



BARRINGTON PARISH COUNCIL



EW Rail Ltd EIA Scoping Report: Barrington PC Response

Executive Summary

Introduction

The EW Rail Ltd EIA Scoping Report considers:

- the issues the EIA needs to address;
- the relative importance to attribute to different issues;
- the methods to apply in assessing them;
- the way that potential adverse effects would be avoided or lessened; and
- the way that the findings will be reported.

EW Rail Ltd states the scoping exercise for the Project has been completed and its findings and recommendations are presented in the Scoping Report in order for PINS to provide an opinion.

Barrington Parish Council (BPC) has assessed the Scoping Report and is of the view that ***the Scoping Report is inadequate in two main respects:***

1. It fails properly to enable the planned Environmental Statement to consider the relative environmental impacts of ***alternative routes into Cambridge.***
2. It fails to provide a focused lens on ***the most significant matters that require detailed investigation, risk assessment and mitigation.***

In addition, BPC believes the non-statutory consultation undertaken by EWR Ltd to date has failed to allow proper consideration of the above two points by consistently filtering out discussion of alternatives.

As such, EWR's preferred route option cannot be said to be the truly preferred outcome of the non-statutory consultation.

BPC therefore invites PINS to require EW Rail Ltd to revise its Scoping Report accordingly.

In the following sections and in the accompanying Appendices we provide additional commentary drawing upon local knowledge in support of these key points.

1. Lack of Consideration of Alternatives

It has been a long-established principle that Environmental Impact Assessments (EIAs) should include an assessment of alternatives. Scoping studies should also meet this requirement as the Handbook for scoping projects (Environment Agency 2002) made clear:

*“...to be most effective, scoping should address the concerns of all of those likely to be affected by the proposals, including non-statutory consultees, NGOs and the public. Thus, good practice requires that the opinion of stakeholders should also be sought at this stage. Stakeholders should be asked to identify their concerns, sources of and gaps in information, **and additional options or sites that may not have been considered.** (emphasis added p13)*

The EA goes on to note this is founded in the regulations:

Part II of Schedule 4 of the Town & Country Planning (Environmental Impact Assessment) Regulations 1999 (SI 1999 No. 293) states that the following details must be included in an environmental statement:

4 An outline of the main alternatives studied by the applicant or appellant and an indication of the main reasons for his choice, taking into account the environmental effects.

And this statement is repeated in Part I of Schedule 4 of the Regulations regarding information requirements.

The key strategic decision of the choice of a northern or southern route into Cambridge has in effect already been taken without the benefit of either a complete environmental baseline or an agreed methodology for the assessment of effects on the alternative routes. No clear business case or risk assessment of the two routes has been made available for independent scrutiny and therefore the EIA must be scoped to accommodate this necessary assessment of alternatives.

There has been no full assessment and costing by EWR Ltd (on the same scale as assessments for southern approach options) on a northern approach to Cambridge from Cambourne. This has never been presented as an option in non-statutory consultations despite it being a recurring theme in consultation feedback. Initial reasons given by EWR for not fully assessing a northern approach (eg cost and environmental impacts) have now been disproved – in fact a northern approach is now accepted by EWR to be better on both counts.

In the EWR Route Update report 2023 p112 it is stated:

The revised northern, approach is likely to cause fewer impacts to the environment compared to the northern approach set out in the Technical Report- Appendix F, published for the 2021 consultation. This is because this new northern option does not require significant construction works on the WAML, which would have resulted in impacts on communities and community facilities and is designed to be closer to current ground levels, reducing potential for landscape impacts. The revised northern approach may also perform better than the southern approach in terms of potential impacts on biodiversity. as it avoids sensitive habitats present for the southern approach which would require mitigation.

and

Our assessment of the northern approach is at a higher level, and so less mature, than a southern approach. A northern approach is potentially quicker to construct and is likely to cost less than a southern approach. The extent of work required is less, including less disruption to the existing network, though this impact would be offset by a longer period before commencing construction.

The only reason for preference of southern approach (and discounting of a possible northern approach) now given is it would provide “direct access to Cambridge South and the biomedical facilities on the Addenbrooke’s hospital complex”. (Section A.6.6 of the Scoping Report)

There seems to be no detailed analysis of cost/feasibility of extending a northern approach from Cambridge North Station-Cambridge Station into Cambridge South station – yet this is stated by EWR as a reason for discounting a northern approach.

This justification is not persuasive for BPC and we suggest unacceptable to all the 13 villages affected by the southern route. This way of dismissing the alternatives is totally unacceptable from a formal environmental impact assessment perspective. The scoping report has “scoped out” consideration of the most significant alternative.

