton and Haslingfield, to the disruptions of earth moving.

Concluding remarks

One of the common themes of data that has not been brought in scope in the EIA is the lack of effective community consultation by East West Rail. For a development of this scale that has such a major impact, it is critical that to effectively assess environmental impact and how this can be mitigated, ongoing consultations with members and/or representatives of the community must be formally brought into scope. Analysis and publication of responses to the NSC should also be in the Scope of the EIA.

Haslingfield Parish Council 23/01/2025

Historic England

The Planning Inspectorate
Operations Group 3
Temple Quay House
2 The Square, Bristol
BS1 6PN

BY EMAIL ONLY
eastwestrail@planninginspectorate.gov.uk
consultation@eastwestrail.co.uk

Our ref: PL00797761

Your ref: TR040012

Telephone 01223 582710

31st January 2025

Dear East West Rail Team

Request for a Formal EIA Scoping Opinion for the ' East West Railway' Proposed by East West Railway Company Limited

Historic England has been asked for a view on the Scoping for this project. The request was made by the Planning Inspectorate via an email (dated 2nd January 2025).

The East West Railway is a proposal by East West Railway Company Limited for a new rail link connecting communities between Oxford, Milton Keynes, Bedford and Cambridge. The project includes the construction of a new railway between Bedford and Cambridge with additional works to upgrade the existing railway between Oxford and Bedford.

The letter is accompanied by the Environmental Impact Assessment Scoping Report (EWR-MWJV Technical Partner, dated 05/12/2024), thematic Environmental Impact Assessment Scoping Method Statements; and other supporting documents (e.g. Approach to BNG; Approach to CoCP, Approach to Equality Impact Assessment; Social Baseline).

Historic England

Historic England, as the governments lead advisors on the historic environment would like to offer our comments on this proposal, taking into consideration the information provided by the applicant in the scoping report.

Historic England's Advice

Historic England broadly support the approach taken towards the historic environment in this report. We have identified areas within the approach that require further consideration and there are a number of issues and comments set out below. These are set out by chapter with reference to the applicant's report.

We confirm our view that there is likely to be a significant effect on the historic environment because of this proposal and that the historic environment would need to be scoped in to the assessment going forward.

Chapter 2: The Project

2.2.2 outlines the main works proposed as part of the EWR development. The majority of these elements have the potential to impact buried archaeological remains. This could be through direct physical impacts during excavation or ground clearance works, or by changes to the preservation conditions of the site through changes to the local water environment.

We would recommend that the Historic England document 'Preserving Archaeological Remains' (2016) is consulted and referenced to in order to understand how changes to the water environment may impact archaeological remains and how this can be investigated/managed: Preserving Archaeological Remains | Historic England.

Chapter 4: EIA and scoping the assessments

4.2.17 states that landscape surveys are required to understand the landscape and historic environment. It is noted in Section 4.2.19 that an evaluation phase has already started to establish an enhanced understanding of the historic character and development along the route.

The report notes the evaluation phase will include a range of desk-based investigations and analysis and field surveys, and It is noted in Section 4.2.20 that some of the surveys have already started (e.g. geophysics and remote sensing in some areas), which will be followed by a suite of targeted intrusive surveys, including trial trench excavations.

We support this approach however we recognise there are significant areas of the route that have not yet been assessed in this way and therefore a significant effort will be required to ensure this work is consistently applied along the route. Significant and important areas of the proposed route, and areas with known high archaeological potential have not been investigated at the present time.

Character and extent of these surveys will need to be specified and agreed with stakeholders and statutory consultees. Historic England expects to be consulted on these surveys and there is a strong concern about the progress in some key areas.

4.2.21 We are pleased to see that a preliminary deposit model will be developed using existing borehole data and data gained from ground investigation works carried out for the project. Attention need to be given to the palaeoenvironmental potential and impacts on key deposit with archaeological potential and those with relationships to known sites.

Chapter 5: Mitigation Strategy

Figure 24 summarises the mitigation hierarchy. We are pleased to see that avoidance through the design and detailed design staged of the proposed project will form the primary mitigation approach (Section 5.1.3).

Paragraph 5.2.2 We are pleased that an iterative environmental assessment will be employed, following repeated cycles of assessment, evaluation and mitigation. Robust and accurate baseline heritage data is needed to successfully inform mitigation by design.

We are also pleased to see that there will be a close collaboration between the project team and the environmental assessment specialists to secure modifications to the design of the proposed scheme (Section 5.2.3). As an example, the use of a tunnel beneath Chapel Hill has been cited which will avoid or limit potential impacts on landscape, heritage and ecology.

Design details will need to be provided to ensure that intended effect has been achieved, and at present the tunnel design and location will need to be amended to avoid significant and known archaeological features. These features have a high value and although are undesignated they may have some equivalence as set out in planning policy. The heritage values here will need to be assessed.

We do not however consider the setting of heritage assets has yet been addressed appropriately, and attention needs to be given to this aspect of assessment.

Paragraph 5.2.6 Heritage mitigation and reducing impacts upon the setting of heritage assets would both need to be added to the list of reasons that might require amendments to the draft order limits.

6.2 Agriculture and Soils

6.2.5 outlines the potential impacts that the proposed scheme may have on agriculture and soils. It should be noted that several of these impacts may also be detrimental to the historic environment, such as soil compaction, changes to the drainage network and the demolition of farm dwellings and buildings. These impacts could result in direct physical damage to archaeological remains or changes to the preservation of nearby sites through changes to the local water environment.

Farm buildings likewise have may have heritage potential and value and may contribute positively to the setting of other heritage assets.

6.6: Land Quality

6.6.1 states that 'land quality' considers how the Project will affect land contamination and potentially result in its mobilisation.

It should be noted that the mobilisation of contaminants into an archaeological site or deposits of palaeoenvironmental interest may limit the ability to investigate the site in the future. For example, the contaminants may make the site inaccessible for health and safety reasons. In addition, the contaminants may remove the ability to investigate archaeological remains using certain scientific techniques, such as radiocarbon dating. We therefore recommend that the historic environment is added as a receptor into Table 13.

We also recommend that the Historic England document 'Land Contamination and Archaeology' (2017) is consider and referenced: Land Contamination and Archaeology | Historic England.

6.6.2 states that conceptual site models will be used to determine potential contamination source-pathway-receptor routes. It should be noted that conceptual site models can also be used to understand potential impacts to the historic environment through changes to the local water environment and the introduction of contaminants.

6.6.5 states that some of the works may require dewatering of deep excavations, such as cuttings or tunnels. Dewatering can impact the local water environment, lowering the groundwater table in adjacent areas. While these impacts may be classed as temporary, they could potentially expose vulnerable archaeological and palaeoenvironmental remains (e.g. waterlogged organic materials) to Oxygen and

microorganisms that act to break down organic remains. This could lead to the degradation or loss of archaeological remains (Preserving Archaeological Remains | Historic England).

This issue could particularly affect preservation of remains within Money Hill barrow cemetery near Haslingfield, which has been identified as non-designated heritage asset of high significance.

6.6.7 states that baseline data for the Land Quality assessment will utilise resources such as the British Geological Survey (BGS) geological maps. This data may also be of value to the geoarchaeological assessment of the proposed scheme area. We would recommend that information is shared where possible to ensure that opportunities are maximised, and to reduce the potential duplication of effort.

6.6.15 states that Phase 1 ground investigation works are currently underway. We would recommend that geoarchaeological assessment is included in this work. A geoarchaeologist should be allowed direct access to any cores as it is better to record and assess continuous core sequences rather than isolated deposits. This allows for greater reliability and confidence in the resulting conclusions.

6.10: Biodiversity

6.10.8 outline the range of impacts that could affect biodiversity, which includes the loss or severance of habitats such as wetlands and water features. It should be noted that these sorts of habitats have the potential to preserve archaeological and palaeoenvironmental remains of interest, such as waterlogged remains. The loss or severance of these habitats could also have a negative impact on the historic environment and would therefore need to be considered.

6.11 Water Resources

6.11.5 notes that the proposed development could result in permanent impacts to the surface water and groundwater receptors. This could be caused by changes to the flow regimes and geodynamics of surface water receptors, changes to watercourses through diversions or the presence of permanent below ground structures, creation of voids and changes to drainage.

Any changes to the local water environment could impact nearby archaeological sites by altering the preservation of the remains. This could lead to the degradation and/or loss of remains, particularly waterlogged organic remains such as wooden remains/structures, leather objects or environmental remains (Preserving Archaeological Remains | Historic England). We would recommend that the extent of any changes to the local water environment is mapped (zones of influence) and

cross referenced with the archaeological baseline data to identify the archaeological sites that may be impacted. as well as the extents of the potential impacts.

6.12 Historic Environment

6.12.5 outlines the types of permanent and temporary impacts on the historic environment that could occur.

We are pleased to see that the impact of changes to the hydrology on historic water bodies (i.e. moats) has been recognised but recommend that the potential for changes to the preservation of archaeological sites and remains is also be included. It would also be useful to note in this section that impacts could relate to permanent changes to water environment, or through temporary activities such as dewatering works.

We are pleased that both direct impacts and setting changes are recognised.
6.12.7 We agree that further archaeological surveys (intrusive and non-intrusive) are necessary to establish heritage baseline. Character and extent of these surveys will need to be specified and agreed with stakeholders and statutory consultees.

6.12.10 Historic England supports the proposal to refine the study area but cannot confirm if suggested distances are sufficient. The applicant should clearly demonstrate that the extent of the proposed study area is of the appropriate size to ensure that all heritage assets likely to be affected by this development have been included and can be properly assessed.

We understand that the baseline information for ES will be gathered using approach outlined in paragraph 9.3.1 of Historic Environment Method Statement. The heritage assets should be selected for detailed assessment based on analysis of evidence (such as ZTV, site visits, etc.) as well as an iterative approach based on professional judgement.

6.12.11 outlines the mitigation strategy for the historic environment. It is stated that the heritage team will work alongside other environmental specialist when developing the mitigation strategy to ensure that they accommodate and enhance the historic landscape character, which we support.

Additional detail is however needed in this section about the nature of the mitigation works that could be needed, the approach proposed and the mechanisms for delivery.

We recommend that additional measures are considered in relation to mitigation of impact to heritage assets where significant impacts cannot be avoided. These

measures could include improvements to management of scheduled monuments, provision of public access to designated heritage assets, enhancement of understanding of significance through publication and interpretation.

It is stated in Sections 6.12.13 and 6.12.14 that impacts could potentially be offset by recording a heritage asset's value to gain understanding and a record for future research, and that non-intrusive and intrusive survey work will be needed. Detail should be included on the sort of approaches that will be used, such as geophysical survey, geoarchaeology and deposit modelling, evaluation excavations etc.

Due the nature and scale of the impact additional heritage mitigation, public engagement and works with public value will be required to deliver appropriately weighted mitigation.

It would also be useful to state the range of techniques that may be employed to understand the historic environment. For example, different geophysical techniques are available which can be used to investigate different types of archaeological remains, and on different geologies. It is noted that geophysical surveys have already been carried out in some part of the proposed scheme area, but it would be good to know if any areas will be targeted using additional complementary geophysical techniques. This may be to help understand complex or significant features in more detail and/or to help develop an appropriate mitigation strategy.

6.12.15 states that the evaluation of effects on the historic environment relies on robust baseline evidence as well as an understanding of the inter-relationships with the historic environment, such as landscape, noise, vibration and ecology. We would recommend that inter-relationships with agriculture, water resources and biodiversity are also considered.

7.2 Biodiversity Net Gain (BNG)

7.2.4 The development of habitats as part of the environmental compensation could impact the historic environment, through the excavation of features or the impact of tree/plant roots on buried remains. We are therefore pleased that baseline information from other environmental aspects, such as the historic environment will be incorporated into a qualitative BNG baseline assessment. This information will be used to identify limitations and opportunities for achieving BNG from other environmental aspects, which is good to see.

Routewide – Environmental – EIA Scoping Method Statement – Historic Environment

Paragraph 4.2.1 Outlines the list of sources used to establish 'the historical baseline of the proposed route'. We broadly support the proposed selection of the data sources to inform desk-based assessments, however, in addition to listed sources an effort should be made to obtain the results of archaeological works undertaken in the study area for other infrastructural projects. These results might not yet be incorporated into local Historic Environment Records. The relevant data should also be taken into account when conducting an assessment.

Paragraph 4.3.1 Outlines approach to study area used for gathering baseline information for this scoping report. The project uses 1 km study area from the proposed Order limits for gathering detailed baseline information for designated heritage assets and 500m study area for non-designated assets. The extent of the study area for the setting assessments is not specifically mentioned.

Historic England supports the proposal to refine the study area but cannot confirm if suggested distances are sufficient. The applicant should clearly demonstrate that the extent of the proposed study area is of the appropriate size to ensure that all heritage assets likely to be affected by this development have been included and can be properly assessed.

The final selection of assets for detailed assessment shod be informed by analysis of evidence (such as ZTV, site visits, etc.) and professional judgement.

Chapter 5 summarises the baseline evidence obtained so far for the proposed Scheme. It is clear that the proposed route crosses a range of different environments and geologies that would have been attractive to populations in the past. The proposed route crosses a complex archaeological landscape with remains dating from the Palaeolithic to the modern period and include a range of different site types (e.g. settlements, funerary structures and remains, ritual sites, enclosures, farmsteads, roads and industrial sites).

Some sites discussed within this chapter are of high significance, such as the sites identified during the development of the Biddenham Loop (e.g. Section 5.6.2). There is also the potential for previously unknown sites of archaeological and palaeoenvironmental potential to be present within the proposed area of the scheme.

Paragraphs 5.4.5-5.4.6 The historic development summary does not mention extensive Iron Age activity recorded along the section of the route between Fenny Stratford and Kempston. This activity includes dispersed rural farmsteads as well as univallate hillfort – Danesborough Camp (scheduled monument). We consider this is an accidental omission as Iron Age sites are listed in paragraph 5.4.17. Iron Age

activity should be addressed in further assessments. We therefore recommend the applicant is asked for a clarification of this matter.

Paragraph 5.4.20 The assignment of medium heritage value to medieval settlement activity in this area is clearly not correct. This needs to be revisited and we recommend further clarification of the approach that has led to this low value assessment.

Earthwork remains of field boundaries and other activity are present within the draft order limits at Lidlington. This area is indicated as an access route and ecological mitigation zone for the relocated Lidlington station. These remains are immediately to the south of the Thrupp End scheduled monument and potentially constituent parts of the designated heritage asset. Although, these remains are not currently designated, it is likely that they are directly associated with designated asset. Therefore, they can potentially be considered to have equivalent significance to scheduled monument and be subject to the same policies.

The heritage value of the assets in this area should be revised. Designated assets and assets of comparable significance should be assessed as having high heritage value.

Paragraph 5.4.24 Iron Age activity is omitted in assessment of potential. Iron Age activity should be addressed in further assessments.

Paragraph 5.5.6 The summary of the archaeological potential for the medieval period does not mention monastic sites in Bedford. Caldwell Priory and Greyfriars could be either partially located within draft order limits or in its proximity, however their exact locations remain uncertain. The Elstow Abbey scheduled monument, is also located in close to the selected route.

Monastic sites in Bedford should be included in further assessments and the list of non-designated heritage assets presented in paragraph 5.5.13 should be amended.

Paragraph 5.6.14 lists assets within Little Barford, however this village is not located in this section of the route. There is clearly a cut an paste error.

The documents and further assessment should accurately describe location of heritage assets to avoid errors and repetitions.

Paragraph 5.7.4 The summary of the activity dating to Roman period does not mention two Roman roads which are likely to be present in the area (Sandy to Great Staughton; and Sandy to Godmanchester). These routes link small Roman towns

and additional Roman activity could be expected along them. Future assessment will need to take into consideration the potential presence of roman remains in these locations.

Paragraph 5.7.5 The summary of activity for the Anglo-Saxon period does not mention extensive settlement remains identified in Tempsford Park or potential remain associated with the Battle of Tempsford (c. AD917-8). This is known from documentary sources to have been centred on a Viking camp and remains could potentially be located within the EWR corridor.

Further assessment should take into account potential presence of remains dating to the Anglo-Saxon period.

Paragraph 5.7.8 The list of designated heritage assets within draft order limits does not mention the scheduled monument known as ‘Bowl barrow, known as the `Round Hill', 440m WNW of College Farm’. The maps illustrating the route indicate that the monument is located within draft order limits, and this was confirmed during discussions.

We are content for the barrow to remain within the order limits, however all designated heritage assets located within draft order limits should be subject to appropriate assessments. Additional mitigation and management options would need to be considered for those assets in order to address concerns over public benefit.

Paragraph 5.7.12 List of non-designated assets does not contain non-designated earthwork remains associated with deserted medieval village at Little Barford. This includes the remains of a deserted medieval settlement, including house platforms and possible mill, moated manor, fish ponds, ridge and furrow and water meadows.

Further assessment should consider presence of these remains. They are known to be of equivalent value to that of designated heritage assets.

Paragraph 5.7.17 This part of the route crosses Bedford Borough and Central Bedfordshire in addition to Huntingdonshire district of Cambridgeshire. Two former local authorities are not mentioned but their heritage assets should be also assessed.

Paragraph 5.8.12 19th century Two Pots Farmhouse and associated buildings are not mentioned on the list of non-designated heritage assets. The building has been identified as a former inn on the north side of the Cambridge to St Neots Road.

Further assessments should include this non-designated heritage asset. What is its value and significance and the degree of surviving fabric.

Paragraph 5.8.17 In addition to Huntingdonshire district of Cambridgeshire this part of the route also crosses South Cambridgeshire District.

Paragraph 5.9.17 Bronze Age round barrow cemetery at Money Hill, Haslingfield is currently not a designated heritage asset, however it could be considered to have equivalent significance to scheduled monument and would be subject to the same policies. At present c. 11 barrows and ring ditches are thought to be located in the landscape which sits on the high ground overlooking an extensive multiperiod archaeological settlement landscape focused on the Granta river. Part of the landscape is scheduled.

Assets of comparable significance to designated assets should be assessed as having high heritage value. Further surveys to define extent of the archaeological remains and their significance are required. The setting of designated and non-designated heritage assets of equivalent value need to be taken into consideration and appropriately assessed.

Paragraph 5.10.7 List of designated heritage assets within the draft order limits does not include conservation areas (Cambridge, Riverside, and Stourbridge Common). The scheduled monument known as ‘Site revealed by aerial photography W of White Hill Farm’ was also omitted. The maps illustrating the route indicate that the CAs and the monument are located within draft order limits. This is very disappointing.

The list of designated assets list should be provided as an addendum to the scoping report, and all relevant designated heritage assets should be included. Assessments should be based on accurate baseline. Consideration of the impact of the proposal on setting, combined with heritage specific LVIA viewpoints and photomontages will need to be produced for all designated heritage asset affected.

Paragraph 5.10.10 Hobson’s Conduit and Railway footbridge on Coldham's Common are not listed among the non-designated heritage assets within the draft order limits.

The non-designated assets list should be reviewed, and all relevant non-designated heritage assets should be included.

Paragraphs 5.3.14; 5.4.14; 5.5.10; 5.6.9; 5.7.9; 5.8.10; 5.9.10; and 5.10.8 - Designated Heritage assets within the study area have not been specified for any part of the route. They have also not been shown on the supporting plans. It is

therefore not possible to determine if correct assets have been identified. This is also disappointing.

Separately, non-designated heritage assets within the study area have also not been specifically identified.

At the moment, it is not clear how the designated and un-designated assets may be impacted by the proposed development (e.g. direct physical impacts, impacts through changes to the preservation of the site, changes to setting etc.). For example, if the proposed development alters the local water environment the effects may be felt away from the area of works and could therefore impact nearby archaeological sites.

Designated and non-designated heritage assets within the study area should be clearly identified in the text and on the supporting plans to enable verification of the assessment and cross referencing.

Section 6.2 outlines expected sources of impact on the historic environment. It has been proposed to assess the types of impact according to them being either temporary, or permanent (6.2.2). While this is a valid approach, we want to highlight that certain elements could fall into both categories. For example, temporary roads, construction compounds, soil storage areas, etc. could cause permanent, and irreversible impact to buried archaeological remains. At the same time their impact on the setting of surrounding heritage assets (the construction impact) would be relatively short lived.

The assessment of impacts should consider different types of impact potentially caused by some elements of the scheme.

The Environmental Statement should clearly identify which elements of the scheme would be permanent and which would be associated with construction phase and later removed.

Historic England welcomes that direct disturbance of buried archaeology (6.2.9) as well as setting changes (6.2.10-11) are recognised as impacts on heritage assets. 6.2.9 outlines the permanent impacts that could affect the historic environment and includes issues associated to changes to drainage that could impact the local water environment, which is good to see. It would be useful to state that other activities may impact the local water environment, such as excavation of tunnels, construction of buried infrastructure or the temporary dewatering works required as part of the construction activities. If these activities impact the local water environment, they

could result in permanent changes to waterlogged organic archaeological and palaeoenvironmental remains.

Paragraph 7.1.1 outlines effective approach to mitigation adapted by the scheme, including changes to design, operation, provision of compensation, etc. We welcome commitment to embedded mitigation by design as a primary tool to avoid or minimise impacts on historic environment.

Paragraph 7.2.4 states that the Code of Construction Practice (CoCP) will include provisions for a written scheme of investigation (WSI) that will set out the objectives and methods of the archaeological work and the technical standards that will be adhered to. The CoCP will also outline the works that will take place if human remains are discovered and if any unexpected archaeological remains are discovered.

Paragraph 7.2.6 states that a register of environmental actions and commitments (REAC) will also be developed. We look forward to seeing and providing comment on this document in due course.

We support the development of the CoCP and REAC documents however there is also a need to ensure there is a clear an unambiguous link from the TWO to the archaeological mitigation. This is to secure an appropriate programme of archaeological works if consent is granted. This requires an appropriate worded heritage requirement in the TWO wording and a nested suite of documents including the CoCP, REAC and an Outline WSI.

Historic England would need to be clearly defined as a named party for the approval of documents post consent in the TWO. The TWO will also need to consider how it relates to heritage legislation and specifically the 1979 Ancient Monuments and Archaeological areas Act alongside the 1990 Panning Acts and relevant amendments.

Historic England should be consulted on the contents of these documents. And We look forward to seeing them in due course.

Due to the complexity of the scheme the WSI might have to have a character of overarching document, with further site specific WSIs and method statements would be required at implementation stage.

Paragraph 8.1.5 We are pleased to see that the potential impacts of changes to hydrology on features such as moated sites have been recognised.

It is stated in Section 8.1.6 that changes in ground conditions, especially to the water table, can affect the survival and condition of archaeological remains. For clarity, it would be useful to also include that changes to ground conditions can also impact palaeoenvironmental remains. This would make it clear that the historic environment is more than archaeological sites, but also the environmental evidence that provides information about how landscapes and environments were used and changed over time, placing archaeological sites into context.

Paragraph 9.2.2 We support the need for further surveys and assessments to identify heritage baseline. The location, character and extent of these surveys should be agreed with the stakeholders and statutory consultees.

For clarity it should be specified that photographic evidence from heritage specific viewpoints will be used to demonstrate impacts on the setting of heritage assets. Where appropriate visualisations of change and impact should be produced.

The non-intrusive and intrusive archaeological surveys have been identified as being necessary. We agree with this conclusion, however more details on the selected techniques that may be employed to understand the historic environment should be provided. For example, a number of different geophysical techniques are available which can be used to investigate different types of remains/features and on different geologies. Also, effectiveness of intrusive archaeological surveys would depend on the sample size being evaluated.

Paragraph 9.3.1 We welcome outlined approach to selection of assets for detailed assessment based on analysis of evidence (such as ZTV, site visits, etc.) and professional judgement. This exercise will need to supersede the baseline established for the preparation of the scoping report as outlined in Paragraph 4.3.1 which is based on hard boundaries.

Section 9.4. We broadly support the outlined approach to assessment methodology. For clarity it should be confirmed which potential effects would be significant in EIA terms. We understand from tables 5 and 6 that a degree of impact rating moderate and above is described as significant.

Should the route impact upon a designated heritage and necessitate all or part of its removal then this would need to be considered as both a significant effect, and as a level of ‘harm’ which is addressed using the language of planning policy. Total loss of an asset for example would be equivalent to ‘substantial’ harm and this will need to be noted in the ES alongside the EIA equivalent. This is to ensure the relevant policy tests are applied and that the harm is clearly articulated so that it can be weighed appropriate by the examining authority.

Paragraph 10.1.1 We recommend that all cartographic evidence is reviewed for the Bletchley to Bedford section of the route.

We recommend that non-intrusive surveys are extended beyond current draft order limit boundary where archaeological assessment on landscape level is required. For example, in the area to the south and west of Harston and between Harston and Haslingfield which contain complex and interlinked archaeological remains related to a scheduled monument - 'Settlement site at Manor Farm'.

A S.42 or SM Consent will be required for any survey work in the designated areas that includes all monument along the route from Alchester Roman to Cambridge.

We recommend that information held in local Historic Environment Records and further surveys are used to identify important non-designated built heritage assets in the local authorities which hold no 'list of locally important structures.'.

Paragraph 11.1.1 Historic England agrees that all types of the heritage assets listed in Table 7 should be scoped into the assessment**.**

Figures – Designated Landscape Features. Historic England notes that Conservation Areas and Registered Parks and Gardens have been shown on the plans marked 'Designated Landscape Features' however other types of heritage assets have been omitted.

The plans should clearly show all types of designated heritage assets, including scheduled monuments, listed buildings, etc. A separate set of plans (at appropriate scale) should be prepared to show the location of non-designated heritage assets.

Figure 114 – Designated Landscape Features Does not show Little Barford Conservation Area. This Conservation Area has been designated by Bedford Borough in 2023.

Conservation Area should be included in any further assessments. The assessments should be based on up-to-date data.

Routewide– Environmental- EIA Scoping Method Statement– Landscape and Visual

Para 4.5 identifies Historic Environment as an LVIA receptor in relation to the report, which we support. The landscape baseline (Section 5.2.4) however does not include scheduled monuments or conservation areas amongst the list of historic environment

features and the report has not clearly articulated between designated and non-designated heritage assets (e.g. at para 5.2.4 and 5.2.9).

The use of language in the LVIA assessment unfortunately lack clarity of mission and purpose with regards to the historic environment. Further reassurance is required in relation to this element of the assessment work. Historic Environment receptors need to be included in the LVIA assessment and treated appropriately to their form, designation and significance.

We recommend a heritage specific section is included in the LVIA and that this is integrated into the heritage chapters of the ES, and that our guidance on setting (GPA3) is used to support the assessment.

Appropriate photomontages would need to be produced to inform the assessment of the setting impacts. Historic England should be consulted on the selection of viewpoints related to designated heritage assets

Mitigation needs to be clearly designed to avoid additional heritage harm

Figures – Visual Receptors. Selected viewpoints do not include heritage specific viewpoints related to identified heritage assets. We recommend that heritage specific viewpoints should be identified as soon as possible and the locations for these images agreed with historic England.

Conclusion

As set out above we broadly support the approach taken however there are shortfalls in the heritage and LVIA sections of the report, we have sought to provide advice on how the applicant can address these matters as well as advice on the assessment process for the next stage of the application.

As with all our advice we hope that these comments are useful, however please do not hesitate to contact us for further information about any of the matters raised or for further clarification.

Yours Sincerely

Will Fletcher
Development Advice Team Leader and East West Rails Planning Lead
Will.Fletcher@HistoricEngland.org.uk

From: [redacted]
To: East West Rail
Subject: Response to Scoping Report from Houghton Conquest Parish Council
Date: 29 January 2025 13:11:59

Further to your letter of 2nd January 2025.

Houghton Conquest Parish Council wish to put forward the following comments:

That consideration is given to the residents of Kempston Hardwick and Stewartby regarding disruption during any construction work, such as road closures and the impact on local traffic.

Public Transport – that consideration is given to linking the train stations with other public transport such as buses from local villages and towns. Currently it is difficult to get to local stations without driving.

Parking – that there is sufficient parking planned at all stations.

As smaller stations could be replaced by larger stations consideration should be given to the environmental impact and biodiversity. Is it possible to keep existing stations?

--
Kind Regards,

Jo Graves

Clerk to Houghton Conquest Parish Council
[redacted]

The Planning Inspectorate
Environmental Services
Operations Group 3
Temple Quay House
2 The Square Bristol, BS1 6PN
eastwestrail@planninginspectorate.gov.uk

CEMHD - Land Use Planning,
NSIP Consultations,
Building 1.2, Redgrave Court
Merton Road, Bootle,
Merseyside L20 7HS.
NSIP.applications@hse.gov.uk

Date: 27/01/2025

Dear Sir/Madam,

PROPOSED EAST WEST RAILWAY PROJECT
PROPOSAL BY EAST WEST RAILWAY COMPANY LIMITED
INFRASTRUCTURE PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2017 (AS AMENDED) REGULATIONS 10 AND 11

Thank you for your email on 2/01/2025 regarding the information to be provided in an environmental statement relating to the above project. HSE does not comment on EIA Scoping Reports, but the following information is likely to be useful to the applicant.

HSE's land use planning advice:

Will the proposed development fall within any of HSE's consultation distances?

The works associated with this NSIP are substantial and include the following (extract from **Routewide- Environmental- EIA Scoping Report 05/12/2024 Ref: 133735-MWJ-Z0-XXX-REP-EEN-000035)**:

• Construction of a new railway between Bedford and Cambridge, including the construction of new stations at Tempsford and Cambourne.

• Improvements to the existing railway between Oxford and Bedford and the approach into Cambridge.

• Works to upgrade existing stations along the route to ensure they can accommodate increased passenger numbers, including:

- Remodelling Bedford station.
- The potential consolidation or upgrade of stations on the Marston Vale Line.
- Relocating Bedford St Johns station.
- Works at Cambridge station.

• Building new infrastructure and upgrading existing structures, including viaducts, tunnels, bridges, cuttings and embankments.

According to HSE's records, the proposed DCO application boundary for this Nationally Significant Infrastructure Project is within the consultation zones of six major accident hazard sites [MAH] and sixteen major accident hazard pipelines ['MAHP']. This is based on drawings contained in **TR040012-000020-East West Rail scoping report - Figures Part 1 – plans (Figures 1-29)** which provide plans of the proposed route and ancillary work areas. [downloaded from: https://national-infrastructure-consenting.planninginspectorate.gov.uk/projects/TR040012/documents]

Due to the scale and complexity of the site boundary against the number of consultation zones in this area and the resulting difficulties in cross-referencing against each other, HSE requested GIS files of the DCO boundary which were received on 16/01/2025.

The duty holders associated with the MAH sites are listed below. All the site consultation zones are intercepted by the existing rail infrastructure however, given the additional construction works required along the project route, following points should be noted.

MAH sites 1 and 6 may not be in operation but the hazardous substance consent may still be in existence. We recommend that the Hazardous Substance Authority is contacted to determine their current status.

MAH sites 2, 4 and 6 are in the vicinity of train stations where the construction work is likely to be more complex and these should be assessed further as the project develops.

1. H4376 The Oil and Pipelines Agency- Islip Petrol Storage Depot
2. H3635 Chemetall Ltd, Milton Keynes, Bletchley Station.
3. H3611, Veolia ES (UK) Ltd, Green Lane, Bedfordshire
4. H1378, Hanson Brick Ltd, Stewartby works,
5. H4840, Asda Stores Ltd
6. H1550,Transco, Bedford Holder Station.

The EIA Scoping document **Routewide- Environmental- EIA Scoping Report 05/12/2024 Ref: 133735-MWJ-Z0-XXX-REP-EEN-000035** also lists sites with a potential to cause major accidents for the project and these should be included in further risk assessments as the project develops.

- Veolia ES (UK) Ltd, Green Lane, Bedfordshire
- Henkel UK Operations Limited, 5 Cromwell Road, St Neots
- 2M Manufacturing Limited, Tego House (HQ), Chippenham Drive, Kingston, Milton Keynes
- Frontier Agriculture Limited, Georgetown, Road, Sandy, Bedfordshire

The MAHPs encountered along the project route are listed below. A note has been made as to whether the pipeline is crossed by the East West rail project, runs parallel to it or is near a proposed or existing rail station. Where the proposed route is a new connection and not an upgrade to existing rail infrastructure it has been additionally marked as new. The operators may require additional information to assess the proposal in the new location.

- 7077_1348, Southern Gas Networks, Tackley / Arncot, crosses the route
- 7075_1346, Southern Gas Networks, Bicester / Marsh Gibbon, runs parallel to the route
- 4023241_2774, Southern Gas Networks, Hardwick / Marsh Gibbon, crosses the route
- 7076_1347, Southern Gas Networks, Banbury / Marsh Gibbon, crosses the route
- 7074_1345, Southern Gas Networks, Marsh Gibbon / Stanton St.John, crosses the route
- 7073_1344, Southern Gas Networks, Marsh Gibbon to Newton Longville, runs parallel to the route
- 4130851_1341, Southern Gas Networks, Newton Longville / Crockmore Farm, crosses the route
- 7079_1350, Southern Gas Networks, Newton Longville / Cranfield- crosses the route and in the vicinity of train station-Bow Brickhill
- 7520_1779, Cadent Gas Ltd, Sherington / Steppingley- crosses the route
- 8423_2703, National Gas, 26 Feeder Huntingdon / Willington, crosses the route, new
- 7594_1848, National Gas, 9 Feeder Huntingdon / Whitwell, crosses the route, new
- 7593_1847, National Gas, 7 Feeder Colmworth / Old Warden, crosses the route, new
- 7471_1730, National Gas, 18 Feeder Huntingdon / Cambridge, crosses the route, new
- 7472_1731, National Gas, 18 Feeder St. Neots / Little Barford, crosses the route, new
- 7404_1663, Cadent Gas Ltd, Girtford / Horsey Lock, crosses the route
- 7401_1660, Cadent Gas Ltd, Teversham / Madingley Road, crosses the route

The Applicant should contact the above operators to inform an assessment of whether the proposed development is vulnerable to a possible major accident. There are three particular reasons for this:

i. The pipeline operator may have a legal interest in developments in the vicinity of the pipeline. This may restrict developments within a certain proximity of the pipeline.

ii. The standards to which the pipeline is designed and operated may restrict major traffic routes within a certain proximity of the pipeline. Consequently, there may be a need for the operator to modify the pipeline or its operation, if the development proceeds.

iii. To establish the necessary measures required to alter/upgrade the pipeline to appropriate standards.

HSE's Land Use Planning advice is dependent on the location of areas where people may be present in relation to HSE's consultation zones [HSE: Land use planning - HSE's land use planning methodology]. Based on the information in the **Routewide- Environmental- EIA Scoping Report 05/12/2024 Ref: 133735-MWJ-Z0-XXX-REP-EEN-000035** there is not yet enough detail for HSE to give advice.

Please note that the advice is based on HSE's existing policy for providing land-use planning advice and the information as provided. HSE's advice in response to a subsequent planning application may differ should HSE's policy or the scope of the development change by the time the Development Consent Order application is submitted.

Would Hazardous Substances Consent be needed?

Hazard classification is relevant to the potential for accidents. Hazardous substances planning consent is required to store or use any of the Categories of Substances or Named Hazardous Substances set out in Schedule 1 of The Planning (Hazardous Substances) Regulations 2015 as amended, if those hazardous substances will be present on, over or under the land at or above the controlled quantities. There is an "addition rule" in Part 4 of Schedule 1 for below-threshold substances.

Based on the **Routewide- Environmental- EIA Scoping Report 05/12/2024 Ref: 133735-MWJ-Z0-XXX-REP-EEN-000035**, it is not clear whether the applicant has considered the hazard classification of any chemicals that are proposed to be present at the development. This may be because there are no in-scope hazardous substances. If hazardous substances planning consent is required, please consult the relevant Hazardous Substance Authority (usually the Local Planning Authority) on the application.

Consideration of risk assessments

Regulation 5(4) of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 requires the assessment of significant effects to include, where relevant, the expected significant effects arising from the proposed development's vulnerability to major accidents. HSE's role in NSIPs is summarised in Advice Note 11 "working with public bodies in the infrastructure planning process" Annex G on the Planning Inspectorate's website: Nationally Significant Infrastructure Projects - Advice Note Eleven, Annex G: The Health and Safety Executive - GOV.UK (www.gov.uk).

Routewide- Environmental- EIA Scoping Report 05/12/2024 Ref: 133735-MWJ-Z0-XXX-REP-EEN-000035 includes consideration of risk assessments under the heading "Major Accidents and disasters" and states that Risks from works close to oil and gas pipelines and major accident or explosion at COMAH facilities will be covered under the requirements of existing legislation and compliance will be secured through an alternative regulatory process. It goes on to state that major accidents and disasters are therefore proposed to be scoped out of the EIA. **We would advise that given the number of major accident hazard sites and major accident hazard pipelines that the proposed scheme intersects that the major accidents and disasters remains in scope and are considered further to better determine the development's vulnerability to major accidents** (e.g. from the above identified sites and/or pipelines).

We would advise this is considered further in line with Advice Note 11 Annex G taking account of the following: *"it may be beneficial for applicants to undertake a risk assessment as early as possible to satisfy themselves that their design and operation will meet the requirements of relevant health and safety legislation as design of the Proposed Development progresses.".*

Explosives sites

From the information provided the proposed development falls within the inner safeguarding of an HSE explosive licenced site. The Explosives Inspectorate has considered the effect that the explosive operations allowed under the licence might have on the proposed development.

Should the development proceed as proposed the Explosives Inspectorate would review the explosives facility's licence. They may result in the quantity of explosives at the licence being reduced.

We would be grateful if the planning authority would advise the Explosive Inspectorate by email to explosives.licensing@hse.gov.uk of the outcome of the planning decision.

At this time, please send any further communication on this project directly to the HSE's designated e-mail account for NSIP applications at nsip.applications@hse.gov.uk. We are currently unable to accept hard copies, as our offices have limited access.

