Appendix B

Working draft: EWR Non-Statutory Consultation - Technical Comments

This document sets out comments by Cambridge City Council (**the Council**) regarding EWR Co.'s Non-Statutory Consultation for the East West Rail (EWR) proposal.

The below table sets out comments across a number of topic areas:

Item no.	Topic area	Consultation material	Key issues and comments	Proposed mitigation measure and actions for EWR Co. to address
AQ.1	Air Quality (CCC)	Environmental Update Report Technical Report Our approach to freight factsheet Transport Update Report	Whilst it is acknowledged that the proposal is primarily a passenger railway with a current commitment to discontinuous electrification (to be confirmed at statutory consultation), clarification is required in relation to freight trains and/or potential for other diesel engines operating on both new and existing stretches of the line. Adequate information is required to establish whether the proposals could trigger the need for Local Air Quality Management (LAQM) assessment in the medium operational term given the complexities most notably of moving freight away from dependency on diesel trains, and whether any wider modelling or monitoring is required. The Council would expect impact on minor roads around Cambridge Station to be considered as part of the assessment and if applicable modelling completed, notably Great Northern Road which is the primary access route for vehicles entering the station.	Detailed information required on forecast for potential freight train movements, and any changes to the network proposed that could lead to freight trains being stationary and/or any other potential diesel movements.
A.1	Archaeology	The Council is not the statutory consultee for this subject area. EWR are expected to consult Cambridgeshire County Council on this matter regarding the proposal (the site and any associated infrastructure that falls within Cambridgeshire County Council's administrative boundary. The Council would defer to Cambridgeshire County Council for a detailed response. However, the Council reserves the right to comment on this subject through technical working groups and future consultation.		
B.1	Biodiversity	Fact Sheet - Our approach to Nature	There is very little information within the document other than the fact that ecological records have been acquired, ecological surveys are underway, and that the project is committed to a 10% net gain in biodiversity. The Council welcomes the commitment to a 10% net gain as a mandatory requirement for 10% net gain for Nationally Important Infrastructure Projects is not likely to become law until late in 2025. However, locally all infrastructure projects have been encouraged, and many are delivering 20% net gain. The Council would encourage EWR to do the same and leave a lasting positive impact to the biodiversity in the area.	Increase the minimum biodiversity net gain target to 20% to match all recent infrastructure projects within South Cambridgeshire District and Cambridge City Council areas.
B.2	Biodiversity	Environment Update Report	<u>Section 4.5.12 – Nature-focused surveys</u> The document states that the project has undertaken approximately 4500 ecological surveys since 2020; although, it does not qualify which section(s) of the route this relates to. The Council would expect the data presented within and supporting the EIA process to be up to date, relevant and complete. If there are ecological features that have been under surveyed (e.g., reduced number of bat surveys) the reasons why this has happened should be clearly explained, and sufficient adjustments made to the analysis to account for this. Incomplete survey data could be used as reason for objection/refusal if unqualified.	Provide sufficient data and analysis of all ecological constraints. All data should be collected using the latest best practice guidance.
B.3	Biodiversity	Environment Update Report	<u>Section 12 - Cambridge</u> The new train turnback facility along the Newmarket Line will pass through the centre of Coldham's Common County Wildlife Site. The site is designated due to both the neutral grassland indicator species and its mosaic of habitats including grassland, woodland, and scrub. The railway embankment is included within the County Wildlife Site boundary and contains woodland and scrub. There is no indication of what working corridor will be required to facilitate the re-instatement of the second line and electrification of the line through the County Wildlife Site, nor if there will be a permanent loss of vegetation along the embankment, or what measures will be taken to regenerate habitats once works are complete. Given the status of Coldham's Common as a County Wildlife Site - its public accessibility - works in this area are likely to be controversial if not properly assessed or mitigated.	Provide sufficient data and analysis of all ecological constraints. All data should be collected using the latest best practice guidance.

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B.4	Biodiversity	Environment Update Report	<u>Section 12 – Cambridge</u> A replacement bridge at Long Road, new lines, and electrification will be added to the stretch of existing railway north of the new Cambridge South station towards Cambridge station. This will pass adjacent to the Triangle North of Long Road County Wildlife Site, designated for a rare vascular plant *Torilis arvensis*. Assessment of potential impact to the County Wildlife Site and its key features will need to be included within and analysis, and suitable mitigation provided.	Provide sufficient data and analysis of all ecological constraints. All data should be collected using the latest best practice guidance.
B.5	Biodiversity	Environment Update Report	<u>Section 13.5 - Combined impacts and effects</u> The Council welcome EWR Co.'s commitment to undertake and Habitats Regulations Assessment (HRA) and understand the ecological impacts of the project on the wider ecological environment. All assessments must follow best practice guidance, and if a deviation is unavoidable, then a clear explanation of why methods have deviated, and explanation of how they are accounted for within the analysis. EWR Co.'s commitment to follow the forthcoming guidance on Biodiversity Net Gain (BNG) and NSIP developments is welcomed. All on and offsite BNG habitat creation and enhancement should be secured through a S106 with the relevant authority. The Council would also point the developer to the Greater Cambridge Biodiversity Supplementary Planning Document which looks for larger developments, such as EWR, to aim for 20% net gain.	Provide sufficient data and analysis of all ecological constraints. All data should be collected using the latest best practice guidance.