Uniqueness of the South Cambs (Comberton to Shelford) Section

EWR’s chosen southern approach into Cambridge has such significant consequences that alternatives must be considered more fully, objectively and transparently. EWR has failed to appreciate the extensive construction disruption that will impact rural south Cambridgeshire, and the significant detrimental effects on the residents of no fewer than thirteen villages, including Barrington. Further, the changed landscape, the disconnected village life, and lack of any local benefit together create an existential threat to the way of life and historic environment of rural south Cambridgeshire from EWR’s choice. The scoping report does not allow for this more strategic appraisal.

Furthermore, impacts to Eversden and Wimpole Woods' SAC Barbastelle Bat population from a southern approach are a show-stopper. Avoiding harm to this rare population is not a "NIMBY" reaction to be treated with contempt. It is a clear legal requirement to avoid the harm. The obvious alternative is a northern approach to Cambridge – which needs to be properly and fully assessed by the EIA. The relative merits of the northern and southern approaches into Cambridge with a completely transparent assessment of the environmental, economic and community / socio-economics costs and benefits should be scoped into the Environmental Statement. Continuing reliance upon desk top studies without the benefit of site investigation and up to date baseline data is not acceptable.

Lack of Considered Analysis

The proposed Assessment Methodology is far too coarse to guide meaningful impact assessment and mitigation in the South Cambs area. The simplistic use of High, Medium and Low categories is insufficient. Furthermore, the categories employ different values (eg proportions vs specific values) which effectively forces comparison between "apples and oranges" and is neither reliable nor valid. The only apparent consistency is that the EIA will be assessed by EWR's own internal or appointed "experts".

In other spheres, such fundamental strategic decisions are taken with the benefit of MCDA (Multi Criteria Decision Analysis) assessment.

- Such an analysis includes an essential method for scoring *and weighting* key environmental factors. The method allows for uncertainty analysis but also key stakeholder input to scoring and weighting effects.
- Rather than reliance upon the applicant's own experts, it builds public and stakeholder confidence and trust in the selected option (or route) by including local knowledge and experience.

BPC suggests that the proposed methodology for environmental assessment through south Cambridgeshire in particular, is inadequate and needs to be refined with the inclusion of uncertainty analysis and the opportunity for stakeholder input as to the relative weights to be attached to the assessments.

Strategic Appraisal

In conclusion, despite the weight of documentation provided by EWR Ltd, BPC is not convinced that a "strategic" appraisal of the overall impact of the proposal is enabled or indeed envisaged by the Scoping Report.

2. Issues of Significance for Barrington

In the following section BPC sets out the main areas of environmental and related concerns that should be given priority within the Environmental Statement.

Heritage and Landscape Value

The environmental impact of the line during both construction and operation upon Barrington - including, vibration, noise, visual impact will detrimentally affect the unique setting of Barrington as one of a group of villages separated by open views of the distinctive green south western ribbon around the city of Cambridge. This detriment will arguably result in a permanent loss of South Cambridgeshire heritage and lifestyle. While the Landscape and Visual Impact Assessment will assess the effects of the project on the views of receptors (people) in the study area, that assessment needs to understand and make provision for both objective and subjective assessments of landscape value and not simply rely upon EWR consultants' appraisal.

Traffic Impacts

During construction, access to Cambridge will be significantly disrupted with the route cutting between Barrington and essential city amenities - especially the main route A10 via Harston but also via Haslingfield. Socio-economic links between local villages are considerable – for education, health and well-being, church, shopping, small businesses and numerous small-scale but meaningful interactions. These should also be modelled and understood alongside the traffic assessment.

The consequential traffic impact both short and long term if the main arterial routes are so disrupted will be horrendous for our residents. Barrington already is used as a “rat run” to Cambridge because of the delays caused to the A10. Traffic cuts right through the unique Barrington Conservation Area with its beautiful village green – known to be one of the longest in England. The exact effect of EWR will be significantly worse. It will likely exacerbate the problems currently caused by the main line level crossing (LC) at Foxton. Traffic impacts of congestion, noise, dust and particulate pollution and increased risk of collisions are all of great concern locally and need to be scoped in for careful evaluation.

Traffic numbers and behaviour need to be properly modelled and tested *with local knowledge*. A tunnel or bridge at Foxton LC should be part of a "strategic" assessment of community benefits and impacts which are otherwise conspicuous by their absence. If spoil from tunnelling through Chapel can be used to hasten the infilling of the Cemex quarry on Chapel Hill that is the only direct potential benefit – subject to careful assessment of the potential damage to the Barrington Chalk Quarry SSSI.

