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GREATER CAMBRIDGE
SHARED PLANNING

Freepost EAST WEST RAIL

Date: 9 June 2021

Contact: Stephen Kelly
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Dear Sir or Madam,

Please find below Cambridge City Council's response to the East West Rail 2021 Public Consultation.

The response of South Cambridgeshire District Council will be sent in a separate letter.

1. Introduction

As set out in its response to previous East West Rail consultations in 2019 Cambridge City Council supports the principle of the Bedford to Cambridge section of the East West Rail line. We welcome the opportunity to provide further comments in respect of the 2021 Public Consultation.

The Council's response to the current public consultation does not prejudice an in-depth consideration of strategic issues related to future development through the forthcoming Greater Cambridge Local Plan (which is being jointly prepared by South Cambridgeshire District Council and Cambridge City Council). This will include consideration of all reasonable strategy options.

Significant further work is still needed to understand the localised impacts of the scheme, the options for mitigation, their effectiveness and implementation including the sequencing with wider strategic infrastructure and development. The Council has not been able to assess issues such as noise or landscape impacts in any detail, given the high level nature of the consultation material, and as such is unable to support any of the options unequivocally at this stage. Thorough and detailed evidence will be expected to demonstrate how issues have been explored and addressed, and why the chosen route is the appropriate one.

East West Rail and the development of the corridor more generally will bring significant change to existing communities. To enable the Council, together with our communities, to make the most of the opportunity that the railway brings, and to effectively address its impacts, we urge East West Rail to engage effectively with local communities to

thoroughly test the options, to understand and explore their detailed concerns, to fully consider the issues being raised and provide further information to ensure a transparent process, as it progresses the Bedford to Cambridge project. We refer you to the seven principles of good consultation laid out by the Consultation Institute (particularly principle 1 on Integrity).

2. Responding to Climate Crisis

Climate Change Targets: Whilst the consultation material makes a number of high level commitments to reducing the climate impacts of the scheme, on the whole it is considered that the proposals are currently lacking in clear and measurable targets related to climate change and carbon reduction, and there are a number of inconsistencies throughout the consultation materials.

The Government has just accepted the Committee on Climate Change's recommendations for the Sixth Carbon budget, which sets an extremely ambitious carbon reduction target for a 78% reduction in emissions by 2035 in order for the UK to be on target to achieve net zero carbon by 2050. This new target will become enshrined in law by the end of June 2021. It will be vital that the proposals that come forward for East West Rail are in line with this carbon budget, including the assessment of the significance of effects as part of the EIA process.

Electrification of the Rail Network: The consultation documents make a number of high level commitments including that the scheme will aim to deliver a net zero carbon railway, in line with existing and developing net zero carbon policy, legislation and commitments at a global, national and local level. Paragraph 3.9.2 of the technical document goes on to state that 'the use of diesel-powered trains is not a project objective'. This is incompatible with the Programme Wide Output Specification (PWOS) contained within the appendices to the technical document, which states (at Section 5.1.9.1) that 'the railway shall not at this point in time be electrified'.

In making their recommendations to Government on the Sixth Carbon Budget, the Committee on Climate Change included recommendations that continued electrification of the rail network, together with hydrogen, battery-electric and hybrid trains, will play a significant role in meeting the sixth carbon budget. To meet the ambition set out in the Committee's carbon reduction scenarios, rail will need to be decarbonised further, with gradual electrification up to 55-60% of the network by 2050. Their recommendation was that 'Government should set out a clear vision to deliver Net Zero in rail and support Network Rail in delivering the target to remove all diesel trains by 2040. This is expected to cover a mix of zero emission technologies (e.g. battery-electric, hydrogen and track electrification). The strategy should be published by 2021 as recommended by the National Infrastructure Commission'. The Council considers it imperative that the proposals for East West Rail are compatible with this recommendation.

The sixth carbon budget cannot be met unless all new railway infrastructure is electrified at the point of construction. The statement in Section 5.9.13 of the PWOS that 'all new or renewed infrastructure shall be made compatible with positive passive provision of future electrification' is not considered to go far enough to meet this commitment.