Yours sincerely

CEMHD NSIP Consultation Team

Your ref:
Date: 31st January 2025
Contact: Claire Burton
Email: Implementation@huntingdonshire.gov.uk

Pathfinder House
St Mary's Street
Huntingdon
PE29 3TN
www.huntingdonshire.gov.uk

Sent via email to: eastwestrail@planninginspectorate.gov.uk

Dear PINS,

East West Rail EIA Scoping Report

I am writing on behalf of Huntingdonshire District Council (the Council) in response to your request dated 2nd January 2025 regarding the Applicant's EIA Scoping Report for the East West Rail proposals. The Council understands that the Applicant for the Proposed Development intends to make an application for Development Consent under the Planning Act 2008, and that the Applicant has sought a Scoping Opinion from the Planning Inspectorate (PINS), on behalf of the Secretary of State, as to the scope and level of detail of the information to be provided within the Environmental Statement that will accompany its future application.

The Council acknowledges that it has been identified by PINS as a consultation body to inform the Scoping Opinion. Attached to this letter is a table containing the Council's views on this matter.

If you have any queries regarding this submission or require any further information, please contact Implementation@huntingdonshire.gov.uk

Yours sincerely,

[redacted]

Clara Kerr
Chief Planning Officer

EWR Scoping Report: Comments on the Applicant's EIA Scoping Report

This document sets out the comments by Huntingdonshire District Council (**the Council**) regarding EWR Co's EIA Scoping Report for the East West Rail proposals.

The following table contains comments across a number of technical specialisms.

Specialism / Topic area	Consultation documents / pages /tables	Comments and key issues	Proposed mitigation and/or actions
Air Quality	EWR-MWJV Technical Partner Routewide - Environmental - EIA Scoping Report **S6.3 & Appendix B** Document Number: 133735-MWJ-Z0-XXX-REP-EEN-000035 Date: 05/12/2024.	As previously discussed in the response to the non-statutory consultation in 2024, from the information provided on alignment options 1b and 1c it is unlikely either of these would have a significant impact on air quality within the district of Huntingdonshire, however 1c would be of preference, along with Option F for the proposed ECML rail logistics hub, for the reasons highlighted previously (the height of 1b, the conclusions of the non-statutory consultation Technical Report, and the reduced quantity of earthworks for Alignment 1c compared to the baseline). It is likely the greatest impact on air quality within the district of Huntingdonshire will be during the construction phase. It is noted that there will be a Code of Construction Practice and that the study area for the construction dust assessment will be up to 250m from construction activities. It would be helpful to see this	Provide a plan to show sensitive receptors.

Specialism / Topic area	Consultation documents / pages /tables	Comments and key issues	Proposed mitigation and/or actions
		on a plan, highlighting the sensitive receptors so we can ensure all relevant receptors are taken into consideration.	
	EWR-MWJV Technical Partner Routewide – Environment - EIA Scoping Method Statement – Air Quality (PW) Document Number: 133735-MWJ-Z0-XXX-REP-EEN-000016 Date: 05/12/2024.	Appendix B regarding the Indicative construction management methods provides examples of mitigation measures which can be built on.	
		Section 3 makes reference to the Environmental Targets (Fine Particulate Matter) (England) Regulations 2023. DEFRA is in the process of producing planning guidance on how developers and decision-makers should take the targets into consideration in the planning process. However, ahead of the publication of the finalised guidance next year the department has issued interim guidance, which should be taken into account.	Consideration of guidance and updates to guidance.
		Section 11.3.1 regarding ongoing consultation is noted and this is welcomed, as there is already more up to date information from local authorities within last year's Annual Status Reports. This is also relevant to Section 5.5 regarding local emission sources, which should also be checked with the relevant	On-going consultation with LA's.

Specialism / Topic area	Consultation documents / pages /tables	Comments and key issues	Proposed mitigation and/or actions
		Local Authorities, as some sources may not be covered by the Environmental Permitting regime.	
Communities, Skills, Employment, Socio-economics	From an Economic Development perspective our findings for the proposed development aligns with key objectives of the Huntingdonshire Economic Growth Strategy, which emphasises fostering economic prosperity, supporting local businesses, and creating employment opportunities. For reference, the strategy can be accessed here **Economic Growth Strategy**	**Communities** *Positive Viewpoints:* Housing Growth: Increased demand for housing can stimulate the local economy and lead to the development of new residential areas. Reduced Travel Time: Improved infrastructure can reduce travel times, enhancing the quality of life for residents. Income Generation: New developments can generate additional income for the community through various channels. Recreational Sites: Increased recreational sites can improve community well-being and attract visitors.	Further develop discussions with the Council to realise the strategic growth opportunities for new jobs, home and infrastructure, including how EWR will actively promote STEM careers, education and apprenticeships and Door-to-Door accessibility and connectivity for St Neots and visitor economy.

		Healthcare/Education: Enhanced infrastructure can lead to better healthcare and educational facilities. Attraction of Working Age: The development can attract a younger, working-age population, boosting the local workforce. *Negative Viewpoints:* Housing Growth: Higher demand for housing may lead to increased property prices, potentially making housing less affordable for some residents. Reduced Travel Time: While beneficial, reduced travel times could lead to increased traffic and congestion in certain areas. Income Generation: The benefits of income generation may not be evenly distributed across the community. Recreational Sites: Development of recreational sites may lead to the loss of natural habitats or green spaces.	

		Healthcare/Education: Increased population may strain existing healthcare and educational facilities. Attraction of Working Age: An influx of new residents could lead to cultural and social integration challenges. **Skills** *Positive Viewpoints:* Bio-medical Employment: Links to Cambridge can boost bio-medical employment opportunities, attracting skilled professionals. High-Level Skills: The development can lead to an increase in high-level skills within the local workforce. Training Opportunities: Potential training opportunities for construction can help retain young people in the district. Educational Links: Greater links to educational sites can enhance learning and development opportunities.	

		Skills Intelligence Model: A skills intelligence model and profile can provide valuable insights for workforce planning. *Negative Viewpoints:* Bio-medical Employment: The focus on bio-medical employment may overlook other important sectors. High-Level Skills: There may be a skills gap if the local workforce is not adequately trained for high-level positions. Training Opportunities: Training opportunities may be limited to specific sectors, excluding others. Educational Links: Increased links to educational sites may not benefit all residents equally. Skills Intelligence Model: Implementing a skills intelligence model may require significant resources and time. **Employment**	

		Positive Viewpoints: Employment Generation: The project can generate both permanent and temporary employment, benefiting the local community. Future Demand: Creation of future demand for housing and employment sites can stimulate economic growth. Construction Employment: Employment generation during construction can provide job opportunities, even if temporary. Access to Employment: Improved access to employment opportunities can enhance the local job market. **Socio-economics** *Positive Viewpoints:* Economic Growth: Improved east-west connectivity can support economic growth by opening up new areas for business development.	

		Journey Times: Shorter and quicker commuter times can enhance productivity and quality of life. Freight Capacity: Increased capacity for freight lines can boost local businesses and trade. Future Development: Attracting future development can lead to sustained economic growth and investment. *Negative Viewpoints:* Economic Growth: Economic growth may lead to increased living costs and potential displacement of lower-income residents. Journey Times: Shorter journey times may result in increased traffic and environmental impact. Freight Capacity: Increased freight capacity may lead to noise and pollution concerns. Future Development: Attracting future development may result in the loss of	

Specialism / Topic area	Consultation documents / pages /tables	Comments and key issues	Proposed mitigation and/or actions
		existing businesses or relocation out of the area. Employment Generation: Temporary employment may not provide long-term job security for workers. Future Demand: Increased demand for housing and employment sites may lead to overdevelopment and strain on infrastructure. Construction Employment: Employment during construction may be regional rather than district-specific, limiting local benefits. Access to Employment: Improved access may lead to increased competition for jobs, potentially disadvantaging local residents	
Noise Reviewed by	EWR-MWJV Technical Partner Routewide – Environmental - EIA Scoping **Method**	*4.1. Baseline Survey*: The location of baseline survey monitoring points must be agreed with Env Health. *4.2. Study Area*:	All baseline data and survey methodology to be provided to the Council for approval. Provide location of baseline survey for agreement

Specialism / Topic area	Consultation documents / pages /tables	Comments and key issues	Proposed mitigation and/or actions
	Statement - Sound, Noise and Vibration (PW) Document Number: 133735-MWJ-Z0-XXX-REP-EEN-000017 Date: 05/12/2024	A 300 metre study distance from the closest construction or operational activity would normally be reasonable, however in the case of St Neots, the A428 is located approximately 300m west of the proposed track, beyond which are residential receptors. It is recommended to extend the area of study here by 100m so there is a better understanding of the rail noise without the direct influence of noise from the A428. *5. Preliminary Baseline Description - 5.6. Roxton to east of St Neots*: No mention of existing quiet rural area and no mention of the proposed A421 road construction along the eastern side of the proposed rail-track. *6. Sources of Impact* Need to know what fixed plant is going to be at ECML Rail Logistics Hub option B because this is close to St Neots south residential area. Good to see BS5228-1 (and -2), CRTN, CRN and Additional railway noise source terms for “Calculation of Railway Noise 1995” will be used.	Increase study area to 400m east of St Neots. Consider existing quiet areas and the A421 under construction east of St Neots. Provide details of any noisy fixed plant at logistic hub option B.

Specialism / Topic area	Consultation documents / pages /tables	Comments and key issues	Proposed mitigation and/or actions
		8.4 Code of Construction Practice A CoCP will be developed. This would need to define noise limits at noise sensitive receptors. Alternatively, these could be within a Construction Environmental Management Plan (CEMP). *9. Evaluating Significance* Error noted in Table 5, note 4 relating to night-time level of 55dB should be SOAEL not LOAEL. Concerned that action may only be taken between LOAEL and SOAEL, whereas the rail noise should not exceed the LOAEL. *10. Proposed Scope* Table 7 scopes out horn/audible warning devices. This is acceptable if they are not used between midnight and 06:00 as stated.	Provide CoCP or CEMP with noise limits. Amend error. Ensure that rail noise will not exceed LOAEL at noise sensitive receptors. Ensure audible warning devices are not used between midnight and 06:00.
Climate and Carbon		The Council is not the statutory consultee for this subject area and so would expect PINS to consult Cambridgeshire County Council on this matter regarding the site and any associated infrastructure that falls within Cambridgeshire County Council's boundary. The Council would defer to	On-going engagement with the Council.

Specialism / Topic area	Consultation documents / pages /tables	Comments and key issues	Proposed mitigation and/or actions
		Cambridgeshire County Council for a detailed response, whilst reserving the right to comment further in the future.	
Health		The Council is not the statutory consultee for this subject area and so would expect PINS to consult Cambridgeshire County Council on this matter regarding the site and any associated infrastructure that falls within Cambridgeshire County Council's boundary. The Council would defer to Cambridgeshire County Council for a detailed response, whilst reserving the right to comment further in the future.	On-going engagement with the Council.
Biodiversity	EIA Scoping Method Statement– Biodiversity	HDC reserves the right to comment further when changes to the study area as defined in section 4.5 will affect the area's habitats and wildlife within it. As previously discussed in the response to the non-statutory consultation in 2024, the council reserves the right to comment on further ecological surveys planned.	On-going consultation with LA's is required. Up to date ecological reports and survey data to be maintained and to follow methodology updates to ensure survey validity. This is particularly important for information gathered on barbastelle bats and any land functionally linked to SAC's All baseline data and survey methodology to be provided to the Council for approval. Locations should be identified for bat monitoring along the route, particularly at crossings and to align with A428 monitoring locations and crossings.

Specialism / Topic area	Consultation documents / pages /tables	Comments and key issues	Proposed mitigation and/or actions
			Veteran tree survey data to be provided, identifying veteran, ancient and notable trees present within and adjacent to the project area.
Archaeology		The Council is not the statutory consultee for this subject area and so would expect PINS to consult Cambridgeshire County Council on this matter regarding the site and any associated infrastructure that falls within Cambridgeshire County Council's boundary. The Council would defer to Cambridgeshire County Council for a detailed response, whilst reserving the right to comment further in the future.	On-going engagement with the Council.
Historic Environment	EWR-MWJV Technical Partner Routewide – Environmental - EIA Scoping Method statement - Historic Environment **Method Statement chapter 5.7 Roxton to East of St Neots** **Chapter 9.4 Assessment Methodology** **and EIA Chapter 6.12**	5.7.17 There is currently no list of buildings of local interest within Huntingdonshire. This is correct but the criteria for identifying locally listed buildings is set out for Huntingdonshire under the Cambridgeshire's local Heritage List. HDC reserves the right to comment further when the relevant heritage assets have been identified 5.7.8 - 5.7.12 It is unclear which heritage assets fall within Huntingdonshire Table 3 para 9.4.4 heritage value of assets is considered acceptable matrix	Ensure any non designated heritage assets meet the criteria on the Cambridgeshire local heritage list. Further clarity sought

Specialism / Topic area	Consultation documents / pages /tables	Comments and key issues	Proposed mitigation and/or actions
		Table 4 para 9.4.5 assessing degree of impact. The rationale behind the beneficial category in the table is not fully understood. For example, a major adverse impact would be recorded against the demolition of a listed building but the wording in the beneficial category would suggest it could be major beneficial impact if that listed building were to be rebuilt, this can not an equitable weighting of harm and benefit. Table 6 significance of effect matrix – this considers degree of impact against Heritage value, all listed buildings designated as High value. However this does not reflect the difference of significance between a grade ii and grade i listed building, which is reflected in the NPPF para 212 – the more important the asset the greater the weight should be given to the assets conservation	Unconvinced by beneficial category please justify Increased weighting in matrix required to highest grade listed buildings
Landscape and Visual	EIA Scoping Method Statement Landscape and Visual	As previously discussed in the response to the non-statutory consultation in 2024 Careful positioning of railway infrastructure with consideration of overhead power supply impacts on landscape sensitivity views is urged.	On-going consultation with LA's: All baseline data and survey methodology to be provided to the Council for approval. Baseline surveys to be provided for winter months when vegetation is not in leaf.

Specialism / Topic area	Consultation documents / pages /tables	Comments and key issues	Proposed mitigation and/or actions
		GLVIA method generally acceptable. Temporal scope of the LVIA should include visual effects of the project at year 1 and 15 in both winter and summer seasons at agreed viewpoints through on-going consultation. Any new development, which include phase 2 and 3 Wintringham and any potential i.e. North Weald Solar Farm to be considered in relation to the potential cumulative impact of the Project. The zone of theoretical visibility (ZTV) has not yet been modelled. This is required at the earliest opportunity to inform the LVIA and subsequent mitigation requirements which need to be sympathetic to the existing surroundings.	Additional surveys (including arboricultural surveys and veteran tree surveys) required as vegetation structure changes within the 2km study area through tree loss and growth. An appropriate number and range of viewpoints to be agreed. Year 15 to include both winter and summer evaluation of effects to demonstrate the effectiveness of planting. The zone or theoretical visibility (ZTV) modelling is required as soon as possible to provide time for the Council to review.
Land Use, Quality, Soils and Agriculture	EWR-MWJV Technical Partner. Routewide – Environmental - EIA Scoping Method Statement – **Land Quality**	Potential land contamination sources identified in the draft Order Limits include a garden centre, a sewage treatment works, farm outbuildings, railway and highways, including the A428 which is	Ensure the ground is assessed for risk to construction workers and groundwater.

Specialism / Topic area	Consultation documents / pages /tables	Comments and key issues	Proposed mitigation and/or actions
	(PW) Document Number: 133735-MWJ-Z0-XXX-REP-EEN-000025 Date: 05/12/2024	crossed twice in the route section. No significant land contamination is expected.	
Minerals and Waste		The Council is not the statutory consultee for this subject area and so would expect PINS to consult Cambridgeshire County Council on this matter regarding the site and any associated infrastructure that falls within Cambridgeshire County Council's boundary. The Council would defer to Cambridgeshire County Council for a detailed response, whilst reserving the right to comment further in the future.	To keep the Council informed.
Water Resources and Flooding	Page 9, 3.3.1	Level 1 SFRA and WCS has been completed for Huntingdonshire and can be found at: Evidence Library for Local Plan Update - Huntingdonshire.gov.uk	Take into account Huntingdonshire District Council Local plan evidence bases
Water Resources - and Flooding	Page 10, Section 4.1 Water Resources chapter	Further modelling will be required to take into account the updates to flood risk mapping including NAFRA2 and Lower Ouse Model. It is agreed that the cumulative impact of East West Rail should be taken into account.	Take into account updated flood models. Careful consideration of Hen Brook, Fox Book and Wintringham Brook and impact from surface water run off and water quality. Maintenance and quality of drainage networks within the proposed development will also need to be considered to ensure flood risk is not increased elsewhere and within existing settlements.

Specialism / Topic area	Consultation documents / pages /tables	Comments and key issues	Proposed mitigation and/or actions
		Flood Zones 3b and 3 are prevalent along Hen Brook, Fox Book and Wintringham Brook with associate surface water run off already a further source of flood risk. Most waterbodies within Huntingdonshire are also highly sensitive when considering ammonia, Abbotsley and Hen Brooks dissolved oxygen status and phosphate status is poor, with ammonia status high. Additional run off from construction and operation could exacerbate the issue, especially in cumulation with the A428 scheme. Maintenance and quality of drainage networks within the proposed development will also need to be considered to ensure flood risk is not increased elsewhere and within existing settlements.	
Water Resources and Flooding	Page 26 and 27, section 8.1 and 8.2 And Water Resources chapter	Notes that “The measures that could be included into the design to avoid, reduce or mitigate the potential flood risk impacts that otherwise may occur include...”	Good practice examples should include a long term maintenance plan for drainage networks to ensure continued flood risk mitigation.

Specialism / Topic area	Consultation documents / pages /tables	Comments and key issues	Proposed mitigation and/or actions
		The National Policy Statement for Water Resources Infrastructure (Defra, 2023) states that effect on water quality and the requirement in to not increase flood risk elsewhere for the lifetime of the development, taking into account climate change is an important consideration. It is considered that the requirement for betterment should be included within the scope of the EIA.	It is considered that the requirement for betterment should be included within the scope of the EIA.
Traffic and Transport	Page 14, paragraph 4.3	The impact and assessment of Transport should take into account future growth scenarios/land allocations as Huntingdonshire's Local Plan progresses. With many Local Authorities currently updating their local plans the cumulative impact of development on the transport network should be assessed. Huntingdonshire District Council will be conducting a transport assessment as part of the local plan preparation.	Ongoing consultation with the Council.
Transport Modelling	Page 64, Paragraphs 4.2.24 and 4.2.25	"The East West Rail Strategic Highway Model (EWRSHM) has been developed and used as an interim tool to assess	Consultation with local authorities regarding growth strategies and site allocations. Update modelling accordingly.

Specialism / Topic area	Consultation documents / pages /tables	Comments and key issues	Proposed mitigation and/or actions
		traffic impacts. The preliminary results are presented in the Transport Update Report (TUR)13. The model has provided information on baseline and future traffic flows" The impact and assessment of Transport should take into account future growth scenarios/land allocations as Huntingdonshire's Local Plan progresses. With many Local Authorities currently updating their local plans the cumulative impact of development on the transport network should be assessed.	
Public Rights of Way (PROW)		The Council is not the statutory consultee for this subject area and so would expect PINS to consult Cambridgeshire County Council on this matter regarding the site and any associated infrastructure that falls within Cambridgeshire County Council's boundary. The Council would defer to Cambridgeshire County Council for a detailed response, whilst reserving the right to comment further in the future.	On going engagement with the Council.
Emergency Planning		The Council is not the statutory consultee for this subject area and so would expect PINS to consult Cambridgeshire County	On going engagement with the Council.

Specialism / Topic area	Consultation documents / pages /tables	Comments and key issues	Proposed mitigation and/or actions
		Council on this matter regarding the site and any associated infrastructure that falls within Cambridgeshire County Council's boundary. The Council would defer to Cambridgeshire County Council for a detailed response, whilst reserving the right to comment in the future.	

From: [redacted]
Cc: East West Rail
Subject: CONSULTATION RESPONSE - East West Rail Environmental Impact Assessment Scoping Report
Date: 31 January 2025 06:52:57

Following our review of the Environmental Impact Assessment Scoping Report and consultation with village residents, Islip Parish Council wishes to raise several significant concerns about the proposed works affecting our parish and requests these be fully incorporated into the scope of the Environmental Impact Assessment.

1. CONFIRMED WORKS AND IMPACTS

The Environmental Impact Assessment (Section 3.1.2, page 25) confirms substantial works planned for Islip including rail corridor widening, new passing loops, footbridge replacements, and overhead line equipment installation. Each element of these works will significantly affect our historic village and its residents.

Our location in the open landscape of the Cherwell and Ray river floodplains makes Islip particularly vulnerable to visual changes. The assessment (Section 2.6.2, page 22) acknowledges that any new structures will be highly visible across this setting. The Environmental Impact Assessment must therefore include detailed visual impact assessments from key viewpoints within and around the conservation area, including seasonal variations and night-time impacts from any proposed lighting.

The noise assessment (Section 6.8.3-6.8.4, pages 111-112) identifies multiple sources that will affect our community, including construction activity, increased train movements, and noise from trains using the new passing loops. The cumulative effect of these noise sources requires careful consideration and mitigation.

The proposed works will significantly affect community movement and access. Changes to public rights of way, combined with construction traffic and potential community separation, will impact daily life in our village. The combined effects of noise, visual changes, dust and traffic during construction require comprehensive management plans.

Our position between the Cherwell and Ray rivers makes wildlife impact a key concern. The assessment (Section 6.10.8, pages 119-120) identifies risks to existing habitats, wildlife movement patterns, and local species from both construction and ongoing operations. The protection of these natural corridors is crucial to maintaining our local environment.

2. TRACTION UNIT CONCERNS

Of particular concern to our community is the proposed traction unit. This industrial structure would be a significant addition to our conservation area. Its scale would be unprecedented in our village setting, being more than twice the height of existing boundary features. Our residents have raised serious concerns about its impact on the conservation area, residential amenity, and access arrangements..

INFORMATION REQUESTED

Given these impacts, we require detailed information about:

a) Construction Management

We seek comprehensive details regarding construction timelines and traffic management plans. The parish council needs to understand how disruption to village life will be

minimised during the works period, particularly regarding construction traffic routes and hours of operation.

b) Infrastructure Changes
The parish requires full information about the replacement footbridge designs, including closure periods and alternative access arrangements during construction. The impact on public rights of way must be clearly detailed, along with proposals for maintaining community connectivity throughout the works.

c) Environmental Protection
Given our sensitive location, we need specific information about measures to protect our river corridors, local wildlife habitats, and the general village environment during both construction and operation phases. This should include detailed ecological surveys and proposed mitigation measures.

d) Traction Unit Proposal
Regarding the proposed traction unit, we specifically require:

1. A detailed justification for locating this substantial structure within our conservation area, including consideration of alternative locations. The impact of a 4-meter high industrial structure on the character of our historic village requires particularly careful consideration.

2. A comprehensive visual impact assessment demonstrating how this structure would affect the conservation area and nearby properties, particularly given our open landscape setting.

3. Full details of associated infrastructure requirements, including power supply arrangements and any additional structures or works needed.

4. Clear information about construction and maintenance access arrangements, given our narrow roads and limited access points.

5. A detailed assessment of impacts on neighbouring properties, with particular attention to vulnerable residents who may be significantly affected by this development.

6. Proposed mitigation measures to minimise the impact on both the conservation area and residential amenity.

3. ONGOING ENGAGEMENT

The Parish Council requests regular updates throughout the development of these proposals and involvement in discussions about detailed design and mitigation measures. Our community's concerns must be properly addressed before any works commence.

We trust these points will be fully considered in the Environmental Impact Assessment process.

Kind regards

Emma Kearney
Clerk & RFO to Islip Parish Council
[redacted]
www.islipparishcouncil.gov.uk

Please note: I work part-time hours so there could be a delay in responding to emails.

From: Local Plan
To: East West Rail
Subject: RE: Notification of scoping report consultation-proposed East West Railway
Date: 13 January 2025 13:13:16
Attachments: image003.png
image005.png
image008.png
image009.png
image010.png
image011.png

> You don't often get email from localplan@hillingdon.gov.uk. Learn why this is important

Dear Sir/Madam,

LB Hillingdon has no comments to make on this consultation.

Kind regards,
Gavin

Gavin Polkinghorn MRTPI
Team Leader Planning Policy
Planning and Sustainable Growth
Hillingdon Council

Logo

From: East West Rail <EastWestRail@planninginspectorate.gov.uk>
Sent: Thursday, January 2, 2025 2:57 PM
To: [redacted]@planninginspectorate.gov.uk>
Subject: Notification of scoping report consultation

> You don't often get email from eastwestrail@planninginspectorate.gov.uk. Learn why this is important

Dear Sir/Madam

Please see attached correspondence on the proposed East West Railway.

The Applicant for the Proposed Development intends to make an application for Development Consent under the Planning Act 2008. The Applicant has sought a Scoping Opinion from the Planning Inspectorate, on behalf of the Secretary of State, as

to the scope and level of detail of the information to be provided within the Environmental Statement that will accompany its future application.

The Planning Inspectorate has identified you as a consultation body to inform the Scoping Opinion and is therefore inviting you to submit comments by 31 January 2025. The deadline is a statutory requirement that cannot be extended.

Further information is included within the attached letter.

Regards

Karen Wilkinson.

Karen Wilkinson (She/Her)

Senior EIA Advisor

The Planning Inspectorate

T 0303 444 5072

Helpline 0303 444 5000

@PINSgov The Planning Inspectorate planninginspectorate.gov.uk

Ensuring **fairness**, **openness** and **impartiality** across all our services

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DPC:76616c646f72

Kingston Parish Council

EWR Scoping Opinion response

By email to: eastwestrail@planninginspectorate.gov.uk

We have grave concerns about environmental impacts during the construction phase. This includes: construction noise; construction traffic using local roads; and road closures and diversions during construction.

The traffic and transport section of the Scoping Opinion document (Table 17) mentions the effects of vehicle movements to new and existing stations, but omits to consider other destinations. Road closures and diversions (whether permanent or temporary) could potentially have an impact on existing road journeys eg routes for access to schools, businesses, shops and other facilities, and should be evaluated.

Furthermore, we are not clear whether the potential for pollution of the aquifer under the Eversden pumping station is included in the topics to be looked at, but would like to ensure that this is taken into account.

We also consider that the Environmental Statement from EWR should include the following aspects which are currently noted to be “scoped out”:

Table 16: Temporary ground-borne vibration from construction road traffic

Table 16: Permanent ground-borne vibration from operational road traffic

Table 10: Emission to air from operational phase diesel passenger trains (*we note that EWR has a “preference for discontinuous electric traction power”, but if this is not guaranteed the potential impact of diesel trains ought to be examined)*

National Gas House
Warwick Technology Park
Gallows Hill, Warwick
CV34 6DA

+44 (0) 1926 65 3000
nationalgas.com

Submitted via email to: eastwestrail@planninginspectorate.gov.uk

31st January 2025

Dear Sir/Madam,

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulations 10 and 11

Application by East West Railway Company Limited (the Applicant) for an Order granting Development Consent for the East West Rail - Bedford to Cambridge and Western improvements (the Proposed Development)

I refer to your email dated 02/01/2025 regarding the above proposed DCO. This is a response on behalf of National Gas Transmission (NGT). Having reviewed the scoping consultation documents, NGT wishes to make the following comments regarding gas infrastructure which may be affected by proposals.

NGT has many feeder mains located within or in proximity to the Order limits. Details of this infrastructure is as follows:

- Feeder Main – FM09 – Huntingdon to Steppingley
- Feeder Main – FM26 – Huntingdon to Steppingley
- Feeder Main – FM07 – Tydd St Giles to Old Warden
- Feeder Main – FM18 – Huntingdon to Cambridge Comp Tee
- Feeder Main – FM18 – St Neots to Little Barford PS
- Cathodic Protection Groundbeds/TR
- Ancillary apparatus

Please note that NGT has existing easements for these pipelines which provides rights for ongoing access and prevents the erection of permanent / temporary buildings/structures, change to existing ground levels or storage of materials etc within the easement strip.

You should also be aware of NGT's guidance for working in proximity to its assets, further guidance and links are available as follows.

CATHODIC PROTECTION SYSTEM

To ensure a high level of safety and reliability in operation, National Gas Transmission's assets are protected by a cathodic protection system. It is essential that buried steel pipework associated with the transmission and distribution of natural gas is designed, installed, commissioned and maintained to withstand the potentially harmful effects of corrosion and that the corrosion control systems employed are monitored to ensure continued effectiveness.

Installations in the vicinity of National Gas Transmission's assets which may potentially interfere with the cathodic protection system must be assessed and approved by National Gas Transmission, and appropriate control measures must be put in place where required.

Installations which have the potential to interfere with National Gas Transmission's Cathodic protection system include (but are not limited to):

1. High voltage cable crossings and parallelism

2. High voltage ac pylon parallelism

3. Battery Energy Storage Systems

4. Third party pipelines with cathodic protection systems

5. PV Solar arrays

Further information on D.C interference can be found in UKOPA/GPG/031 Edition C Microsoft Word - UKOPA GPG 031 DC Interference Ed 1.docx

Microsoft Word - UKOPA GPG 031 DC Interference Ed 1.docx (hold ctrl and click to access)Further information on A.C. interference can be found in UKOPA/GPG/027 UKOPA Good Practice GuideUKOPA Good Practice Guide (hold ctrl and click to access)

The safe limits for transfer voltage and impressed current that a high-pressure gas pipeline can be exposed to are outlined in T/PL/ECP/1, T/PL/ECP/2 and BS EN 50122-1. These are the safe limits for non-electrically trained personnel.

Where the Promoter intends to acquire land, extinguish rights, or interfere with any of NGT's apparatus, NGT will require appropriate protection and further discussion on the impact to its apparatus and rights including adequate Protective Provisions. A Deed of Consent will also be required for any works proposed within the easement strip.

Key Considerations:

- NGT has a Deed of Grant of Easement for each pipeline, which prevents the erection of permanent / temporary buildings, or structures, change to existing ground levels, storage of materials etc.

- Please be aware that written permission is required before any works commence within the NGT easement strip. Furthermore a Deed of Consent will be required prior to commencement of works within NGT's easement strip subject to approval by NGT's plant protection team.

- Any large installations which may result in a large population increase in the vicinity of a high pressure gas pipeline must comply with the HSE's Land Use Planning methodology, and the HSE response should be submitted to National Gas Transmission for review

- The below guidance is not exhaustive and all works in the vicinity of NGT's asset shall be subject to review and approval from NGT's plant protection team in advance of commencement of works on site.

General Notes on Pipeline Safety:

- You should be aware of the Health and Safety Executives guidance document HS(G) 47 "Avoiding Danger from Underground Services", and NGT's Dial Before You Dig Specification for Safe Working in the Vicinity of NGT Assets. There will be additional requirements dictated by NGT's plant protection team.

- NGT will also need to ensure that its pipelines remain accessible during and after completion of the works.

- Our pipelines are normally buried to a depth cover of 1.1 metres, however actual depth and position must be confirmed on site by trial hole investigation under the supervision of a NGT representative. Ground cover above our pipelines should not be reduced or increased.

- If any excavations are planned within 3 metres of NGT High Pressure Pipeline or, within 10 metres of an AGI (Above Ground Installation), or if any embankment or dredging works are proposed then the actual position and depth of the pipeline must be established on site in the presence of a NGT representative. A safe working method agreed prior to any work taking place in order to minimise the risk of damage and ensure the final depth of cover does not affect the integrity of the pipeline.

- Below are some examples of work types that have specific restrictions when being undertaken in the vicinity of gas assets therefore consultation with NGT's Plant Protection team is essential:

  - Demolition
  - Blasting
  - Piling and boring
  - Deep mining
  - Surface mineral extraction
  - Landfilling
  - Trenchless Techniques (e.g. HDD, pipe splitting, tunnelling etc.)
  - Wind turbine installation - minimum separation distance of 1.5x the mast/hub height is required, and any auxiliary installations such as cable or track crossings will require a deed of consent.
  - Solar farm installation
  - Tree planting schemes

Traffic Crossings:

- Where existing roads cannot be used, construction traffic should ONLY cross the pipeline at agreed locations.

- Permanent road crossings will require a surface load calculation, and will require a deed of consent.

- The pipeline shall be protected, at the crossing points, by temporary rafts constructed at ground level. The third party shall review ground conditions, vehicle types and crossing frequencies to determine the type and construction of the raft required.

- The type of raft shall be agreed with NGT prior to installation.

- No protective measures including the installation of concrete slab protection shall be installed over or near to the NGT pipeline without the prior permission of NGT

- NGT will need to agree the material, the dimensions and method of installation of the proposed protective measure.

- The method of installation shall be confirmed through the submission of a formal written method statement from the contractor to NGT.

- An NGT representative shall monitor any works within close proximity to the pipeline to comply with NGT specification T/SP/SSW22

New Asset Crossings:

- New assets (cables/pipelines etc) may cross the pipeline at perpendicular angle to the pipeline i.e. 90 degrees.

- The separation distance for a cable >33kV is 1000mm and pre and post energisation surveys may be required at National Gas Transmission's discretion. A risk assessment/method statement will need to be provided to, and accepted by National Gas Transmission prior to the deed of consent being agreed. Where a new asset is to cross over the pipeline a clearance distance of 0.6 metres between the crown of the pipeline and underside of the service should be maintained. If this cannot be achieved the service shall cross below the pipeline with a clearance distance of 0.6 metres.

- A new service should not be laid parallel within an easement strip

- Clearance must be at least 600mm above or below the pipeline

- An NGT representative shall approve and supervise any cable crossing of a pipeline.

- A Deed of Consent is required for any cable crossing the easement

Where the promoter intends to acquire land, extinguish rights, or interfere with any of NGT apparatus, protective provisions will be required in a form acceptable to it to be included within the DCO. NGT requests to be consulted at the earliest stages to ensure that the most appropriate protective provisions are included within the DCO application to safeguard the integrity of our apparatus and to remove the requirement for objection.

Adequate access to NGT pipelines must be maintained at all times during construction and post construction to ensure the safe operation of our network.

Yours Faithfully

Asset Protection Team

Further Safety Guidance

To download a copy of the HSE Guidance HS(G)47, please use the following link:

https://www.hse.gov.uk/pubns/books/hsg47.htm

Working Near National Gas Assets

https://www.nationalgas.com/land-and-assets/working-near-our-assets

Specification for Safe Working in the Vicinity of National Gas High Pressure Pipelines and Associated Installations

https://www.nationalgas.com/document/82951/download

Tree Planting Guidance

https://www.nationalgas.com/document/82976/download

Excavating Safely

https://www.nationalgas.com/document/82971/download

Dial Before You Dig Guidance

https://www.nationalgas.com/document/128751/download

Essential Guidance:

https://www.nationalgas.com/gas-transmission/document/82931/download

Solar Farm Guidance

https://www.nationalgas.com/document/82936/download

Milton Keynes City Council

The Planning Inspectorate
Via email to:
eastwestrail@planninginspectorate.gov.uk

31st January 2025

Our Ref: PLN/2025/0010
Your Ref: TR040012-000019

Dear Planning Inspectorate,

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulations 10 and 11

Application by East West Railway Company Limited (the Applicant) for an Order granting Development Consent for the East West Rail (the Proposed Development)

Scoping consultation and notification of the Applicant's contact details and duty to make available information to the Applicant if requested

I write in relation to the consultation on the Scoping Opinion for the above development.

Milton Keynes City Council has reviewed the applicant's EIA Scoping Report (133735-MWJ-Z0-XXX-REP-EEN-000035, dated: 05/12/2024).

In general, it is considered that the Scoping Report clearly sets out a comprehesive scope within each topic area for inclusion within the Enviromental Statement. Comments have been received from specialist officers within the Council, but in the main they concur with the conclusions in the applicant's Scoping Report, and are therefore not repeated here. The following specific comments are noted:

5.3 Fenny Stratford to Kempston – baseline description
It should be noted that Blue Lagoon is also designed as a Local Nature Reserve which is a statutory designation. As set out in the most recent 4th Edition Bat Conservation Trust Best Practice

Need to contact us?
planning.services@milton-keynes.gov.uk
01908 691691
Civic, 1 Saxon Gate East, Milton Keynes MK9 3EJ
www.milton-keynes.gov.uk

Guidelines, when undertaking survey work for roosting bats, consideration should also be given to potential for hibernation roosts, both classic and non-classic. Assessment for presence / impacts on hibernation roosts is not mentioned in the scoping report but should be included in the assessment of bats in the ES Chapter.

6.2 Agriculture and soils
No specific comments on the scope of assesment required.

6.3 Air quality
No specific comments on the scope of assesment required.

6.4 Communities and health
No specific comments on the scope of assesment required.

6.5 Electro-magnetic interference
No specific comments on the scope of assesment required.

6.6 Land quality
Environmental Health colleagues are not aware of any former potentially contaminative use that could prohibit development or influence the development design. Therefore, the proposed scope of investigation and likely mitigation is considered acceptable.

6.7 Socio-economics
The socio-economic impact of the potential closture and relocation of Fenny Stratford, Bow Brickhill and Woburn Sands stations should be scoped into the ES. Closure of these stations may detrimentally affect the local economies, as well as population groups at risk of experiencing transport related social exclusion, in addition to wider negative social impacts such as a diminishing of the community's sense of place, a weakening of the strength and closeness of local communities, and increased levels of crime and anti-social behaviour.