Biodiversity

Planning applications in Barrington invariably require detailed assessment of potential effects on local wildlife including Greater Crested Newts, Badgers and the much-treasured Barbastelle bats from Wimpole Wood that feed and are known to roost in the

area. Detailed assessment and mitigation strategies are required of all local planning applications accordingly.

We expect the same care to be taken by EWR. No harm is allowed to this protected species and fully costed analysis of alternative approaches to avoid harm including re-routing and tunnelling, and not just mitigation measures, is required.

Appendix 1

Detailed Review of EIA Scoping Report Jan 2025 – EWR Connection Stage 3

The following paragraphs provide our detailed commentary on certain sections of the EWR Scoping Report.

Page 15 – Consultation Activity

BPC believes the consultation to date has been very poor and not fit for purpose. Has not allowed proper consultation on the alternative option of a northern approach into Cambridge which is acknowledged by EWR to be less expensive, quicker to construct and less environmentally damaging.

Page 17 – Powering the trains

2.4.1 ‘Discontinuous electrification’ is EWR’s preference. Alternative is full electrification.

Further work is needed to assess suitability of ‘discontinuous electrification’. Firm proposals should be included in ES. Firm commitment to no use of diesel on CS3 is required.

Page 18 – Operational facilities

No firm information yet on locations for facilities/buildings required to support operation of EWR. Provision of utilities for buildings needs assessment. Firm proposals should be included in ES.

Page 19 – Freight

2.1.14 No firm information re potential freight demand and requirements and resultant impacts. Will freight be diesel? Firm proposals should be included in ES.

Page 19/20 – Construction

2.5.1 Report states that EWR is at a very early stage of developing the construction approach. Firm information should be included in ES.

2.5.2 Currently, no firm information about construction compounds. It would appear that some compounds will be very close to residential properties eg in Haslingfield – this is unacceptable.

Page 21 – Construction planning and logistics

2.5.7 Assessment of construction traffic routes needed. Assessment of construction traffic at each compound needed. Methodology requires independent checks.

2.5.8 Details of necessary diversions or closures of public highways and public rights of way including timescales and assessment of impact required. (Road closures will have a very significant impact on journey times between adjacent South Cambridgeshire villages eg journey distance would triple between closely linked villages of Haslingfield and Harlton – local shop and medical centre).

Page 21 – Working on the existing railway

2.5.11 Details of expected disruption to existing rail lines (eg Shepreth Branch Royston Line) including timescales and assessment of impact required.

“Access to the existing operational railway would **generally** be during non-operational hours” – this is not sufficiently specific.

Page 50 – Comberton to Shelford

3.7.3 Responsibility for maintenance of balancing ponds is unclear and needs to be addressed.

Page 52 – Tunnel Harlton and Haslingfield

3.7.6 Proposed: 700m tunnel (mined tunnel approach using excavators) through Chapel Hill – cuttings either side up to 26m deep – tunnel services building/emergency rescue area at each end – maintenance access roads. More detail needed in ES re construction. Should a tunnel boring machine be considered as an option.

Longer tunnel (950m) option through Chapel Hill has been discounted by EWR due to longer construction time. With proposed 700m tunnel, the western portal would be unacceptably close (approx 200m) from residents’ property boundaries. There are also other benefits of a longer tunnel. Further assessment is required including balance of benefits in less disruption and less impact on Bats

Page 62 – Defining the Environmental Baseline

People-focused surveys/Nature-focused surveys

Scoping report states how many of each type of survey have been carried out. Further info is given in EIA Scoping Method Statements which are attached at end of report but little data that relates specifically to Comberton to Shelford section.

Page 64 – Transport modelling

4.2.24 So far this has used the East West Rail Strategic Highway Model with modelling for Baseline (2023,) Construction (2032), Year of opening (2034) and Future year (2049). The Transport Update Report is based on qualitative baseline data. Baseline data for Comberton to Shelford section is extremely limited and there is no baseline data for rural South Cambridgeshire roads that would be affected by construction and operation of EWR. More widespread and sophisticated transport modelling needed. What is “the new and bespoke corridor-wide model”.

The potential travel impacts for Comberton to Shelford section in Transport Update Report (p179) does not assess:

- Unsuitability of rural South Cambridgeshire roads which lead to construction areas for heavy construction vehicles. How will construction traffic reach these construction areas? Will road condition surveys be carried out prior to start of construction work? Will EWR commit to repair of damage to roads due to construction traffic?
- The extent and duration of increased journey lengths and traffic congestion for local people due to closures of local roads and diversions during construction. Increased traffic through local villages due to congestion, road closures and diversions.