We are also disappointed that the scheme does not makes a clear target to rule out diesel powered EWR services or freight services and recommend that the PWOS be updated to commit to electrification from the outset. To fail to do so would not be compatible with the UK's legally binding carbon reduction commitments and could open up the project to legal challenge on climate change grounds.

Wider Environmental Sustainability Targets: With regards to wider approaches to environmental sustainability, while the aspirations set out in Section 5.30 of the PWOS are broadly welcomed, they are lacking in detail and specific measurable targets for areas such as materials, waste and carbon. These aspirations also do not cover wider elements associated with EWR such as construction standards for new station buildings or elements such as electric vehicle charging provision at stations.

Whilst it is recognised that these are very detailed elements, it is considered that the inclusion of firm commitments at this stage is necessary to give the public and local authorities confidence that the proposals can deliver a 'net zero carbon railway'. Carbon emissions associated with the construction of the line, and embodied carbon in particular, are likely to be significant, but it is not clear from the information the extent to which this has been included in the assessment factors used to analyse the various route options presented throughout the consultation material. Climate is included as an assessment factor, but there is no detail of what is considered within climate. Further detail is therefore sought.

3. Challenges and opportunities relating to the route options

We note from the consultation that there is a preference for a southern access into Cambridge from Cambourne, through the countryside to the -western edge of Cambridge, joining the existing King's Cross line to the west of the Little Shelford / Hauxton level crossing.

We are of the view that in arriving at the preferred option, further details on the environmental, social and economic impacts of the two options needs to be published. We ask that East West Rail provides further information on the work undertaken for both north and south accesses to demonstrate how the preferred option has been arrived at.

Landscape Impacts: The landscape between Cambourne and Shelford is populated with small and medium sized villages including Caldecote, Toft, Comberton, the Eversdens, Harlton, Haslingfield, Harston and Hauxton. The introduction of a railway line with accompanying infrastructure would be potentially intrusive in this settled, open landscape with slightly undulating topography, a high point near to Highfields Caldecote, and would likely result in significant landscape and visual impact.

The preferred option would also have an impact on the setting of the historic city of Cambridge. Areas to the west and south of Cambridge include sensitive landscapes and vulnerable views, mainly due to the raised and accessible landscapes of existing high points such as Red Meadow Hill, the Gog Magog Hills and the Greensand ridge south and west of Haslingfield.

Further assessment of landscape impact should be undertaken. This should also provide a comparison with the northern route, to ensure the relative impacts have been fully considered.

Further information is requested to demonstrate how landscape considerations have been used in selecting the route alignments, to ensure they are acceptable from a landscape and visual perspective. In this regard the Council would wish to understand the engineering choices which have been made and indicate a desire to deliver an elevated route and in particular whether less visually obtrusive other means, such as tunnels or cuttings, could be utilised. It is an expectation that the visual impact of all associated railway infrastructure, (including grade separated junctions) and electrification is considered as part of this assessment.

Heritage Impacts: The project has the potential to impact upon above and below ground heritage assets, including Scheduled Ancient Monuments and listed buildings. A full assessment of the impacts on such heritage assets should be undertaken, which should be shared with the Council in order to demonstrate that the route alignments and associated infrastructure are acceptable in terms of impacts on heritage assets. It is an expectation that specialist archaeological advice on the condition and impact of below ground heritage assets is also sought. The heritage assessment should also consider the impacts of increased vibration from rail traffic.

Within the route sections, the impacts on specific sites should be fully evaluated, including the following:

Section D - North of Cambourne: grade II listed building farmhouse and associated buildings, New Inn Farm, Knapwell. South of Cambourne: grade II listed building to the North East of Caxton Pastures Farmhouse and Scheduled Monument which fully covers this site; Old Court House Caxton (grade II listed);

Section E - Scheduled Ancient Monument No. 1006809 settlement site at Manor Farm either site of Royston Road; Rowley's Hill to the south of Harston; Harston Manor, 65 Church Street (grade II listed).
Shelfords to Cambridge section – Cambridge Road overbridge area in Great Shelford: grade II listed Four Mile House and De Freville farmhouse and outbuildings; Shepreth Branch Junction: 32-38 Granham's Road and dovecote at Granham's Farm (grade II listed); Line south-west and west of Addenbrookes: Scheduled Ancient Monument site 'West of Whitehill Farm'.