6.8 Sound, noise and vibration
No specific comments on the scope of assesment required.

6.9 Traffic and transport (journeys and access)
The potential closture and relocation of Fenny Stratford, Bow Brickhill and Woburn Sands stations may result in public transport journey times and cost is expected to result in increased use of private motor vehicles and associated impacts, and should be scoped in. Future demand assessments should consider committed local developments detailed within approved planning applications, associated transport assessments, transport statements and travel plans in addition to local plan land use allocations expected to be delivered over the appraised planning horizons. The assessment of the impact of changes to level crossings and other railway line crossings should be assessed by use of a

micro-simulation model as this offers more accurate insights on the nature of road traffic queue lengths, queuing time, journey times and vehicle re-routing than is possible using a regional travel demand model.

6.10 Biodiversity
No specific comments on the scope of assesment required.

6.11 Water resources
No specific comments on the scope of assesment required.

6.12 Historic environment
No concern have been raised by Conservation and Archaeology consultees with the scope of the Environmental Statement in relation to heritage assets of archaeological and conservation interest within those areas of Milton Keynes likely to be impacted by the scheme. The East West Rail project is supported from a heritage perspective, however, there is an awareness that that designated heritage assets may be at threat of redundancy through, for example, station closure, or that there are as yet unrecognised non-designated heritage assets that may be inadvertently / unnecessarily lost, possibly in the form of level crossing infrastructure. An early sight of an inventory of designated and non-designated assets and an indication how proposals will affect them would be welcome.

6.13 Landscape and visual
The document refers to the out-of-date MK LCA 2016. The LVIA needs to refer to the latest document Milton Keynes Landscape Character Assessment 2022 which can be found here: Milton Keynes Landscape Character Assessment 2022 | Milton Keynes City Council.

The scope of visual impact should include the visual impact of any large structures associated with the railway line, most notably the bridges at V10 Brickhill Street, expected as part of this application, and Woodley's Crossing (as part of the South East Milton Keynes Strategic Urban Extension) and how to mitigate the impact on residents and areas of attractive landscape.

6.14 Carbon (greenhouse gas) emissions
No specific comments on the scope of assesment required.

6.15 Major accidents and disasters
No specific comments on the scope of assesment required.

6.16 Material resources and waste
No specific comments on the scope of assesment required.

7.2 Biodiversity Net Gain
No specific comments on the scope of assesment required.

7.3 Habitats Regulations Assessment
No specific comments on the scope of assesment required.

7.4 Climate resilience
No specific comments on the scope of assesment required.

7.5 Equality impact assessment
No specific comments on the scope of assesment required.

7.6 Flood risk assessment
The Lead Local Flood Authority wish to comment that these areas may conflict with proposals associated with the South East Milton Keynes Strategic Urban Extension. In particular, there are areas where strategic blue/green infrastructure is provisionally identified to manage existing flood risk within the IDB drainage district. Likewise, there are other areas where development has already taken place such as along the Tilbrook Roundabout. Further engagement may be required to ensure there is no conflict with proposals.

The Environmental Impact Assessment Scoping Report submitted includes information of the water environment proposals. The principles of surface water drainage outlined within the scoping report are acceptable, however the LLFA expect a full flood risk assessment and/or surface water drainage strategy to be submitted to support any application, which must include:

• How the proposed surface water drainage scheme has been determined following the drainage hierarchy
• Pre development and post development run-off rates
• Discharge location(s)
• Drainage calculations to support the design of the system
• Drawings of the proposed surface water drainage scheme including sub-catchment breakdowns where applicable
• Maintenance and management plan of the surface water drainage system (for the lifetime of the development) including details of future adoption

The applicant should, as part of the surface water strategy, demonstrate that the requirements of any local surface water drainage planning policies have been met and the recommendations of the relevant Strategic Flood Risk Assessment and Surface Water Management Plan have been considered.

7.7 Water Framework Directive
No specific comments on the scope of assesment required.

7.8 Arboriculture
No specific comments on the scope of assesment required.

8.0 Propsed Scope (Ecology)
It is understood that a distrct level licence is proposed to be sought for Great Crested Newts; this approach is supported. The route passes through Red Risk Zones, there are around 47 ponds within 500 metres of the site boundary, and records of GCN on or near to the development site.

This letter forms the Council's response to the applicant's Scoping Report.

Yours sincerely

Elizabeth Verdegem
Team Leader (Strategic Team)
Development Management
on behalf of the Head of Planning

Feedback from Milton Ernest Parish Council

Overview
Whilst Milton Ernest Parish Council accept there may be some positive economic benefits from EWR in the longer term, **we strongly object to the choice of 'Route E' and support the direction for a full re-consultation on ALL of the available routes** with a clear and transparent consultation process.

Our main concerns are summarised below:

- The proposed route E is more environmentally damaging than other options south of Bedford. It seems the price for Bedford being directly connected to the line will be paid by the devastation of the countryside north of Bedford. This is especially true in the area of Clapham, where the environmental impact on the Carriage Drive area and the adjacent Clapham Woods, will be catastrophic. At a time when environmental degradation is critical, **EWR should be proposing the least environmentally damaging route as a priority** and proposing solutions to overcome the issue of connecting Bedford town to the South.

- The Office for Environmental Protection has just published its annual report stating that 'the Government remains largely off track to meet its environmental ambitions', therefore it is imperative to select the route with the lowest environmental impact.

In conclusion, Milton Ernest Parish Council do not see the benefits, nor the mitigations, to avoid the devastation to our countryside that arises from the selection of route 'E'.

We therefore object to this current route choice and strongly request a full re-consultation of all available route options.

Kind Regards
Milton Ernest Parish Council

From:	Planning
To:	East West Rail
Subject:	East West Rail scoping consultation
Date:	08 January 2025 13:17:12
Attachments:	image001.png

E-mail East West Rail EastWestRail@planninginspectorate.gov.uk

F.A.O Karen Wilkinson Senior EIA Advisor The Planning Inspectorate

Our ref: CB/360/PL/447

Dear Ms Wilkinson

Swavesey Internal Drainage Board

-

East West Rail scoping consultation

Thank you for your e-mail received 2nd January,

Due to the proposed location of this development corridor to the south of the river Ouse we do not have any direct comments on behalf of the Middle Level Commissioners or Internal Drainage boards that we administer.

However, concerns have been raised to us by Swavesey Internal Drainage Board of the potential impact of any associated development which may be stimulated as a result of the proposed Cambourne station. This concern relates to sewerage infrastructure serving this area which impacts the Swavesey drain system.

Regards

Chris Bailey
Head of Water Management Technical Services

Proudly managing water levels in the Fens since 1862
www.middlelevel.gov.uk

Middle Level Offices | 85 Whittlesey Road | March | Cambs | PE15 0AH

Tel: 01354 653232 Email: planningmatters@middlelevel.gov.uk

For general enquiries please use: admin@middlelevel.gov.uk

National Grid House
Warwick Technology Park
Gallows Hill, Warwick
CV34 6DA

Tiffany Bate
Development Liaison Officer
UK Land and Property
[redacted]@nationalgrid.com
[redacted]

www.nationalgrid.com

Submitted electronically to:
eastwestrail@planninginspectorate.gov.uk

29 January 2025

Dear Sir / Madam

Ref: Application by East West Railway Company Limited (the Applicant) for an Order granting Development Consent for the East West Rail (the Proposed Development)

SCOPING CONSULTATION RESPONSE

I refer to your letter dated 2nd January 2025 regarding the above proposed application. This is a response on behalf of National Grid Electricity Transmission PLC (NGET).

Having reviewed the scoping report, I would like to make the following comments regarding NGET existing or future infrastructure within or in close proximity to the current red line boundary.

NGET has high voltage electricity overhead transmission lines, underground cables and a high voltage substation within the scoping area. The overhead lines and substation forms an essential part of the electricity transmission network in England and Wales.

Existing Infrastructure

Substation

- EAST CLAYDON 132 kV SUBSTATION
  EAST CLAYDON 400 kV SUBSTATION
  Associated overhead and underground apparatus including cables

Overhead Lines

4VK 400 kV OHL	EATON SOCON - WYMONDLEY MAIN 1
	COTTAM - EATON SOCON - WYMONDLEY 2
ZA 400 kV OHL	GRENDON - SUNDON 2
ZL 400 kV OHL	EAST CLAYDON - ENDERBY - PATFORD BRIDGE 1
	EAST CLAYDON - ENDERBY - PATFORD BRIDGE 2
ZL 400 kV OHL	AMERSHAM - EAST CLAYDON - IVER 1
	AMERSHAM - EAST CLAYDON - IVER 2
4YH 400 kV OHL	COWLEY - EAST CLAYDON
	COWLEY - LEIGHTON BUZZARD - SUNDON

National Grid House
Warwick Technology Park
Gallows Hill, Warwick
CV34 6DA

Cables
Cable Fibre BURWELL - EATON SOCON

I enclose plans showing the location of NGET's apparatus in the scoping area.

New Infrastructure

Please refer to the Holistic Network Design (HND) and the National Grid ESO website to view the strategic vision for the UK's ever growing electricity transmission network. https://www.nationalgrideso.com/future-energy/the-pathway-2030-holistic-network-design/hnd'

Onshore Infrastructure
New substations are required to facilitate customer connections along the ZA 400 kV Overhead Line and 4YH 400 kV Overhead Line. The locations of the new substations are still to be confirmed.

East Claydon Replacement
We are developing early proposals for a replacement substation near East Claydon, Buckinghamshire. The proposed substation will support the UK's transition to net zero and the government's target to power all home and businesses with green energy by 2035.

NGET requests that all existing and future assets are given due consideration given their criticality to distribution of energy across the UK. We remain committed to working with the promoter in a proactive manner, enabling both parties to deliver successful projects wherever reasonably possible. As such we encourage that ongoing discussion and consultation between both parties is maintained on interactions with existing or future assets, land interests, connections or consents and any other NGET interests which have the potential to be impacted prior to submission of the Proposed DCO.

The Great Grid Upgrade is the largest overhaul of the electricity grid in generations, we are in the middle of a transformation, with the energy we use increasingly coming from cleaner greener sources. Our infrastructure projects across England and Wales are helping to connect more renewable energy to homes and businesses. To find out more about our current projects please refer to our network and infrastructure webpage. https://www.nationalgrid.com/electricity-transmission/network-and-infrastructure/infrastructure-projects. Where it has been identified that your project interacts with or is in close proximity to one of NGET's infrastructure projects, we would welcome further discussion at the earliest opportunity.

These projects are all essential to increase the overall network capability to connect the numerous new offshore wind farms that are being developed, and transport new clean green energy to the homes and businesses where it is needed.

National Grid House
Warwick Technology Park
Gallows Hill, Warwick
CV34 6DA

The following points should be taken into consideration.

Electricity Infrastructure:

- National Grid's Overhead Line/s is protected by a Deed of Easement/Wayleave Agreement which provides full right of access to retain, maintain, repair and inspect our asset

- Statutory electrical safety clearances must be maintained at all times. Any proposed buildings must not be closer than 5.3m to the lowest conductor. National Grid recommends that no permanent structures are built directly beneath overhead lines. These distances are set out in EN 43 – 8 Technical Specification for "overhead line clearances Issue 5 (2019)", which publicly available..

- If any changes in ground levels are proposed either beneath or in close proximity to our existing overhead lines, then this would serve to reduce the safety clearances for such overhead lines. Safe clearances for existing overhead lines must be maintained in all circumstances.

- The relevant guidance in relation to working safely near to existing overhead lines is contained within the Health and Safety Executive's (www.hse.gov.uk) Guidance Note GS 6 "Avoidance of Danger from Overhead Electric Lines" and all relevant site staff should make sure that they are both aware of and understand this guidance.

- Plant, machinery, equipment, buildings or scaffolding should not encroach within 5.3 metres of any of our high voltage conductors when those conductors are under their worse conditions of maximum "sag" and "swing" and overhead line profile (maximum "sag" and "swing") drawings should be obtained using the contact details above.

- If a landscaping scheme is proposed as part of the proposal, we request that only slow and low growing species of trees and shrubs are planted beneath and adjacent to the existing overhead line to reduce the risk of growth to a height which compromises statutory safety clearances.

- Drilling or excavation works should not be undertaken if they have the potential to disturb or adversely affect the foundations or "pillars of support" of any existing tower. These foundations always extend beyond the base area of the existing tower and foundation ("pillar of support") drawings can be obtained using the contact details above

- National Grid Electricity Transmission high voltage underground cables are protected by a Deed of Grant; Easement; Wayleave Agreement or the provisions of the New Roads and Street Works Act. These provisions provide National Grid full right of access to retain, maintain, repair and inspect our assets. Hence, we require that no permanent / temporary structures are to be built over our cables or within the easement strip. Any such proposals should be discussed and agreed with National Grid prior to any works taking place.

- Ground levels above our cables must not be altered in any way. Any alterations to the depth of our cables will subsequently alter the rating of the circuit and can compromise the reliability, efficiency and safety of our electricity network and requires consultation with National Grid prior to any such changes in both level and construction being implemented.

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Warwick Technology Park
Gallows Hill, Warwick
CV34 6DA

Further Advice

We would request that the potential impact of the proposed scheme on NGET's existing and future assets as set out above and including any proposed diversions is considered in any subsequent reports, including in the Environmental Statement, and as part of any subsequent application.

Where any diversion of apparatus may be required to facilitate a scheme, NGET is unable to give any certainty with the regard to diversions until such time as adequate conceptual design studies have been undertaken by NGET. Further information relating to this can be obtained by contacting the email address below.

Where the promoter intends to acquire land, extinguish rights, or interfere with any of NGET apparatus, protective provisions will be required in a form acceptable to it to be included within the DCO.

NGET requests to be consulted at the earliest stages to ensure that the most appropriate protective provisions are included within the DCO application to safeguard the integrity of our apparatus and to remove the requirement for objection. All consultations should be sent to the following email address: **box.landandacquisitions@nationalgrid.com**

I hope the above information is useful. If you require any further information, please do not hesitate to contact me.

The information in this letter is provided not withstanding any discussions taking place in relation to connections with electricity customer services.

Yours faithfully

[redacted]

Tiffany Bate
Development Liaison Officer
Commercial and Customer Connections – Electricity Transmission Land and Property

nationalgrid | National Grid Web Map

Legend

Buried Cable

Buried Cable Commissioned

OHL 400Kv

OHL 400Kv Commissioned

Notes

0 3.25 6.5 13 19.5 26 km

OS Disclaimer: Background Mapping information has been reproduced from the Ordnance Survey map by permission of Ordnance Survey on behalf of The controller of His Majesty's Stationery Office. ©Crown Copyright Ordnance Survey National Grid Electricity Transmission (100024241) & National Gas Transmission (100024886)

Date: 2/22/2024
Time: 11:22 AM

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Printed By: Tiffany.Bate
Scale: 1:250,000

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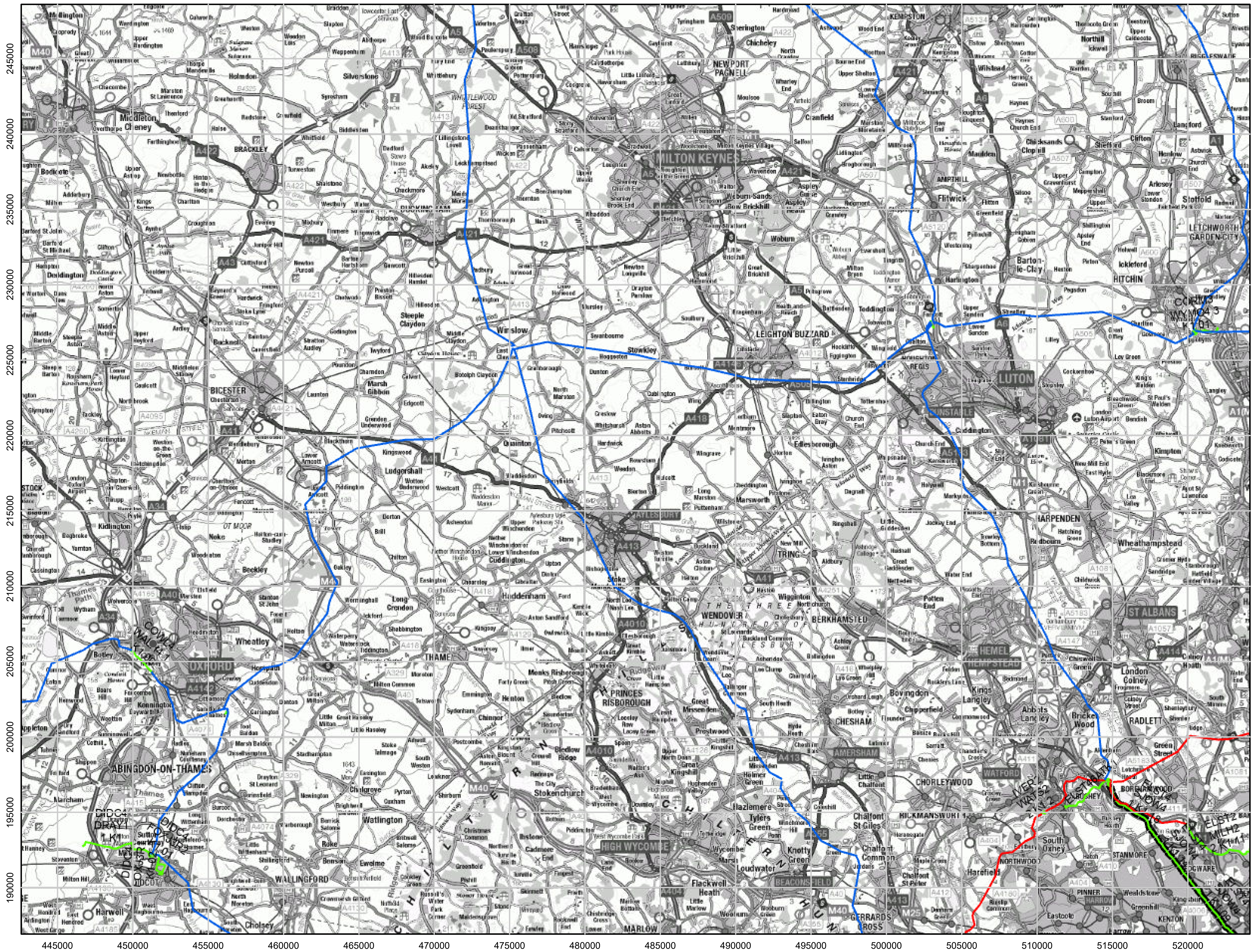
Note: Any sketches on the map are approximate and not captured to any particular level of precision.

National Grid Web Map



Legend

ET ASSETS

Cable Tunnel

Buried Cable

Buried Cable Commissioned

OHL 275Kv

OHL 275Kv Commissioned

OHL 400Kv

OHL 400Kv Commissioned

Notes

0 3.25 6.5 13 19.5 26 km

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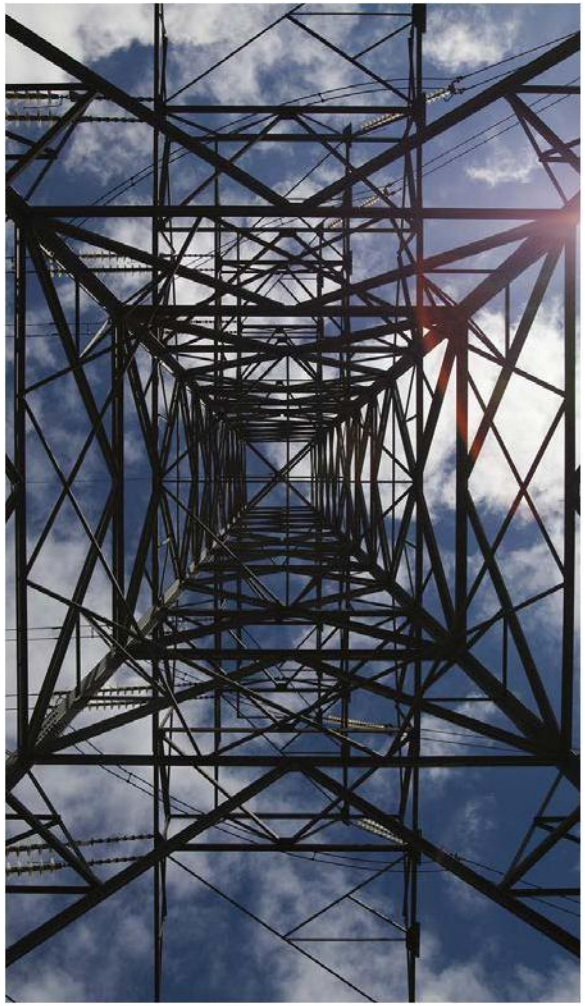
Note: Any sketches on the map are approximate and not captured to any particular level of precision.

Technical Guidance Note 287

Third-party guidance for working near National Grid Electricity Transmission equipment



Purpose and scope

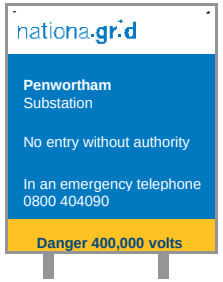
The purpose of this document is to give guidance and information to third parties who are proposing, scheduling or designing developments close to National Grid Electricity Transmission assets.

The scope of the report covers information on basic safety and the location of our assets – and also highlights key issues around particular types of development and risk areas.

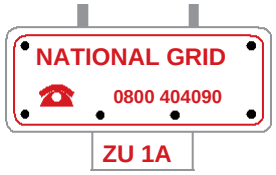
In the case of electrical assets, National Grid does not authorise or agree safe systems of work with developers and contractors. However, we will advise on issues such as electrical safety clearances and the location of towers and cables. We also work with developers to minimise the impact of any National Grid assets that are nearby.

How to identify specific National Grid sites

Substations
The name of the Substation and emergency contact number will be on the site sign.



Overhead Lines
The reference number of the tower and the emergency contact number will be on this type of sign.



Contact National Grid

Plant protection

For routine enquiries regarding planned or scheduled works, contact the Asset Protection team online, by email or phone.

www.lsbud.co.uk

Email: assetprotection@nationalgrid.com

Phone: 0800 001 4282

Emergencies

In the event of occurrences such as a cable strike, coming into contact with an overhead line conductor or identifying any hazards or problems with National Grid's equipment, phone our emergency number 0800 404 090 (option 1).

If you have apparatus within 30m of a National Grid asset, please ensure that the emergency number is included in your site's emergency procedures.

Consider safety

Consider the hazards identified in this document when working near electrical equipment

Part 1

Electricity transmission infrastructure

National Grid owns and maintains the high-voltage electricity transmission network in England and Wales (Scotland has its own networks). It's responsible for balancing supply with demand on a minute-by-minute basis across the network.

Overhead lines

Overhead lines consist of two main parts – pylons (also called towers) and conductors (or wires). Pylons are typically steel lattice structures mounted on concrete foundations. A pylon's design can vary due to factors such as voltage, conductor type and the strength of structure required.

Conductors, which are the 'live' part of the overhead line, hang from pylons on insulators. Conductors come in several different designs depending on the amount of power that is transmitted on the circuit.

In addition to the two main components, some Overhead Line Routes carry a Fibre Optic cable between the towers with an final underground connection to the Substations.

In most cases, National Grid's overhead lines operate at 275kV or 400kV.

Underground cables

Underground cables are a growing feature of National Grid's network. They consist of a conducting core surrounded by layers of insulation and armour. Cables can be laid in the road, across open land or in tunnels. They operate at a range of voltages, up to 400kV.

Substations

Substations are found at points on the network where circuits come together or where a rise or fall in voltage is required. Transmission substations tend to be large facilities containing equipment such as power transformers, circuit breakers, reactors and capacitors. In addition Diesel generators and compressed air systems can be located there.

Part 2

Statutory requirements for working near high-voltage electricity

The legal framework that regulates electrical safety in the UK is *The Electricity Safety, Quality and Continuity Regulations (ESQCR) 2002*. This also details the minimum electrical safety clearances, which are used as a basis for the Energy Networks Association (ENA) TS 43-8. These standards have been agreed by CENELEC (European Committee for Electrotechnical Standardisation) and also form part of the *British Standard BS EN 50341-1:2012 Overhead Electrical Lines exceeding AC 1kV*. All electricity companies are bound by these rules, standards and technical specifications. They are required to uphold them by their operator's licence.

Electrical safety clearances

It is essential that a safe distance is kept between the exposed conductors and people and objects when working near National Grid's electrical assets. A person does not have to touch an exposed conductor to get a life-threatening electric shock. At the voltages National Grid operates at, it is possible for electricity to jump up to several metres from an exposed conductor and kill or cause serious injury to anyone who is nearby. For this reason, there are several legal requirements and safety standards that must be met.

Any breach of legal safety clearances will be enforced in the courts. This can and has resulted in the removal of an infringement, which is normally at the cost of the developer or whoever caused it to be there. Breaching safety clearances, even temporarily, risks a serious incident that could cause serious injury or death.

National Grid will, on request, advise planning authorities, developers or third parties on any safety clearances and associated issues. We can supply detailed drawings of all our overhead line assets marked up with relevant safe areas.

« Section continued from previous page

Your Responsibilities - Overhead lines

Work which takes place near overhead power lines carries a significant risk of coming into proximity with the wires. If any person, object or material gets too close to the wires, electricity could ‘flashover’ and be conducted to earth, causing death or serious injury. You do not need to touch the wires for this to happen. The law requires that work is carried out in close proximity to live overhead power lines only when there is no alternative, and only when the risks are acceptable and can be properly controlled. Statutory clearances exist which must be maintained, as prescribed by the Electricity Safety, Quality and Continuity Regulations 2002.

Under the Health and Safety at Work etc. Act 1974 and Management of Health and Safety at Work Regulations 1999, you are responsible for preparing a suitable and sufficient risk assessment and safe systems of work, to ensure that risks are managed properly and the safety of your workforce and others is maintained. Your risk assessment must consider and manage all of the significant risks and put in place suitable precautions/controls in order to manage the work safely. You are also responsible for ensuring that the precautions identified are properly implemented and stay in place throughout the work.

Work near overhead power lines must always be conducted in accordance with GS6, ‘avoiding danger from overhead power lines’, and any legislation which is relevant to the work you are completing.

.

What National Grid will provide

National Grid can supply profile drawings in PDF and CAD format showing tower locations and relevant clearances to assist you in the risk assessment process.

What National Grid will not provide

National Grid will not approve safe systems of work or approve design proposals

Part 3

What National Grid will do for you and your development

Provision of information

National Grid should be notified during the planning stage of any works or developments taking place near our electrical assets, ideally a minimum notification period of 8 weeks to allow National Grid to provide the following services:

Drawings

National Grid will provide relevant drawings of overhead lines or underground cables to make sure the presence and location of our services are known. Once a third party or developer has contacted us, we will supply the drawings for free.

Risk or impact identification

National Grid can help identify any hazards or risks that the presence of our assets might bring to any works or developments. This includes both the risk to safety from high-voltage electricity and longer-term issues, such as induced currents, noise and maintenance access that may affect the outcome of the development. National Grid will not authorise specific working procedures, but we can provide advice on best practice.

400kV

The maximum nominal voltage of the underground cables in National Grid's network

Risks or hazards to be aware of

This section includes a brief description of some of the hazards and issues that a third party or developer might face when working or developing close to our electrical infrastructure.

Land and access

National Grid has land rights in place with landowners and occupiers, which cover our existing overhead lines and underground cable network. These agreements, together with legislation set out under the *Electricity Act 1989*, allow us to access our assets to maintain, repair and renew them. The agreements also lay down restrictions and covenants to protect the integrity of our assets and meet safety regulations. Anyone proposing a development close to our assets should carefully examine these agreements.

Our agreements often affect land both inside and outside the immediate vicinity of an asset. Rights will include the provision of access, along with restrictions that ban the development of land through building, changing levels, planting and other operations. Anyone looking to develop close to our assets must consult with National Grid first.

For further information, contact Asset Protection:

Email: assetprotection@nationalgrid.com
Phone: 0800 001 4282

Electrical clearance from overhead lines

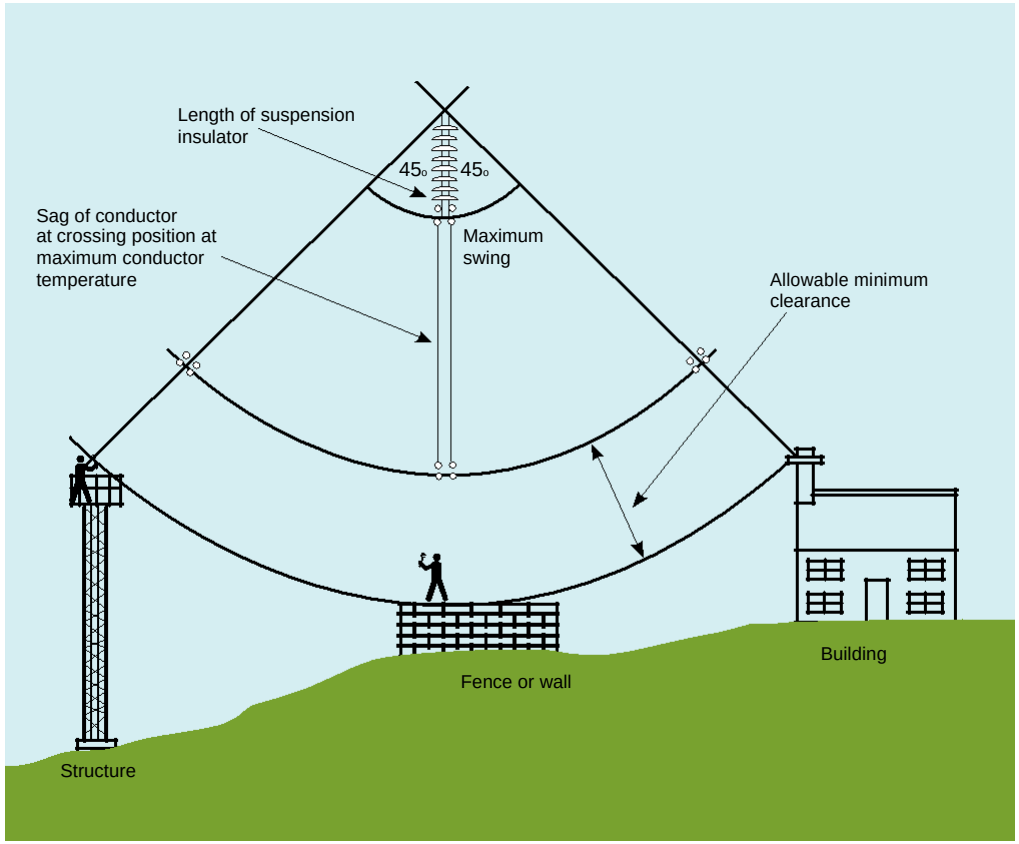
The clearance distances referred to in this section are specific to 400kV overhead lines. National Grid can advise on the distances required around different voltages i.e. 132kV and 275kV.

As we explained earlier, *Electrical Networks Association TS 43-8* details the legal clearances to our overhead lines. The minimum clearance between the conductors of an overhead line and the ground is 7.3m at maximum sag. The sag is the vertical distance between the wire's highest and lowest point. Certain conditions, such as power flow, wind speed and air temperature can cause conductors to move and allowances should be made for this.

The required clearance from the point where a person can stand to the conductors is 5.3m. To be clear, this means there should be at least 5.3m from where someone could stand on any structure (i.e. mobile and construction equipment) to the conductors. Available clearances will be assessed by National Grid on an individual basis.

National Grid expects third parties to implement a safe system of work whenever they are near Overhead Lines.

Diagram not to scale



There should be at least 5.3m between the conductors and any structure someone could stand on

We recommend that guidance such as *HSE Guidance Note GS6 (Avoiding Danger from Overhead Power Lines)* is followed, which provides advice on how to avoid danger from all overhead lines, at all voltages. If you are carrying out work near overhead lines you must contact National Grid, who will provide the relevant profile drawings.

7.3m

The required minimum clearance between the conductors of an overhead line, at maximum sag, and the ground

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The undergrounding of electricity cables at Ross-on-Wye

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Underground cables Underground cables operating at up to 400kV are a significant part of the National Grid Electricity Transmission network. When your works will involve any ground disturbance it is expected that a safe system of work is put in place and that you follow guidance such as *HSG 47 (Avoiding Danger from Underground Services)*.

You must contact National Grid to find out if there are any underground cables near your proposed works. If there are, we will provide cable profiles and location drawings and, if required, on-site supervision of the works. Cables can be laid under roads or across industrial or agricultural land. They can even be layed in canal towpaths and other areas that you would not expect.

Cables crossing any National Grid high-voltage (HV) cables directly buried in the ground are required to maintain a minimum seperation that will be determined by National Grid on a case-by-case basis. National Grid will need to do a rating study on the existing cable to work out if there are any adverse effects on either cable rating. We will only allow a cable to cross such an area once we know the results of the re-rating. As a result, the clearance distance may need to be increased or alternative methods of crossing found.

For other cables and services crossing the path of our HV cables, National Grid will need confirmation that published standards and clearances are met.

Impressed voltage

Any conducting materials installed near high-voltage equipment could be raised to an elevated voltage compared to the local earth, even when there is no direct contact with the high-voltage equipment. These impressed voltages are caused by inductive or capacitive coupling between the high-voltage equipment and nearby conducting materials and can occur at distances of several metres away from the equipment. Impressed voltages may damage your equipment and could potentially injure people and animals, depending on their severity. Third parties should take impressed voltages into account during the early stages and initial design of any development, ensuring that all structures and equipment are adequately earthed at all times.

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Earth potential rise

Under certain system fault conditions – and during lightning storms – a rise in the earth potential from the base of an overhead line tower or substation is possible. This is a rare phenomenon that occurs when large amounts of electricity enter the earth. This can pose a serious hazard to people or equipment that are close by.

We advise that developments and works are not carried out close to our tower bases, particularly during lightning storms.

Noise

Noise is a by-product of National Grid's operations and is carefully assessed during the planning and construction of any of our equipment. Developers should consider the noise emitted from National Grid's sites or overhead lines when planning any developments, particularly housing. Low-frequency hum from substations can, in some circumstances, be heard up to 1km or more from the site, so it is essential that developers find adequate solutions for this in their design. Further information about likely noise levels can be provided by National Grid.

Maintenance access

National Grid needs to have safe access for vehicles around its assets and work that restricts this will not be allowed.
In terms of our overhead lines, we wouldn't want to see any excavations made, or permanent structures built, that might affect the foundations of our towers. The size of the foundations around a tower base depends on the type of tower that is built there. If you wish to carry out works within 30m of the tower base, contact National Grid for more information. Our business has to maintain access routes to tower bases with land owners. For that reason, a route wide enough for an HGV must be permanently available. We may need to access our sites, towers, conductors and underground cables at short notice.

30m

If you wish to carry out work within this distance of the tower base, you must contact National Grid for more information

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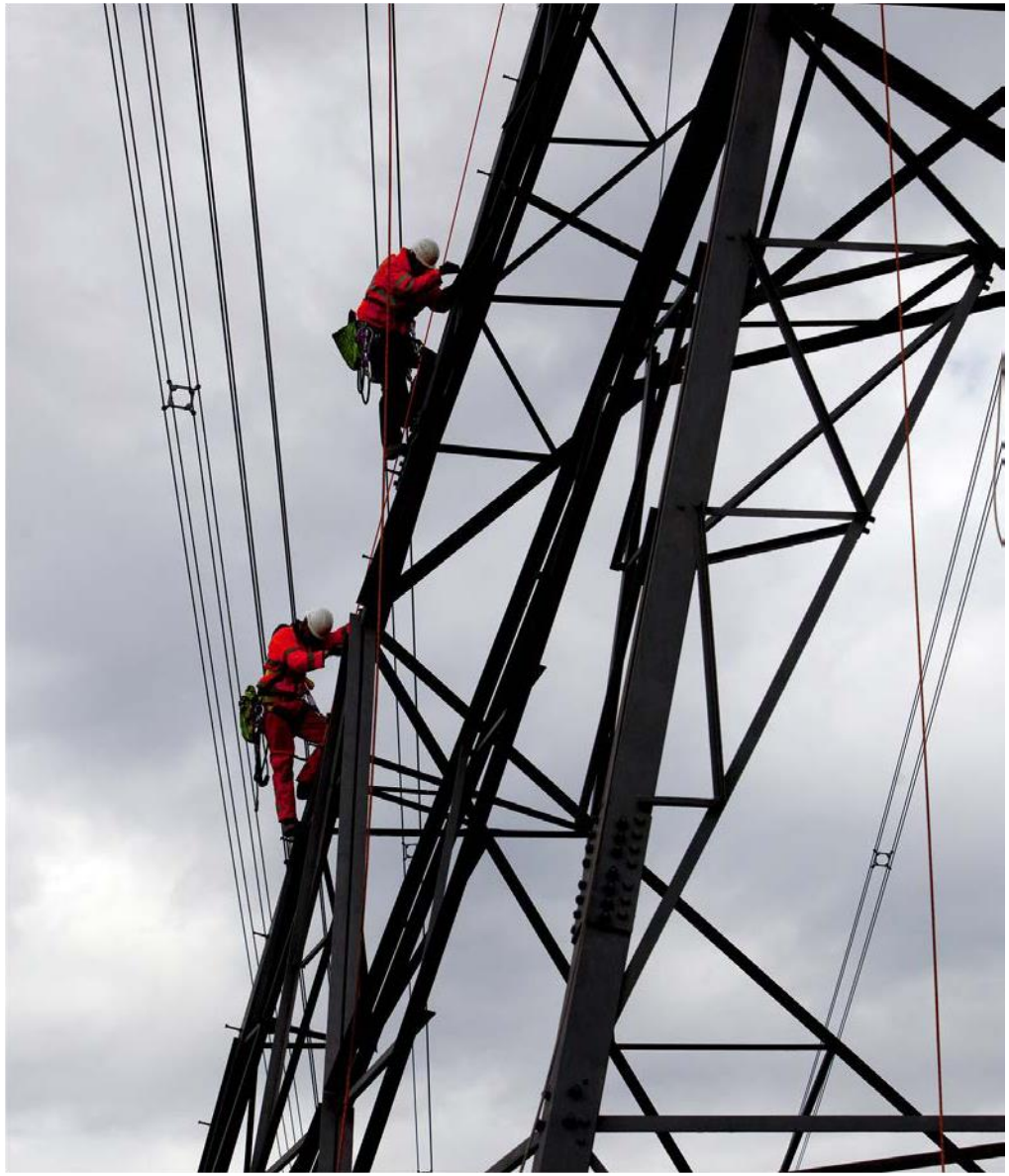

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Fires and firefighting

National Grid does not recommend that any type of flammable material is stored under overhead lines. Developers should be aware that in certain cases the local fire authority will not use water hoses to put out a fire if there are live, high-voltage conductors within 30m of the seat of the fire *(as outlined in ENA TS 43-8)*.