CC.1	Climate and carbon	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 been installed, with the Environmental Update Report noting that this may be until all construction through to Cambridge has been completed. The Council considers it important that a fixed end date for the use of diesel trains, both passenger and freight, is committed to, in order to ensure that EWR is consistent with the requirements of the Climate Change Act and Department for Transport's (DfT) own commitments to end diesel only trains on the rail network.	Outline and quantify how and when the use of diesel for freight and passenger services will reduce carbon emissions and meet the DfT commitments.
CC.1	Climate and carbon	Environmental Update Report	<u>Section 13.2 – Carbon</u> 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, the Council 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 Council 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.	Provide further detail on the assessment of carbon as part of the construction and operational phases of the proposed development, along with mitigation measures.
CC.2	Climate and carbon	Environmental Update Report	It will be important to understand how the wider climate impacts will be considered as part of the Environment Statement, 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.	Provide further information on how climate resilience and climate impacts beyond just flood risk is being factored into the Environmental Statement.
CC.3	Climate and carbon	Environmental Update Report	Water scarcity is a considerable issue facing the region, 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.	Consider water resource demand generated by both the construction and operational phases of EWR as part of the ES and identify appropriate mitigation measures.
CC.2	Climate and Carbon	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 north of Cambridge. Work is currently underway to develop a Local Area Energy Plan (LAEP) for Cambridgeshire. As part of this work, it will be important to ensure that the electricity infrastructure requirements of EWR are factored into the growth scenarios that the LAEP will look to support.	EWR Co. to engage in the development of the LAEP and share relevant data with the Council to ensure that the power requirements of the project are considered as part of the wider transition of energy infrastructure across Cambridgeshire to support net zero carbon.

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C.1	Communities (Strategic Sites)	Technical Report	Section 13.3 – North of Cambridge station The EWR proposals north of the Fen Road level crossing are very close to the major development area at North East Cambridge, which lies west of the Cambridge to Ely line and may even encroach on some areas development sites (e.g., the North East Cambridge proposals include a foot/cycle bridge over the railway line landing in the middle of the proposed EWR sub-station (Milton Feeder station). The impacts of the EWR proposals on the proposed NEC development needs to be fully assessed and mitigated, and the Council would like to explore whether the proposals can be delivered together. *See figures 10 and 30 of the Proposed Submission North East Cambridge Area Action Plan, Regulation 19 (November 2021).*	Early discussions with the Council to establish the relationship of proposals to the development site, and opportunities for coordinated delivery of infrastructure
C.2	Communities	Technical Report	Section 13.3 – North of Cambridge station Clarification needed on whether the proposed replacement for two train sidings from Cambridge Station will be re-provided at Chesterton Sidings at Cambridge North station, and whether this will increase the barrier downtime at Fen Road level crossing (note: the use of the level crossing is already a point of concern, having a negative impact on the communities living and working in the area, as Fen Road is the only means of access). The works proposed at Cambridge North station lie partly within the North East Cambridge Area Action Plan (NECAAP) area. This area is being replanned and include proposals to improve wider connectivity with a potential new pedestrian and cycle bridge over the railway from the Anglian Waste Water Treatment site to Chesterton Fen. It will need to be understood how the railway works in this area could impact on the deliverability of this bridge or could potentially help deliver this ambition.	Early discussions with the Council are required.
C.3	Communities	Technical Report	Section 13.4 – East of Cambridge The Council notes that the EWR proposals include reconstruction of two pedestrian bridges at Coldham's Common and The Tins and identify the possibility of a train turnback siding area at Cherry Hinton. Comprehensive development is planned at Cambridge East with initial phases at Marleigh and Springstead village already under construction, and Marshalls' relocation of Cambridge Airport operations enabling comprehensive redevelopment of the airport site. (refer to: Policy SS/3 of the Adopted South Cambridgeshire Local Plan 2018; Policy 13 of the Adopted Cambridge Local Plan 2018; Adopted Cambridge East Area Action Plan; and Policy S/CE of the emerging Greater Cambridge Local Plan). The Council requests that all opportunities are taken by EWR Co. to improve active travel connectivity in the area of Cambridge East, noting that the rail line forms a significant barrier to travel between this area and the city centre; as such the Council suggests the opportunity should be taken to upgrade the pedestrian bridges at Coldham's Common and The Tins to accommodate cycles. Further to this, with regard to the possibility of a train turnback siding area at Cherry Hinton, the Council is keen to explore with EWR Co. and local partners the potential for a new station in the vicinity of Cambridge East, which could have a potentially transformative impact on connectivity to and from this area of the city. Any turn back at Cherry Hinton should also be future proofed so as not to preclude enhancement of the rail line east of Cambridge, which could further enable sustainable travel to and from the city.	
CON.1	Consultation approach	Factsheets: Accessibility and Equalities Consultation process in general	People with English as a second language are not listed as a group around accessibility – a higher proportion are present in Cambridge due to city's population churn and tourists. Another example would be setting out how the consultation will engage with Gypsy, Roma and Traveller communities at Fen Road – some communities may not be comfortable with the venues and locations suggested for public consultation.	EWR Co. to share the Equality Impact Assessment and regularly update it throughout the consultation period. Consult well with the local voluntary and community sectors and with equalities groups. Obtain specialist advice on best practice and about asking these communities how they would like to receive information.