Should alterations to the preferred route result from the current consultation then the Council would request that a fresh evaluation of heritage assets in any new route corridor is undertaken.

Ecological Impacts: The consultation presents limited ecological evidence in respect of the route impacts on designated sites, priority species and the nature network. In the absence of this information it is difficult to critique or compare individual route options and their associated impacts for biodiversity.

Valuing existing habitats in the urban environment, for both biodiversity and local communities, must be a high priority when considering route options. Ecological impacts should be limited wherever possible and mitigated on or close to site, to ensure that green infrastructure is not replaced by grey, resulting in loss of local multifunctional ecosystem services.

Clear evidence must be provided to demonstrate that the preferred route alignment options have fully considered the Ecology Mitigation Hierarchy with respect to avoiding impacts on the highest quality habitats and priority species. The ecological impacts, including Biodiversity Net Gain (BNG), of any new highway routes arising from the closure of crossings would also need to be considered within this process, being directly related to the proposed development.
Whilst reference is made in the consultation documentation to impacts on priority habitats and ancient woodland being greater or lesser for certain alignments, it is difficult to independently scrutinise these without clear evidence of the number of designated sites (particularly County and City Wildlife Sites), watercourse, area and ideally condition of priority habitats. This evidence should be provided to demonstrate how these issues have been considered and why the chosen route is the appropriate one in ecological terms.

- Delivering Biodiversity Improvements

The consultation documentation states that 10% Biodiversity Net Gain (BNG) is proposed from the overall scheme. This target appears unambitious given the scale of the scheme and the government's stated ambitions for Nature Recovery. A minimum 20% is more appropriate and allows for margins of errors to ensure an overall, long term BNG is achieved. This would reflect the shared regional principles for protecting, restoring and enhancing the environment in the Oxford Cambridge Arc, developed through the Ox Cam Arc Environment Working Group.

Positive outcomes to be secured through the scheme must include enhanced management of existing designated sites and priority habitats sites and the creation of new strategic habitats that connect existing ecological networks rather than creating further severance. It should be demonstrated that this will meet the government's aspirations for Nature Recovery Networks. Reference should be made to Cambridge City Council and South Cambridgeshire Biodiversity Emergency declarations, South Cambridgeshire Doubling Nature Strategy, 'Natural Cambridgeshire' Local Nature Partnerships Doubling Nature vision and associated Priority Areas, including the soon to be launched Cambridge Nature Network. The Council is also developing evidence regarding green infrastructure for the Greater Cambridge Local Plan, and this may highlight further opportunities and synergies.

- Ecological Mitigation

Mitigation proposals must seek to provide long term management enhancements of existing non statutory designated sites. It should be ensured that the linear route does not sever key nature corridors or prevent future landscape scale restoration of nature networks.

Further detail needs to be provided to demonstrate that BNG requirements are achievable in relation to the options proposed. BNG calculations (including all assumptions made), should demonstrate that BNG best practice has been implemented. Any deviation from the use of the DEFRA V2 metric should be clearly explained and justified.

When designing BNG (and landscaping) schemes, it should be ensured that future management plans, delivery bodies, monitoring and reporting are in place to ensure that BNG ambitions are to be met in practice. Any landscaping scheme or habitat creation as a result of the scheme should be tailored to local needs using species of local provenance.

- Ecological Surveys

The consultation documentation states that ecological surveys have informed the consultation to date and are ongoing. The Council requests that this information is shared in the public domain to demonstrate that all survey work is compliant with BS42020 and associated CIEEM best practice.

- Specific Ecological Issues – Designated Sites

It is noted that the northern route would require construction of an additional junction on Coldham's Common County Wildlife Site (CWS) to facilitate onwards journeys. Coldham's Common is one of the largest natural green spaces in Cambridge, and a key element of the proposed Cambridge Nature Network. Any loss of these grassland and woodland habitats would need to be fully considered.