In these situations, National Grid would have to be notified and reconfigure the system – to allow staff to switch out the overhead line – before any firefighting could take place. This could take several hours.

We recommend that any site which has a specific hazard relating to fire or flammable material should include National Grid's emergency contact details (found at the beginning and end of this document) in its fire plan information, so any incidents can be reported.

Developers should also make sure their insurance cover takes into account the challenge of putting out fires near our overhead lines.

Excavations, piling or tunnelling

You must inform National Grid of any works that have the potential to disturb the foundations of our substations or overhead line towers. This will have to be assessed by National Grid engineers before any work begins.

BS ISO 4866:2010 states that a minimum distance of 200m should be maintained when carrying out quarry blasting near our assets. However, this can be reduced with specific site surveys and changes to the maximum instantaneous charge (the amount of explosive detonated at a particular time).

All activities should observe guidance layed out in *BS 5228-2:2009*.

Microshocks

High-voltage overhead power lines produce an electric field. Any person or object inside this field that isn't earthed picks up an electrical charge. When two conducting objects – one that is grounded and one that isn't – touch, the charge can equalise and cause a small shock, known as a microshock. While they are not harmful, they can be disturbing for the person or animal that suffers the shock.

For these reasons, metal-framed and metal-clad buildings which are close to existing overhead lines should be earthed to minimise the risk of microshocks. Anything that isn't earthed, is conductive and sits close to the lines is likely to pick up a charge. Items such as deer fences, metal palisade fencing, chain-link fences and metal gates underneath overhead lines all need to be earthed.

For further information on microshocks please visit **www.emfs.info.**

200m

The minimum distance that should be maintained from National Grid assets when quarry blasting

Specific development guidance

Wind farms

National Grid's policy towards wind farm development is closely connected to the *Electricity Networks Association Engineering Recommendation L44 Separation between Wind Turbines and Overhead Lines, Principles of Good Practice.* The advice is based on national guidelines and global research. It may be adjusted to suit specific local applications.

There are two main criteria in the document:

(i) The turbine shall be far enough away to avoid the possibility of toppling onto the overhead line

(ii) The turbine shall be far enough away to avoid damage to the overhead line from downward wake effects, also known as turbulence

The toppling distance is the minimum horizontal distance between the worst-case pivot point of the wind turbine and the conductors hanging in still air. It is the greater of:

- the tip height of the turbine plus 10%
- or, the tip height of the turbine plus the electrical safety distance that applies to the voltage of the overhead line.

To minimise the downward wake effect on an overhead line, the wind turbine should be three times the rotor distance away from the centre of the overhead line.

Wake effects can prematurely age conductors and fittings, significantly reducing the life of the asset. For that reason, careful consideration should be taken if a wind turbine needs to be sited within the above limits. Agreement from National Grid will be required.

Commercial and housing developments

National Grid has developed a document called *Design guidelines for development near pylons and HVO power lines*, which gives advice to anyone involved in planning or designing large-scale developments that are crossed by, or close to, overhead lines.

The document focuses on existing 275kV and 400kV overhead lines on steel lattice towers, but can equally apply to 132kV and below. The document explains how to design large-scale developments close to high-voltage lines, while respecting clearances and the development's visual and environmental impact.

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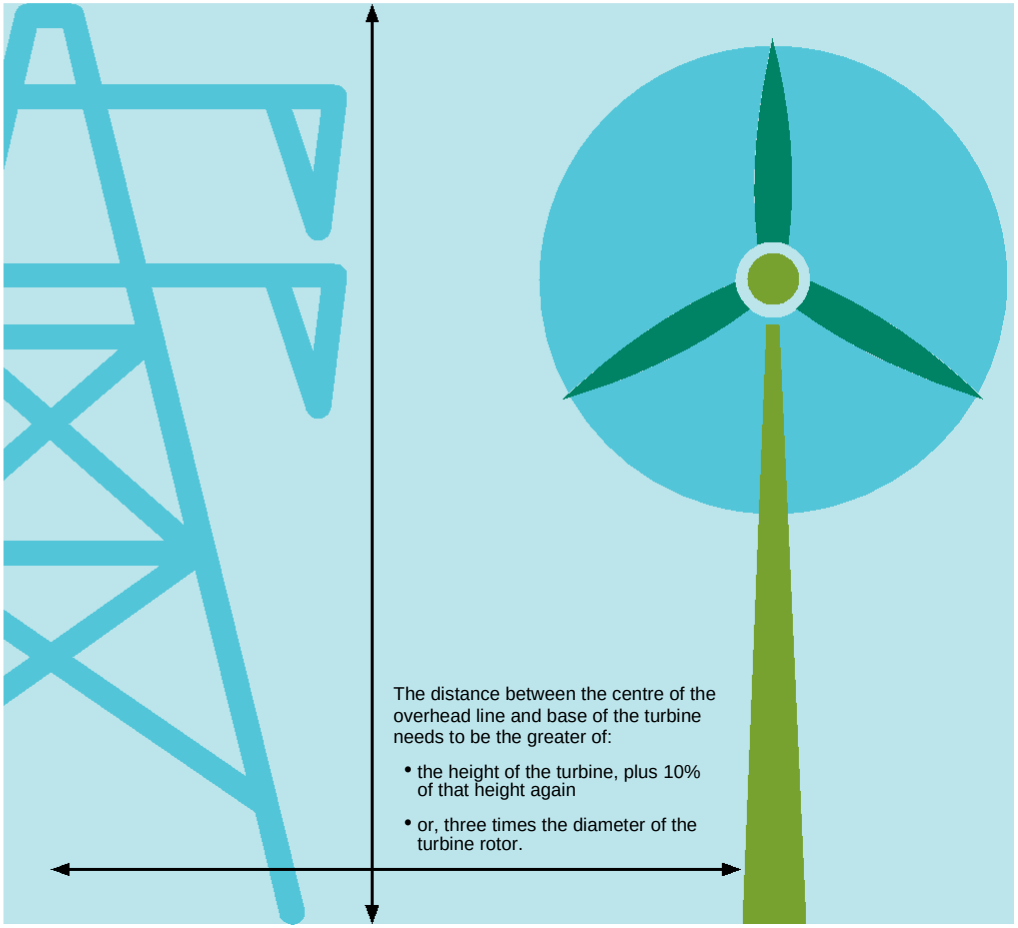
Diagram not to scale



Turbines should be far enough away to avoid the possibility of toppling onto the overhead line

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The advice is intended for developers, designers, landowners, local authorities and communities, but is not limited to those organisations.

Overall, developers should be aware of all the hazards and issues relating to the electrical equipment that we have discussed when designing new housing.

As we explored earlier, National Grid's assets have the potential to create noise. This can be low frequency and tonal, which makes it quite noticeable. It is the responsibility of developers to take this into account during the design stage and find an appropriate solution.

Solar farms

While there is limited research and recommendations available, there are several key factors to consider when designing Solar Farms in the vicinity of Overhead Power Lines.

Developers may be looking to build on arable land close to National Grid's assets. In keeping with the safety clearance limits that we outlined earlier for solar panels directly underneath overhead line conductors, the highest point on the solar panels must be no more than 5.3m from the lowest conductors.

This means that the maximum height of any structure will need to be determined to make sure safety clearance limits aren't breached. This could be as low as 2m. National Grid will supply profile drawings to aid the planning of solar farms and determine the maximum height of panels and equipment.

Solar panels that are directly underneath power lines risk being damaged on the rare occasion that a conductor or fitting falls to the ground. A more likely risk is ice falling from conductors or towers in winter and damaging solar panels.

There is also a risk of damage during adverse weather conditions, such as lightning storms, and system faults. As all our towers are earthed, a weather event such as lightning can cause a rise in the earth potential around the base of a tower. Solar panel support structures and supply cables should be adequately earthed and bonded together to minimise the effects of this temporary rise in earth potential.

Any metallic fencing that is located under an overhead line will pick up an electrical charge. For this reason, it will need to be adequately earthed to minimise microshocks to the public.

For normal, routine maintenance and in an emergency National Grid requires unrestricted access to its assets. So if a tower is enclosed in a solar farm compound, we will need full access for our vehicles, including access through any compound gates. During maintenance – and especially re-conductoring – National Grid would need enough space near our towers for winches and cable drums. If enough space is not available, we would require solar panels to be temporarily removed.

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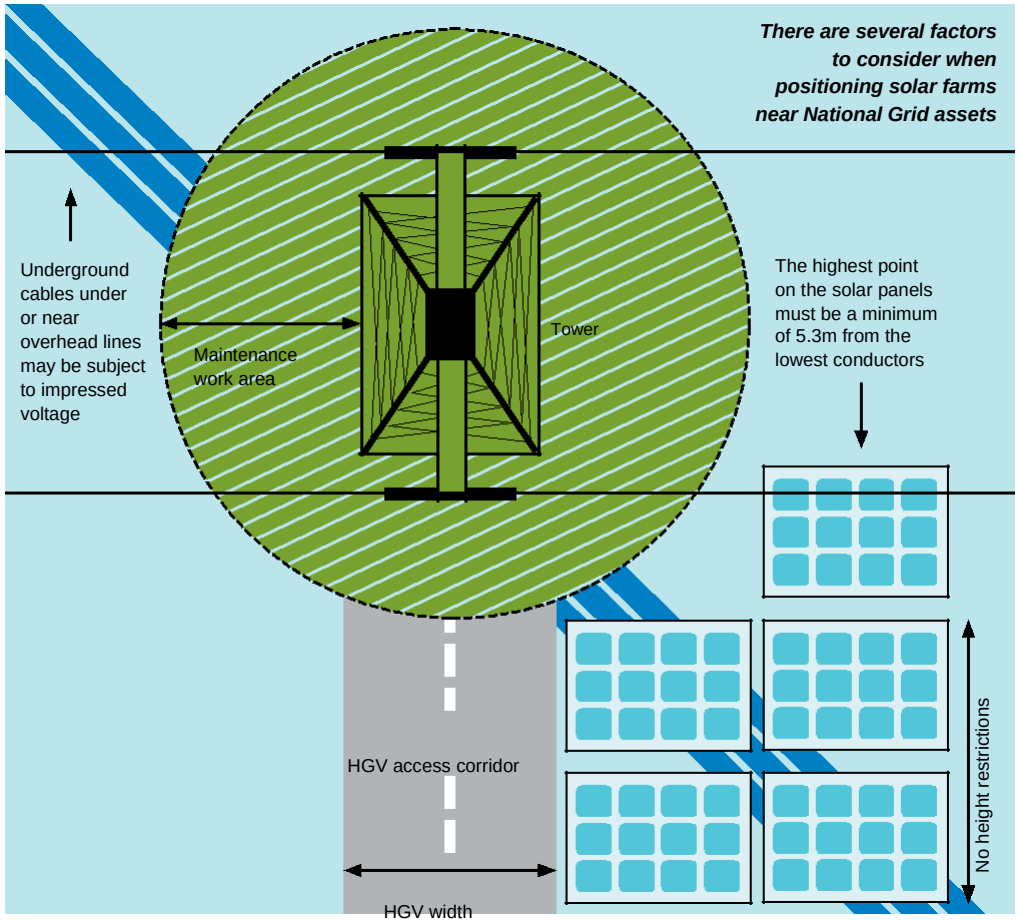


Asset protection agreements

In some cases, where there is a risk that development will impact on National Grid's assets, we will insist on an asset protection agreement being put in place. The cost of this will be the responsibility of the developer or third party.

Contact details

Emergency situations

If you spot a potential hazard on or near an overhead electricity line, do not approach it, even at ground level. Keep as far away as possible and follow the six steps below:

- Warn anyone close by to evacuate the area
- Call our 24-hour electricity emergency number: 0800 404 090 (Option 1)[1]
- Give your name and contact phone number
- Explain the nature of the issue or hazard
- Give as much information as possible so we can identify the location – i.e. the name of the town or village, numbers of nearby roads, postcode and (ONLY if it can be observed without putting you or others in danger) the tower number of an adjacent pylon
- Await further contact from a National Grid engineer

[1] It is critically important that you don't use this phone number for any other purpose. If you need to contact National Grid for another reason please use our Contact Centre at www2.nationalgrid.com/contact-us to find the appropriate information or call 0800 0014282.

Routine enquiries

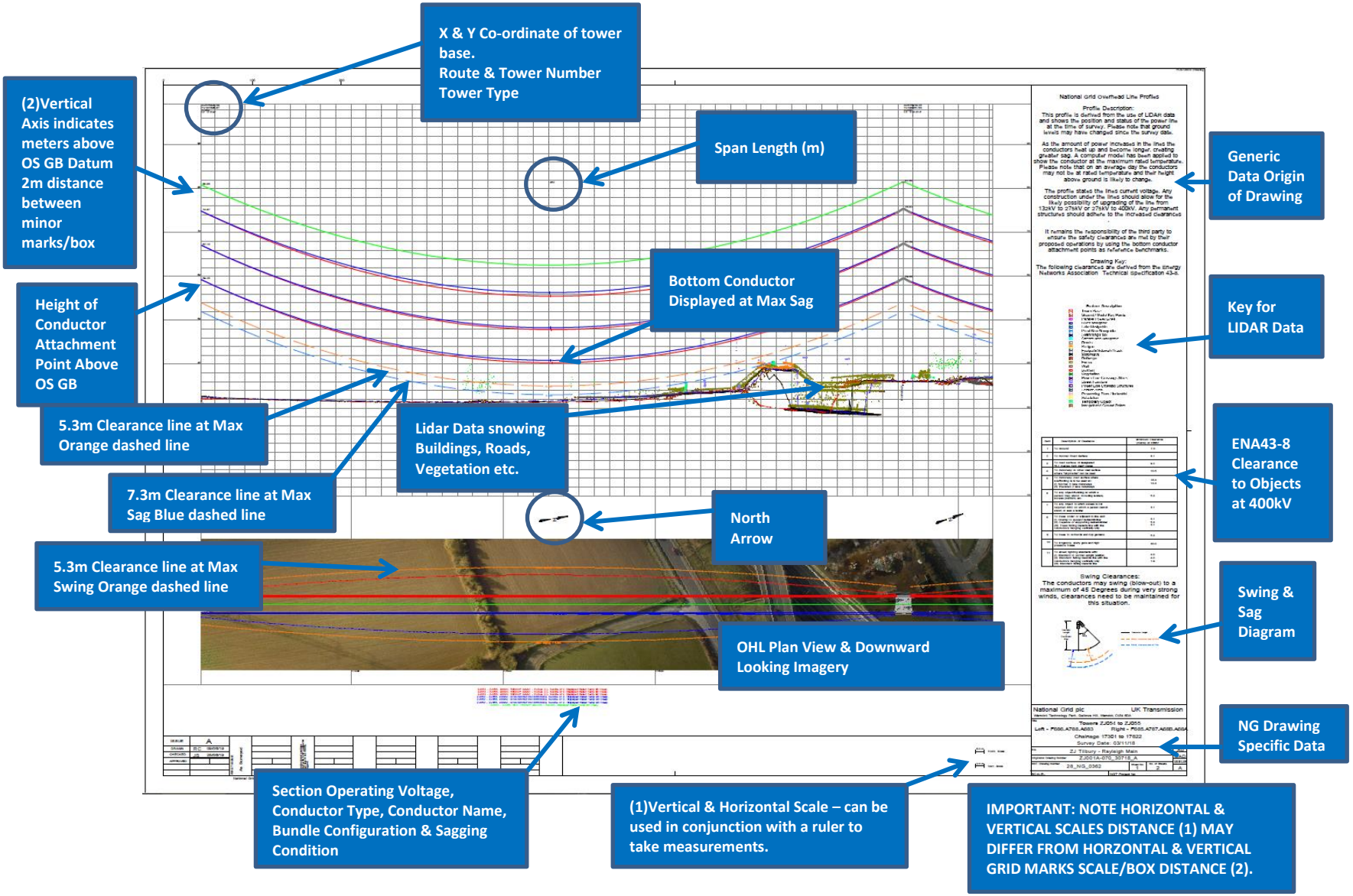
Email:
assetprotection@nationalgrid.com

Call Asset Protection on:
0800 0014282

Opening hours:
Monday to Friday 08:00-16:00

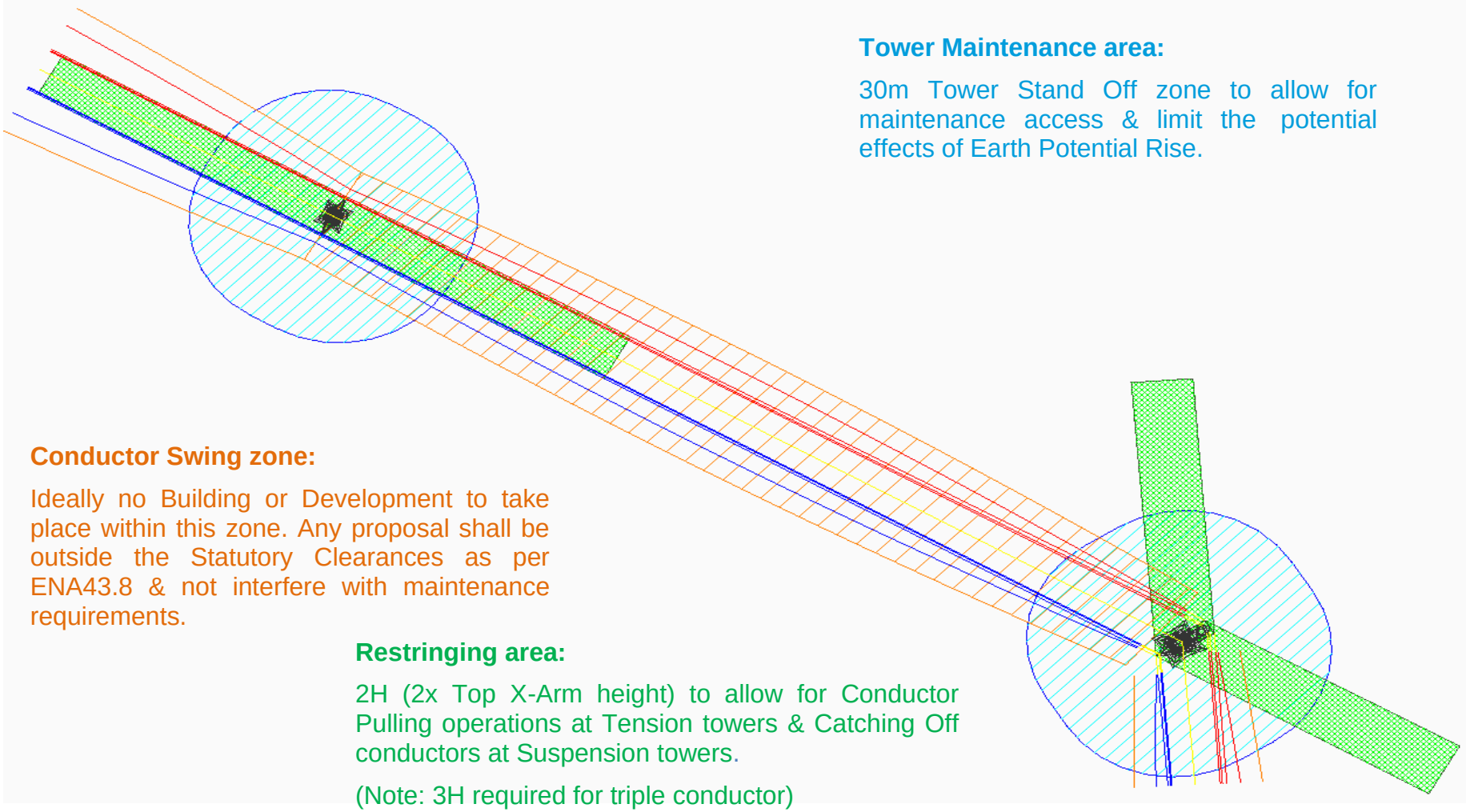
14 APPENDIX A

OHL Profile Drawing Guide



15 APPENDIX B

OHL Tower Stand Off & Reconductoring Area



Tower Maintenance area:

30m Tower Stand Off zone to allow for maintenance access & limit the potential effects of Earth Potential Rise.

Conductor Swing zone:

Ideally no Building or Development to take place within this zone. Any proposal shall be outside the Statutory Clearances as per ENA43.8 & not interfere with maintenance requirements.

Restringing area:

2H (2x Top X-Arm height) to allow for Conductor Pulling operations at Tension towers & Catching Off conductors at Suspension towers.

(Note: 3H required for triple conductor)

National Highways
The Cube
199 Wharfside Street
Birmingham
B1 1RN

31st January 2025

Our ref: SHARE/112728956

Your ref: TR040012- 000019

Via E-Mail to: eastwestrail@planninginspectorate.gov.uk

Dear Sir or Madam,

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulations 10 and 11

Application by East West Railway Company Limited (the Applicant) for an Order granting Development Consent for the East West Rail (the Proposed Development)

Scoping consultation and notification of the Applicant's contact details and duty to make available information to the Applicant if requested

1.1 National Highways welcomes the opportunity to respond to the scoping consultation for East West Rail (EWR). National Highways is the government owned company which operates, maintains and improves the Strategic Road Network (SRN) as the strategic highway company appointed under the provisions of the Infrastructure Act 2015 and in accordance with the Licence[1] issued by the Secretary of State for Transport.

1.2 National Highways is a statutory consultee to the planning process. It has a specific obligation to deliver economic growth through the provision of a safe and reliable SRN, in line with the provisions set out in DfT Circular 01/2022: *The strategic road network and the delivery of sustainable development*[2]. The Circular sets out how National Highways will work with developers to ensure that specific tests are met when promoting a scheme. This includes ensuring the transport impact is understood, any mitigation (or other infrastructure) is designed in accordance with the relevant standards and that environmental impacts are appraised and mitigated accordingly.

1.3 By ensuring safe and reliable journeys on the SRN, National Highways boosts productivity and cuts operational costs for businesses in line with Government's key priority of securing economic growth.

[1] https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/431389/strategic-highways-licence.pdf

[2] https://www.gov.uk/government/publications/strategic-road-network-and-the-delivery-of-sustainable-development

1.4 National Highways is currently working collaboratively with East West Rail Co (EWR Co) on the development of the East West Rail Project in addressing the potentially adverse impacts to the SRN from the proposed EWR scheme and have communicated our priorities and expectations directly to them. National Highways has identified potential impacts to the SRN at a number of locations as a result of interfaces with the proposed EWR route. These impacts are likely to require enhancements to the SRN in the vicinity of the proposed works which will be determined during the ongoing development of the proposals and we encourage pre-application discussion on schemes which will impact the SRN. We, therefore, welcome the opportunity to provide advice on the scope of the Environmental Statement, pursuant to the procedures set out in the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017, in respect of the EWR scheme.

1.5 National Highways suggest the following documents are referenced within the policy review for the project:

- Relevant National Policy Statements;
- National Planning Policy Framework (NPPF) (2024);
- DfT Circular 01/2022: *The strategic road network and the delivery of sustainable development* (the Circular).

1.6 In addition to the above, we have set out below both general and specific areas of concern that National Highways would wish to see assessed as part of an Environmental Statement. The comments relate specifically to matters arising from National Highways' responsibilities to manage and maintain the SRN, as set out in our Licence. Comments relating to non-trunk roads should be sought from the relevant local highway authorities.

2. General aspects to be addressed

2.1 National Highway's principal concern with any development proposal is the impact generated on the SRN. Our priorities are ensuring the safety of all who use and work on our roads, providing smooth and reliable journeys for our customers, connecting communities as well as protecting and improving the environment.

2.2 Traffic and environmental impacts arising from the changes to the SRN, the increase/re-routing of traffic post-opening (including phased opening) of the EWR project during construction, traffic volume (including cumulative effects), composition or routing change and transport infrastructure modification should be fully assessed and reported. This assessment should set out the traffic and environmental impacts to the SRN specifically alongside the assessment of the impacts of the EWR project as a whole. EWR Co should seek to minimise the impact from the EWR Project on National Highways' Key Performance Indicators and ensure that, where the rail network interacts with the SRN, any environmental assets/functions/mitigations are not adversely effected. If this cannot be avoided, then compensatory measures will need to be agreed.

2.3 To support a proposed scheme, National Highways will require evidence that the provision of new infrastructure (including mitigation) and additional traffic generated by the project will not hamper its ability to meet its environmental obligations, as set out in Part 5 of the Licence. We recommend, where possible, EWR Co seeks to avoid physical interactions with the SRN to avoid these impacts. Where physical interactions are essential, National Highways expect EWR Co's design and delivery work to comply with our Design Standards and Futureproofing requirements. National Highways also expects EWR Co to explain how the disbenefits to the

SRN and Local Road Network that will result from the construction of the EWR scheme have been factored into the assessment criteria used to select the preferred route option.

2.4 We welcome reference to previous engagement with National Highways at paragraph 4.2.6 with regards to the interaction the EWR scheme is expected to have with the new dual carriageway currently being constructed as part of the A428 Black Cat to Caxton Gibbet improvements scheme. We also welcome the stated intention to work with National Highways on issues including traffic and transport, construction planning and logistics, air quality, noise pollution and water resources.

2.5 EWR Co has commenced traffic modelling which will be used to support their proposals and is sharing information on the early development of these models with National Highways. EWR Co will need to demonsrate that the impact of the development on the SRN both during construction and operation has been modelled robustly and, if necessary, suitable mitigation provided. This should include microsimulation modelling of the areas highlighted as areas of concern following the completion of strategic modelling.

2.6 National Highways will also work with EWR Co on matters relating to the design and development of changes to the SRN. Whilst not covered through the Environmental Impact Assessment specifically, EWR Co will need to demonstrate that all proposals for changes to the SRN to mitigate the impact of the development are in line with the various requirements described in the Circular.

2.7 The Secretary of State's tests with regard to development impacting on the Strategic Road Network are contained within DfT Circular 01/2022: *The strategic road network and the delivery of sustainable development* (the Circular) as detailed above. EWR Co will need to demonstrate that these tests have been addressed through the development of its planning application. An assessment of transport related impacts of the proposal should be carried out and reported as described in the Department for Transport 'Guidance on Transport Assessment (GTA)'. It is noted that this guidance has been archived, however it still provides a good practice guide in preparing a Transport Assessment. In addition, the Ministry of Housing, Communities and Local Government (MHCLG) also provide guidance on preparing Transport Assessments.

2.8 National Highways will require early sight of the scheme's Transport Assessment as this is developed and should be consulted on the scope of this assessment to ensure all relevant tests have been included prior to both their statutory consultation and the subsequent submission of a Development Consent Order application. By providing comments in this way, National Highways would expect that the Transport Assessment robustly addresses all the tests outlined in the Circular.

3. Traffic Modelling

3.1 EWR Co will need to provide modelling data which demonstrates that all impacts have been accurately assessed and suitable mitigation provided. This should include appropriate analysis such as:

- Model outputs for scenarios with and without impacts and mitigation, using suitable assessment years.
- Models and analysis that have been assured by EWR Co.

- Information provided to National Highways to demonstrate that the model build, assumptions and performance are in line with TAG and good practice and are acceptable for the purpose of the analysis.
- Assessments included for all network changes at SRN locations regardless of duration given the impacts that even short term reductions in SRN capacity can cause.
- Assessment of the re-routing impacts relating to temporary road closures or diversions as well as temporary closures of rail infrastructure.
- Assessment of the impacts on SRN junctions using local junction models

3.2 National Highways would like to highlight that the EWRSHM short term modelling framework that is referenced at paragraph 4.2.24 of the Scoping Report has been used as an interim tool to assess traffic impacts and forms the basis of information in the Transport Update Report and as such will not be suitable for ongoing analysis or to inform either the Preliminary Transport Assessment or Final Transport Assessment. National Highways is engaging with EWR Co with regards to the development of the new bespoke corridor-wide model that is referenced in paragraph 4.2.25.

3.3 National Highways would like to understand the parameters of any Assurance Framework that EWR Co are intending to use in the context of traffic analysis and modelling and require confirmation that the analysis used for decision-making has been assured through Analytical Assurance Statements or equivalent documents.

4. Construction Impacts

4.1 EWR construction activities will create traffic demand on sections of the SRN which, if not managed, will displace other traffic, creating a potentially serious impact on National Highways' customers and the operation of the SRN.

4.2 During every phase of EWR construction, the necessary road infrastructure and traffic management measures must be put in place to maintain the safe and effective operation of the SRN. National Highways will be expecting EWR Co to provide full analysis of the impacts of the construction of the scheme on the SRN undertaken using a strategic model, local junction models and spreadsheet-based modelling as appropriate. Analysis should include (but not be restricted to) SRN traffic and transport impacts relating to:

- Construction traffic scenarios and assumptions (including workforce traffic and rail passenger displacement to the SRN during engineering works to the existing rail infrastructure).
- Compound locations, access arrangements and traffic routing.
- Temporary diversions and road closures.
- Plans for proposed mitigation, including information on the design of the mitigation at each location and analysis demonstrating its impacts and efficacy.

4.3 In respect of interventions impacting the SRN, this analysis will need to be detailed in the Construction Traffic Management Plan (CTMP) that is referenced in section 6.3.14, to be agreed with National Highways including (but not be limited to) detail relating to:

- Measures to provide for road safety, for members of the public and construction staff during traffic management works, including temporary traffic control measures.

- Procedures to be followed for the temporary or permanent closure or diversion of roads or accesses.
- Procedures to maintain pedestrian, equestrian and cyclist routes, where reasonably practicable.
- Measures proposed during staged closures of the highway to complete new bridge structures.
- Measures to be implemented to reduce construction traffic impacts or impacts associated with parking on residential streets.
- Access to the construction works.
- Permitted access routes for construction traffic.
- Requirements for monitoring and engagement/interaction with local highway authorities.

4.4 The Scoping Report mentions the need for EWR to divert utilities at a number of locations along the route. A full utilities diversion strategy will need to be developed including the provision of power to the new rail line and EWR Co will need to demonstrate where, if at all, this will have interactions with the SRN. In addition, we will need to understand how many additional utilities crossings of the SRN may be required, what methodologies will be employed including, for example, directional drilling to minimise disruption due to closures and likely timings.

4.5 The Scoping Report states the intention for the earth works balance to be neutral which will need to be confirmed as survey work progresses. Should there be a greater need to import or export materials and this is not possible to achieve through the established logistics hub then EWR Co will need to demonstrate the likely impact on the SRN and what mitigation is proposed.

5. Technology

5.1 EWR Co will need to demonstrate which roadside technology and communications assets will be impacted by the scheme proposals. EWR Co must engage with National Highways to identify a design solution to facilitate the continuity of operational services both during construction and upon completion. It is crucial that impacts to National Highways technology assets are identified at an early stage. Replacement and/or relocation of these assets can be a significant cost, so impacts on these assets must be identified early so that it can inform the selection of the preferred option

5.2 EWR Co's construction programme must allow sufficient time to plan for any necessary relocation of technology assets alongside the SRN in order to mitigate against abortive work and to ensure there is a clear understanding of where the asset will need to be relocated to.

6. Operational Impacts

6.1 EWR Co will need to demonstrate that the impact of the EWR generated station demand on the SRN has been modelled robustly and, if necessary, mitigation schemes be appropriately scoped and designed to accommodate the additional demand. Where new or enhanced stations are proposed near congested sections of the SRN or where the station itself will create congestion, appropriate mitigation must be identified and agreed with National Highways and included in the scheme design.

6.2 Furthermore, new and upgraded stations will not only attract increased passengers but are also expected to be catalysts for growth in the area, with the aspiration to see significant

economic development around the stations. National Highways supports the aspiration to increase economic growth, however, it is vital, in order to maximise both the use of EWR stations and the ability to develop the area around stations, that station demand modelling and surface access solutions take account of the entirety of planned growth that it is considered will be generated by EWR. The impact of both the new demand arising from the station and the increase in demand associated with the subsequent growth around the station, should be considered by EWR Co during station transport assessments and mitigation design. We welcome the stated intention at paragraph 6.9.12 to engage with National Highways in determining the future baseline.

6.3 EWR Co will need to provide full analysis of the impacts of the operation of the scheme on the SRN undertaken using a strategic model, local junction models (including microsimulation modelling at key impacted locations) and spreadsheet-based modelling as appropriate. This should include (but not be restricted to) SRN traffic and transport impacts relating to:

- Changes in demand for accessing new and/or enhanced rail services and new/re-developed stations, including car parking capacity/demand relationship and assumptions on access mode split and demand assignment.
- Demand accessing other facilities such as rail logistics hubs.
- Changes to level crossing arrangements.
- Plans for proposed mitigation, including information on the design of the mitigation at each location and analysis demonstrating its impacts and efficacy

6.4 EWR Co will also need to demonstrate that the impact of demand from EWR stabling yards or other maintenance depots on the SRN have been modelled robustly and, if necessary, mitigation schemes be appropriately scoped and designed to accommodate the additional demand.

6.5 In addition to working together to resolve the identified impacts, National Highways look forward to collaborating further with EWR Co to explore the potential for greater joint planning with other modes of public and active travel including bus, walking, and cycling in order to provide a holistic approach to travel while also ensuring an inclusive method to consider all end-to-end journey possibilities. In particular, exploring opportunities for park and ride facilities at proposed new or enhanced EWR stations and adjacent developments to reduce highway demand travelling east and west across the Oxford-Cambridge Arc.

7. A428 Black Cat to Caxton Gibbet Scheme

7.1 Paragraph 3.5.4 of the Scoping Report notes the interaction between the Roxton to East of St Neots section of the EWR route and the new A421 dual carriageway currently being constructed by National Highways as part of the A428 Black Cat to Caxton Gibbet improvements scheme with an expected completion date in 2027.

7.2 The EWR scheme is due to follow a near-parallel alignment for much of the length of the new road and therefore, has the potential to result in a number of construction, design and interface issues between the two schemes. In particular, the proposed rail crossing of the new road if alignment 1b is chosen as the preferred option. The area is also highly constrained by the presence of existing infrastructure such as the A1 and East Coast Main Line as well as by natural features such as the River Great Ouse and its flood plains.

7.3 National Highways must retain the ability to meet all obligations and discharge all conditions in relation the A428 scheme DCO. The Environmental Statement will need to reflect

that biodiversity mitigation measures provided by the A428 scheme will be fully established by the time construction of this section of EWR is due to commence. In particular the bat tunnel (mammal underpass) which is being constructed. Any proposals which involve the alteration, removal and rerouting of any habitat will need to be carefully considered and require agreement with National Highways without detriment to the performance of the consented mitigation in place.

8. Air Quality Assessment

8.1 Section 6.3 of the Scoping Report details how the assessment of the air quality impacts from the EWR project will be undertaken. Adverse change to air quality should be particularly considered, including in relation to compliance with the European air quality limit values and/or in local authority designated Air Quality Management Areas (AQMA's). National Highways has an air quality KPI, agreed with the Department for Transport, and based on the Pollution Control Mapping model. EWR Co will need to confirm how EWR will take measures to ensure that its interactions with the SRN does not hinder National Highways' ability to bring links associated with the SRN identified in this model into compliance within legal NO_2 limits in the shortest possible time.

9. Carbon Emissions

9.1 Section 6.14 of the Scoping Report details how the EWR project's impact on climate change through the changes it causes as a result of Carbon Emissions will be assessed. EWR Co will need to confirm how any amendments to and interactions with the SRN as a result of the proposed scheme have been designed to minimise whole life carbon emissions as far as practicable. In addition, EWR Co will need to demonstrate how designs have considered future climate change and incorporates resilience measures to reduce affects from climate change to within acceptable levels, as per our Design Standard DMRB LA 114.

10. Biodiversity

10.1 Amendments to and interactions with the SRN should result in a minimum of 10% biodiversity net gain. For accounting purposes, the biodiversity gain associated with the SRN should be calculated in line with current industry practice and made available to National Highways.

11. Water Quality Assessment

11.1 Section 6.11 of the Scoping Report sets out the approach to be taken in relation to Water Resources. The Environmental Statement should set out how amendments to and interactions with the SRN as a result of the EWR Project will seek to improve the water environment associated with the SRN by enhancing existing affected watercourses and incorporating design measures to improve water quality at affected outfalls.

12. Flood Risk Assessment

12.1 Section 7.6 of the Scoping Report details how the EWR Project will be subject to a Flood Risk Assessment as part of the DCO application. National Highways wish to highlight that the water management in this area, especially around the A421 at Marston Montaine and the Black Cat Junction needs to be taken into account by EWR Co in design proposals given it is within a flood plain and has been subject to recent excessive rainfall and flooding. These types of events will become more frequent as a result of the effects of climate change and so will need to be carefully considered. This should include any existing record which indicates a high risk of flooding (flooding hotspot), exceedance flow and blockage/breach scenarios.

13. Drainage

13.1 The Environmental Statement should set out how the impact of the EWR Project on National Highways' existing drainage and surface water management assets including balancing ponds, drains etc will be assessed and mitigated, if required. Any drainage assessment will also need to consider how any new assets installed as part of the A428 Black Cat to Caxton Gibbet Scheme are impacted.