CON.2	Consultation approach	Route Sections	Route section plans (plan and profile drawings) are not easily read or interpretated given that a 'north-up' approach is not applied.	Provide alternative plans to ensure ease of readability.

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CL.1	Contaminated land	Environment Update Report Technical Report	Contaminated land (including the re-use of site-won soils) has been included as topic areas in these initial high-level reports and further details have been promised in the forthcoming Preliminary Environmental Information Report and, eventually, in the Environmental Statement. This early recognition and commitment to the gradual increase in the level of detail is welcomed.	No mitigation recommendations at this stage. The submission of further details at the next stage of consultation is welcomed and will allow for the Council to provide further comments.
CL.1	Contaminated land	Environment Update Report Technical Report	The Coldham's Lane proposed construction compound is on or near an active landfill site which we understand is licensed by the Environment Agency (EA). There may be land stability and unintended groundwater contamination issues which falls to the responsibility of the Environment Agency.	EWR Co. to contact the Environment Agency for feedback on the proposed location of the Coldham's Lane main construction compound.
D.1	Design	All consultation material	More details in relation to the proposed buildings and the route structure should be provided at this stage to better understand the development context and make more practical judgment on the likely impacts. Such early analyses and assessments will inform the design of these buildings and frame the created spaces.	EWR Co. to share design work on the various structures proposed and their likely impact and potential mitigation.
D.2	Design	All consultation material	EWR will have significant short and long-term impact on the existing context and emerging projects. Therefore, temporary and permanent realignment for main routes and construction work should give thought to how these routes are currently used by local people and the emerging strategic routes (e.g., C2C and CSET) and their delivery timeframe. This is essential to offer suitable alternatives for residents and avoid any conflicts with the timeframes of other projects.	EWR Co. to share an assessment of impacts with the Council at the earliest opportunity. A detailed phasing programme against which local stakeholders including the District Council's are able to input will be required to minimise disruption to existing projects and to communities and livelihoods especially during the construction phase.
D.3	Design	All consultation material	Cambridge station – building design Cambridge station building is a listed building and located in a sensitive location. The proposed extension and added building should consider the proposal impact upon the existing network and the immediate and wider contexts. There is very little information within the document in relation to the proposed new building sizes and the offered facilities within it and who is expected to benefit from them. The needed facilities for the increased number of passengers and their different ways of accessing the station should be further studied, make allowances for the possible emerging ways of transportation. There is a need for an adaptable approach in building design and this should be based on an understanding of the site sensitivity in historic terms.	Detailed design work to the station should be shared with the Council prior to statutory consultation.
D.4	Design	Technical Report	Section 14.7.4 - Artificial lighting Light pollution and human impacts of any artificial lighting levels off site including through the construction phases 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)'. Additionally, ILP's 'PLG04 – Guidance on undertaking environmental lighting impact assessments (2013)' may also be relevant to the EIA. This document outlines good practice in lighting design and provides practical guidance on production and assessment of artificial lighting impacts within new developments.	EWR Co. to share further design details and an assessment of impacts with the Council at the earliest opportunity.
DD.1	Door to door connectivity	Technical Report	Section 3.7 – Approach to door-to-door connectivity in design development It is noted that EWR Co. are developing route-wide Door to Door Connectivity proposals. The Council would expect provision of a comprehensive network of sustainable travel routes to surrounding communities to be developed and appropriately funded. These routes should be designed to a high quality standard reflecting LTN1/20 and the higher propensity to cycle in Cambridge.	EWR Co. to engage with the Council to develop a comprehensive network sustainable travel routes and design specification.
DD.2	Door to door connectivity	Technical Report	Section 13.2 - Cambridge Station (eastern access) The Council supports the further exploration of a new eastern entrance at Cambridge station to improve access for existing and future residents to leisure activities, education, and employment opportunities. Integration with Cambridge Station from the east of the railway is currently limited to the existing Carter Bridge. The EWR proposals should have regard to policies in the adopted and emerging local plans for this area which support the continued and complete regeneration of vibrant, mixed-use areas of the city, centred around and accessible to a high quality and improved transport interchange (see Policies 21 and 25 of Cambridge Local Plan (2018); and Policy S/OA of the emerging Greater Cambridge	Consider an additional pedestrian / cycle crossing to connect Clifton Road, Cambridge. Include design ideas in future consultation and establish a means of collaborative engagement between relevant host authorities.

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			Local Plan). The Council suggests that additional connectivity should be provided further to the south, in the vicinity of Clifton Road, to provide better connectivity to the business and leisure uses within this area, avoiding a circuitous route via Hills Road bridge.	
DD.3	Door to door connectivity	Factsheets: Accessibility and Equalities Consultation process in general	Train capacity Consideration to be given to the capacity to carry bicycles onboard the trains – many people undertake onward commuting journeys – Cambridge has very high proportion of cyclists, as does Oxford – it is therefore reasonable to expect people to bring their bikes with them. Will there be additional cycle storage capacity provided at Cambridge station with the addition of the new platform?	Share the detail plans for the development of new cycling storage and facilities at Cambridge South station and expansion at the main Cambridge station for these facilities and check capacity.