- The extent and duration of local rail suspensions/disruptions during construction and their effect on traffic congestion on local roads as people who would usually travel by rail (eg to Cambridge) take to the roads
- The table states that there is a potential “mode shift from car to rail” after completion. There are no stations that would benefit South Cambridgeshire residents.

A southern approach into Cambridge will not benefit transport into Cambridge from large housing developments in progress/planned which are all located north of Cambridge.

Page 65 - Air quality and noise and vibration

Assessments “will be undertaken”.

There are very few baseline air quality surveys undertaken for local villages in South Cambridgeshire at present. Will additional monitors be strategically placed?

What are the locations and methodology for assessment of noise impacts from trains and road traffic both during construction and operation?

Page 65 - Flood modelling

Some initial modelling. “Will be further developed”. Which 11 watercourses were involved and why were they chosen? Will details of further modelling be included in ES? Flooding and groundwater run-off are recurrent issues locally both in Barrington specifically and in South Cambs generally – full assessment and analysis is required – this must not be scoped out.

Page 85/86 – Agriculture and soil

6.2.11 Grade 2 agricultural land will be affected in South Cambridgeshire with detrimental impacts on national food security. It is estimated that more than 6,200 acres of productive farmland will be impacted (either lost completely or degraded) between Bedford and Cambridge – this includes around 2,000 acres in the 7.5km before Chapel Hill. It has been calculated that this will take away the equivalent of grain that would feed at least 200,000 people for a year. The effect upon food security needs to be addressed in the ES.

Page 89 – Air quality

6.3.5 Construction dust is likely to have a significant impact on air quality in villages in South Cambridgeshire close to construction activities.

Key questions are how widely will baseline air quality data be collected? How will sampling / monitoring locations be identified? Will baseline air quality data be collected for village locations close to construction activities where construction dust is likely to have an impact?

Page 92 – Communities and Health

6.4.2 The Scoping Report does not recognise the extent of the impact in rural South Cambridgeshire consisting of farmland interspersed by historical villages with close links.

The proposed Comberton to Shelford section of EWR will have a significant and extremely adverse effect on these rural villages of South Cambridgeshire. Many villages (including Comberton, Caldecote Great Eversden, Little Eversden, Harlton, Haslingfield, Barrington, Harston, Newton, Hauxton, Little Shelford, Great Shelford) will be directly affected (far more than for a northern approach into Cambridge).

Closely linked villages will be separated and communities cut in two eg Newton and Harston. School children that attend school in a neighbouring village will be affected. Travel to doctor's surgery in Harston used by many South Cambridgeshire residents will be affected. Rural way of life will be permanently changed for residents. Effect on villages due to no-one wanting to move in during lengthy construction phase (and possibly beyond). Project has no benefit for South Cambridgeshire villages – just many adverse effects.

These assessment items should not be scoped out as suggested in the report. There could be significant impacts for South Cambridgeshire. Public services and infrastructure provision for construction workers and permanent workforce will be significant. Similarly, there will be impacts on emergency services – access particularly during the construction phase affecting the A10 access to Addenbrookes hospital.

Page 112 – Establishing the baseline (Sound, noise and vibration)

6.8.9 Key locations should include rural village settings where there is currently no/very low baseline sound, noise and vibration.

Page 114 – Proposed scope table (Sound, noise and vibration)

Why is temporary ground-borne vibration from construction road traffic scoped out? This could potentially cause damage to village properties if they have large construction vehicles thundering past. Will properties that may be affected be surveyed prior to commencement of construction?

Page 116 Sources and types of impact (Traffic and Transport)

6.9.10 How will the operational rail service bring any benefits in terms of new or improved journeys to residents of South Cambridgeshire?

Page 119 Biodiversity

6.10.1 The protection of extremely rare Barbastelle bats, whose habitat will be severely disrupted if the proposed southern approach into Cambridge is proceeded with, must be a priority.

Page 122 Biodiversity

6.10.17 A net Biodiversity Net Gain of 10% is insufficiently ambitious. How will this be achieved on the rural Comberton to Shelford section of the line?

Use of Biodiversity Method Statement.

Page 126 Proposed scope (Biodiversity) Table

Why has ancient Woodland in Comberton to Shelford section been scoped out? There are areas of woodland that will be affected.

Page 130 Sources and types of impact (Historic environment)

6.12.5 These impacts would definitely apply for historic rural South Cambridgeshire - notably the Bronze Age burial barrows on Chapel Hill.