13.2 While considering the impact on the SRN drainage system, assessment should be made based on the drainage catchment and should not be limited by the scheme boundary. Several locations along the EWR route have been subject to recent excessive rainfall and flooding. These types of events will become more frequent as a result of the effects of climate change and so the flood risk assessment should be taken into account. This should include any existing record which indicates a high risk of flooding (flooding hotspot), exceedance flow and blockage/breach scenarios.

13.3 Where EWR works will interact/impact the existing SRN drainage network, EWR Co must ensure that any changes are compliant with the existing standards, irrespective of their specification / state before works interference.

14. Geotechnical

14.1 EWR Co will need to demonstrate how the possible deterioration of earthworks/ structures/ drainage has been assessed and National Highways will require sight of a Ground Investigation Report. For all interfaces with the SRN, a Geotechnical Design Report (GDR) will also be required and any works on our network will need to be carried out in accordance with the Manual of Contract Documents for Highways Works (MCHW).

15. Noise Levels

15.1 Section 6.8 of the Scoping Report details how the EWR Project's impact on noise levels will be assessed. EWR Co need to confirm how amendments to and interactions with the SRN will not hinder National Highways' ability to reduce noise levels for residents adversely affected by the SRN. Measures that reduce the perception of noise, such as removing screening vegetation or bunds that result in the source of noise being visible to receptors should be avoided.

15.2 National Highways has a Key Performance Indicator to mitigate households affected by noise located in noise important areas and is more broadly committed to reducing excessive noise across the network where practically possible. Where developments amend/interact with the SRN, opportunities should be sought to improve noise for affected residents, such as utilising sympathetic design measures, e.g. cuttings, embankments, and implementing mitigation measures where appropriate, such as noise fencing.

16. Injurious Weeds

16.1 Paragraph 1.7.4 states that the Code of Construction Practice will set out the measures to be implemented for the treatment and control of invasive non-native species and injurious weeds as well as the measures to promote biosecurity. This will need to set out arrangements for the impact on the SRN and how any chemicals used in weed control will be controlled to prevent run off onto the SRN or effect on its users.

17. Cultural heritage assets

17.1 The construction, improvement and maintenance of the SRN can result in environmental effects on cultural heritage. EWR Co will need to demonstrate what the adverse impact or change is to the significance of any individual heritage assets, what the proposed mitigation is and what the residual effect will be from the project. EWR Co will therefore need to provide a clear heritage asset-by-asset impact assessment, so that the balancing of harm against public benefit can be assessed in areas that are relevant to the SRN.

18. Landscape and visual effects

18.1 The construction, improvement and maintenance of the SRN can result in environmental effects on landscape and the visual amenity. Landscaping associated with third party projects can also create potential risks to the safe and efficient operation of the network. EWR Co will need to demonstrate that any planting within the highway boundary is in accordance with DMRB standards to meet our environmental, as well as operational and safety, requirements. EWR Co will also need to demonstrate that any planting in close proximity to the SRN estate will not have an adverse impact on the estate, for example, by obscuring signs.

19. Good Design

19.1 EWR Co will need to demonstrate how the scheme complies with National Highways' strategic design document The Road to Good Design or subsequent design policies.

20. Location specific considerations

20.1 National Highways understands that EWR will potentially have a direct impact on the SRN at the following locations but we will expect EWR Co to highlight any changes to this:

- A34 at Oxford Parkway rail station;
- M40 underbridge south of Junction 9
- A5 overbridge west of Redmoor roundabout and proposed temporary direct access;
- M1 underbridge south of junction 13
- Ridgmont Station at M1 J13
- Existing A421 underbridge south of Kempston
- Existing A421 west of Roxton with possible new rail crossing (Alignment 1b only);
- A1 around Roxton with possible new rail crossing (Alignment 1b only);
- A1 north of Black Cat Junction (Alignment 1c only)
- New A421 east of the Black Cat Junction (Alignment 1b only)
- A428/B1428 Cambridge Road Junction
- Proposed highway alignment (adjacent to A428 West of Cambourne)
- Proposed footbridge over A428
- A428 temporary realignment and proposed cut and cover tunnel
- Proposed new road bridge east of M11
- M11 crossing underbridge
- Existing A14 underbridge

20.2 EWR Co shall confirm all locations to be assessed in the Transport Assessment through engagement with National Highways via Technical Working Groups. This shall include all locations where there is a material change to traffic flows as a result of the application, including those distant from the boundary of the Proposed Development.

21. Engagement with EWR Co

21.1 The above comments imply no pre-determined view on the part of National Highways as to the acceptability of the proposed development in traffic, environmental or highway terms. National Highways is working closely with EWR Co to understand the impact of the Proposed Development, and we are keen that this proactive engagement continues to ensure that National Highways' requirements are met through the development planning process.

Yours sincerely

Peter Fisher
Head of Third Party NSIPs
National Highways

From: NATS Safeguarding
To: East West Rail
Cc: [redacted]
Subject: RE: East West Railway notification of scoping report consultation [SG38664]
Date: 08 January 2025 16:31:28
Attachments: ~WRD0003.jpg
image002.png
image003.png
image004.png
image005.png
image006.png
image011.png
image012.png
image013.png
image014.png
image015.png
image016.png

Our Ref: SG38664

Dear Sir/Madam

NATS has assessed the proposal and notes that no part of the route lies within 5km of a NATS installation. As such, no impact is anticipated on its infrastructure and operations. Accordingly, NATS has no objections to the Application.

However, please be aware that this response applies specifically to the above consultation and only reflects the position of NATS (that is responsible for the management of en route air traffic) based on the information supplied at the time of this application. This letter does not provide any indication of the position of any other party, whether they be an airport, airspace user or otherwise. It remains your responsibility to ensure that all the appropriate consultees are properly consulted.

If any changes are proposed to the information supplied to NATS in regard to this application which become the basis of a revised, amended or further application for approval, then as a statutory consultee NERL requires that it be further consulted on any such changes prior to any planning permission or any consent being granted.

Yours faithfully

NATS Safeguarding

E: natssafeguarding@nats.co.uk

4000 Parkway, Whiteley,
Fareham, Hants PO15 7FL
www.nats.co.uk

From: East West Rail <EastWestRail@planninginspectorate.gov.uk>
Sent: Thursday, January 2, 2025 3:01 PM
To: Wilkinson, Karen <[redacted]@planninginspectorate.gov.uk>
Subject: East West Railway notification of scoping report consultation

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Dear Sir/Madam
Please see attached correspondence on the proposed East West Railway.

The Applicant for the Proposed Development intends to make an application for Development Consent under the Planning Act 2008. The Applicant has sought a Scoping Opinion from the Planning Inspectorate, on behalf of the Secretary of State, as to the scope and level of detail of the information to be provided within the Environmental Statement that will accompany its future application.

The Planning Inspectorate has identified you as a consultation body to inform the Scoping Opinion and is therefore inviting you to submit comments by 31 January 2025. The deadline is a statutory requirement that cannot be extended.

Further information is included within the attached letter.

Regards
Karen Wilkinson.

Karen Wilkinson (She/Her)
Senior EIA Advisor
The Planning Inspectorate
T 0303 444 5072
Helpline 0303 444 5000

@PINSgov The Planning Inspectorate planninginspectorate.gov.uk

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The statements expressed in this e-mail are personal and do not necessarily reflect the opinions or policies of the Inspectorate.

DPC:76616c646f72

From: [redacted]
To: East West Rail
Cc: [redacted]
Subject: Network Rail Scoping Response
Date: 31 January 2025 16:48:01
Attachments: Outlook-vgofqp1u.png
Outlook-iccvpkov.png
Outlook-Twitter_bi.png

OFFICIAL

Dear Sir/Madam,

Thank you for your letter providing Network Rail the opportunity to comment on your Scoping Opinion.

In reference to the protection of the railway, the Environmental Statement (ES) should consider any impact of the scheme upon the railway infrastructure and operational railway safety. In particular, if deemed relevant for operational railway safety, the ES should include a Glint and Glare Study assessing the impact of the scheme upon train drivers (including, distraction from glare and potential for conflict with railway signals). The ES should also include a Transport Assessment to identify any HGV traffic/haulage routes associated with the construction and operation of the developer's site that may utilise railway assets, such as bridges and level crossings, during the construction and operation phases of the development.

Please note that if the intention is to install cabling under, through and/or above railway land, the developer will be require an easement from Network Rail, and in turn, we would recommend that the developer engage with us early in the planning of their scheme to discuss and agree this particular element of the proposal.

Regards,

Tony Ridley

Surveyor – Property Services
Land & Property (Eastern)
M: [redacted]
W: www.networkrail.co.uk/property
E: [redacted]@networkrail.co.uk

Follow us on Twitter: @NetworkRail

Diversity and Inclusion Champion
Property Digital Ninja

Without Prejudice and Subject to Contract

NEWTON PARISH COUNCIL

Clerk: Mrs Sally Walmesley
Chairman: Mrs Louise Peden

Redwood Lodge
South Street, Litlington
Nr Royston
Herts
SG8 0QR
Tel: 01763 852137
E-mail: parishclerk@newtonparishcouncil.org

29th January 2025

Dear Sir/Madam,

EIA scoping consultation, your reference TR040012- 000019: East West Rail.

Thank you for the opportunity to comment on the scoping of the East West Rail environmental statement. I am responding on behalf of Newton Parish Council.

We have nothing to add to the list of topics for consideration, but we do have comments on the study areas under each heading in section 6 and one in section 7.

As background, the straight-line distance from the closest part of the proposed line to the village centre is in excess of 1000m. It seems that under some definitions Newton may be excluded from EIA study areas. We do note that Newton is within the 2Km visual impact area.

Our village will have one, possibly 2, balancing ponds within the boundaries and see significant changes to local road layouts so although we are some distance from the line itself, we are close to EW Rail activities.

With that in mind we would like to see each environmental study area consider the impact on the whole of Newton, recognising that EMF (section 6.5) is unlikely to be relevant.

In particular:

- Matters relating to groundwater/ water resources should include Hoffer Brook which runs through both Newton and Harston. The study area defined in 6.11.11 suggests that might be the case but does not guarantee it and Hoffer Brook does not appear to be listed in EW Rail documents to date.
- Matters relating to traffic should include a study of the likely impact of EWR road changes on all routes through and within Newton. We note that section 6.9.13 allows the assessment team to determine the area of study and believe that is an inadequate definition.
- Matters relating to noise and vibration from operations and from construction should encompass the whole village and should include any noise consequences of operating the balancing pond (s) and any necessary pumping when the line is operational.

Because of changes to road alignments and the need for balancing ponds, Newton should also be included in the flood risk assessment (including fluvial, groundwater, and surface water) in section 7.6 which is outside the formal EIA scope.

Yours sincerely

Louise Peden
Chair To Newton Parish Council

Norfolk County Council's Comments to the Planning Inspectorate on the:

East West Rail – Scoping Opinion

January 2025

1. Introduction

1.1 The County Council welcomes the opportunity to provide comments on the above Environmental Impact Assessment (EIA) Scoping Opinion/Report. The comments below are made on a without prejudice basis and the County Council reserves the right to make further additional comments on the Development Consent Order (DCO) application during the statutory consultation periods; and at the Public Examination stage.

1.2 While the County Council recognise most of the project and therefore the scope, sits outside Norfolk, the County Council have the following comments to make on the Scoping Opinion.

2. Socio-Economic and Strategic Transport

2.1 The County Council would expect to see the following items addressed in the EIA:

- Likely number of jobs generated locally to Norfolk – the County Council are satisfied temporary employment is scoped in and operational employment is scoped out given the limited employment numbers this will generate, as referred to in section 6.7.25.
- Potential to use local supply chains (Norfolk)
- Likely duration of any construction work
- Potential environmental impact from construction activities
- Potential impact to Norfolk highways from construction activities and construction traffic
- Disruption of services from Norwich to Cambridge, Stansted Airport and Cambridge North and King's Lynn to Ely.

Should you have any queries with the above comments, please contact the Strategic Transport Team Manager: David Cumming [redacted]@norfolk.gov.uk

Planning and Regulatory Services

Planning

www.oxford.gov.uk

To contact us
Quote this reference : 24/00234/PAC
E: planning@oxford.gov.uk
DD: 01865 249811
Postpoint: SAC 3.1A

OXFORD CITY COUNCIL

On Behalf Of: Planning Inspectorate
Environmental Services
Operations Group 3
Temple Quay House
2 The Square
Bristol, BS1 6PN

Date: 30th January 2025
My ref: 24/00234/PAC
Your ref: TR040012- 000019
Please ask for: Robert Fowler
Direct Dial: 01865 252255

Dear Ms Wilkinson

APPLICATION: 24/00234/PAC

RE: **Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulations 10 and 11**

Application by East West Railway Company Limited (the Applicant) for an Order granting Development Consent for the East West Rail (the Proposed Development)

Scoping consultation and notification of the Applicant's contact details and duty to make available information to the Applicant if requested

AT: **Land identified by East West Railway Company Limited (the Applicant) for an Order granting Development Consent for the East West Rail (the Proposed Development)**

Thank you for your letter (2nd January 2025) relating to the above. Please consider this to be a response sent on behalf of Oxford City Council as a Local Planning Authority and consultation body (for the purposes of Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (as amended)).

Availability of Information - Regulation 11(3) duty
With respect to the above, the requirements of the duty are noted and we have already provided information to East West Rail Company (the Applicant) in line with these requirements. The Applicant and their contact details are noted.

Scoping consultation

It is the Council's position at this stage that the information contained with respect to the ES includes the broad topic areas that would be expected for the purposes of the EIA scoping. At this stage though it is considered somewhat premature to be seeking a scoping opinion given the parameters of the proposed development are uncertain and the specific interventions in terms of infrastructure in the Oxford are not well-defined.

The proposed changes required at Oxford may include modifications to the railway station at Oxford to provide capacity for both trains and passengers and without knowing what these

changes are it is not possible to comment on the scope for an ES. There are also very significant impacts that would arise from some of the railway infrastructure enhancements that could be installed, including the installation of Overhead Line Equipment (OLE). The installation of OLE is envisaged to be discontinuous and whilst it is possible to consider that more sensitive areas of the route (including Oxford City) may be areas where OLE is not installed this is entirely dependent on the successful operation of hybrid battery-electric locomotives; this technology has been not been applied in this setting and the extent of OLE required is not detailed in the submitted documents. If, in fact this technology is not adopted and continuous electrification is required (which is understood to be the current fallback position) then the impacts of this in heritage terms for Oxford would be highly significant.

In addition to heritage impacts, it is considered that the uncertainties of what is required in infrastructure terms in the Oxford area associated with the proposed development may also have significant impacts in terms of ecology (in particular with reference to SSSIs, SACs and the Wolvercote Tunnel in Oxford), amenity (including noise and vibration), air quality and transport. For these reasons it is considered that whilst the broad topics of the scoping document may be relevant the environmental impacts are uncertain and these matters should be addressed in more detail prior to seeking a scoping opinion.

We look forward to further consultation on the proposals as they emerge and the opportunity to comment on the preparation of the ES as part of the Development Consent Order process.

Yours sincerely

Robert Fowler
Development Management Team Leader (West)

Please quote reference number 24/00234/PAC in all communications.

OXFORDSHIRE COUNTY COUNCIL

Karen Wilkinson
Senior Environmental Impact Assessment Advisor
Planning Inspectorate
Environmental Services
Operations Group 3
Temple Quay House
2 The Square
Bristol
BS1 6PN

County Hall
New Road
Oxford
OX1 1ND

Director Economy and Place
Robin Rogers

31st January 2025

Sent by email only to:
eastwestrail@planninginspectorate.gov.uk

Dear Karen Wilkinson,

Re: East West Rail EIA Scoping Consultation (December 2024)
Closing date for comments: 31st January 2025

Thank you for consulting Oxfordshire County Council (OCC) on 2nd January 2025 regarding an EIA Scoping Opinion for East West Rail.

OCC has considered the proposed scope of each chapter and recommends that additional information is included in the ES and that the scope is widened in accordance with the comments table set out at Annex 1 of this letter.

If you or the applicant have any queries, please do not hesitate to contact me. Please update OCC's contact details for this application with my name and the email address below.

Yours sincerely,

[redacted]

David Flavin
Principal Strategic Planner

Email: PlanningInOxfordshire@oxfordshire.gov.uk
www.oxfordshire.gov.uk

Annex 1: OCC comments on East West Rail EIA Scoping Opinion and additional information to be included/topics to cover in the Environmental Statement

Contents

Transport Comments

Routewide – Environment - EIA Scoping Method Statement – Air Quality

Paragraph 5.1.3 – Table 7 – CDC AQMA No.3 (Bicester Road Kidlington) – this AQMA has been revoked as detailed in CDC's Air Quality Annual Status Report 2024- Air quality management | Cherwell District Council

Routewide - Environmental - EIA Scoping Report

Chapter 6 - Study Area (Para. 6.9.12, p.117) – The Scoping Note states that committed development will be taken into account. This needs to also include allocated sites in the Adopted Cherwell Local Plan 2031 and the emerging Cherwell Local Plan review 2042 (Regulation 19 plan).

Chapter 6 - Study Area (Para. 6.9.13, p.117) – The Scoping Note states that:

'*The study area for traffic and transport is that within which significant effects will potentially occur. It is not set at a specific distance but having regard to IEMA guidance will be determined by those highway links where traffic flows (or HGV flows) would increase by 30% or more, or any other link or location where the assessment team determine that environmental or population sensitivities may warrant it, and where existing routes are closed or diverted*'.

We have concerns regarding the 30% threshold given the prevalence of sensitive areas, namely the Bicester Air Quality Management Area (AQMA) and the congested highway links and junctions in Oxfordshire (M40 Junction 9 (Wendlebury Interchange), A34 corridor, Wolvercote Roundabout (A40, A44) and A43.

IEA guidance suggests that two broad rules-of-thumb should be used delimit the scale and extent of any EIA assessment. Rule 2 of this IEA guidance states that ES impact assessments should: '*include any other specifically sensitive areas where traffic flows have increased by 10% or more'.*

We would therefore recommend that, in accordance with the IEA guidance ('*Guidelines for the environmental assessment of road traffic'*) on the geographical boundaries of assessment, that the 10% impact threshold be used at sensitive locations, including but not limited to those set listed above.

The following locations should also be assessed regardless of traffic increase:

- Launton Road, Bicester
- Queen's Avenue, Bicester
- A4165 (Oxford Road, Kidlington

Chapter 6 - Proposed Scope (Table 17, p. 119) – The impact on road safety has been scoped out. We would recommend that the impact on accidents and safely be assessed as part of the ES. This is because there is likely to be the potential for a significant impact on accidents and safety, as a result of the increase in HGV movements expected during the construction process, with NMUs at a much higher risk from HGVs. This is likely to increase the likelihood of PICs occurring. Furthermore during the operational phase there may be a net increase in traffic on some roads resulting from both new rail passenger journeys and from the rerouting of existing traffic, such as the London Road Level Crossing in Bicester, which could result in significant impacts on the alternative routes in term of increased PIC risk, for example Launton Road in Bicester which is narrow in places with limited places for pedestrians to cross.

Chapter 6 - Sources and Types of Impact (Para 6.9.4, p. 116) – Regarding any temporary restrictions, and diversions of roads and PRoW. It is worth noting, we would not envisage any development that needs to take place at Oxford Railway Station (or any other station located in the County) needing to close roads for a long period of time. OCC will require further detail of the nature of any temporary road closures that might be required in Oxford, Bicester and other locations to deliver the EWR proposals including location and duration of any closures.

Comments on Traffic and Transport Scoping Chapter

Chapter 3 – Policy (Para. 3.2.1, p.9) – In the list of National Policy documents the scoping report references the National Planning Policy Framework (NPPF), December 2023. The NPPF was updated in December 2024, therefore we suggest that reference is made to the most recent version.

Chapter 3 – Policy (Para. 3.2.1, p.9) – The report refers to '*Gear change: a bold vision for cycling and walking,'* which is supported. However, there is opportunity to expand this to include reference to Cycle infrastructure design (Local Transport Note (LTN) 1/20), as this is likely to help with the assessment of Fear and Accommodation.

Chapter 4 – Study Area (Para. 4.4.4, p.15) – Clarification is required to understand if construction traffic movements include construction worker trips (i.e. contractors' personal journeys) in addition to construction vehicle trips. We would recommend that construction worker trips are included when determining the Study Area.

Chapter 5 – Baseline Description (Para 5.1.3, p.17) – Rail passenger demand data from 2023-2024 is now available from the ORR. We would therefore recommend that 2023-2024 ORR data, rather than 2021-2022 data, is used to determine the baseline passenger demand. We consider the most recent data to be more realistic that 2021-2022 data, as it does not contain any potential impacts as a result of Covid 19 restrictions during 2021.

Chapter 5 – Baseline Description (Table 6, p.18) – It needs to be clarified which year the baseline rail passenger demand data (ORR) data is used. Paragraph 5.1.3 indicates that a baseline data from 2021-2022 has been used; however, Table 6 indicates that 2022-2023 data has been used to determine passenger demand between Oxford and Bletchley (and for subsequent EWR sections).

Chapter 5 – Bus Network (p.19) – When referencing the NMUs and bus routes there is no discussion of the bus services accessible at Bletchley (*inc. from adjacent bus station).*

Chapter 5 – Highway Network (Para 5.2.13, p.19) – When referencing the key roads within the Oxford to Bletchley section of the route, the A40 and its context is omitted. However, in paragraph 5.2.13 it makes specific reference to this route and its contrasting growth in traffic flows. Flows from the A40 are also contained in Table 7, therefore we would recommend that context is added to explain this routes importance.

Chapter 7 – Potential Impacts (Para 7.1.1, p.34) – When setting out which impacts will be considered in the ES there is no, or limited, reference to either 1) Accidents and Safety or 2) Impact on Public Transport. We would strongly recommend that these are assessed in the ES for the reasons set out below:

- Accidents and Safety – There is likely to be the potential for significant impact on accidents and safety, in particular during construction phase, but also during the operational phase. This will be as result of the increase in HGV movements expected during the construction process (with NMUs at a much higher risk from HGVs), net increases in traffic on resulting from new rail passenger journeys, maintenance trips and from the rerouting of existing traffic. These could all have an impact on Traffic and Transport active travel, as well as air and noise quality. We therefore recommend that the impact on accidents and safely be considered as part of the ES. Further, increased traffic will in turn have implications for increased highway maintenance requirements.
- Public Transport – There could potentially be significant effects on the local bus network. To understand the full impact on bus services we would require further detailed modelling. This could include: -
    - Will additional services be required as a result of increased rail services.
    - The closure of the London Road level crossing in Bicester, will likely impact bus routes 29 (Bicester - Langford - Graven Hill - Ambrosden - Arncott), 108 (Bicester - Oxford) and H5 (Bicester - JR Hospital), which currently operate over this infrastructure.
    - Increased competition between bus and rail services, which may result in the removal of some services (such as the X5 between Oxford and Buckingham) This could in turn result in increased demand on bus services along sections of the route that were shared with removed services (for example S5 between Oxford and Bicester).

Chapter 8 – Mitigation Principles (para 8.1.4, p.37) – The EIA scoping method states that '*For the assessment of impacts on Traffic & Transport, embedded mitigation might include: Specifying construction routes to contain construction traffic on more appropriate routes as much as possible, to reduce impacts upon residential streets*'.

We recommend that construction traffic mitigation routing considers the location of other sensitive receptors (such as schools, hospitals, high streets/ district centres, nurseries, and other areas with high footfall or vulnerable people), which have higher receptor sensitivity than residential dwellings. There is also an opportunity to include reference to HGV routing maps/ guide developed by local highway authorities, as these determine the most appropriate routes for HGV use.

Chapter 8 – Mitigation Principles (para 8.1.4, p.37) – There is an opportunity to include the provision of integration between public transport services as a mitigation measure.

Chapter 10 - Proposed Scope (Table 31 and 32) – The impact on bus services is currently only being reviewed as part of the assessment of journey time impacts. We would recommend that impact on bus services need to be fully understood, and need be reviewed in more detail, as there are likely to be impacts, as set out below (with more detail each point set out earlier in this response):

- Rise in ridership and demand for buses a result of the increased rail services at existing stations.
- As a result of the closure of the London Road level crossing in Bicester, this could impact a number of bus routes.
- Increased competition between bus and rail services

Chapter 10 - Proposed Scope (Table 31 and 32) – The impact on road safety has been scoped out. We oppose this and recommend that the impact on accidents and safely be considered as part of the ES during both the construction and operational phases. During the construction phase there is likely to be the potential for an increase in accidents as a result of the increase in HGV movements; NMUs are at a much higher risk from HGVs.. During the operational phase there is the also the potential for increased accidents depending on rerouted traffic options. Overall there is the potential for an increase in the likelihood of PICs occurring.

Appendix A (p.51) – Aspects and matters proposed to be scoped out – While we accept that new and upgraded highway infrastructure will meet relevant design standards and will be supported by a Road Safety Audit. There appears to be no justification as to why a review of PIC data and increased risk associated with construction vehicle trips has been scoped out. As alluded to earlier in this response, we strongly oppose this and recommend that the impact on accidents and safely be considered as part of the ES.

Comments on Air Quality EIA Assessment

Due to the scale of the works, the dust assessment should be followed by a detailed quantitative assessment using air dispersion modelling to understand effects on air quality from changes in AADT, HGVs, changes in speeds of vehicles and any road alignment changes.

Comments on Carbon (greenhouse gas) Emissions Scoping Chapter

Oxfordshire County Council would support full electrification, not just partial electrification. The business case for EWR is partly predicated on freight use and OCC is working closely with rail freight partners, Network Rail and England's Economic Heartland (EEH) to get lorries off the County's roads and onto rail. If this is to be achieved in an acceptable way – meeting net-zero, air quality and noise pollution requirements – the use of electric freight locomotives will be required.

We are launching an "Electrification Spotlight" on Friday 31 January 2025 at a major rail conference, to be held in Oxford. This will be developed further as a key component of our new Rail Strategy, by close working with EEH/Network Rail. Overhead wiring between

Didcot – Oxford - Bletchley would create a decarbonised spine for freight and intercity services passing through Oxfordshire".

Notwithstanding the above, the landscape, visual and biodiversity impacts of full electrification must be scoped in and the need for new pylons and overhead cables should not impact on the delivery of Local Plan site allocations.

Public Rights of Way

We are satisfied that impacts on Public Rights of Way are adequately scoped in.

Biodiversity Comments

It is noted that ecological surveys dating back to 2020 have been referred to within the documentation received and update surveys are currently being undertaken. It should be ensured that ecological survey results are up to date in line with best practice guidelines (Advice note on the Lifespan of Ecological Reports and Surveys | CIEEM).

The reasoning behind the chosen study search area selected for the desk study particularly regarding internationally designated sites, nationally designated sites, non-statutory designated sites, scheduled invasive non-native species is currently unclear and justification should be provided for this. Justified search areas should also be provided for legally protected species and Habitats of Principle Importance records.

The non-statutory sites records searched for during the desk study are not currently stated and should be specified. The non-statutory designated wildlife sites in Oxfordshire include Local Wildlife Sites, District Wildlife Sites and Road Verge Nature Reserves.

When considering the potential impacts and effects (table 7 on pages 33-35 and table 9 on page 43) of the project on habitats of principle importance, designated sites and their qualifying features are important ecological features to be considered consistently.

The proposed Habitats Regulations Assessment should include an assessment of present and planned minerals and waste and regulation 3 developments when considering combined impacts.

It is understood that dormouse surveys are being considered to inform localised areas of works between Oxford. These surveys are welcomed and should be undertaken in all areas of suitable connected habitat for dormouse to help inform appropriate mitigation.

The proposed methodology for undertaking watercourse habitat condition assessments has not been stated. When undertaking the proposed watercourse habitat condition assessments the MoRPh survey methodology should be specified where applicable (Modular River Survey).

While it is appreciated that a route wide approach will be undertaken regarding the biodiversity net gain (BNG) spatial multiplier and this approach will follow BNG guidance for NSIPs, effort to conserve and enhance biodiversity within Oxfordshire will be welcomed.

Carbon sequestration has been included as a consideration when integrating climate resilience into the BNG assessment of the scheme. It is not currently clear how this consideration will interact with other priorities such as achieving local nature objectives.

Districts: City and Cherwell
Consultation: East West Rail Scoping Opinion Consultation

Landscape & Visual Comments

Landscape & Visual

Landscape and visual impacts are being considered in chapter 6.13 of the scoping report.

Limited detail is included in the chapter at this stage. The Landscape & Visual section makes reference to a *Landscape and Visual Method Statement*, but this appears not to be included in the submitted information.

The report states that landscape/townscape character and visual amenity assessments are being scoped in, which is supported. It is also supported that the Landscape and Visual Impact Assessment should in accordance with the Guidelines for Landscape and Visual Impact Assessment, 3rd Edition (GLVIA3). This should also take account of subsequent clarifications and updates.
Visualisations should be in accordance with the Technical Note *TGN 06/19 - Visual Representation of Development Proposals* or subsequent updates. Other relevant guidance such as Natural England's *Landscape Character Assessment Guidance (2014)* or *TGN02/21 Assessing Landscape Value Outside National Designations* should also be taken into account.

The Landscape & Visual figures in appendix 4.1. include maps of designated landscape features, National Character Areas, local character areas, topography and visual receptors. It is difficult to comment on some of these as they are not accompanied by additional information, such as which Local Landscape Character Assessments are being taken into account, or information on the visual receptors represented by the viewpoints. Such information should be provided in the Environmental Statement.

Local landscape character assessments should include the *Oxfordshire Wildlife and Landscape Study (2004), A Character Assessment of Oxford and its Landscape Setting (2002), Assessment of the Oxford View Cones (2015), Cherwell Landscape Character Assessment (Cobham Consultants, 1995)* as well as relevant conservation area appraisals or townscape assessments. In addition, landscape evidence produced by Oxford City Council and Cherwell DC in preparation of their respective Local Plans should also be taken into account.

It is recommended that the assessment methodology, ZTV, viewpoint locations and visualisations (method, type, number, locations) are agreed with landscape officers of the affected local authorities.

The sources of impact outlined in the scoping report should also include the impact of substations and construction traffic.

A 2km study area might be appropriate but it should be informed/confirmed by the Zone of Visual Influence (ZTV). Flexibility to the study also needs to remain where the development might cause adverse effects outside the study area boundary, e.g. construction traffic through villages.

The LVIA should also consider combined or cumulative effects on landscape character and views.

Lighting

It might be covered elsewhere in the document, but it is important that both construction and operational lighting impacts are considered either as part of the landscape and visual assessment work or as a separate chapter. Lighting should be kept to a minimum and needs to be sensitively designed to minimise effects on views and landscape character, biodiversity and the night sky.

Minerals and Waste Comments

Overall, we are pleased to see the inclusion of a section on Material Resources and Waste within the Scoping paper, and this is where we have focused our attention and comments. We look forward to the more detailed assessment within the Environmental Statement.

The Scoping Report does not contain any estimates on the potential primary, recycled, and secondary aggregate requirements, nor projected waste arisings, for the Project. This lack of clarity on the scale of potential demand on Mineral Resources and Waste Management facilities makes it difficult to fully explore the potential impacts. In addition, it is unclear how assumptions such as "the east of England and south-east of England regions in which the Project is being constructed have waste management facilities for the treatment and management of waste
arising from the construction of the Project" (7.3.3) can be made within the Scoping Paper without this level of detail. We hope this will be clarified in the next stage.

This aside, we do have some suggestions for the next stage and seek clarification on several issues.

Overall Report and Appendices

Given the proximity of North and West Northamptonshire to the Project and its inclusion in the geographical study area (Figure 63), we would expect the East Midlands to be scoped into the EIA and considered throughout the Assessment and within the baseline information. Sites in North and West Northamptonshire for locally sourced materials and waste management facilities are closer than those in the wider Southeast, such as Hampshire.

Additional information is required on the methodologies used within the Report and baseline calculations within the Resources and Waste Appendix. Including:

- The methodology used for establishing the CD&E and C&I arisings (4.3.2 and Appendix),
- The methodology for the annual growth calculations (4.3.3 and Appendix),
- The methodology for establishing capacities that are likely to be available for the regional waste treatment facilities and landfill sites (Appendix 2.1.37 and Figures 1-5
- The methodology for calculating the annual projection of waste generation and its treatment (Appendix 2.1.37 and Figures 1-5)
- The methodology for assessing primary aggregate provision (13.1.2 bullet 1)
- The methodology for the future waste management available capacities in Southeast of England (Appendix Table 10)

- The methodology for calculating the percentage reduction of capacity based on a reasoned average from the historic data which is presented as curves in Figure 1 to Figure 5 of the Appendix (2.1.38).

Without these we are unable to assess whether the baselines are appropriate and on which the future EIA assessment can be undertaken.

The Waste Section and supporting Appendices, state that waste sites within 10km of the Project have been identified and will be considered as part of the baseline evidence. This is incorrect and should actually be “Waste sites within 10km of the seven postcodes within the Project” as the 10km buffer of the seven postcodes will not cover the entire Project Area; and therefore, potentially not all of the waste sites within the 10km of the project will be considered.

To achieve a record of all sites within 10km could be identified through the use of Authority Monitoring Reports and/or the Environment Agencies data.

Specific Section Comments

Section 9 Potential Impacts and Effects

Clarity is sought on why transport and emissions of mineral resource movements and waste management movements have not been scoped in within Table 2 and Table 3 within Potential impact and effects (Section 9).

Section 11, "Potential Temporary Construction Effects"
The report should address the use of primary aggregate. The demand for primary won aggregate during construction will increase pressure on existing permitted quarries, potentially necessitating new quarries to meet mineral needs across the three regions and nationally.

Section 13 Evaluating Significance

Availability of aggregate for the Project should not be based solely on annual sales, as set out at 13.1.2. It should be based on a thorough review of available reserves, landbank, existing Aggregate Provision Rates and permission end dates alongside the anticipated projected aggregate requirements and project timescales.

Clarity is sought on why the assessment for construction and operational phases excludes the East of England, citing a lack of available hazardous landfill. This region has recycling and other landfill facilities and should therefore be included. (13.1.3).

We expect the assessment to consider the locations of material sources for constructing and operation of the Project (13.1.7), as well as the locations of facilities for managing waste arisings from the project's construction (13.1.8).

Section 15 Assumptions
Paragraph 15.1.12 discusses contaminated waste and how it will be assumed to be hazardous, however at 13.1.11 it states that the assessment of contaminated land will

be included within the land quality method statement. Will this assessment within this section consider the impact on existing hazardous waste management facilities?

Appendix

We will expect the final EIA to include up-to-date figures for mineral production, APRs, reserves and landbanks for the UK, South East, East of England, East Midlands and individual authorities.

On a minor note, in 2022 please amend Oxfordshire's 10 year average for land won sand and gravel to 1.021 and Crushed rock to 0.914. The Local Aggregate Assessment for 2024 is now available on our website, which should be used for the next stage of the EIA.

Lead Local Flood Authority Comments

The scope of the EIA seems to be appropriate for the proposals.

For this application we would expect to see a Flood risk assessment and drainage strategy to be produced for the scheme/proposals. There are many elements such as changes to roads, buildings and the construction itself that may have an effect on the surface water drainage of the area and therefore these assessments are likely to need to be detailed and cover the wider areas that may be affected by enabling works.

Requirements for surface water drainage are included in our Local Standards and should be reviewed when considering how the proposals will drain including the use of SuDS measures.

We would recommend that the assessments review more up to date modelling and mapping information as it progresses this includes the potential changes to the NAFRA produced by the Environment Agency being published in 2025 and any local information from the recent events in 2024 and any subsequent events. To ensure that all sources of flooding are identified and assessed as part of the EIA as its prepared.

Districts: City and Cherwell
Consultation: East West Rail Scoping Opinion Consultation

Archaeology Comments

The applicant has completed a high-level Heritage Impact Assessment which sets out the broad archaeological context of the development. The EIA will need to include a detailed Archaeological Desk Based Assessment, which investigates the impacts of the specific proposals affecting heritage assets. Much of the proposed works within Oxfordshire are along the existing railway network, however, the scheme passes through areas of archaeological interest and potential so the ADBA will need to consider any impacts of works surrounding the railway line.

An archaeological desk-based assessment will need to be submitted along with any planning application for the site in line with the National Planning Policy Framework (NPPF 2024) paragraph 207. This assessment will need to be undertaken in line with the Chartered Institute for Archaeologists standards and guidance for desk-based assessments including the submission of an appropriate written scheme of investigation to agree the scope of the assessment.

A programme of archaeological investigation may be required ahead of the determination of any planning application for the site. This investigation must be undertaken in line with the Chartered Institute for Archaeologists standards and guidance for archaeological evaluation including the submission and agreement of a suitable written scheme of investigation.

Districts: City and Cherwell
Consultation: East West Rail Scoping Opinion Consultation

Public Health Comments

The Public Health team are reviewing the EIA Scoping Report based on its potential to influence human health, primarily the Communities and health chapter, and its accompanying method statement.

Health and wellbeing must be assessed and scoped into the Environmental Statement, as a comprehensive Health Impact Assessment (HIA), either as a section within the ES, or as a standalone document. The completion of an HIA to address and mitigate health impacts of a major development has been a policy requirement in Oxfordshire since July 2022 (policy 9 of LTCP). We question the statements in the Communities and health chapter which imply that there is no standard or legislative process for assessing human health.

The receptors outlined in the method statement are acknowledged, although the subsequent health assessment needs to include specific vulnerable receptors as the impacts of the development on these groups is likely to be more severe. Vulnerable receptors include care facilities, schools, areas where people are engaging in outdoor sport or recreation etc. We also wish to see users of PRoW included as receptors as many of these routes will interact with the study area.

We welcome the inclusion of PRoW diversions in the list of sources of impact for human health receptors. We also support the spatial extent of 500m around the scheme area for the assessment of impacts to human health.