We note and support the identification of potential impacts on Nine Wells Local Nature Reserve (LNR) from the southern approach and appropriate mitigation. Other sites including the ecological mitigation on Hobsons Park and potential loss of woodland on the embankment of Long Rd could have implications for these sites.

Any route south of the current A428 would need to fully consider the impact on Eversden and Wimpole Woods Special Area of Conservation (SAC) designated for maternity roosts of an annex II species. Western barbastelle bats are known to traverse along hedgerows and trees lines north of the SAC between the SAC and areas of ancient woodland north of the current A428.

Environmental Impacts: The Council has been unable to assess the environmental impacts, given the high-level nature of the consultation material. Further information and evidence will be expected to demonstrate how environmental issues have been considered, and why the chosen route is the appropriate one in environmental terms.

- Air Quality

The Council's main concern in relation to the proposal and air quality is the uncertainty and lack of commitment regarding the use of electrified trains or other technology from the outset. This is a key concern, and is emphasised later in this report in relation to climate change. Further consideration will also need to be given to given to local connectivity, access and traffic management of the route options to minimise the impact on local air quality as the scheme is developed.

- Noise

The information presented in terms of potential impacts as a result of the scheme is at a very early stage. Consequently, it is not possible to accurately predict noise impacts as a result of the introduction of the proposals on sensitive receptors at any given location.

A number of options for a new route into Cambridge Station have been considered. The preferred route which is presented will be positioned North of Cambourne, and would serve the Bourn Airfield development as well as existing and proposed developments at Cambourne. It would also follow a route near to the A428 corridor following the alignment of highway improvements currently being considered.

Further information is requested in respect of how these cumulative noise considerations have been used in selecting the route alignments, to ensure they are acceptable from an environmental health perspective. Irrespective of the potential route alignment options, the preferred route should seek to avoid, or where unavoidable, minimise sources of rail and construction noise into areas previously unaccustomed to such impacts. Route alignment should follow existing transport corridors, as these already experience higher existing background noise levels as a result.

Detailed noise modelling/prediction of impacts on sensitive receptors, (including both existing residential and future residential properties) should be undertaken in order to ensure that significant adverse noise impacts is prevented and that an appropriate level of mitigation is employed (if necessary). The noise assessment should consider any potential increase in the intensification of use of new train stabling and carriage servicing siding/platforms and facilities at Cambridge Station, as a result of additional East West Rail services.

When modelling railway noise impacts along this route, the cumulative noise impacts on nearby residential premises from both rail and road schemes operating simultaneously should be taken into consideration. Noise impacts should also be assessed for both the construction and operational phases of the development, including in particular at night. The assessment should consider the noise impacts of increased train movements, including at potentially higher speeds, on sensitive receptors.

It is an expectation that best practical means and noise/vibration monitoring will be used to minimise disturbance to residential/noise sensitive premises.

On-line and off-line route options should also be evaluated in respect of potential noise impacts that could occur as a result of an elevated track. Noise from a height will travel further and be heard at a greater distance than noise sources close to the ground, as they will not benefit as much from the effects of ground attenuation over distance. Noise barriers placed closer to the noise source will have a greater effect and this is easier to achieve if the mitigation measures are located at ground level.

Given the number of former industrial sites adjacent to railway land in Cambridge which have extant planning permission for residential development, it is an expectation that the noise impact of any siding relocation is assessed if it is to be relocated near existing or proposed residential properties in the City.

An airborne noise mitigation hierarchy should be followed as part of the project
It should be noted that an existing section of the railway (from Purbeck Road to Hills Road railway bridge) has been identified as an Important Area (Noise Hotspot) for railway noise under the Noise Action Plan: Railways and Agglomerations (Urban Areas) 2019. This should be taken into consideration as part of the noise impact assessment, to ensure that this noise sensitive location is not further affected by increases in noise levels arising from the development.