DD.4	Door to door connectivity	Factsheets: Accessibility and Equalities Consultation process in general	Disability is mentioned in the accessibility fact sheet, but it is not clear how or who is involved in the consultation and what accommodations are being made for those who don't have digital access or can't get to the public consultations. It is not clear in the publicity whether the buildings being used for meetings are accessible.	EWR Co. to share the Equality Impact Assessment and regularly update it throughout the consultation period. Consult well with the local voluntary and community sectors and with equalities groups. Obtain specialist advice on best practice and about asking these communities how they would like to receive information.
HW.1	Health and Wellbeing (CCC)	Factsheets: Accessibility and Equalities Consultation process in general	Young people and transport hubs Station development should ensure interconnected travel and 'door-to-door' connectivity with regards to the needs of young commuters from outside Cambridge in particular. Cambridge has a high proportion of young people who commute to college and school from outside of the city boundary. Care should be taken to think of their needs for their daily commute and onwards travel/ travel connections, especially as young people are more likely to need to catch a bus or cycle to get to their destination during school hours.	Consideration to be given to the recent Youth Strategy by Cambridge City Council which outlines the key issues and sets out a plan of engagement with young people. Consideration should be given to the Cambridge South station area to understand the current flow of students across the city at peak hours. Engaging with local colleges and schools near new developments is essential.
HW.2	Health and Wellbeing (CCC)	Factsheets: Accessibility and Equalities Consultation process in general	Walking, cycling, and using public transport can boost physical and mental health, reduce chronic disease risk, and lowers air pollution. Planning cycle and footpaths, and creating green corridors, should be prioritised for a healthier lifestyle and cleaner environment. Illustrating how the project interacts with existing infrastructure will assist communities in understanding the relationship between the railway and sustainable travel options in their area.	Further evidence about how the project can contribute to the uptake of sustainable travel during its development and implementation by utilising the Health Impact Assessment (HIA) process is required.
HW.3	Health and Wellbeing (CCC)	Factsheets: Accessibility and Equalities Consultation process in general	The factsheets overlooked women's specific safety and accessibility needs, missing a chance to improve their travel experience. Future consultations should actively engage women and focus on human-centric design. Women are one of the largest groups of public transport users, who face well-known barriers such as station lighting, safe night-time use of public transport, and public toilet provision.	Future consultations should make significant efforts to engage women as a user group and to fully adhere to the mission of human-centric design.
H.1	Heritage	Factsheet: Approach to the Historic Environment	The factsheet states that EWR have begun the process of collating survey and archive work to understand the impacts of the proposals on the historic environment and design ways to reduce or remove impacts. The Council has not seen any detailed information on this work relating to the built heritage and so it is difficult to assess the impacts fully at this stage.	EWR Co. to share the built historic environment data and assessment of impacts with the Council at the earliest opportunity.
H.2	Heritage	Technical Report	Chapter 4 outlines the assessment factors used to inform the design development of specific elements of the project. A table is provided with Environment and Society at No 14 however there is no mention of the historic environment in the definition. Maintenance, train depots and staff facilities are proposed at intervals along the line. Potential locations for Infrastructure maintenance depots are identified at 14.6.3 with a number on the Harston to Cambridge South section of the route which has several sensitive heritage receptors. The line will be continuously fenced with the fences varying depending on whether the railway is on an embankment, cutting or at grade. Vegetation is being planned to screen the various earthworks, but the type and impact of any landscape mitigation is not detailed as the plans are still progressing. These elements are potentially harmful to the historic landscape and views and detailed information and assessment of harm from certain mitigation measures will be required. There are potential heritage impacts with the construction of the railway in terms of location and size of borrow pits, earth	EWR Co. to highlight how preserving the historic environment has informed the project. Details of the impacts and proposed mitigation to be discussed in detail adn developed with the Councils and included in the EIA Detailed design of these elements to be included in the EIA.

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			stockpiles and construction compounds. Compounds will need to be fenced and lit and assessment of these and their likely impacts/mitigation will be required in the EIA. Access roads and lighting associated with the long-term construction process also need to be assessed in relation to heritage.	
H.3	Heritage	Environmental Update Report	New footbridges, viaducts, overbridges etc. EWR state that the form and shape will be designed to maximise opportunities for standardisation and reduce cost and yet at the same time it also states that the form has considered the surrounding environment and cultural context to reduce visual intrusion. EWR recognise that several structures will be very prominent or pass through areas of visual or cultural interest and that further architectural work will be undertaken, and details provided at statutory consultation. It is vital that these highly prominent structures are not a standard product based simply on cost issues. The proposed works to Cambridge station include a new platform to the east of the station, extension of two existing platforms, new footbridges, and extension of an existing footbridge There would be modifications within the existing station building to improve user access and the station concourse would be upgraded. Other changes include extending the existing footbridge to serve the new platform 9, relocating staff areas for train crew and other operators, and building two new footbridges for passenger use and emergency evacuation. EWR state that any changes to the Grade II listed station building will require a full understanding of the station's architectural importance and history, with sympathetic designs being developed that reflect and respect this importance. The Council will need sight of this assessment and sympathetic designs at an early opportunity.	EWR to share design work on the various structures proposed and their likely impact and potential mitigation. Early engagement with the District Councils to identify key new structures and the design approach to them is required. Full assessment of the likely impacts on existing heritage assets and appropriate mitigation need to be explored with the District Council and included in the EIA. Detailed design work to the station should be shared with the Council prior to the statutory consultation.