The subsequent health assessment will need to include all of the elements outlined in the Future Oxfordshire Partnership's HIA Toolkit, including an population health baseline for the areas affected by the scheme, all of which can be sourced from the Oxfordshire Data Hub in additional to the ONS which is mentioned in the method statement.

Reflecting on the elements to be scoped into or out of the assessment, it is questioned whether safety and security should actually be scoped into the assessment, as these are crucial elements of wellbeing.

From: [redacted]
To: East West Rail
Subject: Application by East West Railway Company Limited for an Order granting Development Consent for the East West Rail
Date: 13 January 2025 09:31:14

You don't often get email from [redacted]@padburyparishcouncil.com. Learn why this is important

Your ref TR040012- 000019
Thank you for the opportunity to comment on this project. This is a response on behalf of Padbury Parish Council.
Our village was massively affected, and not for the better, by the building of the east west railway. As well as general disruption, the road network suffered considerable damage which has only just been fixed. In our view a planning condition must be imposed to the effect that where any work is undertaken on or next to a track that has already been laid, then delivery and removal of materials etc to the site of such work must be by train. As well as the obvious benefit of much reduced disruption to the residents of the area, there will be a saving in CO2 emissions and other pollutants over using vehicle traffic.

Peter Burton
Councillor
Padbury Parish Council

Ravensden Parish Council

Planning Inspectorate
Operations Group 3
Temple Key House,
2 The Square
Bristol BS1 6PN

28th January 2025

Reference: TR040012-000019

Sent by email: eastwestrail@planningInspectorate.gov.uk

For attention of: Karen Wilkinson Senior Environmental Impact Assessment Advisor.

Dear Madam,

Under procedures within the Planning Act 2008 the Planning Inspectorate has initiated (by email correspondence date 2nd January 2025) a Scoping Consultation in regard to Environmental Impact Assessment for the East West Rail development which is identified as a Nationally Significant Infrastructure Project.

This project critically affects Ravensden (a Parish within Bedford Borough) and the Parish Council welcomes the opportunity as a prescribed consultation body to comment on the Environmental EIA Scoping Report.

We are concerned that as a body comprising unpaid volunteers this has required members of the Parish Council to review over 1000 pages within a mandated period of 28 days. You should be aware that during this same limited period we have also been preparing our response to East West Rail Company (EWRCo) on their latest Non-Statutory Consultation. We note that EWRCo appears to have ignored the advice that PINS has previously given that the two procedures should not run simultaneously – and also ignored the indication they themselves previously gave to PINS that documentation would be succinct.

However, having considered the Scoping Report **we hereby request that the Secretary of State's Scoping Opinion requires that the Environmental Statement to be produced by EWRCo includes a thorough assessment of any Geological or Geophysical conditions that could pose threats to the environment and human lives if not addressed before the implementation stage, and mitigated appropriately**.

This is a priority because in October 2024 there was a significant explosion of natural gas and a major fire at Cleat Hill within the Ravensden Parish boundary, during drilling of a 100m deep borehole to install a domestic ground-based heat pump. The explosion and fire tragically resulted in the death of two elderly occupants, caused substantial damage to their home, and necessitated the evacuation of residents from 30+ properties in the vicinity, and the closure of roads and public rights of way in the area, for a matter of weeks. The affected house was so badly damaged that it has recently been demolished. This tragic event and its aftermath are currently under further investigation prior to a formal Coroner's inquest. The Local Authority-led response team has not yet determined the full extent of the gas reservoir or the underlying geophysical

features that may have contributed to the event. The site of the explosion is about 1km from the planned alignment of the East West Rail. It is possible that similar geophysical conditions could be encountered during earthworks associated with the construction of the railway. This amendment is therefore considered essential.

The Parish Council has a further concern. The **Study Area for the Landscape and Visual Assessment** has been set with a boundary of 2km from the Draft Orders Redline. This is not considered adequate to assess all longer distance impacts arising within the Parish and does not provide sufficient scope and context to enable a comprehensive landscape mitigation strategy to be developed; vital aspects such as rights of way connectivity may be missed. **Ravensden Parish Council therefore recommend the study area be increased to a minimum of 3km.**

We have no other comment or amendment.

Yours faithfully,

Diane Robins, CILCA
Clerk/RFO

Name Claire Pugh
Department Planning
Email address [redacted]@rbwm.gov.uk
Phone number 01628 685739

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Royal Borough of Windsor & Maidenhead

17 January 2025

To Whom it May Concern,

TR040012- 000019: Proposed East West Railway- Scoping Consultation

I write with regard to your letter dated 2nd January 2025 regarding the above matter. I would advise that the Council (Royal Borough of Windsor and Maidenhead) has no comment to make.

Yours faithfully

Claire Pugh
Principal Planning Officer- Major Projects Team
Place Directorate

Proposed DCO Application by the East West Railway Company Limited for East West Rail

Royal Mail response to EIA Scoping Consultation

Royal Mail – relevant information

Under section 35 of the Postal Services Act 2011, Royal Mail has been designated by Ofcom as a provider of the Universal Postal Service. Royal Mail is the only such provider in the United Kingdom. The Act provides that Ofcom's primary regulatory duty is to secure the provision of the Universal Postal Service. Ofcom discharges this duty by imposing regulatory conditions on Royal Mail, requiring it to provide the Universal Postal Service.

Royal Mail's performance of the Universal Service Provider obligations is in the public interest and should not be affected detrimentally by any statutorily authorised project. Accordingly, Royal Mail seeks to take all reasonable steps to protect its assets and operational interests from any potentially adverse impacts of proposed development.

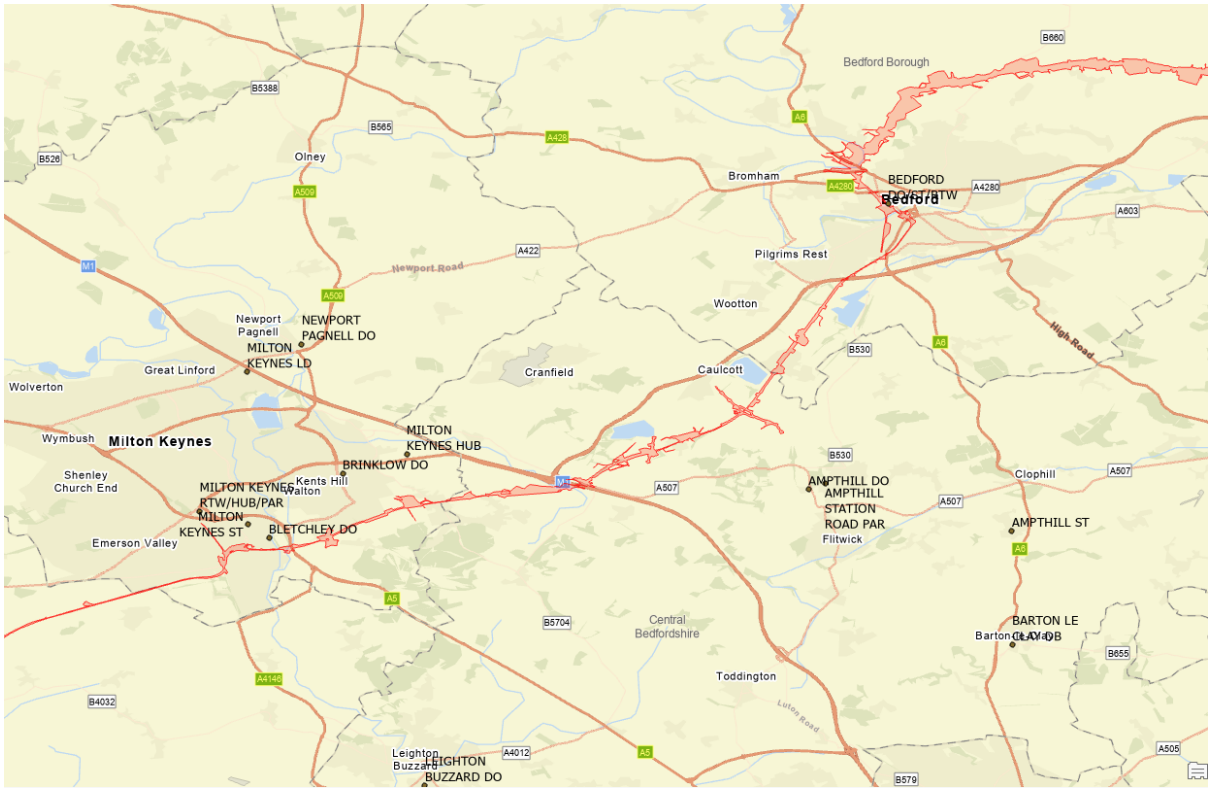
Royal Mail and its advisor BNP Paribas Real Estate have reviewed the EIA Scoping Report dated 5 December 2024 TR040012-000019-East West Rail - EIA Scoping Report.pdf and the Appended EIA Scoping Method Statement – Traffic & Transport of the same date.

Royal Mail has the following 18 operational properties within approximately 5 miles of the proposed East West Rail Order Limits as listed and shown on plans below:

1. Cambridge Delivery Office – Clifton Road, Cambridge, CB1 7QQ, 0 miles (directly adjacent)
2. Bedford Delivery Office Bedford, MK40 1AA, 0 miles (directly adjacent)
3. Oxford Delivery Office – Osney Lane, Oxford, OX1 1XX, 100m from draft order limit. Adjacent to Potential Train Crew Facility
4. Bletchley Delivery Office – Dane Road, Milton Keynes, MK1 1JQ - < 0.5 mile
5. Winslow SUDO - < 0.5 mile
6. Bicester DO - < 0.5 mile
7. Milton Keynes St - Dawson Road, Milton Keynes - <1 mile
8. Cambridge Henley Road PAR / LD - <1 mile
9. Brinkslow DO – 1.25 miles
10. Kidlington DO – 1.25 miles
11. St Neots DO – 1.5 miles
12. Ampthill Station Road PAR/DO – 2 miles
13. Milton Keynes HUB – 2 miles
14. Sandy DO – 3.25 miles
15. Oxford East – 4 miles
16. Milton Keynes LD – 4.5 miles
17. Newport Pagnell DO - 5 miles
18. Buckingham DO – 5 miles

East West Rail Route: Oxford – Winslow

East West Rail Route: Milton Keynes – Bedford



East West Rail Route: St Neots - Cambridge

Royal Mail's postal sorting and delivery operations rely heavily on road communications. Royal Mail's ability to provide efficient mail collection, sorting and delivery to the public is sensitive to changes in the capacity of the highway network.

Royal Mail is a major road user nationally. Disruption to the highway network and traffic delays can have direct consequences on Royal Mail's operations, its ability to meet the Universal Service Obligation and comply with the regulatory regime for postal services thereby presenting a significant risk to Royal Mail's business.

In exercising its statutory duties every day, Royal Mail vehicles use all of the main roads that may potentially be affected by the proposed East West Rail works.

Royal Mail position on EIA scoping consultation

East West Rail is a major infrastructure project that will cross a large swathe of central and eastern England. Its construction phase will run over a long period which is not specified in the EIA Scoping consultation documentation.

Based on the information that is currently available as part of this consultation, the proposed construction of the East West Rail project as a whole has potential to impact on Royal Mail operations without appropriate mitigation / construction traffic management, particularly if combined with cumulative impacts from other major development schemes in the surrounding area.

On 24 January 2025 Royal Mail submitted a response to East West Rail's non-statutory consultation in which Royal Mail has requested measures to mitigate impact on its assets and operation both during the construction and operation phases, as set out below:

"Construction phase

In order to protect Royal Mail's operational and business interests during the construction phase, it is requested that wording is added to the Construction CTMP and / or the COCP for East West Rail to secure the following proposed mitigations:

1. *the CTMP / COCP include specific requirements that during the construction phase Royal Mail is consulted by East West Rail or their contractors at least two months in advance on any proposed road closures / diversions / alternative access arrangements, hours of working;*

2. *where road closures / diversions are proposed, East West Rail or their contractors consult with Royal Mail at least two months in advance to enable it to identify and make available alternative arrangements for operational use (in order to ensure that Royal Mail can meet its statutory obligations throughout the construction period and avoid disruption to its operations during Royal Mail's peak period between 15 November and 15 January every year);*

3. *the CTMP and or the COCP include a mechanism that informs Royal Mail at least two months in advance about all other works affecting the local highways network (with particular regard to Royal Mail's distribution facilities near the proposed works, as identified in this consultation response), and*

4. *the CTMP and or the COCP require East West Rail or their to contractors provide named contacts and timetables for the proposed works at least three months before any works commence.*

Operational phase

Royal Mail requests that East West Rail and its operators are obliged under a DCO Requirement to ensure that the operation of East West Rail can be carried out without detriment to the carrying out of the undertaking of Royal Mail as the Universal Service Provider.

It is further requested that East West Rail or their operators are obliged under a DCO Requirement to notify Royal Mail at least two months in advance of any maintenance, repair or other works required during the operational phase which may detrimentally affect the carrying out of the undertaking of Royal Mail as the Universal Service Provider. We anticipate that this would most likely be applicable where highway works, closures or diversions are required to facilitate maintenance, repair or other works to the railway."

In relation to Royal Mail's requests in relation to the construction phase, the Traffic and Transport chapter of the EIA Scoping Report has a section on the sources and types of Impact (6.9.4 to 6.9.10) and the Traffic & Transport Scoping document has a section on potential impacts and effects (section 7 paragraphs 7.1.1 to 7.3.2). There is no reference in these sections to the potential for East West Rail's construction works to impact on either major road users generally or on road users with statutory obligations, such as Royal Mail. Appropriate references should be added and the scope of the traffic and transport section of the EIA to ensure that these potential impacts are adequately addressed.

The Mitigation section of the Traffic and Transport chapter of the EIA Scoping Report (paragraphs 6.9.16 to 6.9.17) has a section on mitigation measures and the Traffic & Transport Scoping document contain a section on assumed mitigation (section 8. Paragraph 8.1.1 to 8.1.5). These are high level in nature and the former section refers to the Code of Construction Practice (CoCP) and a Construction Traffic Management Plan (CTMP), stating:

"Generic measures will be set out within the CoCP. In due course specific measures, agreed with the LA would be set out in a CTMP that will be developed by the principal contractor."

The list of example mitigations at paragraph 6.9.16 does not include any reference to advance consultation with major road users and key stakeholders and statutory bodies such as Royal Mail.

The indicative construction management methods at Appendix B of the Traffic & Transport Scoping document sets out the typical elements and measures likely to be included in the draft CoCP:

"Contractors will be required to limit undue inconvenience to the public arising from increased traffic flows and disruptive impacts of construction traffic, as far as reasonably practicable, and ensure that legal requirements for works affecting highways are implemented and undertake the works in such a way as to maintain, as far as reasonably practicable, existing public access routes and rights of way during construction. This will include a range of measures such as:

- ***Construction traffic management and routes.***
- ***Management of deliveries including timings, and lorry movements.***

Site access arrangements including workforce travel plans."

Again, there is no reference the need for consultation with major road users and key stakeholders and statutory bodies such as Royal Mail.

As draft the CoCP and draft CTMP are, understandably, not available as part of the EIA scoping consultation at this early stage of the East West Rail project, Royal Mail is unable to comment on further the adequacy (or otherwise) of any generic or specific measures that may be being considered. So, for the purposes of the current EIA Scoping consultation Royal Mail's above comments and requested mitigation measures should be noted and addressed by the East West Rail Company as part of the Traffic and Transport impact assessment.

Summary

Royal Mail is not able to provide a full consultation response to the EIA scoping consultation due to insufficient information being available to adequately assess the level of risk to its operation and the available mitigations for any risk. Consequently, Royal Mail wishes to reserve its position to submit a consultation response/s at a later stage in the consenting process and to give evidence at any future Public Examination, if required.

In the meantime, any further consultation information on this infrastructure proposal and any questions of Royal Mail should be sent to:

Holly Trotman (holly.trotman@royalmail.com), Senior Planning Lawyer, Royal Mail Group Limited

Daniel Parry-Jones (daniel.parry-jones@realestate.bnpparibas) BNP Paribas Real Estate/Strutt & Parker

Please can you confirm receipt of this consultation response and holding statement by Royal Mail.

Greater Cambridge Shared Planning
South Cambridgeshire Hall
Cambourne Business Park
Cambourne
Cambridge
CB23 6EA

www.greatercambridgesharedplanning.org

PINS reference: TR040012 - 000019
Contact: Rachel Lambert
Principal Planner (Strategic Sites)
[redacted]@greatercambridgeplanning.org

31 January 2025

FAO: Karen Wilkinson
Environmental Services
Operations Group 3
Temple Quay House
2 The Square
Bristol
BS1 6PN
eastwestrail@planninginspectorate.gov.uk

Electronic submission only

Dear Ms Wilkinson

Consultation response on EIA Scoping Report – relating to application by East West Railway Company Limited (the Applicant) for an Order granting Development Consent for the East West Rail (the Proposed Development) (PINS ref: TR040012- 000019)

Introduction

This response is provided on behalf of South Cambridgeshire District Council ("the Council") in response to the EIA Scoping consultation request issued by the Planning Inspectorate (PINS) on 2 January 2025 for the East West Rail Development Consent Order (DCO).

The Council is identified as a 'consultation body' as defined in the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (as

amended) and has therefore been consulted prior to PINS adopting its Scoping Opinion. The deadline for consultation responses is 31 January 2025.

EIA Scoping Report

The Applicant commissioned an Environmental Impact Assessment (EIA) Scoping Report, dated 5 December 2024, in accordance with Regulations 10 and 11 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017.

The Council has reviewed the EIA Scoping Report and has provided technical comments as detailed in Table 1 of Appendix A appended to this letter.

The Council has identified key areas for further dialogue with the Applicant to shape the scope of the EIA and ensure comprehensive identification and assessment of the proposal's impacts. These areas include, but are not limited to:

- **Approach to powering the trains:** Assessing the differential impacts of discontinuous electrification versus full electrification on the railway structures, mitigation requirements and landscape.

- **Access and connectivity**: Addressing the social, economic and environment effects of the railway on existing communities and in particular, its future relationship with the completed/expanded Bourn/Cambourne area, in order to fully assess opportunities and identify mitigation requirements (e.g., ensuring suitable access provision and door-to-door connections are provided to the new Cambourne station for communities south of the A428).

- **Biodiversity impacts**: Assessing the impact of the A428 Cut and Cover Tunnel design on biodiversity and the wider landscape. A need for comprehensive surveys and a requirement for scoping on further surveys.

- **Combined effects:** Evaluating the interface with other committed development and infrastructure projects and existing planned mitigation, as well as related projects (e.g. A428 upgrade, Cambourne to Cambridge busway, Cambridge South Railway Station and strategic growth sites [Bourn Airfield, North East Cambridge, Cambridge East] etc.).

- **Construction disruption:** Assessing the potentially significant disruption to villages life and community facilities (including access to schools) during the construction phase, whilst drawing upon lessons learnt from other major infrastructure projects (e.g., HS2). Additionally, concerns raised regarding the wider socio-economic, environmental and economic effects on the impacts of travel to work patterns, particularly disruption to routes throughout the construction phase.

- **Design and landscape/visual impact:** The assessment of the effects of decisions on the detailed design, including the vertical alignment of the railway, including embankment heights, cutting lengths/depths, and potential for extended tunnel lengths, having regard to the design and impact of the railway and key structures on landscape, wildlife, and visual amenity. This includes a comparative assessment needed of the construction, landscape and visual impacts of cut-and-cover versus bored tunnel options.

- **Environmental baseline:** Further information and data required to fully assess environmental impacts of the scheme.

- **Freight:** Analysing the impact of introducing and intensifying freight traffic on residential amenity, for communities located close to existing and new rail lines focusing on noise, vibration, and air quality impacts from diesel-powered trains.

- **Landscape mitigation:** The identification and assessment of options for landscape mitigation and the creation of new landscape to manage economic, social and ecological impacts.

- **Road and path closures:** Understanding the implications of temporary and permanent road and path closures, new structures, and interactions with local routes on community and social cohesion.

- **Scope of DCO:** Considering the exclusion of a new station at Cambridge East from the current scope, and the resulting unaddressed impacts and opportunities.

The comments provided are made on a without prejudice basis and having regard to the material provided. The Council reserves the right to offer further comments on the scope of the Environmental Impact Assessment (EIA) in future submissions. This includes, but is not limited to, feedback on the Preliminary Environmental Information Report (PEIR) and other instances where insufficient information may have led to certain impacts being excluded from consideration. In such cases, the Council retains the right to challenge the adequacy of the EIA Scoping.

If you have any queries regarding this submission or require any further information, please contact nsips@greatercambridgeplanning.org

Yours sincerely

[redacted]

Stephen Kelly
Director of Planning & Economic Development
On behalf of South Cambridgeshire District Council

cc. Liz Watts (Chief Executive)

Enclosures
Appendix A: Consultation response on EIA Scoping Report (South Cambridgeshire District Council)

RWE

Planning Inspectorate
Environmental Services
Operations Group 3
Temple Quay House
2 The Square
Bristol, BS1 6PN

Your reference: TR040012- 000019
Our reference:
Adriana Gasparini
E-Mail [redacted]@rwe.com

BY EMAIL ONLY to EastWestRail@planninginspectorate.gov.uk

29Th January 2025

Dear Ms Wilkinson,

RWE GENERATION UK PLC EIA SCOPING CONSULTATION RESPONSE
Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulations 10 and 11

Thank you for your email dated 2nd of January 2025 enclosing the link to the East West Rail Development Consent Order ('Proposed Development') Environmental Impact Assessment ('EIA') Scoping Report ('Scoping Report') (TR040012-000019-East West Rail - EIA Scoping Report.pdf).

RWE Generation UK plc (RWE) is the holder of an electricity generation licence under Section 6 (1) of the Electricity Act 1989 (EA 1989) (entitled to exercise the powers under Schedule 3 of the Act) and a deemed statutory undertaker under section 8(1) of the Acquisition of Land Act 1981, by virtue of Schedule 16, paragraph (2) 2 of the EA 1989. As such, RWE is a statutory undertaker for the purposes of Section 127 of the Planning Act 2008 and a relevant consultation body to this consultation as per Schedule 1 of the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 and the Infrastructure planning (Environmental Impact Assessment) Regulations 2017**.**

RWE is also a statutory undertaker under section 262(6) of the Town and Country Planning Act 1990 and is the freeholder owner and operator of **Little Barford Power Station** ('Power Station') which is operational land under section 263 of that Act. In fact, the Proposed Development may cause detrimental impacts on the Power Station with **potential to cause serious detriment to RWE's undertaking**, as its Environmental Impact Assessment does not identify and assess significant environmental impacts at the Power Station. Such impacts also need to be fully considered in the EIA as well as incorporated in the Secretary of State's Scoping Opinion, including the following:

RWE Generation

Trigonos
Windmill Hill Business Park
Whitehill Way
Swindon
Wiltshire SN5 6PB

T +44(0)1793/87 77 77
F +44(0)1793/89 37 81
I www.rwe.com

Registered office:
RWE Generation UK plc
Windmill Hill Business Park
Whitehill Way
Swindon
Wiltshire SN5 6PB

Registered in England
and Wales no 3892782

- The Proposed Development will involve construction of a viaduct over the Great Ouse upstream of the Power Station, meaning any impacts on water quality during construction would affect the quality of the cooling water ('CW') make up water that is essential for the normal operation of the station. The Scoping Report does mention the use of measures to minimise release of substances during construction over or alongside rivers (in particular, suspended solids), and the use of monitoring systems. However, while a large number of abstraction licences/abstractors are referred to in the document as key receptors, RWE's abstraction licence (Ref. number 6/22/20/*S/0116/R01) which ensures cooling water supply to the Power Station is not one of those listed (possibly because we are outside the distance criteria used in that assessment). As the Power Station is the major abstractor downstream of the proposed viaduct and likely to be the most heavily affected should the construction work lead to any releases of suspended solids, the Power Station should be recognised as a receptor as part of the EIA, so that impacts and mitigation measures are well understood, as well as enabling protection to RWE's undertaking to be secured via dedicated Protective Provisions in future.

- RWE notes that there are two options for a route over Barford road. One involves a viaduct over the road, and another involves raising the road. Although the road is not the primary access route used by RWE, there have been occasions in the past when that road was the primary access route to the Power Station, due to closures on alternative access road to the north of the station. In one case it was the only route to our operational Power Station site for around six months due to road closures. As such, RWE requires unrestricted 24/7 access via Barford road. In addition, we note that Table 15 of the Scoping Report refers to both temporary and permanent changes to vehicular and pedestrian access to commercial premises/assets. However, none of the proposed changes to Barford road should result in any greater restrictions (for example height restrictions) on vehicles accessing the Power Station site, as this would prevent HGVs accessing the site for routine maintenance during planned or unplanned outrages or due to operational requirements. The impacts on the Power Station must be fully assessed in the EIA, and appropriate mitigation proposed and protective measures secured.

- The Scoping Report also highlights the works from Tempsford to east of St Neots 3.5: *"14 Across the Ouse Valley, Alignments 1b and 1c would both run along the western side of the new A421 dual carriageway past Little Barford, initially on embankment before entering cutting. A traction power connection would be made between Little Barford power station and the railway".* There is currently no traction capability at Little Barford. If the Proposed Development requires a connection to the substation adjacent to the Power Station site, it is likely that some construction works would take place on RWE operational land and we would need to understand the extent of those, the impacts on our undertaking as well as the potential extent of any future wayleaves required for maintenance and access to the transformer. It is paramount that construction or operation of the Proposed Development does not disrupt RWE's required 24/7 access to the Power Station and its day to day operation.

RWE therefore proposes that **the EIA should fully consider the environmental impacts of the Proposed Development on the Power Station, which should be included in the EIA Scoping Opinion.** RWE considers that appropriate mitigation measures as well as bespoke Protective Provisions to its statutory undertaking should be secured in the future Proposed Development DCO, to ensure that Little Barford Power Station can continue to operate without any serious detriment posed by the Proposed Development.

RWE will be an interested party to the Proposed Development DCO and would like to be kept notified of the progress of this application by email and by post. Please do not hesitate to contact me on the above referenced email if you need any further information or clarifications at this stage.

Yours sincerely,

[redacted]

Adriana Gasparini
Senior Legal Counsel for RWE Generation UK plc

Appendix A

Consultation response on EIA Scoping Report – relating to application by East West Railway Company Limited (the applicant) for an Order granting Development Consent for the East West Rail (the proposed development) (PINS ref: TR040012- 000019)

Table 1: Response to EIA Scoping Report

This table sets out comments from South Cambridgeshire District Council (**the Council**) in relation to the EIA Scoping Report and associated documents (as listed in Table 2).

ID	Section of report	Description	Comments	'Scoped out' assessment items to be scoped in
General comments				
EWR-MWJV Technical Partner Routewide – Environmental - EIA Scoping Report				
GEN.1	4.2	Defining the environmental baseline: Landscape and historic environment surveys	Understanding how criteria for short-term, medium-term and long-term, as well as permanent and temporary effects can vary among settings (urban and rural) is essential for the assessment outcome and its feasibility. More details of how these criteria will be structured to capture level of impacts/effects in such varied settings should be discussed and agreed with the local planning authority once surveys and data gathering are completed.	-

GEN.2	4.5	Wider development and cumulative effects	The proposed route may intersect with or impact other projects, including the Cambourne to Cambridge busway, the new Bourn Airfield development, as well as other initiatives. Given that work on these projects might commence concurrently with or prior to the EWR project, it is crucial to establish communication with the respective project teams. This collaboration will facilitate a comprehensive understanding of the cumulative effects, as each project may have varying environmental priorities.	-
GEN.3	4.5	Wider development and cumulative effects: Defining other developments and monitoring area	The Council would welcome early sight of the gathered GIS data and projects shortlisting through the four stages.	-
Environmental assessment topics: Landscape and visual				
EWR-MWJV Technical Partner Routewide – Environmental - EIA Scoping Report				
LV.1	6.13	Landscape and visual	Whilst no specific detailed lighting assessment has been included at this stage, it is expected that more detailed assessment will be carried out before the planning application stage. This should include consideration of any artificial lighting impacts in accordance with the Institute of Lighting Professionals "Guidance Notes for the Reduction of Obtrusive Light". It should be made clear for easy reference where the artificial lighting is to be installed, and an assessment will need to be presented within the document. When comparing the existing site and its lighting environment against the proposed development's lighting requirements, by virtue of the nature, size and location	-

			of the proposals there will be an increase in the lighting levels on site This will result in a change of the existing lighting environment. However, the Council appreciates this will be considered more at the detailed design stage, but it would be beneficial to consider impacts as early as possible. The proposed study, assessment and mitigation approach to the ES appears satisfactory at this time from an Environmental Health perspective. However, further consideration needed regarding other impact / effects on other environments such as businesses, other interested organisations such as Astronomy Organisations (sky glow), ecology (wildlife / animal behaviour & breeding), drivers on public highway, landscape or secured by design requirements. These effects should be considered by respective specialists in those areas.	
LV.2	6.13	Sources and types of impact	The approach for considering impacts within 500m distance of the route/area of intervention, and up to 1km for areas with designated historic assets and up to 2km when assessing impacts upon landscape or townscape is welcomed. The Council would welcome an opportunity to have early sight of how this impact distance was determined in some locations such as Cambourne, Bourn Airfield new village and Cambridge City to help us better understand the potential impacts & effects on landscape and townscape character of these areas and the practicality and effectiveness of the mitigation measures that will be implemented. Additional viewpoints are likely to be required once the data is gathered and more detailed information on the design of the new station at Cambourne and associated structures are available.	-

LV.3	6.13	Proposed scope	Generally, the scope is acceptable; however, the Council reserves the right to amend the lists of criteria based on survey results, site walk overs, local knowledge and collaborative consultation with local authority officers.	-
Routewide – Environmental - EIA Scoping Method Statement – Landscape and Visual				
LV.4	1.1.7	Method Statement – Landscape and Visual	Section 1.1.7 is too limiting regarding landscape impacts. It correctly identifies the impacts on landscape character but fails to identify impacts to other landscape designations both national and local which may exist.	-
LV.5	1.1.8	Method Statement – Landscape and Visual	Section 1.1.8 identifies people and groups of people as the visual receptors for the assessment but does not include an indication of the differing sensitivities of different groups of people and their activities which is an important facet of a Landscape and Visual Impact Assessment (LVIA). It is understood that the above are just introductory statements about landscape and visual differences, but more detail would give clarity to the text.	-
LV.6	5.2.4	Landscape baseline	Impact to designated landscape features must also be included along with the National and Local Landscape Character Areas which are mentioned. Designations may come at a variety of scales (national to local) and sensitivities along the route and must be considered and assessed (e.g., the Greenbelt, nature reserves, TPOs etc.).	-

LV.7	5.2.11	Townscape baseline	Reference to the Cambridge Inner Green Belt Boundary Study (2015) is acceptable. However, reference and weight should also be given to the Greater Cambridge Greenbelt Assessment (2021) that forms part of the evidence base for the emerging Greater Cambridge Local Plan. It covers more areas than the previous document and is more up to date.	-
LV.8	6.2	Landscape and townscape sensitivity	The proposed rail corridor is next to areas of existing transport infrastructure and routes/infrastructure that are in construction stages (e.g., A428 and Cambridge South station). The baseline assessment and sensitivity of these parts of the east west rail corridor should consider the conditions before and after other adjacent projects in construction. The Council reserves the right to amend or alter the sensitivity criteria and assessment based on further survey and desktop work alongside local knowledge.	-
LV.9	6.2	Landscape townscape and visual elements	The text should include a description of the Cambridge North area and the areas around Coldham's Common, Cambridge East and Cherry Hinton which are distinct from other parts of the city alongside the rail corridor.	-
Book of Figures				
LV.10	Figures 155 to 159	Visual receptors	Additional and amended viewpoints are likely to be required once the baseline data is available and more detailed information on design of the corridor and associated structures are available. More detailed drawings showing viewpoint locations are required. The Council reserves the right to amend and request additional viewpoints.	-

Environmental assessment topics: Historic Environment				
EWR-MWJV Technical Partner Routewide – Environmental - EIA Scoping Report				
HE.2	6.12	General	The Council would like to have early sight of the work on the historic environment assessment to assist in better understanding, and where appropriate help inform, the design and mitigation strategies to reduce the impact of the proposal on the historic environment. The methodology for assessing the impacts and effects of the construction and operation of EWR are understood.	-
Method Statement– Historic Environment				
HE.3	3.3	Standards and guidance	There is no mention of Historic England Good Practice Advice Note: The Setting of Heritage Assets (GPA 3).	-
HE.4	4.3	Study area	The provision of the baseline data within 1 km of the draft order for designated assets and 500m for NDHA is accepted with the acceptance that any other assets outside these areas that are highlighted by stakeholders may also be included.	-
HE.5	5.8.18	Heritage assets-non-designated heritage assets	Section 5.8.18 notes that there is no local list for South Cambridgeshire District Council. The Council understands that Cambridgeshire County Council's Historic Environment Team provided a GIS dataset to EWR Co which included a dataset for local heritage listings for both Cambridge City Council and South Cambridgeshire District Council. This showed the status of buildings as Locally Listed, Candidate Ready and Candidate in Preparation for the preferred route plus a buffer of 4km. This information needs to be included within the scoping report.	-

Environmental assessment topics: Air Quality				
EWR-MWJV Technical Partner Routewide – Environmental - EIA Scoping Report				
AQ.1	6.3	Air quality	Construction phase dust emissions can be reduced by the adherence to a scheme wide Dust Management Plan (or similar), or as part of a Construction Environmental Management Plan and Code of Construction Practice with specific areas that require more detailed assessment and/or additional mitigation being identified. Considerable information is provided on this topic and comments with regard to this section will require further specialist advice and comments from the Council regarding air quality.	-
AQ.2	6.3	Air Quality	The project requires both temporary and permanent changes to road infrastructure, including the temporary diversion of the A428 and permanent closures of several level crossings in the Harston and Hauxton area. These changes to road layouts will undoubtedly have an impact on air quality in these particular areas, which could potentially be positive or negative and are likely to require assessment. The impact of diesel freight trains using the project will also need to be assessed.	-
AQ.3	6.3.8 – 6.3.9	Establishing the baseline	In establishing the baseline, it is welcomed that a significant nitrogen dioxide monitoring programme has taken place and that a variety of other sources are being used to establish a baseline. However, particulate matter (PM2.5 and PM10) have not had any scheme specific monitoring. Given the potential impacts from the scheme and the relatively limited	-

			information held by the Council on PM baseline levels, additional baseline monitoring for PM would be welcomed.	
AQ.4	6.3.10 – 6.3.12	Study area	For the study area, where moving diesel freight trains are in use, assessment is only proposed where background levels of NO2 are above 25µg/m3. Assessment criteria should also be set for PM2.5 and PM10 as diesel trains can be a significant contributor to PM levels.	-
AQ.5	6.3.	Proposed scope	The Council acknowledges that the preference is for electric passenger trains. However, this does not appear to be guaranteed at this stage. Diesel freight trains will also be using the railway line. Any study should consider a worst-case scenario including diesel passenger trains to ensure worst case impacts are considered.	Emission to air from operational phase diesel trains to include passenger services.
Method Statement – Air Quality				
AQ.6	3.3	Standards	Section 3.3 does not discuss the population exposure reduction target as specified in The Environmental Targets (Fine Particulate Matter) Regulations 2023. This legislation has two legal requirements relating to PM2.5: • A target of 10µg/m3 to be reached by 2040 • A population exposure reduction of at least 35% by the end of 31st December 2040 compared to the baseline period of 2016 to 2018 This population exposure reduction is important because the legislation requires a significant reduction	-

			in PM2.5 and therefore any development that contributes to an increase in long term PM2.5 levels may not be acceptable, even if compliance with the PM2.5 target of 10µg/m3 is demonstrated. Although a considerable monitoring programme has taken place for nitrogen dioxide, all data relevant to the Council's administrative area was collected during 2021 and therefore may be atypical as per the position statement from the IAQM and advice from Defra. This data should not be relied upon, unless heavily caveated and adjustments made.	
AQ.7	3.5.6	Study area	For the study area, where moving diesel freight trains are in use, assessment is only proposed where background levels of NO2 are above 25µg/m3. Assessment criteria should also be set for PM2.5 and PM10 as diesel trains can be a significant contributor to PM levels.	-
AQ.8	5.3	Automatic monitoring	Section 5.3 does not include data from the Harston automatic monitor which would be directly relevant to the proposed scheme. Data from 2023 is available and should be considered as part of a future assessment.	-
AQ.9	6	Sources of impact	Exhaust emissions of SO2 and NO2 from diesel trains using the project (including idling) during the operational phase are included, but PM2.5 from exhaust emissions from diesel trains is not included for assessment. PM2.5 from diesel trains using the project must be considered as part of the assessment.	-
AQ.10	7.1.4	Operational diesel trains	The assessments in relation to diesel trains need to be expanded to cover PM2.5.	-

AQ.11	7.2.9	Construction road traffic	Section 7.2.9 states: “Where the duration of construction activities is less than two years it is unlikely that the construction activities would constitute a significant air quality effect given the short-term duration”. Although in most parts this statement is true, the temporary re-routing of the A428 to construct the cut and fill tunnel could cause significant local disruption, depending on the exact nature of these works. Possible significant air quality impacts should be considered for this particular construction activity. It should be noted that any air quality modelling from road traffic should only take place once the traffic models have been agreed with the relevant highway authorities to minimise risks of error or dispute.	-
Environmental assessment topics: Communities and health				
EWR-MWJV Technical Partner Routewide – Environmental - EIA Scoping Report				
CH.1	6.4	Communities and health	The assessment should involve relevant parish councils, the Council’s Communities Team and relevant community groups including affected schools.	-
CH.2	6.4.2	Communities and health	As per government guidance, EWR may result in changes to existing geographical boundaries defining communities and may result in the need for community governance reviews.	-
CH.3	6.4	Sources and types of impact	Emphasis must be made to the importance of mental health impacts that begin at the planning consultation stages; whilst temporary, the effects to human health will be long-term and therefore should be a main focus of the evaluation on communities and health.	-

CH.4	6.6.8	Sources and types of impact	Any reduction in walking/ cycling can impact on social cohesion by reducing opportunities for interaction, this impact should be considered.	-
CH.5	6.4	Establishing the baseline	The Council agrees with the sources of data to establish the baseline. The applicant should make reference to Cambridgeshire Insight which hosts a range of Joint Strategic Needs Assessments including District Summaries and Ward profiles. The applicant is also directed to the public health data held on the PHE Fingertips webpage.	-
CH.6	6.4.12	Establishing the baseline	Surveys should also be used to determine the impact on other areas of impact not selected areas of public space alone. The Council should be consulted on which community infrastructure will be impacted and surveys on identified infrastructure completed.	-
CH.7	6.4	Evaluating effects	The Council agrees with the approach to evaluating effects of the proposal, which must consider age, socio-economic status and/or pre-existing health conditions.	-
CH.8	6.4	Proposed scope	Changes in demand for public services should be included in scope. The sustainability of rural public services can be sensitive to changes in numbers of service users. EWR changes may result in changes to access of public services which may affect viability. As per comments above community structure and institutional arrangement should be included within the scope.	Changes in demand for public services and community structure and institutional arrangement to be scoped in.