Given recurring noise complaints about the Public Address (PA) announcements on existing platforms at Cambridge Station, it is an expectation that any new platform with additional PA systems do not give rise to further adverse noise impacts. Improvements to the performance of the existing station sound/PA system should be considered, to reduce local noise impacts.

The noise assessment should also include a consideration of vibration, for both the construction and operational phases of the project.

Artificial Lighting: Any new/additional artificial lighting has the potential to have an adverse impact. The impacts of light pollution arising from additional lighting at new or altered platforms, sidings and road/crossings/junctions should be fully assessed.

Health impacts: National rail networks and strategic rail freight movements have the potential to affect the health, well being and quality of life of the population. They can have direct impacts on health due to traffic, noise, vibration, air quality and emissions, light pollution, community severance, dust, odour, polluting water or hazardous waste. New or enhanced national network infrastructure may also have indirect health impacts.

The consultation documentation does not appear to indicate any research has yet been done into the impacts of the project on human health. We request further information in respect of the impacts on health and wellbeing of both the north and south routes, evidenced for both the construction and operational phases. The final route option should demonstrate how it will promote strong, vibrant and sustainable communities, and promote community cohesion.

A full health impact assessment should be undertaken as part of the project. This should identify vulnerable groups who may be more adversely affected by these environmental changes, both temporarily throughout the construction phase, and in the long term, operationally. The report should include the differential impacts according to health or other vulnerability.

Indirect, Secondary and Cumulative Impacts: It is an expectation that all indirect and cumulative impacts of the project are assessed, as well as impact interactions and inter relationships.

Local impacts on communities: The construction and operational impacts of the preferred route should be fully addressed as part of the subsequent stages. There is potential for significant negative impacts on local residents and businesses, by severing communities and local connectivity (including local roads and public rights of way). This is causing significant local concern, and the Council would expect to see severance issues addressed robustly, particularly where it could impact on access to essential services, such as schools. We ask that whichever route is selected, the detailed design carefully addresses the issue of severance. It must explore in detail the impact on local paths, cycleways, roads and public rights of way, to ensure that connectivity is maintained and if possible enhanced. Full consideration should also be given to the impacts of service disruption on local communities during the construction period.

Initial responses received by the Council from the local communities along the proposed route have raised significant concerns that a northern route does not appear to have been examined with the level of rigour that would be expected. Further, residents have highlighted the contradiction between a diesel operated railway and local and national requirements around carbon reduction and climate change.

Delivering benefit to the wider area: Whilst the area around Cambourne and other existing and planned stations will benefit from the proximity of a new railway station, it will be vital to consider how other nearby communities in Greater Cambridge will be able to access the new train services. Improved connectivity for the rural villages along the route should be a priority.

We ask that East West Rail puts in place measures for working in partnership with local transport authorities, to consider how walking, cycling and public transport and connections to existing and planned stations will be improved, and also to consider the potential to subsidise use by local communities. The Cambourne to Cambridge scheme being developed by the Greater Cambridge Partnership has the potential to complement a rail scheme, by helping people to access rail services. This will help ensure that a range of communities can have easy and affordable access to rail services without relying on private cars to access them. In addition, consideration should also be given to how people can take their bikes on rail. This will help to widen the benefit of the railway to a much wider community, and also potentially help to get freight off the roads and onto rail.

Maximise opportunities for infrastructure connections: The project presents an opportunity to explore opportunities for infrastructure that could share the corridor (e.g. digital infrastructure or potable water pipelines). We ask that such opportunities are fully explored, including engagement with Water Resources East to consider the delivery of strategic water infrastructure that must help deliver sustainable water supplies and opportunities to reduce extraction from the chalk aquifer.

4. Relationship with future development

Proposed new railway station at Cambourne: We note from the consultation material that a station location at Cambourne has been influenced by an assessment of potential future development opportunities, and there is an emerging preferred option for a station north of Cambourne.

Cambridge City Council and South Cambridgeshire District Council are at an early stage in their statutory plan making process towards a Greater Cambridge Local Plan, which will consider the level of development that should be planned for to 2041, and where it should be planned for.