L.1	Landscape and visual impacts	Environmental Update Report (EUR) Plan & Profile Drawings	<u>Section 4.4.5 - Cumulative impacts</u> Detailed information on the Greater Cambridge Partnership (GCP) transport projects which are close to the proposed rail corridor is missing. The Cambourne to Cambridge busway, CSET, Sawston Greenway, Fulbourn Greenway, Cambridge eastern access and Haslingfield Greenway are all likely to be affected. New planting, drainage and mitigation implemented as part of the GCP projects should be protected and retained.	Detailed information to be added to the Environmental Report/EIA and to plans.
L.2	Landscape and visual impacts	Environmental Update Report (EUR) Plan & Profile Drawings	<u>Section 4.4 - Cumulative impacts</u> Cumulative effects of other rail projects i.e. Cambridge South station must be included. The construction of the new station and addition of new tracks impacts on Hobsons Park, the biomedical campus and the areas south of the new station. New planting, drainage and mitigation implemented as part of the Cambridge South project should be protected and retained.	Detailed information on all adjacent or connected projects and developments to be added to the Environmental Report/EIA and to plans.
L.3	Landscape and visual impacts	Technical Report Plan & Profile Drawings	<u>Section 5.4.8</u> This section lists other Network Rail projects and transport projects that interface with EWR – "various large residential and employment developments" are mentioned but no detail on which developments.	Detailed information on all adjacent or connected projects and developments to be added to the Environmental Report/EIA and to plans.
L.4	Landscape and visual impacts	Environmental Update Report (EUR) Plan & Profile Drawings	<u>EUR Section 4.5 - Defining the environmental baseline</u> Information on existing trees, hedgerows and trees with Tree Preservation Orders (TPO) is missing and must be added as part of defining the baseline.	Detailed information on existing trees, trees with TPO's, tree removal and retention and compensatory planting must be provided. This should be developed in partnership with the Councils and local communities.
L.5	Landscape and visual impacts	Technical Report Plan & Profile Drawings	<u>Technical Report Section 3.82 - Rail systems</u> The rail systems will impact on the landscape and more detail is required to appropriately assess impacts (e.g., heights and materials of overhead lines and gantries (figure 5); heights and materials of fencing (para 3.8.2.7); and lineside equipment and drainage (para 3.8.2.7)). The response to and mitigation of such impacts also needs to be discussed in detail with the Council along the route so that an optimised outcome is developed for the final design.	Full details of rail systems to be provided and integrated with the design and landscape mitigation.

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L.6	Landscape and visual impacts	Technical Report Plan & Profile Drawings	<u>Technical Report Section 3.82 - Rail systems</u> <u>Technical Report Section 3.8.3.2 - Structures</u> The new railway will include construction of numerous structures, such as road bridges, retaining walls, tunnels and foot bridges. The structures are noted on the plans, but no levels or sections have been provided and there is no information on materials, design strategy and accessibility.	The Design of all new structures should be discussed with the Council prior to a final design solution being fixed. Full details of the design strategy for structures are required and full details of all structures are required including heights and materials.
L.7	Landscape and visual impacts	Technical Report Plan & Profile Drawings	<u>Cambridge South station</u> Full details of the Cambridge South station and associated landscape works including areas of planned reinstatement and restoration post construction should be added to the drawings to demonstrate any overlap between the projects and show how they are coordinated in terms of finished landscape works, impacts on Hobsons Park and CBC.	More details required including information to show adjacent transport projects and other developments which may be impacted or impact on the proposed rail corridor.
L.8	Landscape and visual impacts	Technical Report Plan & Profile Drawings	<u>Long Road replacement bridge</u> Further detail is required of the proposals for the Long Road bridge replacement including details of the impacts on trees, existing and proposed levels.	More details required including information to show adjacent transport projects and other developments which may be impacted or impact on the proposed rail corridor.
L.9	Landscape and visual impacts	Technical Report Plan & Profile Drawings	<u>Cambridge station</u> More detail is required to show the proposals for the station and how it will accommodate additional passengers. This should include any planned extensions to buildings on both sides of the railway, existing and planned entrances and access routes, proposed footbridges and lighting, cycle storage. Temporary works during construction must be planned and designed so as not to cause damage to the existing hard and soft landscape in and around Station Square.	More details required including information to show adjacent transport projects and other developments which may be impacted or impact on the proposed rail corridor.
L.10	Landscape and visual impacts	Technical Report Plan & Profile Drawings	<u>North of Cambridge station</u> The railway passes through residential areas and Coldham's Common and acoustic fencing is shown alongside the railway edge in various locations. More detail required on the heights and types of acoustic fencing and sections are required to show how it relates to existing and proposed ground levels and heights of neighbouring boundary treatments and existing planting.	More details required including information on the appearance and visual design of acoustic fences to show existing buildings/levels and consented projects which may be impacted or impact on the proposed rail corridor.
L.11	Landscape and visual impacts	Technical Report Plan & Profile Drawings	<u>Cambridge North station</u> Full details required of the Milton Railway feeder station including height and materials and impacts on views from the surrounding landscape. The site boundary includes the northern ramped approach to the cycle/pedestrian bridge over the Cam. Clarification of any works proposed here are required because this is a heavily used route.	Discussion with the Council and more details required including information to show existing properties and other developments which may be impacted or impact on the proposed rail corridor.