Page 133 Landscape and visual

6.13.2 There will be a very significant impact (both temporary and permanent) in South Cambridgeshire yet the Comberton to Shelford part of the line is not specifically mentioned in landscape and visual section of report.

Page 141 Carbon emissions

How long will it take for greenhouse gas emissions resulting from construction of EWR to be negated by savings in greenhouse gas emissions because EWR was built?

Appendix 2: Appraisal of EWR Consultation activity

The following outline sets out BPC’s concerns about EWR’s consultation approach to date.

2019: Non-statutory consultation on 5 potential route options (all approaching Cambridge from the south) – Not well publicised – many people who would be potentially affected were not aware. Feedback form consisted of leading multiple choice questions: On a scale of 1-5 how do you think Route Option ... performs against our key criteria? Very limited scope to comment on the project as a whole. No scope to comment on whether a northern approach should be considered.

2021: Consultation Feedback Report published by EWR. Around 7000 consultation responses received – only 3350 from the general public. Feedback from this consultation included why a route option which approached Cambridge from the north was not presented as one of the 5 options.

2021: Non-statutory consultation on Preferred Route Alignment and Design Options. Whilst stating that a northern approach into Cambridge had been ‘looked at’ (but not assessed in the same detail as southern approaches) EWR documentation (Fact Sheet: Approaching Cambridge April 2021) nevertheless strongly supported a southern approach into Cambridge.

How do the northern and southern approaches compare?

The table below summarises some of the key differences between a northern and southern approach into Cambridge to enable their potential impacts to be easily compared.

Cambourne North station to Cambridge station	Southern approach	Northern approach
Total route alignment length	23.7km	24.6km
Built length in flood zones 2 and 3 (areas identified by the Environment Agency as being at risk from flooding)	830m	4735m
Total length of viaducts	1.1km	3.4km
Number of built-up areas within 500m of alignment	9	4
Length of railway in Cambridge City Council wards	2.8km	4km
Number of properties within 200m of alignment	3,800	4,600
A road crossings (new infrastructure required)	4	5
B road crossings (new infrastructure required)	2	1
Minor road crossings (new infrastructure required)	11	9
Guided busway crossings (new infrastructure required)	0	1
Properties that would need to be demolished (residential and commercial)	5	39-84

In answer to the questions:

Would a northern approach into Cambridge be cheaper to build?

And

Isn't a northern approach better for the environment?

The EWR documentation gave the clear answer **“No”**.

Yet EWR now concedes that both the above negatives are inaccurate. Similarly, many of the comparisons in the table supporting a southern approach are no longer applicable.

At this stage, it was intended that EWR trains would be diesel and that making “provision for potential future freight demand” was an objective of EWR.

EWR representatives at public meetings and Zoom meetings held during the consultation period were not well-informed and unable to answer questions. The consultation form assumed a southern approach into Cambridge and the questions asked were based on that being the case.

2023: Consultation Feedback Report published by EWR. Around 9800 responses received.

EWR Consultation Feedback Report – Chapter 3 (Approach to Cambridge)

The feedback report concedes that the northern approach “now has a lower cost than the southern approach”.

“Environmental risks for both options are thought to be mitigable”. Bodies including Campaign to Protect Rural England, Wildlife Trust, The Woodland Trust and Natural England have stated that a northern approach would be better environmentally than a southern approach.

Nevertheless: “We continue to favour the southern approach to Cambridge which is identified as the preferred approach to Cambridge.”

EWR Consultation Feedback Report – Chapter 11 (Comments relating to the consultation)

“Respondents commented that the consultation lacked information about the proposals for a northern route into Cambridge and that this option should not have been discounted by EWR.”

Route Update Report (May 2023) states:

“Our high-level investigations since the 2021 consultation indicate that a northern approach may potentially be cheaper to build and quicker to construct and have less potential environment impact”

Reasons given for continuing to favour a southern approach:

- A southern approach gives greatest economic benefits arising from direct connectivity to Cambridge South station and hence the Cambridge Biomedical Campus. (Detailed economic analysis to support this assertion?) A northern approach would have direct connectivity to Cambridge North station and the

Cambridge Science Park – passengers would need to change at Cambridge North or Cambridge stations to reach Cambridge South station.

- It would (apparently) only need relatively minor enhancements for future extension of EWR from Cambridge station to Cambridge North station. By contrast, future extension of EWR from Cambridge station to Cambridge South station would (apparently) be difficult and expensive.

2024: Non-statutory consultation on current proposals. This mostly consisted of answering questions on very specific aspects of route design on the whole route. Only questions on the preferred southern approach to Cambridge are included.