Method Statement – Communities				
CH.9	4.3.1	Surveys and stakeholder engagement	Community surveys should be undertaken for all community facilities.	-
CH.10	4.3.2	Surveys and stakeholder engagement	Affected residents as well as community receptors should be engaged in the development of a shared understanding on the impact of EWR on community facilities.	-
CH.11	5.2.4	Community elements	Public rights of way should be considered both as part of travel and transport and as community infrastructure, these routes are frequently used for recreation and amenity such as dog walks or ways of spending time with friends/ family and serve a wider use than a path. Sites of ecological value should also be considered as community receptors as they hold much significance for rural communities.	-
Environmental assessment topics: Land quality				
EWR-MWJV Technical Partner Routewide – Environmental - EIA Scoping Report				
LQ.1	6.6	Establishing the baseline	The following comments relate to risk in terms of human health only. Consideration of risks to controlled waters is outside the remit of this consultation. Given the site overlies a Principal Aquifer, comments should be sought from the Environment Agency in relation to controlled waters risks. The Land Quality Method Statement covers both land contamination and geo-conservation. It is noted that site walkovers and desk-based assessment will be carried out; reviewing any existing reports and completion of desk studies in	-

			areas not yet covered. It is also noted that proposals for site investigation are underway, and the findings are to be reported as part of a quantitative risk assessment in line with guidance. Section 6.6.7 states that that Local Authority Part 2A contaminated land designations will be utilised and Table 3 within the Land Quality Method Statement lists the Councils where the Part 2A designations have been reviewed. SCDC's public register of Part 2A designations does not appear to have been included and the applicant should be aware that a significant Part 2A designated site in Hauxton is located approximately 1km from the draft order limits. The applicant may want to comment on any risk this does, or does not, pose. Though the majority of land within the draft order limits is agricultural, there are some potential sources of contamination such as petrol filling stations, disused railways, agricultural contractor, Lords Bridge MOD site and a couple of landfills. However, a new railway is not particularly sensitive to the presence of contamination and there are various mitigation measures required as standard in accordance with the Environment Agency's Land Contamination: Risk Management (LCRM) guidance, and further through the use of the CoCP and accompanying documents, including any excavated soils being managed via the Department of Waste: Code of Practice and associated Materials Management Plans. There is also a requirement for a procedure to cover unexpected contamination. Effects resulting from the operation of stations and infrastructure is not considered to be significant and has therefore been scoped out. The documentation states that management of contamination risks will	

			remain central to the project, with investigation works completed in accordance with LCRM, and therefore likely significant effects in respect of land contamination are not anticipated. Overall, comments with regard to this topic will require further specialist advice and comments from the Council.	
LQ.2	6.6	Proposed scope	The Council is satisfied that land contamination can be scoped out since it is not expected to be significant, with the documents stating the only aspect of land quality to be scoped in is in relation to geodiversity within the Comberton to Shelford section. However, the Council reserves the right to amend the lists of criteria based on survey results, local knowledge and collaborative consultation with local authority officers.	-
Environmental assessment topics: Sound, noise and vibration				
EWR-MWJV Technical Partner Routewide – Environmental - EIA Scoping Report				
SNV.1	3.6.8	Project description: Croxton to Toft	Section 3.6.8 states that in the location of the Bourn Airfield development, A428 crossing, a “tunnel services building, housing operational and maintenance equipment, would be required at each end of the tunnel.” This facility would need additional noise assessment (in accordance with BS:4142) as this use has the potential to cause adverse noise impacts to nearby residential properties during its construction and operation, and suitable mitigation will need to be considered and provided.	-

SNV.2	3.7.6	Project description: Comberton to Shelford	Section 3.7.6 refers to another 700m tunnel in the Harlton to Haslingfield section, which will need similar services. This should also be assessed using the same methodology (see SNV.1 above).	-
SNV.3	3.7.17	Project description: Comberton to Shelford	Section 3.7.17 of the report refers to “a new rail systems compound would be provided to house equipment supporting the widened railway.” It is not clear where this facility is to be located, but if in close proximity to residential properties, it is recommended that this use is restricted to the housing of equipment only and any use for train maintenance, etc (including cleaning) be prevented.	-
SNV.4	4.2.10	People-focused surveys	Section 4.2.10 confirms 60 noise surveys have been completed to date and some vibration assessments have been carried out in order to establish the baseline conditions that currently exist; however, the duration of each assessment has not been given.	-
SNV.5	4.2.27	Modelling: Air quality and noise and vibration	Section 4.2.27 confirms that “noise impacts from trains and road traffic will be assessed using noise models to calculate temporary and permanent noise levels at receptor locations.” This is considered an acceptable approach, but detailed information will need to be supplied accordingly.	-
SNV.6	5.3	Construction and the code of construction practice	Section 5.3 makes reference to the draft CoCP that will be developed and submitted with the application. It is confirmed this will convey responsibility to the “Principal Contractor” to carryout monitoring as required. This will be for noise and vibration during construction for this environmental topic. Operational	-

			noise mitigation will need to be assessed after the schemes completion, to ensure the methods employed are working as effectively as predicted and provide the level of protection expected. The Council would expect this to be included within DCO conditions imposed as part of the examination process. This is an acceptable approach, however the concept of using confidential strict/sensitive documents that are supplied as supporting information as part of the DCO process should be avoided as they cannot be fully scrutinised at a later date if necessary (e.g., private contractual obligations, penalties for sub-contractor non-compliance, etc.). It is recognised that the construction phase of the A428 Bourn Airfield tunnel will be particularly disruptive. Existing residential properties at Highfields and Caldecote will be affected and depending on the expected timeline, potential occupiers of the Bourn Airfield development will be adversely impacted (particularly from the extensive construction and tunnel works). Also, it is recognised that noise levels will be increased at Cambourne due to the railway and Cambourne station construction works and future operation of the railway. The effect of increased vehicle movements using the station will need to be considered in relation to increased road traffic noise levels affecting properties enroute to the site. As a result of the operation of the railway, a new noise source will be introduced into many rural areas and detailed impacts will need to be considered throughout the route. Acoustic mitigation is to be used including the use of acoustic barriers and/or bunds will be developed as noise assessment progresses and	

			details of the mitigation will need to be made available as part of the more detailed design moving forwards.	
SNV.7	6.8	Sources and types of sound, noise and vibration	Construction and transportation noise have the potential to cause significant adverse impacts on the health and quality of life of existing residents if not adequately controlled/mitigated. It will need to be demonstrated that significant adverse impacts/effects or just adverse impacts have been avoided, minimised or mitigated and must apply to both construction and operational phases of the scheme. Decommissioning impacts have not been considered as there are no current plans to decommission the project at this time. Provided the road surfaces in question are kept in a good state of repair, vibration from vehicle movements will not be an issue. However, if the road surface is in a poor state noise and vibration could be an issue at nearby sensitive premises. This is confirmed in Section 7.1.3 of the Sound Noise and Vibration Method Statement. This is outside of the applicant's control, although there may be scope for an agreement with the highway authority to make good areas of damage caused by heavy construction traffic. Further consideration of these issues and HGV movements, etc are given in the Traffic and Transport (journeys and access) section of the report (Section 6.9).	-
SNV.8	6.8	Study area	In addition to direct noise and vibration impacts, as a result of the construction and operation of the railway, noise impacts as a result of other works such as road realignments will need detailed assessment.	-

SNV.9	6.8	Mitigation	It is noted that large lengths of “indicative mitigation” are shown on the previous route plans submitted. However, no information is currently given as to the types/height/construction or expected levels of attenuation obtained have been provided. This will need to be reported in detail as the EIA process progresses and more information becomes available. In some cases, such as the proximity to the villages of Harston and Hauxton, where the existing roads are moved and then affect new receptors not previously impacted, detailed assessment will be required and appropriate compensation may be payable to occupiers of eligible properties.	-
SNV.10	6.8.14	Mitigation	The content of Chapter 6 (in relation to noise and vibration) the hierarchy of mitigation presented in Section 6.8.14 does not include the option to “Avoid” the noise source altogether. This mitigation section refers to control and mitigation at source and receptor, but avoidance (if possible) seems to be omitted. This needs to be addressed.	-
SNV.11	6.8.17	Mitigation	Reference is made to reliance on the CoCP to propose measures to mitigate construction noise impacts. It is understood that a draft Code of Construction Practice (CoCP) will be developed and submitted as part of the application and will continue to be developed, in consultation with local authorities and relevant stakeholders, and further information will be presented at statutory consultation. The typical elements and measures likely to be included in the draft CoCP set out in Table 26 of Appendix B are acceptable in high-level principle regarding sound, noise and vibration.	-

			However, more site-specific detail and data used to confirm acceptable noise limits, mitigation, monitoring and working practices will need to be provided.	
SNV.12	6.8.22	Evaluating effects	Section 6.8.22 states that “Noise from train horns sounded at whistle boards used at footpath crossings, or to give warnings to personnel working at the track side, are required for safety reasons. Consequently, these noise impacts are unavoidable but are short in duration and will generally result in a minor contribution to the daytime and night-time LAeq noise levels.” It also concludes “Therefore, train horn noise is not expected to result in significant environmental effects.” Officers disagree with these statements. Although the limited duration of train horn noise will not raise LAeq noise levels significantly, this is due to the relatively long monitoring time period over which the measurements are taken, which will result in an effective “averaging out” of the noise level reported and does not adequately reflect the maximum peak levels produced that can be the source of disturbance and noise nuisance. Historically, it has been a contentious issue as to the identification of the “person responsible for the nuisance” (i.e. the train operating company, rail network owner, driver, etc.) when reacting to whistle boards placed at the approach to rail crossings, which require the approaching train to sound its horn. These boards can be the source of complaint and significant adverse impacts. Safety is often stated as the overriding factor to be considered in these cases and so the noise impacts are legally difficult to control/enforce, once the signs are in position. Officers welcome the intent given in this section for “The	-

			elimination of track crossings and the sensitive siting of whistle boards will be undertaken where feasible and in compliance with relevant safety requirements." It is recommended that serious consideration is given to alternative safety options (e.g., foot bridges, tunnels. etc) that can be used at pedestrian rail crossings, rather than whistle boards throughout the proposed route and particularly near residential properties.	
SNV.13	6.8	Proposed scope	Concerns are raised regarding the scoping out of temporary and permanent airborne noise due to train horn/audible warning devices (see SNV.12).	Temporary and permanent airborne noise due to horns/audible warning devices to be scoped in.
Method Statement - Sound, Noise and Vibration				
SNV.14	3	Relevant standards and guidance	Any information supplied, which informs the content of the ES Sound Noise and Vibration topic must have due regard to current government / industry standards, best practice and guidance and the relevant sections of the: 'Greater Cambridge Sustainable Design and Construction Supplementary Planning Document, (Adopted January 2020)' and in particular section 3.6 - Pollution) and the further technical guidance related to noise pollution (pages 230-256). It is acknowledged that at this stage detailed design information is not available as to potential plant and equipment that may be installed at specific facilities (e.g. the new Cambourne station), but detailed noise data will need to be gathered, assessed and significant effects mitigated, on a case-by-case basis when this	-

			information becomes apparent and is likely to be controlled by the imposition of planning conditions (as necessary) at the more detailed design stage.	
SNV.15	3.2	Guidance	Section 3.2. does not include the 'Greater Cambridge Sustainable Design and Construction Supplementary Planning Document, (Adopted January 2020)'. As mentioned above, information supplied, which informs the content of the Sound Noise and Vibration environmental topic must have due regard to the relevant sections of the aforementioned SPD and in particular section 3.6 (Pollution) and the further technical guidance related to noise pollution (pages 230-256).	-
SNV.16	4.1	Baseline surveys	This approach is acceptable provided all results are presented in a clear and concise way and is fully representative of the conditions/environment that exists, particularly in relation to the potential impacts on noise sensitive receptors. It is anticipated that noise monitoring locations/methodologies etc will be agreed with the Council before the noise monitoring surveys are carried out.	-
SNV.17	4.2.1	Study area	Table 2 – Summary of relevant study areas to be used in the sound, noise and vibration assessment presented in Section 4.2.1 is generally acceptable, but it is recommended that in relation to the 'Construction phase – noise' row of the table, the 300m study area proposed may need to be extended, if particularly noisy work is to be undertaken that is found to cause potentially significant adverse effects to receptors beyond this distance. The Council also seeks	-

			clarification as to why a distance of 300m has been chosen for the study area in respect of the operational assessment of airborne noise from trains, but 600m has been selected for operational assessment of airborne noise from road traffic. Both assessments are in relation to new and altered pieces of infrastructure. The maximum distances proposed for the study area for assessment of ground-bourne noise and vibration (for both road and rail) are acceptable.	
SNV.18	4.3.1	Consultation	The commitment for ongoing consultation during progression of the DCO process is welcomed.	-
SNV.19	5	Preliminary baseline description	The baseline consideration of noise sensitive receptors for the sections of route in the South Cambridgeshire District Council's administrative boundary is generally acceptable. It recognises the vast majority of these sections will cross rural areas, where the introduction of new rail noise could affect the character of the area.	-
SNV.20	5.7	Preliminary baseline description: Croxton to Toft	Bourn Airfield development has been omitted. This needs to be included with regard to existing and future development around this area, particularly in relation to the cut and fill tunnel that is planned to cross the A428 in this locality and is expected to be extremely disruptive and adversely impact delivery rates as a result of construction impacts.	-
SNV.21	5.9	Preliminary baseline description: Comberton to Shelford	Section 5.9. relating to the Cambridge section of the route does not take into account the area near to Cambridge North station and the options to bring into use the nearby sidings. In addition to the receptors identified pertaining to the Cambridge area, there are	-

			also residential areas within the Council's jurisdiction (e.g., the traveller sites along Fen Road at Chesterton). Such structures provide residential accommodation, but by the nature of their construction offer relatively little noise attenuating properties, compared to usual brick buildings. This needs the appropriate level of assessment to ensure adverse impacts do not occur at these locations.	
SNV.22	5.10.1	Future baseline	Section 5.10.1 has information relating to climate change and resistance, which is not relevant to the sound, noise and vibration method statement of the ES.	-
SNV.23	6	Sources of impact	The "sources of impact" identified and their proposed assessment in Section 6 are acceptable.	-
SNV.24	7.1.1	Potential permanent and operational effects	Section 7.1.1 presents the potential permanent and operational effects on receptors and identifies those that are likely to experience annoyance or disturbance in different circumstances. The list presented should be aligned with those presented in Section 5.1.2 (Sensitive receptors).	-
SNV.25	7.1.4	Potential permanent and operational effects	If there are any resulting impacts as a result of the change in climate they should be reported. Reference is made to their inclusion in Section 5 of the Climate Resilience Method Statement for further details on the current and projected future climate.	-
SNV.26	8	Assumed mitigation	The section on mitigation of construction and operational effects, provides broad descriptions and options for the use of mitigation, including the hierarchy	-

			to be adopted. This is acceptable, but site-specific details will need to be provided for individual locations where mitigation is required.	
SNV.27	8.4	Code of construction practice	Section 8.4. concerns the content of the Code of Construction Practice and recognises its importance in mitigating construction effects that may occur. This will be an ongoing process but as highlighted above, the use of confidential strict/sensitive documents that are supplied, as supporting information as part of the DCO process, should be avoided as they cannot be fully scrutinised at a later date if necessary (e.g., private contractual obligations, penalties for sub-contractors non-compliance, etc).	-
SNV.28	9	Evaluating significance	The information and limits described/adopted are based upon best practice and national guidance and are acceptable in developing the ES.	-
SNV.29	10	Proposed scope	The proposed scope (Table 7) is generally acceptable. However, the Council disagrees with the assumption that temporary and permanent airborne noise due to horns/audible warning devices are to be scoped out for the reasons stated above in relation to the installation of whistle boards. Serious consideration needs to be given to alternative safety options (e.g., foot bridges, tunnels. etc) that can be used at pedestrian rail crossings, rather than whistle boards throughout the scheme's route and particularly near residential properties.	Temporary and permanent airborne noise due to horns/audible warning devices to be scoped in.
SNV.30	11	Assumptions and risks	The final sections of the Method Statement describing the EIA data collecting assumptions and risks	-

			associated with noise and vibration monitoring and modelling, and the opportunities available to capitalise on mitigation by more unobtrusive noise barrier options are all acceptable.	
SNV.31	Appendix A	Aspects and matters proposed to be scoped out	The aspects and matters proposed to be scoped out of the assessment again refers to the temporary and permanent airborne noise due to horns/audible warning devices. For the reasons stated above, the Council disagrees with this statement in relation to the installation of whistle boards. Additionally, more information is to be provided in relation to noise from audible warning devices. These can be warning devices used at level crossings and around train doors during opening and closing, which are required for safety reasons. The design will need to minimise the impact of audible warning devices on noise-sensitive receptors and additional mitigation may be required.	Temporary and permanent airborne noise due to horns/audible warning devices to be scoped in.
Environmental assessment topics: Traffic and transport				
EWR-MWJV Technical Partner Routewide – Environmental - EIA Scoping Report				
TT.1	6.9	Traffic and transport	Transport matters fall under the jurisdiction of Cambridgeshire County Council as the Highway Authority. As such, GCSP defers to the County Council for these matters.	
Environmental assessment topics: Water resources				
EWR-MWJV Technical Partner Routewide – Environmental - EIA Scoping Report				
WR.1	4.5.22	Environmental priorities	Para 4.5.22 bullet point one notes that water scarcity is a critical issue in this part of the UK and could be exacerbated by cumulation of projects each with their	-

			own demands on potable water supply. Measures to reduce potable water consumption will also need to be included with the Code of Construction Practice (CoCP), and I would recommend that this be included within Section 1.15 of the Method Statement for the CoCP.	
WR.2	6.11	Water Resources	Section 6.11 on water resources and the associated Water Resources Method Statement do not appear to include an assessment of the potential impacts on water resource availability in light of potable water requirements associated with both the construction and operational phases of EWR and the likely mitigation measures that could be implemented.	-
WR.3	6.11	Water Resources	There are several Community Groups who are care takers for Chalk Streams and who should be involved in assessment of impact.	-
WR.4	6.11	Proposed scope	Given this recognition of water scarcity, and especially in light of the levels of water scarcity facing the Greater Cambridge area, the Council recommends that consideration of potable water supply and the water requirements of EWR both at the construction and operational stages be included in the proposed scope as outlined in Table 19, with reference to the latest Water Resource Management Plans. If impacts on water resource availability are to be scoped out of the EIA, further information is required to understand the reasoning behind this decision and to ensure that this issue is addressed as part of the wider sustainability commitments of the project.	Consideration of potable water supply and the water requirements of EWR both at the construction and operational stages to be included in the proposed scope.

Environmental assessment topics: Carbon (greenhouse gas) emissions				
EWR-MWJV Technical Partner Routewide – Environmental - EIA Scoping Report				
CE.1	6.14	Carbon (greenhouse gas) emissions	The general methodology for assessing the projects impact on climate change through the changes it causes in the emissions of greenhouse gases (ghg) as outlined in Section 6.14 and the EIA Scoping Method Statement – Carbon, is welcomed.	-
CE.2	6.14.5	Sources and types of impact	It would be helpful to understand early on whether the assessment of ghg emissions from changes in traffic flow referenced in paragraph 6.14.5 has been applied to the assessment to different station location options in terms of the emissions associated with commuting to and from those stations, to help ensure that the best option from a ghg perspective is chosen.	-
CE.3	6.14.10	Mitigation	The use of the carbon reduction hierarchy, as outlined at paragraph 6.14.10 is welcomed. The Council would welcome early sight of the Carbon Management Plan as this is developed to help us better understand, and where appropriate help inform, the mitigation measures that will be implemented to reduce ghg emissions.	-
CE.4	6.14	Proposed scope	No comment – all areas scoped in.	No comment – all areas scoped in.
Method Statement - Carbon				

CE.5	3.3.1	Local policy	Note that at paragraph 3.3.1 of the Carbon Method Statement, reference should also be included to South Cambridgeshire District Council's Zero Carbon Strategy (2020) and Cambridge City Council's Climate Change Strategy, 2021 to 2026.	-
Environmental assessment topics: Biodiversity Net Gain				
EWR-MWJV Technical Partner Routewide – Environmental - EIA Scoping Report				
BNG.1	7.2	Biodiversity Net Gain	The key consideration of what habitats to create and where should take into consideration two very important factors. Firstly, is the habitat proposed suitable for the location? Grasslands, woodlands, and wetlands can require specific environmental resources to grow and, for example, turning a habitat such as cropland into high distinctiveness habitat is likely to take more than 30-years, therefore, unlikely to be a feasible option. Secondly the applicant will need to consider who will be responsible for the management of these habitats. Will they remain within the Network Rail estate, or with they be given back to landowners? Each of these created habitats may require a form of legal agreement to manage them for the required 30-year period. This will be through either a S106 agreement with the relevant authority or a Conservation Covenant with a Responsible Body. The agreement will be with the landowner (or their tenant with permission from the Freeholder), and given the length of the scheme and possible number of landowners there is the possibility that this will be a complicated process. Monitoring data will need to be given to the relevant body on a regular basis as they will have the responsibility of reporting such matters to	-

			Central Government through their new duty required by the amended NERC Act (section 40a). The ongoing management of the newly created and enhanced habitats could be secured under Requirements of the DCO; however, without further legal agreement the responsibility of collecting monitoring data would, presumably, fall to the Planning Inspectorate. There are several areas where the scoping document has fallen short of expectations: • Insufficient justification for scoping out reptile surveys. • Use of generic passages where details are required (e.g., HRA process). • General use of generic passages, for example, stating there are existing railways within sections where are none. • BNG requirements for monitoring have not been considered when describing potential post intervention outcomes. The requirement for legal agreements will have a significant impact on the delivery of enhanced and created habitat.	
Method Statement - Biodiversity				
BNG.2	4.3.5	Surveys	The document scopes out reptile surveys as populations were assumed to be low. This needs further justification, for example, publishing survey results from 2020-2021 (methods, limitations, data gaps etc.). Reptile population tend to take one of three routes in the general area of EWR: 1. no reptiles 2. low populations spread out over large areas	-

			3. high populations found in localised areas Unless the applicant can provide data and a clear justification of scoping out reptile surveys, they must remain in scope. Many of those population comprise of common lizard and grass snake and the applicant will need to have a clear plan of how impacts will be mitigated. For example, avoiding the breeding bird season to clear vegetation does not avoid the hibernation season for reptiles, so potential conflicts of mitigation need to be identified, and alternatives recommended.	
BNG.3	5.7.4	Croxton to Toft	What existing railway is there between Croxton and Toft?	-
BNG.4	5.7	Croxton to Toft	Skylark should be included in any analysis of impacts. The largest group likely to be impacted by the project will likely be farmland birds due disruption from construction and removal of habitat. The analysis should consider including farmland birds as a receptor group.	-
BNG.5	5.9.1 – 5.9.3	Cambridge: Designated sites	The section states that there are no statutory protected sites within 2 km of the project; however, Local Nature Reserves (LNR) are classed as statutorily protected and Nine Wells LNR is within the 2 km buffer. This must be amended and Nine Wells LNR included within any analysis on indirect and direct impacts to statutory sites. This must include in-combination impacts with proposed busways currently under TWAO application and Greenway applications that will be coming forward in the next 12 months, both of which will lie adjacent to	-

			the project boundary and have possible direct and indirect impacts to Nine Wells LNR.	
BNG.6	8.1.2	Proposed scope	Only mentioned great crested newt as scoped out due to the provisional agreement to take part in the District Level Licencing Schemes in both Bedfordshire and Cambridgeshire. There is no mention of reptile surveys being scoped out (see BNG.2).	All species to be scoped in unless sufficient justification is provided.
BNG.7	9.1	Assumptions	If the entire length of the route does not have completed surveys, then, other than great crested newts, no species should be scoped out. For example, the submitted document scopes out further reptile surveys without sufficient justification, if a complete set of surveys already undertaken has not informed this decision, then the decision to scope out surveys appears to be unjustified.	-
Environmental assessment topics: Habitat Regulations Assessment				
EWR-MWJV Technical Partner Routewide – Environmental - EIA Scoping Report				
HRA.1	7.3	Habitats Regulations Assessment	The only HRA that is likely to take place specifically focusses on Eversden and Wimpole Woods SAC which is designated for the presence of an Annex II species and not habitat. Therefore, this section appears to be a very generic description of HRA analysis rather than focusing on the relevant issues concerned with the relevant SAC.	-
HRA.2	7.3.9	Habitats Regulations Assessment	“A number of Habitat Sites relevant to HRA have been identified…”. This is far too generic and does not focus on the revenant sites as identified in the document.	-

Environmental assessment topics: Climate resilience				
EWR-MWJV Technical Partner Routewide – Environmental - EIA Scoping Report				
CR.1	5.4	Designing for a changing climate	The approach outlined for designing for a changing climate and the development of the Climate Change Resilience Assessment is welcomed.	-
CR.2	7.4	Climate resilience	Section 7.4 of the report and the EIA Scoping Method Statement – Climate Resilience outline the assessment of climate change resilience in more detail, and the approach to assessing both the RCP 6.0 (medium) and RCP 8.5 (high) scenarios as part of the climate projects is welcomed. The Council would welcome an opportunity to have early sight of the work on the Climate Change Resilience Assessment to help us better understand, and where appropriate help inform, the mitigation measures that will be implemented to reduce climate impacts and enhance the climate resilience of East West Rail.	-

Table 2: List of documents submitted to PINS by EWR Co.

This table lists all documents submitted by the Applicant to the Planning Inspectorate in relation to the EIA Scoping Opinion Request.

Document	Document number	Date published	Prepared by
EWR-MWJV Technical Partner Routewide – Environmental - EIA Scoping Report	133735-MWJ-Z0-XXX-REP-EEN-000035	5 December 2024	Mott MacDonald WSP-Joint Venture (MWJV)
Routewide – Environment - EIA Scoping Method Statement – Air Quality	133735-MWJ-Z0-XXX-REP-EEN-000016	5 December 2024	Mott MacDonald WSP-Joint Venture (MWJV)
Routewide – Environmental – EIA Scoping Method Statement – Agriculture and Soils	133735-MWJ-Z0-XXX-REP-EEN-000015	5 December 2024	Mott MacDonald WSP-Joint Venture (MWJV)
Routewide – Environmental - EIA Scoping Method Statement – Biodiversity	133735-MWJ-Z0-XXX-REP-EEN-000019	5 December 2024	Mott MacDonald WSP-Joint Venture (MWJV)
Routewide – Environment - EIA Scoping Method Statement – Carbon	133735-MWJ-Z0-XXX-REP-EEN-000030	5 December 2024	Mott MacDonald WSP-Joint Venture (MWJV)
Routewide – Environmental - EIA Scoping Method Statement – Climate Resilience	133735-MWJ-Z0-XXX-REP-EEN-000032	5 December 2024	Mott MacDonald WSP-Joint Venture (MWJV)
Routewide – Environmental - EIA Scoping Method Statement – Communities	133735-MWJ-Z0-XXX-REP-EEN-000021	5 December 2024	Mott MacDonald WSP-Joint Venture (MWJV)
Routewide - Environmental - EIA Scoping Method Statement - Flood Risk	133735-MWJ-Z0-XXX-REP-EEN-000023	5 December 2024	Mott MacDonald WSP-Joint Venture (MWJV)
Routewide – Environmental – EIA Scoping Method Statement – Historic Environment	133735-MWJ-Z0-XXX-REP-EEN-000022	5 December 2024	Mott MacDonald WSP-Joint Venture (MWJV)
Routewide - Environmental - EIA Scoping Method Statement - Human Health	133735-MWJ-Z0-XXX-REP-EEN-000024	5 December 2024	Mott MacDonald WSP-Joint Venture (MWJV)
Routewide – Environmental - EIA Scoping Method Statement – Landscape and Visual	133735-MWJ-Z0-XXX-REP-EEN-000029	5 December 2024	Mott MacDonald WSP-Joint Venture (MWJV)
Routewide – Environmental - EIA Scoping Method Statement – Land Quality	133735-MWJ-Z0-XXX-REP-EEN-000025	5 December 2024	Mott MacDonald WSP-Joint Venture (MWJV)

Routewide – Environmental – EIA Scoping Method Statement – Material Resources and Waste	133735-MWJ-Z0-XXX-REP-EEN-000018	5 December 2024	Mott MacDonald WSP-Joint Venture (MWJV)
Routewide - Environmental - EIA Scoping Method Statement Technical Appendix - Resources and Waste	133735-MWJ- Z0-XXX-REP-EEN-000044	5 December 2024	Mott MacDonald WSP-Joint Venture (MWJV)
Routewide – Environment - EIA Scoping Method Statement – Socio-economics	133735-MWJ-Z0-XXX-REP-EEN-000026	5 December 2024	Mott MacDonald WSP-Joint Venture (MWJV)
Routewide – Environmental - EIA Scoping Method Statement - Sound, Noise and Vibration	133735-MWJ-Z0-XXX-REP-EEN-000017	5 December 2024	Mott MacDonald WSP-Joint Venture (MWJV)
Routewide - Environmental - EIA Scoping Method Statement – Traffic & Transport	133735-MWJ-Z0-XXX-REP-EEN-000028v	5 December 2024	Mott MacDonald WSP-Joint Venture (MWJV)
Routewide- Environmental - EIA Scoping Method Statement – Water Resources	133735-MWJ-Z0-XXX-REP-EEN-000036	5 December 2024	Mott MacDonald WSP-Joint Venture (MWJV)
Routewide – Environment - EIA Scoping Method Statement Technical Appendix – Water Resources	133735-MWJ-Z0-XXX-REP-EEN-000046	5 December 2024	Mott MacDonald WSP-Joint Venture (MWJV)
Routewide – Environmental - EIA Scoping: Approach to achieve Biodiversity Net Gain	133735-MWJ-Z0-XXX-REP-EEN-000031	5 December 2024	Mott MacDonald WSP-Joint Venture (MWJV)
Routewide – Environmental – EIA Scoping Method Statement – Approach to Code of Construction Practice	133735-MWJ-Z0-XXX-REP-EEN-000041	5 December 2024	Mott MacDonald WSP-Joint Venture (MWJV)
Routewide – Environmental – EIA Scoping - Approach to Equality Impact Assessment	133735-MWJ-Z0-XXX-REP-EEN-000027	5 December 2024	Mott MacDonald WSP-Joint Venture (MWJV)
Routewide – Environmental – Social Baseline	133735-MWJ-Z0-XXX-REP-EEN-000040	5 December 2024	Mott MacDonald WSP-Joint Venture (MWJV)
EWR-MWJV Technical Partner Book of Figures	133735-MWJ-Z0-XXX-REP-EEN-000063	5 December 2024	Mott MacDonald WSP-Joint Venture (MWJV)

Planning Service
HEAD OF SERVICE: **Adrian Duffield**

South Oxfordshire District Council
Listening Learning Leading

Environmental Services Operations Group 3
Temple Quay House
2 The Square
Bristol
BS1 6PN

CONTACT OFFICER: Ben Duffy
[redacted]@southandvale.gov.uk
Tel: 01235 422422
Textphone: 18001 01235 422422

Abbey House, Abbey Close, Abingdon,
OXON, OX14 3JE

Our reference: P25/S0040/3PC
Customer ref: TR040012- 000019

31 January 2025

Dear Karen Wilkinson,

Thank you for consulting South Oxfordshire District Council on the scope of the Environmental Statement for East West Rail.

As the works to implement East West Rail near our locality have already been implemented or permitted, recognising that there are potential upgrade works required on the Oxford to Bletchley line, we have no comment to make on the scope of the Environmental Statement.

We would however like to take this opportunity to reiterate our support for the improvement of rail services in the area, as well as highlight the opportunity of extending these services from Oxford to Didcot. This would enable the benefits of these improved services to be shared with the residents of South Oxfordshire. This is particularly important considering the recent announcements regarding the Oxford to Cambridge Growth Corridor and the important role that the Culham AI Growth Zone and Harwell Campus will play in this.

Yours sincerely

[redacted]

Ben Duffy
Senior Planning Officer (Major Applications)

Community and Place Delivery
Development Management

The Planning Inspectorate
Environmental Services
Operations Group 3 Temple Quay House
2 The Square
Bristol
BS1 6PN

Our Ref: 5/2025/0020
Please ask for: Samuel Miller
E-mail: planning@stalbans.gov.uk
Date: 24 January, 2025

Dear Sir/Madam,

TOWN AND COUNTRY PLANNING ACT 1990

Planning Application: 5/2020/0020

Proposal: Consultation only - Application by East West Railway Company Limited (the Applicant) for an Order granting Development Consent for the East West Rail (the Proposed Development).

Thank you for consulting St Albans City and District Council planning department on this application. We have no comments to make on this application.

Yours faithfully

Christine Traill
Strategic Director- Community and Place Delivery
St Albans City & District Council

From: [redacted]
To: East West Rail
Subject: Scoping Report Consultation
Date: 27 January 2025 13:35:27
Attachments: EWR Letter to stat cons_Scoping & Reg 11 Notification.docx

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> You don't often get email from [redacted]@stratford-dc.gov.uk. Learn why this is important

Good afternoon,

Further to receipt of the above consultation, Stratford-on-Avon District Council has no comments to make.

Kind regards,

Stuart Flaherty BA (Hons) MSc MRTPI
Senior Planning Officer

Switchboard +44 (0)1789 267 575
Direct line +44 (0)1789 260 350
Email [redacted]@stratford-dc.gov.uk, web www.stratford.gov.uk

Planning Inspectorate
Arolygiaeth Gynllunio

Environmental Services
Operations Group 3
Temple Quay House
2 The Square
Bristol, BS1 6PN

Customer Services: 0303 444 5000
e-mail: eastwestrail@planninginspectorate.gov.uk

By Email

Your Ref: N/A

Our Ref: TR040012- 000019

Date: 02 January 2025

Dear Sir/Madam

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulations 10 and 11

Application by East West Railway Company Limited (the Applicant) for an Order granting Development Consent for the East West Rail (the Proposed Development)

Scoping consultation and notification of the Applicant's contact details and duty to make available information to the Applicant if requested

The Proposed Development is a Nationally Significant Infrastructure Project (NSIP), as defined in the Planning Act 2008 (as amended). A summary of the NSIP planning process can be found at the following link:

https://www.gov.uk/guidance/nationally-significant-infrastructure-projects-the-stages-of-the-nsip-process-and-how-you-can-have-your-say#preapp

The Proposed Development is currently in the pre-application stage.

Environmental Statement (ES) and the scoping process

To meet the requirements of the EIA Regulations, Applicants are required to submit an ES with an application for an order granting development consent for any NSIP likely to have a significant effect on the environment. An ES will set out the potential impacts and likely significant effects of the Proposed Development on the environment. Schedule 4 of the EIA Regulations sets out the general information for inclusion within an ES.

The Applicant has asked the Planning Inspectorate on behalf of the Secretary of State for its written opinion (a Scoping Opinion) as to the scope, and level of detail, of the information to be provided in the ES relating to the Proposed Development. The Applicant has set out its proposed scope of the ES in its Scoping Report which is published on the 'Find a National Infrastructure Project' website:

https://national-infrastructure-consenting.planninginspectorate.gov.uk/projects/TR040012

Alternatively, you can use the following direct links:

https://national-infrastructure-consenting.planninginspectorate.gov.uk/projects/TR040012/documents

Before adopting a Scoping Opinion, the Planning Inspectorate must consult the relevant 'consultation bodies' defined in the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (as amended).

The Planning Inspectorate has identified you as a consultation body which must be consulted before adopting its Scoping Opinion. The Planning Inspectorate would be grateful if you would:

- Inform the Planning Inspectorate of the information you consider should be provided in the ES; or
- Confirm that you do not have any comments.

If you consider that you are not a consultation body as defined in the EIA Regulations please let us know.

The deadline for consultation responses is 31 January 2025. The deadline is a statutory requirement and cannot be extended. Any consultation response received after this date will not be included within the Scoping Opinion but will be forwarded to the Applicant for information and published on our website as a late response.

The Planning Inspectorate on behalf of the SoS is entitled to assume under Regulation 10(11) of the EIA Regulations that you do not have any comments to make on the information to be provided in the ES, if you have not responded to this letter by the deadline above.