MW.1	Minerals and waste	The Council is not the statutory consultee for this subject area. EWR are expected to consult Cambridgeshire County Council on this matter regarding the proposal (the site and any associated infrastructure that falls within Cambridgeshire County Council's administrative boundary. The Council would defer to Cambridgeshire County Council for a detailed response. However, the Council reserve the right to comment on this subject through technical working groups and future consultation.		
NV.1	Noise and vibration (CCC)	General Requirements - Sound, noise and vibration	EWR Co. state that the assessment of noise and vibration arising from EWR proposals will be based on accepted standards and guidelines to identify significant effects. The potential for significant effects will be considered in terms of disturbance to building occupants, disruption of activities within receptors (such as laboratories – sensitive equipment) and the onset of cosmetic or structural damage to buildings or sensitive structures. Appropriate thresholds and criteria will be adopted. This approach is welcomed.	The detailed sound, noise and vibration impact, effect and significance criteria to be used should be agreed as early as possible with the Council.
NV.2	Noise and vibration (CCC)	General Requirements - Sound, noise and vibration	The EIA should consider specifically the ground-borne sound, noise and vibration, and airborne sound and noise impacts/effects, associated with the construction and operation of the proposed scheme on the health and quality of life/amenity of all sound sensitive receptors. <u>Ground-borne</u> It is agreed that ground-borne vibration created by either construction activities (such as piling and tunnelling) or operational train services may arise. Vibrations have the potential to travel through the ground to nearby buildings where it may result in the vibration of building elements floors, walls and ceilings. Low-frequency vibration, ranging in 2 and 80 Hz, can be perceived as a feelable "whole body" vibration (vibration felt human impact element) and which may also be heard as a low frequency "rumbling" sound / noise (heard / aural human	The detailed sound, noise and vibration impact, effect and significance criteria to be used should be agreed as early as possible with the Council. The baseline data gathering should be comprised of objective data that describes the existing ambient / background sound and noise environment, but also information on the local sound environment, including indicators of its soundscape. Realtime baseline sound, noise and vibration monitoring locations should be agreed as early as possible.

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			impact element) called ground-borne sound / noise). Both of these should be assessed. <u>Airborne sound and noise</u> *Direct operational sources:* During operation, airborne sound would be generated by numerous sources: • trains (engine noise, wheel/rail interaction noise, and brake sounds) • power/traction/ auxiliary noise at lower speeds and general rolling noise (aerodynamic if applicable probably unlikely, and wheel track/railhead noise, level crossings, train horns, whistle boards) • other (fixed) sources such as: line side equipment/plant; track/crossing alarms, electricity substations, ventilation shafts (if applicable); maintenance or stabling depots/sidings, passing loops, turnaround locations (Cherry Hinton and Fen Road) and stations (new or existing upgraded with extended and or new platforms [e.g., Cambridge Central and Public Address (PA) systems]). • wheel squeal from tight curves, impact noise from open joints, etc. <u>Indirect: Current road and rail networks</u> The proposed scheme may also cause changes in existing local road and rail traffic flow on the current road and rail networks which should also be considered in terms of sound, noise and vibration impacts/effects. <u>Baseline noise and vibration monitoring</u> Baseline monitoring should be gathered at locations where significant effects are likely at noise sensitive receptors. This may be initially screened by a 'desktop' baseline to identified highly sensitive locations that require real time baseline noise and vibration monitoring.	
NV.3	Noise and vibration (CCC)	Fact Sheet- Construction management	A draft overarching Code of Construction Practice (CoCP) is to be developed by EWR Co. and submitted as part of the DCO application. During construction, it is acknowledged that airborne sound would be generated by construction activities such as demolition, roadworks or earthworks, where machinery and breaking of hard surfaces is involved. Additional noise sources include equipment/plant, construction worksites/compounds, construction vehicles on haul routes and local roads, and changes to local road traffic flows during construction. The draft CoCP should also set out a range of sound, noise and vibration mitigation measures and principles which contractors would be required to follow when building the project, including engaging with stakeholders and the community through regular meetings. The proposed overarching CoCOP is welcomed and the best practical means to mitigate and minimise noise and vibration impacts/effects should be used at all times. It is stated that examples of the types of measures that may be included in the draft CoCP are: • Controls on working hours • Wherever possible, selection and location of machinery and haul roads away from areas where they could cause disturbance • Controlling noise at source, or use of noise barriers • Monitoring noise and vibration to enable corrective measures where necessary	The content of the proposed CoCP should be agreed in advance and in liaison with the Council as early as possible. Additionally, specific (local) construction impacts should be assessed along the proposal in accordance with the CoCP. This is to account for the fact that sensitive receptors and their spatial locations will vary and differ from section to section as will construction methods / techniques, compounds and haul routes etc. The terminology and approach for such section specific (local) construction impact assessments should be confirmed and agreed with the Council (e.g., Local Construction Management Plans or similar wording).