On page 220 of the main consultation document, it is stated that, 'a site in this area is already identified in the emerging Greater Cambridge Local Plan'. It should be clarified that no decisions have been made regarding which sites are to be included in the Greater Cambridge Local Plan at this point. This is most likely a reference to the published material relating to the testing of strategic options, published on the Greater Cambridge Shared Planning website in November 2020. Preferred options for the local plan will be subject to consultation later in 2021.

The development potential of areas in proximity to a station location to the north or south of Cambourne would require full review. It is likely that development immediately south of Cambourne at the station location identified would be less favourable, given the nature of the landscape and the location relative to existing villages, but this is an initial view given the lack of information on the scale and nature of development provided by the consultation.

Development to the north would still be challenging, particularly in respect of addressing potential landscape impacts. Linkages to the existing settlement would also be crucial to consider. This will be particularly key to encouraging non-car access to the station. Whilst the area around Cambourne will benefit from the proximity of a new railway station, it will be important to consider how other nearby communities will be able to access the station.

Proposed new train stabling at Cambourne: We note that the project will involve the relocation of sidings at Cambridge station, and that the preferred location for stabling EWR trains in the general Cambourne area. The siting of this would require detailed consideration, with regard to potential impacts on local communities and the environment, taken into account alongside operational requirements. Its location could also have implications for future development, and connections to Cambourne. The East West Rail scheme should also consider the wider the need for sidings in the Greater Cambridge area and make appropriate provision.

Impact on current planned development – Bourn Airfield: The assessment in the consultation document does not provide details regarding the implications for planned developments, in particular in relation to the impact of the preferred route upon the delivery of a new village on Bourn Airfield. This development is identified in the adopted South Cambridgeshire Local Plan 2018 for approximately 3500 dwellings, employment and other supporting facilities. In February 2021, the Council's Planning Committee resolved to grant outline planning permission, subject to completion of a Section 106 Agreement.

The preferred route will impact on the entrance to the Bourn Airfield New Village site, by virtue of a viaduct which is indicated as crossing the north-eastern part of the site and continuing into an embankment. This could give rise to significant issues with regard to site access and implications for the delivery of the site. The Council requests that further information be provided regarding how the options have taken this into account, the measures proposed to maintain access and mitigate the impact on the planned

development. As well as the impact from demolition of existing properties, the impact on delivering committed growth on this site and others on the alignments should also be acknowledged and properly weighed up in the decision making process. This is particularly important given the consideration of housing delivery objectives for the scheme set out in paragraph 9.8.10 of the consultation document.

Local infrastructure projects: The preferred route needs to consider the impact of local infrastructure projects, (including the Cambourne to Cambridge Busway scheme which passes through the area of the proposed viaduct at Bourn Airfield and the A428 project), and the linkages to such transport infrastructure.

Proposed Cambridge South Station: We note that the southern access option places weight on the importance of directly servicing the proposed Cambridge south station. This project is a separate project to East West Rail. There is a critical need for all partners to remain focused on the delivery of this station project, to support more sustainable commuting to this location, including making the most of the opportunity provided by East West Rail.

5. Other Points

Operational Hours of the Railway/Movement of Freight: We support the approach that route priority is given to commuter traffic and recognise the importance of the role of freight in moving goods efficiently and reducing carbon emissions associated with road-based travel. However, little information has been provided about expected freight traffic including means of traction (or the additional infrastructure required to provide freight connectivity), and the operational hours of the railway are not apparent from the consultation documents. Concern is raised that the route may lead to the use of freight paths during the night, which could give rise to noise and disturbance to local communities. Further information is required in respect of these elements.

Related to this point, although the eastern section of East West Rail beyond Cambridge is to be considered as part of a separate project, the impact the current scheme could have on the existing infrastructure and its nearby communities needs to be considered. In particular, our communities will be concerned about the likely knock on effects of increased railway traffic in areas such as Cherry Hinton and Fulbourn where the line is currently single track in nature and heavily constrained by a number of level crossings and public rights of way

Stephen Kelly
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