To support the smooth facilitation of our service, we strongly advise that any responses are issued via the email identified below rather than by post. Responses to the Planning Inspectorate should be sent by email to eastwestrail@planninginspectorate.gov.uk

Please note that your response will be appended to the Scoping Opinion and published on our website consistent with our openness policy.

Please also note that this consultation relates solely to the ES scoping process. Further opportunities for you to engage with and provide views on the project more generally, will arise through the Applicant's own consultation. Applicants have a duty to undertake statutory consultation and are required to have regard to all responses to their statutory consultation.

Scoping Opinion

The Planning Inspectorate (on behalf of the Secretary of State) must adopt a Scoping Opinion within 42 days of receiving a scoping request. The Scoping Opinion will be published on the relevant project page of the 'Find a National Infrastructure Project' website at the end of the statutory period, or before if applicable.

The Applicant must have regard to comments made within the Scoping Opinion and the ES submitted with the future application must be based on the most recently adopted Scoping Opinion.

Applicant's name and address

As the Planning Inspectorate has been notified by the Applicant that it intends to prepare an ES, we are also informing you of the Applicant's name and address:

Tristan Lincoln-Gordon
Head of Environment
East West Rail Company
The Quadrant,
Elder Gate,
Milton Keynes
MK9 1EN
tristan.lincoln-gordon@eastwestrail.co.uk

Regulation 11(3) duty

You should also be aware of your duty under Regulation 11(3) of the EIA Regulations, if so requested by the Applicant, to make available information in your possession which is considered relevant to the preparation of the ES.

Spatial data

The Applicant has provided the Planning Inspectorate with spatial data for the purpose of facilitating the identification of consultation bodies to inform a Scoping Opinion (as set out in our Advice Page 'Nationally Significant Infrastructure Projects - Advice Note Seven: Environmental Impact Assessment: process, preliminary environmental information and environmental statements', available on the gov.uk website). Requests by consultation bodies to obtain and/or use the spatial data to inform its consultation response should be made directly to the Applicant using the contact details above.

If you have any queries, please do not hesitate to contact us.

Yours faithfully

Karen Wilkinson

Karen Wilkinson
Senior Environmental Impact Assessment Advisor
on behalf of the Secretary of State

Thames Water Utilities Ltd.

Clearwater Court,
Vastern Road,
Reading,
RG1 8DB

29th January 2025

FAO: Karen Wilkinson
Planning Inspectorate

Environmental Services
Operations Group 3
Temple Quay House
2 The Square
Bristol, BS1 6PN

Thames Water Response to East West Rail Scoping Consultation – Infrastructure Planning (EIA) Regulations 2017

Dear Karen Wilkinson,

Thank you for consulting Thames Water Utilities Limited (TWUL) regarding the East West Rail (EWR) project.

Following our review of EWR's Environmental Impact Assessment Scoping Report, we confirm that the scheme is unlikely to have significant environmental impacts on Thames Water's operations.

The project is however expected to interact with our sewers and clean water mains, particularly along the Oxford to Bletchley stretch of the proposed scheme. Engagement with EWR is ongoing to identify all potentially affected Thames Water assets and ensure their protection during project planning and execution.

Please let us know if further details or input are required.

Yours faithfully,

Thames Water Utilities Limited

From: clerk@staploe-pc.gov.uk
To: East West Rail
Cc: [redacted]
Subject: East West Rail Environmental Impact Assessment Scoping
Date: 30 January 2025 23:34:22

Thank you for your letter inviting Staploe Parish Council to comment on the East West Rail Environmental Impact Assessment Scoping. We note the deadline of 31st January.

We do have a few comments we would like to make:

- We believe that the existing railway at Bedford station is old and noisy. The project should aim to reduce noise overall in Bedford relative to the current situation - not just maintain the current noise levels
- Noise reduction needs to be a priority, particularly near settlements such as Chawston which will be heavily impacted by the railway
- Biodiversity should be significantly increased (>10% net gain)
- The landscaping should be planted at the first opportunity after each section is completed and watered, weeded, replanted as necessary and maintained. We have seen situations where it took two or three years to plant tiny whips around a local solar farm which were not cared for and soon died. It then took another year or two to replace them. By which time we could have had some good screening if it had been planted quickly and properly cared for.
- We believe it is a terrible waste of public money to replace the bridge over the A421 which is currently being built (p46 3.5.15)

Best wishes,

Lucy Crawford
Clerk to Staploe Parish Council
33, Staploe,
St. Neots,
Cambs. PE19 5JA
01480 471 526
clerk@staploe-pc.gov.uk
Our privacy policy is available on our website: https://staploe-pc.gov.uk/wp-content/uploads/simple-file-list/Policies/Data-Protection-and-CCTV/General-Privacy-Notice.pdf

27 January 2025

Planning Inspectorate
Environmental Services

By email: eastwestrail@planninginspectorate.gov.uk

Response from Toseland Parish Council to Consultation on Environmental Statement, East West Rail

Toseland Parish Council is a statutory consultee in this process.

Toseland is a rural village set in open countryside, surrounded by Grade A agricultural land with a diverse range of local wildlife. The proposed development is expected to have significant impacts on the area's natural environment, agricultural productivity, and the quality of life for residents.

Key Environmental Impacts

Impacts on Biodiversity and Wildlife

• Wildlife Habitat Disruption: The proposed railway will fragment habitats critical to local species, including hedgerows, woodland edges, and grassland habitats. Species at risk include birds, small mammals, amphibians, and insects dependent on these ecosystems.

• Protected and Priority Species: Toseland and the surrounding countryside provide vital habitats to protected and priority species including barn owls, bats, badgers, and great crested newts. These are protected under the Wildlife and Countryside Act 1981 and Natural Environment and Rural Communities (NERC) Act 2006.

• Mitigation Strategies: What are the mitigation measures, including wildlife corridors, underpasses, and habitat creation to compensate for losses? How would timing of construction should also avoid critical breeding and nesting seasons?

Landscape and Visual Amenity

• Visual Intrusion: The open countryside around Toseland contributes to its rural nature. The construction of railway infrastructure, embankments, and overhead electrification will significantly alter the village's visual character.

• Impact on Historic Features: Toseland Wood is a scheduled ancient monument. Toseland Hall is grade II* listed building along with other grade II listed buildings in the village. Toseland Parish Council has significant concerns regarding any visual or physical impacts on heritage features within and around Toseland, such as listed buildings and historic landscapes.

Agricultural Land and Soils

• Loss of Grade A Agricultural Land: Toseland is surrounded by high-quality agricultural land and supports local farming livelihoods. The railway's construction will permanently reduce the availability of productive farmland and disrupt farming activities, damaging the UK's future food security.

• Soil Management: Construction will result in soil compaction, erosion, loss of fertility and introduction of potentially poisonous substances in a food production environment.

Noise, Vibration and Air Quality

• Construction and Operational Phases: Noise from train movements, heavy machinery, pile driving, and increased vehicular traffic will disrupt the surrounding area. What are the proposals for noise barriers, low-noise track designs, and scheduling of construction activities to avoid night-time disruption?

Hydrology and Flood Risk

• Flood Risk, Watercourses and Drainage: Toseland suffers from regular flooding and any impact on water courses will further exacerbate. Does the project increase flood risks in Toseland or surrounding areas due to altered drainage patterns or impermeable surfaces? How will runoff from construction activities impact productive agricultural land and water courses?

Cumulative and In-Combination Impacts

• The cumulative impact on Toseland of EW rail and the A428 scheme threatens to have a devastating effect on the local environment, biodiversity, and community. Of particular concern is the proposal for a rail logistics hub and the change of use of agricultural land in an inherently rural area.

The Environmental Statement should provide:

• Baseline Assessments: Detailed surveys of the current biodiversity, landscape, soil quality, and hydrology in and around Toseland.

• Mitigation Measures: Clear strategies for avoiding, minimising, or compensating for environmental impacts.

• Community Consultation: Evidence of consultation with Toseland residents and stakeholders to address concerns and identify opportunities for local benefits.

• Long-Term Monitoring: Plans for monitoring environmental impacts during construction and operation to ensure compliance with mitigation measures.

Route alignment

The proposed and emerging preferences for the route east of St Neots to Cambridge South represent the least direct and most environmentally damaging route. Given the proposed terminus at Cambridge South, the obvious routing between Bedford and Cambridge is to follow the previous "Varsity Line" along the A603 from Sandy to Cambridge. This has the benefits of a rail interchange at the existing station at Sandy on the East Coast Mainline.

Siting of Rail Logistics Hub

Toseland Parish Council has very significant concerns and strongly objects to the proposals for a logistics hub "Hub Option B" within a mile of the village and on high grade agricultural land. A logistics hub of this size and scale irreversibly damages the inherently rural nature of the location:

- very significant impact on local amenity and character of the village
- impact of noise, visual amenity, proximity of heavy industrial plant
- irreversible damage to high grade agricultural land
- proximity to the woodland area known as "The Gorse" represents high likelihood of damage to local wildlife, flora and fauna.

It is impossible to understand how the land will be "reinstated post construction" and Toseland Parish Council has grave concerns regarding the impact on the village.

Impact on Ancient Rights of Way

It is not clear what mitigation or proposals are made to protect existing bridleways and footpaths.

Impact on St Neots and wider local community

St Neots is the largest town in Cambridgeshire. The current proposals fail to demonstrate any advantages given the lack of an interchange at St Neots station. The route seems to rely on proposals to build housing at Tempsford and Cambourne north to make it viable, whilst failing to service the existing needs of St Neots and the surrounding villages.

National Infrastructure Commission

We note that the Chairman of the National Infrastructure Commission, the Government's own advisors, has commented against further expansion of the rail network "the continued decarbonisation of road transport removes one of the traditional arguments that you should use a lot more rail because rail is less polluting than roads. That will not be the case in the future. I don't see any significant growth in rail… The vast majority of journeys are made by car. I don't think people are going to leap out of their cars on to the trains…"

Toseland Parish Council strongly rejects the proposals relating to route alignment and siting of Hub Option B.

UK Health Security Agency

Environmental Hazards and Emergencies Department
Seaton House, City Link
London Road
Nottingham, NG2 4LA

nsipconsultations@ukhsa.gov.uk
www.gov.uk/ukhsa

Your Ref: TR040012- 000019
Our Ref: CIRIS 91662

Tristan Lincoln-Gordon
Head of Environment
East West Rail Company
The Quadrant,
Elder Gate,
Milton Keynes
MK9 1EN

30 January 2025

Dear Tristan,

Nationally Significant Infrastructure Project
East West Rail scoping consultation and notification
Scoping Consultation Stage

Thank you for including the UK Health Security Agency (UKHSA) in the scoping consultation phase of the above application. ***Please note that we request views from the Office for Health Improvement and Disparities (OHID) and the response provided below is sent on behalf of both UKHSA and OHID.*** The response is impartial and independent.

The health of an individual or a population is the result of a complex interaction of a wide range of different determinants of health, from an individual's genetic make-up to lifestyles and behaviours, and the communities, local economy, built and natural environments to global ecosystem trends. All developments will have some effect on the determinants of health, which in turn will influence the health and wellbeing of the general population, vulnerable groups and individual people. Although assessing impacts on health beyond direct effects from for example emissions to air or road traffic incidents is complex, there is a need to ensure a proportionate assessment focused on an application's significant effects.

Having considered the submitted scoping report we wish to make the following comments:

Environmental Public Health
We believe the summation of relevant issues into a specific section of the report provides a focus which ensures that public health is given adequate consideration. The section should

summarise key information, risk assessments, proposed mitigation measures, conclusions and residual impacts, relating to human health. Compliance with the requirements of National Policy Statements and relevant guidance and standards should also be highlighted.

In terms of the level of detail to be included in an ES, we recognise that the differing nature of projects is such that their impacts will vary. UKHSA and OHID's predecessor organisation Public Health England produced an advice document *Advice on the content of Environmental Statements accompanying an application under the NSIP Regime*', setting out aspects to be addressed within the Environmental Statement[1]. This advice document and its recommendations are still valid and should be considered when preparing an ES. Please note that where impacts relating to health and/or further assessments are scoped out, promoters should fully explain and justify this within the submitted documentation.

Our position is that pollutants associated with road traffic or combustion, particularly particulate matter and oxides of nitrogen are non-threshold; i.e, an exposed population is likely to be subject to potential harm at any level and that reducing public exposure to non-threshold pollutants (such as particulate matter and nitrogen dioxide) below air quality standards will have potential public health benefits. We support approaches which minimise or mitigate public exposure to non-threshold air pollutants, address inequalities (in exposure) and maximise co-benefits (such as physical exercise). We encourage their consideration during development design, environmental and health impact assessment, and development consent.

Noise

UKHSA welcomes the consideration of noise impacts within the design development and decision-making process to date. As the project progresses to more detailed stages, UKHSA expects a more detailed assessment of the health impacts arising from noise emissions. Annex 1 provides an overview of UKHSA's recommended approach for the noise assessment methodology.

Human Health and Wellbeing

Given the scale and nature of the proposal we recommend that a health working group is established to enable regular consultation with the local Directors of Public Health (DsPH), Integrated Care Boards (ICBs), Environmental Health, UKHSA and OHID.

Yours sincerely,

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1 https://khub.net/documents/135939561/390856715/Advice+on+the+content+of+environmental+statements+accompanying+an+application+under+the+Nationally+Significant+Infrastructure+Planning+Regime.pdf/a86b5521-46cc-98e4-4cad-f81a6c58f2e2?t=1615998516658

On behalf of UK Health Security Agency

Please mark any correspondence for the attention of National Infrastructure Planning Administration.

Annex 1

NSIP National Networks – (scoping stage) UK Health Security Agency: Noise and Public Health
Version 07.01.2025

Guiding principles

Environmental noise can cause stress and sleep disturbance, which over the long term can lead to a number of adverse health outcomes [1-4].
The Noise Policy Statement for England (NPSE) [2] sets out the government's overall policy on noise. Its aims are to:

- avoid significant adverse impacts on health and quality of life;
- mitigate and minimise adverse impacts on health and quality of life; and
- contribute to the improvement of health and quality of life.

These aims should be applied within a broader context of sustainable development [5], where noise is considered alongside other economic, social and environmental factors. UKHSA expects such factors may include:

- Ensuring healthy lives and promoting well-being for all at all ages;
- promoting sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all;
- building resilient infrastructure, promoting inclusive and sustainable industrialisation and fostering innovation;
- reducing inequality; and
- making cities and human settlements inclusive, safe, resilient and sustainable.

UKHSA's consideration of the effects of health and quality and life attributable to noise is guided by the recommendations in the Environmental Noise Guidelines for the European Region 2018 published by the World Health Organization [3], and informed by high quality of the scientific evidence (for example [1, 6, 7]). In 2023, UKHSA published the first spatial assessment of the attributable burden of disease due to transportation noise in England [4]. The scientific evidence on noise and health is rapidly developing, and UKHSA's recommendations are also informed by relevant studies that are judged to be scientifically robust and consistent with the overall body of evidence.

In line with its mission, UKHSA believes that Nationally Significant Infrastructure Projects (NSIP) should not only limit significant adverse effects due to noise, but also explore opportunities to improve the health and quality of life of local communities and achieve more equitable health outcomes.

UKHSA also recognises the developing body of evidence showing that areas of tranquillity offer opportunities for health benefits through psychological restoration. NSIP applications need to demonstrate that they have given due consideration to the protection of the existing sound environment in these areas.

Significance of Impacts

Determining significance of impacts is an essential element of an Environmental Impact Assessment, and therefore significance needs to be clearly defined at the earliest opportunity by the Applicant. UKHSA recommends that the definition of significance is discussed and agreed with relevant stakeholders, including local authority environmental health and public health teams and local community representatives, through a documented

consultation process. UKHSA recommends that any disagreement amongst stakeholders on the methodology for defining significance is acknowledged in the planning application documentation and could inform additional sensitivity analyses.
For noise exposure, UKHSA expects assessments of significance to be closely linked to the associated impacts on health and quality of life in line with the NPSE [2] and not on noise exposure per se.

With reference to the noise exposure hierarchy table in the Planning Practice Guidance (Noise) [8], UKHSA is not aware of good quality scientific evidence that links specific noise levels to behavioural/attitudinal changes in the general population. Reactions to noise at an individual level are strongly confounded by personal, situational and environmental non-acoustic factors [9, 10], and large inter-personal variations are observed in the reaction of a population to a particular noise level [11-14]. For these reasons UKHSA is not able to provide evidence-based general recommendations for SOAELs that are able to achieve the aims and objectives of the Noise Policy Statement for England and the Planning Practice Guidance on noise. The UKHSA recommends that the Applicant gives careful consideration of the following:

i. The existing noise exposure of affected communities – in particular, consideration of any designated Noise Important Areas identified in proximity to the scheme;
ii. The size of the population affected – for example an effect may be deemed significant if a large number of people are exposed to a relatively small noise change;
iii. The relative change in number and type of rolling stock movements
iv. Changes in the temporal distribution of noise during day/evening/night, or between weekdays and weekends;
v. Soundscape and tranquillity, in particular the value that communities put on the lack of environmental noise in their area, or conversely, on the lack of public areas within walking distance that are relatively free from environmental noise;
vi. Opportunities for respite (predictable periods of relief from noise), either spatially or temporally;
vii. Cumulative exposure to other environmental risk factors, including other sources of noise and air pollution,
viii. Local health needs, sensitivities and objectives.

The WHO Environmental Noise Guidelines [3] do not define LOAELs for environmental noise sources, partly because the scientific evidence suggests that there is no clear threshold where adverse impacts on health and quality of life cease to occur in the general population. UKHSA recommends that the Applicant explains what its chosen LOAELs and SOAELs mean in population health terms.

Health Outcomes
UKHSA encourages the applicant to present noise exposure data in terms of the L_{den} metric (in addition to L_{eq} and L_{10}), to facilitate interpretation by a broad range of stakeholders. This is because most recent scientific evidence on the health effects of environmental noise is presented in terms of L_{den} [3, 6, 7]. UKHSA believes that quantifying the health impacts associated with noise exposure and presenting them in health-based metrics allows decision makers to make more informed decisions.

The UKHSA believes the health outcomes assessment should take into consideration the Public Health Outcomes Framework (PHOF) indicators for daytime noise (B14b) and night-

time noise (B14c) and if necessary include a calculation of the impact of the scheme on these indicators [15].

For transportation sources, UKHSA recommends the quantification of health outcomes using the methodology agreed by the Interdepartmental Group on Costs and Benefits - Noise subgroup [IGCB(N) [16] (currently under review), and more recent reviews (for example [3, 6, 7]). For rail noise, UKHSA believes there is sufficient evidence to quantify the following health outcomes: long-term annoyance and sleep disturbance[4]. Effects can be expressed in terms of number of people affected, number of disease cases, and Disability Adjusted Life Years (DALYs). THE IGCB(N) guidance [16] can also be used to translate these effects into monetary terms.

Some health outcomes, namely annoyance and self-reported sleep disturbance, can be influenced by the local context and situation. In these cases, it may be preferable to use exposure-response functions (ERFs) derived in a local context. However, UKHSA is not aware of any ERFs for railway traffic derived for a UK context from data gathered in the last two decades. Therefore, in UKHSA's view the ERFs presented in the WHO-commissioned systematic reviews and relevant updates published in 2022 offer a good foundation for appraisal of the health effects associated with rail traffic noise [1, 17, 18].

Where schemes have the potential to impact a large number of people, UKHSA expects the Applicant to carry out literature scoping reviews to ensure that the most robust and up-to-date scientific evidence is being used to quantify adverse effects attributable to the scheme.

UKHSA expects to see a clear and transparent methodology how the Applicant will take into consideration effects on health and quality of life when making judgement of significance, including a description of local circumstances and modifiers anticipated, and how reasonably foreseeable changes in these circumstances will be dealt with during the assessment process.

Identification and Consideration of Receptors

The identification of noise sensitive receptors in proximity to the proposed scheme - or route options - is essential in providing a full assessment of potential impacts. Examples of noise sensitive receptors include but are not limited to:

i. Noise Important Areas (NIAs)
ii. Residential areas
iii. Schools, hospitals and care homes
iv. Community green and blue spaces and areas valued for their tranquillity, such as local and national parks
v. Public Rights of Way (PRoWs)

Noise Important Areas (NIAs) are areas with the highest levels of noise exposure at a national level and as such require very careful consideration in terms of protection from increased noise levels as well as opportunities for noise mitigation that can lead to an improvement in health and quality of life. New infrastructure development should offer an opportunity to reduce the health burden of existing transport infrastructure, particularly for those worst affected. UKHSA would encourage this approach to extend beyond NIAs, in line with the third aim of NPSE [2].

Baseline Sound Environment

The greater the understanding of the baseline sound environment, the greater the potential for the assessment to reflect the nature and scale of potential impacts, adverse or beneficial, associated with the scheme. UKHSA recommends that traditional averaged noise levels are supplemented by a qualitative characterisation of the sound environment, including any particularly valued characteristics (for example, tranquillity) and the types of sources contributing to it [19].

UKHSA recommends that baseline noise surveys are carried out to provide a reliable depiction of local diurnal noise variations for both weekdays and weekends, in a variety of locations, including the difference between day (07:00-19:00), evening (19:00-23:00) and night-time (23:00-07:00) periods. This is particularly important if there are areas within the scheme assessment boundary with atypical traffic day/evening/night distributions. Achieving these aims is likely to require long-term noise monitoring in multiple locations for a period greater than seven days. This information should be used to test the robustness of any conversions between noise metrics (e.g., converting from $L_{A10,18hr}$ to $L_{Aeq,2300-0700}$ and L_{den} in the case of road traffic noise).

UKHSA suggests that a variety of metrics can be used to describe the sound environment with and without the scheme—for example, L_{den} and L_{night} as referenced in the WHO Guidelines 2018 [3], levels averaged over finer time periods, background noise levels expressed as percentiles, and number of event metrics (e.g., N65 day, N60 night)—and that, where possible, this suite of metrics is used to inform judgements of significance. There is emerging evidence that intermittency metrics can have an additional predictive value over traditional long-term time-averaged metrics for road traffic noise [20].

Mitigation

UKHSA expects decisions regarding noise (including vibration) mitigation measures to be underpinned by good quality evidence, in particular whether mitigation measures are proven to reduce adverse impacts on health and quality of life. For interventions where evidence is weak or lacking, UKHSA expects a proposed strategy for monitoring and evaluating their effectiveness during construction and operation, to ensure the effectiveness of said measures.

With regards to operational railway noise, procurement of low-noise rolling stock, rail and wheel roughness maintenance, track design, acoustic barriers, traffic management and noise insulation schemes can all be considered.

Priority should be given to reducing noise at source, and noise insulation schemes should be considered as a last resort. UKHSA expects any proposed noise insulation schemes to take a holistic approach which achieves a healthy indoor environment, taking into consideration noise, ventilation, overheating risk, indoor air quality and occupants' preference to open windows. There is, at present, insufficient good quality evidence as to whether insulation schemes are effective at reducing long-term annoyance and self-reported sleep disturbance [21], and initiatives to evaluate the effectiveness of noise insulation to improve health outcomes are strongly encouraged.

UKHSA suggests that monitoring of health and quality of life can be considered pre and post operational phases, to ascertain whether mitigation measures are having the desired effect for local communities.

Noise during Construction
UKHSA expects consideration of potential adverse effects due to noise and vibration during construction and recommends that a full and detailed Construction Environmental Management Plan (CEMP) is developed and implemented by the Applicant and/or the contractor responsible for construction. UKHSA recommends that the CEMP includes a detailed programme of construction which highlights the times and durations of particularly noisy works, the measures taken to reduce noise at source, the strategy for actively communicating this information to local communities, and procedures for responding effectively to any specific issues arising.

There is a paucity of scientific evidence on the health effects attributable to construction noise associated with large infrastructure projects [6, 7] where construction activities may last for a relatively long period of time. UKHSA recommends that the Applicant considers emerging evidence as it becomes available and reviews its assessment of impacts as appropriate.

Green Spaces and Private Amenity Areas
UKHSA expects proposals to take into consideration the evidence which suggests that quiet areas can have both a direct beneficial health effect and can also help restore or compensate for the adverse health effects of noise in the residential environment [22-24]. Research from the Netherlands suggests that people living in noisy areas appear to have a greater need for areas offering quiet than individuals who are not exposed to noise at home [22]. Control of noise at source is the most effective mitigation for protecting outdoor spaces; noise insulation schemes do not protect external amenity spaces (such as private gardens and balconies or community recreation facilities and green spaces) from increased noise exposure.

UKHSA expects consideration to be given to the importance of existing green spaces as well as opportunities to create new tranquil spaces which are easily accessible to those communities exposed to increased noise from the scheme. These spaces should be of a high design quality and have a sustainable long-term management strategy in place.

Step-changes in Noise Exposure and the Change-effect
The Applicant should take into consideration the “change-effect”, i.e. the potential for a real or anticipated step-change in noise exposure to result in attitudinal responses that are greater or lower than that which would be expected in a steady state scenario. Where a perception of change is considered likely, UKHSA recommends that the change-effect is taken into account in the assessment for the opening year of the proposed development. For longer term assessments, the effects of population mobility need to be taken into consideration.

Community Engagement and Consultation Feedback
UKHSA recommends that public consultations carried out during the planning application process clearly identify the predicted changes to the sound environment during construction and operation of the scheme, the predicted health effects on neighbouring communities, proposed noise mitigation strategies and any proposed measures for monitoring that such mitigation measures will achieve their desired outcomes.

Some individuals in local communities can encounter barriers preventing them from engaging in the NSIP process, for example time constraints, inability to attend meetings and

difficulty navigating documentation. Failure to sufficiently engage with residents may lead to concerns and resistance to the project [25]. UKHSA encourages the Applicant to use effective ways of communicating with local communities. For example, immersive and suitably calibrated audio-visual demonstrations can help make noise and visual changes more intuitive to understand and accessible to a wider demographic. If the proposed scheme will have an impact over a relatively large geographical area, the Applicant should consider community-specific fact-sheets and/or impact maps, which are easily accessible to all.

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Planning Service
HEAD OF SERVICE: **Adrian Duffield**

Vale of White Horse District Council

Environmental Services Operations Group 3
Temple Quay House
2 The Square
Bristol
BS1 6PN

CONTACT OFFICER: Ben Duffy
[redacted]@southandvale.gov.uk
Tel: 01235 422422
Textphone: 18001 01235 422422

Abbey House, Abbey Close, Abingdon,
OXON, OX14 3JE

Our reference: P25/V0018/3PC
Customer ref: TR040012- 000019

27 January 2025

Dear Karen Wilkinson,

Thank you for consulting the Vale of White Horse District Council on the scope of the Environmental Statement for East West Rail.

As the works to implement East West Rail near our locality have already been implemented or permitted, recognising that there are potential upgrade works required on the Oxford to Bletchley line, we have no comment to make on the scope of the Environmental Statement.

We would however like to take this opportunity to reiterate our support for the improvement of rail services in the area, as well as highlight the opportunity of extending these services from Oxford to Didcot, and potentially a new station at Wantage / Grove. This would enable the benefits of these improved services to be shared with the residents of the Vale of White Horse.

Yours sincerely

[redacted]

Ben Duffy
Senior Planning Officer (Major Applications)

From: [redacted]
To:
Subject: Re: East West Rail scoping report consultation
Date: 09 January 2025 12:31:04
Attachments: image001.png
image007.png
image008.png
image009.png
image010.png
Outlook-j00vdf1x.jpg

Dear Ms Wilkinson,

Re: Planning Act 2008 and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 – Scoping Consultation Response for East West Rail Development (Ref: TR040012)

Thank you for your letter regarding the scoping consultation for the East West Rail development.

The Council acknowledges its role as a consultee in this process and appreciates the opportunity to contribute. We understand the strategic importance of this project and its alignment with national and local growth strategies, including the objectives outlined in the National Planning Policy Framework (NPPF, December 2024) and the Vale of Aylesbury Local Plan (VALP).

At this stage, the Council has no specific comments but reserves the right to engage further as the project evolves. We appreciate being included in the consultation process and look forward to future updates.

Kind regards,

Melanie

Melanie Rose, CiLCA
Clerk to Waddesdon Parish Council
Tel: [redacted]
Usual office hours Monday to Thursday 9am - 1pm

From: East West Rail <EastWestRail@planninginspectorate.gov.uk>
Sent: 02 January 2025 3:04 PM
To: [redacted]@planninginspectorate.gov.uk>
Subject: East West Rail scoping report consultation

Dear Sir/Madam
Please see attached correspondence on the proposed East West Railway.

The Applicant for the Proposed Development intends to make an application for Development Consent under the Planning Act 2008. The Applicant has sought a Scoping Opinion from the Planning Inspectorate, on behalf of the Secretary of State, as to the scope and level of detail of the information to be provided within the Environmental Statement that will accompany its future

application.

The Planning Inspectorate has identified you as a consultation body to inform the Scoping Opinion and is therefore inviting you to submit comments by 31 January 2025. The deadline is a statutory requirement that cannot be extended.

Further information is included within the attached letter.

Regards
Karen Wilkinson

Karen Wilkinson (She/Her)
Senior EIA Advisor
The Planning Inspectorate
T 0303 444 5072
Helpline 0303 444 5000

@PINSgov The Planning Inspectorate planninginspectorate.gov.uk

Ensuring **fairness**, **openness** and **impartiality** across all our services

From: [redacted]
To: East West Rail
Subject: East West Rail Scoping opinion Your ref TR040012- 000019
Date: 29 January 2025 11:02:28

> You don't often get email from office@waltoncommunitycouncil.gov.uk. Learn why this is important

Good morning,

Following the email received around 2nd January 2025 on the scoping opinion on the Environmental Statement on the East West Rail project.

I can confirm that Walton Community Council has no comments to make on this matter.

Kind regards,

[redacted]
Interim Council Clerk / Community Engagement Officer
WALTON COMMUNITY COUNCIL
Striving to improve our community
Tel – 01908 106543 / 07726 591029
Mon – Thu – 9:30 – 5:00

From: [redacted]
To: East West Rail
Subject: TR040012- 000019 (West Suffolk Council Reference - ENQ/25/1600)
Date: 27 January 2025 15:54:47

You don't often get email from [redacted]@westsuffolk.gov.uk. Learn why this is important

Good afternoon,

I can confirm on behalf of West Suffolk as Local Planning Authority that it has no comment to make on this scoping opinion.

Kind regards.

Dave

Dave Beighton
Principal Planning Officer
Planning
Direct Dial: +44 1638 719470
Email: dave.beighton@westsuffolk.gov.uk
www.westsuffolk.gov.uk
West Suffolk Council
#TeamWestSuffolk

From: Clerk@westcottparishcouncil.gov.uk
To: East West Rail
Subject: RE: East West Rail scoping report consultation
Date: 25 January 2025 12:56:31
Attachments: image001.png
image002.png
image003.png
image004.png
image005.png

> You don't often get email from clerk@westcottparishcouncil.gov.uk. Learn why this is important

Dear Karen

Thank you for your email

We do not have nay comments on this at this time but would be happy to remain involved as part of your consultation group.

Kind regards

Mandy

Amanda Ludlow
Clerk to Westcott PC
Clerk@westcottparishcouncil.gov.uk
[redacted]
www.westcottparishcouncil.gov.uk

From: East West Rail <EastWestRail@planninginspectorate.gov.uk>
Sent: 02 January 2025 15:05
To: [redacted]@planninginspectorate.gov.uk>
Subject: East West Rail scoping report consultation

Dear Sir/Madam
Please see attached correspondence on the proposed East West Railway.

The Applicant for the Proposed Development intends to make an application for Development Consent under the Planning Act 2008. The Applicant has sought a Scoping Opinion from the Planning Inspectorate, on behalf of the Secretary of State, as to the scope and level of detail of the information to be provided within the Environmental Statement that will accompany its future application.

The Planning Inspectorate has identified you as a consultation body to inform the Scoping Opinion and is therefore inviting you to submit comments by 31 January 2025. The deadline is a statutory requirement that cannot be extended.

Further information is included within the attached letter.

Regards
Karen Wilkinson

Karen Wilkinson (She/Her)
Senior EIA Advisor
The Planning Inspectorate
T 0303 444 5072
Helpline 0303 444 5000

@PINSgov The Planning Inspectorate planninginspectorate.gov.uk

Ensuring **fairness**, **openness** and **impartiality** across all our services

DPC:76616c646f72

From: [redacted]
To: East West Rail
Subject: Response to EIA Scoping Consultation for East West Rail - Bedford to Cambridge and Western Improvements (Ref: TR040012)
Date: 26 January 2025 17:28:08
Attachments: East West Rail scoping report consultation.msg

You don't often get email from [redacted]@btinternet.com. Learn why this is important

For the attention of Karen Wilkinson, Senior Environmental Impact Assessment Advisor

Dear Ms Wilkinson,

Further to your email of 2nd January as attached, I have set out below comments on the above scoping report consultation from Yelling Parish Council.

Before commenting on the Scoping Consultation specifically, the Parish Council notes and supports the media report in the Telegraph, of the statement made to the Commons transport select committee by Sir John Armitt, (a former chief executive of National Rail and chairman of National Express and now Chairman of the National Infrastructure Commission) that *"the bulk of the population is totally reliant on roads"* and that *"to further the Government's ambition towards net zero more funding should be devoted to building roads and there should be less focus on promoting rail travel;; the continued decarbonisation of road transport removes one of the traditional arguments to using a lot more rail as rail is less polluting than roads. That will not be the case in the future. I don't see any great significant growth in rail and there will be continued pressure on roads. The vast majority of journeys are made by car. I don't think people are going to leap out of their cars onto trains*". It is, therefore, Parish Council's fundamental view that the case for the continued development of East West Rail is flawed economically, environmentally and socially and needs to be critically reassessed and the Scoping Consultation considered by the Inspectorate accordingly.

Against that background, the Parish Council has the following comments on the Scoping Consultation.

1. Traffic and Transport Impacts

Yelling village is a longstanding rural community much loved by residents for its quiet, pollution-free environment. However, we are increasingly impacted by the high volume of traffic on our rural road by vehicles, including Heavy Goods Vehicles (HGVs), particularly as a shortcut between major routes. The development of the EWR project poses a significant risk of exacerbating these traffic issues.

This is compounded by a key flaw in Cambridgeshire's current highways scoring criteria for implementing HGV restrictions: as a small village with limited amenities, Yelling does not score enough points to qualify for traffic restrictions. Ironically, this lack of amenities—including no pavements or streetlights—makes the safety risk for residents even greater.

To address these risks, we request that the ES includes:

- A comprehensive assessment of potential increases in construction and operational traffic,

specifically the risk of HGVs and other vehicles using Yelling as a diversion route.
- Specific mitigation measures, including enforceable traffic management plans, to ensure Yelling remains free from additional through traffic.
- Consideration of traffic calming measures and infrastructure improvements that could alleviate the existing HGV problem, as well as mitigate new risks arising from the project.

We hold detailed local traffic statistics that we are happy to share with the Planning Inspectorate and East West Rail Company to support the scoping process.

2. Environmental Impacts: Air and Noise Pollution

Yelling's rural, tranquil environment is integral to the quality of life our residents enjoy. Many have specifically chosen to live here because it is free from the noise, air pollution, and environmental degradation associated with urban and industrial developments. The prospect of diesel-powered trains on the EWR line raises significant concerns about both air quality and noise pollution.

Although we are unsure whether diesel trains remain part of the proposal, we urge the ES to:

- Clearly confirm whether diesel trains are part of the current or future EWR plans.
- Provide a full assessment of the air quality impacts of any proposed diesel-powered operations.
- Consider alternative, cleaner technologies, such as electrification, to reduce emissions and mitigate long-term harm to air quality.

Additionally, the ES should thoroughly evaluate:

- Noise Pollution: The impacts of construction noise, operational train noise, and cumulative noise exposure on Yelling residents. This should include robust mitigation measures, such as sound barriers or adjusted operational timings.
- Air Quality Impacts: Current baseline air quality levels in Yelling and projections for how they may be affected by both construction and train operations.

The introduction of diesel trains or other sources of significant noise and pollution would profoundly threaten the health, well-being, and quality of life of Yelling's residents, as well as our village's overall character.

3. Community and Socio-Economic Impacts

Yelling is a close-knit community that thrives on its rural charm and small, quiet nature. Any disruptions from the EWR project, whether during construction or operation, would significantly affect our residents' lives. We therefore request that the ES addresses:

- Potential disruptions to daily life, including road closures, construction noise, and restricted access to local services and amenities.
- The socio-economic impacts on our community, including property values, access to employment, and the retention of Yelling's rural identity.

We also ask that East West Rail Company provides a transparent and accessible plan for consulting with residents of Yelling throughout the project's lifecycle.

4. Heritage and Visual Impacts

Yelling's historical and picturesque rural landscape must be preserved. We urge the ES to:

- Conduct a detailed heritage impact assessment, addressing potential impacts on listed buildings and conservation areas in and around the village.
- Assess visual impacts, particularly changes to the landscape and vistas that define Yelling's rural identity, and outline mitigation measures to minimize adverse effects.

5. Commitment to Engagement and Data Sharing

Yelling Parish Council is committed to engaging constructively with the Planning Inspectorate and East West Rail Company to ensure our concerns are addressed. We hold detailed traffic statistics that we are willing to share to support the preparation of the ES.

Additionally, we welcome direct engagement with project representatives to discuss our concerns, including hosting local consultation meetings to facilitate dialogue with our community.

Conclusion

Yelling Parish Council urges the Planning Inspectorate and East West Rail Company to thoroughly consider the significant risks posed to our rural community, its environment, and the quality of life of our residents. In the event that the development does proceed, we emphasize the need for robust mitigation measures to address these risks, ensuring that the EWR project respects and preserves the character and well-being of Yelling.

We look forward to continued engagement on this project and are available to provide further input or discuss our concerns in greater detail. Please do not hesitate to contact me in need.

Yours sincerely,

Phil Himbury
Clerk
Yelling Parish Council