NV.4	Noise and vibration (CCC)	Fact Sheet - Our approach to noise and vibration / Mitigating construction noise and vibration impacts	EWR Co. state that they are committed to working hard to mitigate and manage potential noise and vibration impacts and minimise the risk of disruption for people during both construction and operation of the railway. Based on early assessment work on potential noise and vibration impacts, EWR Co. has identified the areas where noise mitigation may be required along the railway. More detail on this is presented in the Consultation Document, Technical Report and Environmental Update Report. More detailed preliminary results of the assessment work will be included in the Preliminary Environmental Information Report that will be published at the statutory consultation stage. <u>Mitigating construction noise and vibration impacts</u> EWR state that the Code of Construction Practice (CoCP) will include where appropriate the following:	The construction mitigation measures, and approach detailed is considered acceptable. However, the CoCP mitigation measures for construction noise and vibration impacts outlined in this Fact Sheet appear slightly different and in addition to those mentioned in the '*Fact Sheet- Construction management / Approach to the management of construction ONLY'.* All should be consolidated into one single CoCP. **Operational mitigation offsite** In terms of reference to noise insulation measures (at receptors) in line with the relevant Noise Insulation Regulations (Noise Insulation Regulations (Railways and Other

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			• Construction methods – The selection of quieter or lower vibration construction methods and equipment. • On-site mitigation – Use of temporary acoustic screening. • Programming of works – Scheduling of noisier works for less sensitive times of day. • Off-site manufacturing – The manufacture of components off-site before installation, where possible. • Off-site mitigation – Implementation of a noise insulation and temporary rehousing for those that qualify under the guidance laid out in British Standard (BS) 5228:2009+A1:2014 - Code of practice for noise and vibration control on construction and open sites – Part 1: Noise & 2: Vibration <u>Mitigating operational noise and vibration impacts</u> EWR state that there are several design and other considerations that would have a bearing on operational noise and vibration from the project. These include: • Low-impact route alignment **–** seeking to develop a railway that avoids tight corners and gradients as far as reasonably practicable, to help to minimise noise impacts during operation. Also aiming to keep the track low in the landscape where possible to help reduce the spread of noise. • Screening – in areas where further noise reduction is needed, physical screening proposed using the landscape, earthworks or acoustic barriers. • Track design – the design of the track itself and the alignment and level of the railway affect the characteristics of noise and vibration from passing trains. Measures that use mass, stiffness and damping within the track components can be applied to mitigate the noise and vibration emissions from the tracks. • Train fleet – the procurement of railway vehicles would be informed by several factors, including noise and vibration. • Structure design – seeking to reduce noise (as well as other negative impacts such as light pollution) in the way they locate and design new structures that either give rise to noise and vibration or otherwise affect its transmission. This would include EWR facilities, such as stations, realigned roads and other structures. Noise insulation – where other forms of mitigation (operational at source) have been considered but noise disturbance above trigger levels remains, EWR will provide noise insulation measures (at receptors) in line with the relevant Noise Insulation Regulations (Noise Insulation Regulations (Railways and Other Guided Transport Systems) 1996).	Guided Transport Systems) 1996) it is assumed this will include consideration of the following: *Compensation and insulation:* The Council understands that if certain criteria are met for new or additional works to a railway system, the promoter of the scheme can offer secondary glazing and alternative ventilation for habitable rooms of dwellings so affected. In addition, Part 1 of the Land Compensation Act provides for monetary compensation to those homeowners affected by the new or altered railway recognising any loss in value of the home that has occurred by the opening of the new or improved railway. This assessment is purely subjective, carried out by surveyors, and claims have to be made within a certain time period. Further information on this should be provided. It is also the Council's understanding that the Noise Insulation Regulations referred to consider airborne noise threshold / tigger levels based on the movement of trains / rolling stock using, or expected to use, initial works, additional works or altered works, as the case may be, by use of the method of calculation specified in a technical memorandum entitled '*Calculation of Railway Noise (1995)'*. The Council's view is that the Noise Insulation Regulations 1996, as referred to consider airborne noise threshold / tigger levels based on quite dated research and older guidance on health / quality of life and similar impacts. The following should also be referred to: • BS8233: 2014 – '*Guidance on sound insulation and noise reduction for buildings'* – to be considered in relation to suitable noise levels in internal habitable rooms and outdoor amenity areas. • World Health Organisation noise guidelines: (WHO) '*Environmental Noise Guidelines for the European Region* (2018)', which complement the *"Night Noise Guidelines"* (WHO-2009) and supersede the outdoor noise recommendations from *"Guidelines for Community Noise"* (WHO- 1999) although the 1999 guidelines for internal noise remain valid. • *BS 4142:2019 – Methods for rating and assessing industrial and commercial sound* - for separate fixed / standalone potential sources of noise such as fixed plant / equipment then it is assumed that will be used. • Local Environmental Health requirements relating to construction / demolition and operational artificial lighting, contaminated land, noise / sound, air quality impact assessment and mitigation as required, shall be in accordance with the scope, methodologies of relevant sections of the *'Greater Cambridge Sustainable Design and Construction Supplementary Planning Document, (Adopted January 2020)'* https://www.cambridge.gov.uk/greater-cambridge-sustainable-design-and-construction-spd and in particular section 3.6 - Pollution (pages 76-144) and the following associated appendices: 8: Further technical

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				guidance related to noise pollution (pages 230-256). • Due regard should also be given to relevant and current up to date Government / national and industry British Standards, Codes of Practice and best practice technical guidance.
NV.5	Noise and vibration (CCC)	Fact Sheet- Our approach to freight	It is stated that within EWR current proposals, and without additional investment beyond the project, EWR would allow for up to two new freight services per day in each direction from Felixstowe via Cambridge through to Oxford and beyond. Also noted that there may be opportunities for other construction or aggregates traffic to run as well as freight. Although not specifically mentioned in other noise / vibration fact sheets, the potential noise and vibration impact of these new / additional sources of freight should be assessed – both temporary (construction) and long term (operational), including hours of use.	Potential impacts to be assessed, and EWR Co. to establish engagement with the Council.
NV.6	Noise and vibration (CCC)	Fact Sheet - Our approach to the environment	EWR's Environmental Sustainability Strategy is noted, welcomed with the following six pillars: • Natural environment • Carbon • Climate resilience • Historic environment and landscape • Circular economy • People & community We are aware of The Rail Safety and Standards Board (RSSB) which we understand is an independent safety, standards and research body for Great Britain's rail network. They work across Britain's evolving railway to improve safety, efficiency, customer satisfaction and sustainability. RSSB have published a Sustainable Rail Blueprint (November 2023) which we understand is an industry-wide blueprint for realising sustainable rail. (the-sustainable-rail-blueprint.pdf https://www.rssb.co.uk/-/media/Project/RSSB/RssbWebsite/Documents/Public/Public-content/Sustainability/the-sustainable-rail-blueprint.pdf) The Blueprint sets out 11 sustainable rail topics, across emissions, natural environment and social sustainability (listed below) with six common solutions identified as the primary enablers of sustainable rail, as follows: Emissions • Net Zero Carbon - Rail A railway that's central to delivering a net zero economy by 2050. • Clean Air - A railway that supports a positive impact on local air quality. • A Quieter Railway - A railway that manages noise and vibration to protect the health and wellbeing of its colleagues, customers and local communities. Natural Environment • Prepared for a Changing Climate - A railway that's resilient to extreme weather and prepared for a changing climate. • A Railway for Nature - A railway that supports a thriving natural environment, for the benefit of people and wildlife. • Zero Waste - A railway that uses resources efficiently and supports a collaborative circular economy. • Protect & Conserve Water - A railway that uses water sustainably and supports improved water quality. Social Sustainability • Maximising Social Value - A railway that's committed to the creation and maximisation of social value. • Rail at the Heart of Communities - A railway that engages and empowers its communities. • Careers, Economy & Sustainable Growth - A rail industry that's resilient and innovative, providing good jobs and supporting sustainable economic development. • People-centred Rail - A railway that's inclusive and accessible, and committed to the wellbeing of colleagues, customers and local communities	Is EWR Co a member of the RSSB and does EWR's Environmental Sustainability Strategy generally align with RSSB's Sustainable Rail Blueprint? Have EWR sought advice from and has the project been endorsed by RSSB?
NV.7	Noise and vibration	Environmental Update Report	Addenbrookes to Long Road bridge	Mitigation to be assessed, and EWR Co. to establish engagement with the Council.

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			The submissions states that North from Addenbrooke's Road the project would pass the medical facilities of Addenbrooke's and Royal Papworth hospitals, as well as school (St Marys School Playing Field CB2 8PS, college (Long Road Sixth Form College -CB2 8PX) and various commercial facilities. The biomedical campus accommodates vibration-sensitive facilities, including the Microbiological Research Centre laboratory and the Ann McLaren Building. It is stated that the noise and vibration impacts of trains passing these facilities is an important focus of ongoing assessment.	
NV.8	Noise and vibration	Environmental Update Report	It is not clear why Scholars Court is the only noise sensitive residential type premises 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 Rd bridge and around Cambridge Central Station. These include but are not limited certain address points within the following streets: • Homerton Gardens • Purbeck Road • Homerton Street • Glenalmond Avenue • Glenalmond Avenue • Station Place • Rustat Avenue • William Smith Close • Swanns Terrace	Mitigation to be assessed, and EWR Co. to establish engagement with the Council.
NV.8	Noise and vibration	Environmental Update Report	<u>Cherry Hinton turnback</u> The Council are concerned about the proximity of the proposed Cherry Hinton turnback to nearby residential areas, with housing on both sides of the existing railway track and the proposed turnback location, in the following street locations: • Railway Street, Cherry Hinton • High Street, Cherry Hinton • Chartfield Road, Cherry Hinton These properties are likely to currently experience infrequent train movements at very low speeds, therefore any current operational railway noise is likely to be very low level.	Mitigation to be assessed, and EWR Co. to engage with the Council on the potential impacts and mitigation approach.
NV.9	Noise and vibration	Route Sections	It is noted large lengths of "noise mitigation (indicative)" are annotated on the submitted route plans and profile drawings as a thin purple line. However, no information is currently given as to the types/height/length construction or expected levels of attenuation / acoustic performance have been provided.	More detail required.
NV.10	Noise and vibration	Environmental Update Report	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. However, we note that it is stated that the EWR proposals will comply with the Noise Policy Statement for England. This policy aims to not only avoiding significant adverse impacts on health and quality of life but also the mitigation and minimization of adverse impacts on health and quality of life and where possible, contribute to the improvement of health and quality of life.	Impact assessments should be carried out for both construction and operational impacts for all the additional noise sensitive locations identified above. This list is by no means exhaustive and there may be other noise sensitive premises both residential and educational or similar.
NV.11	Noise and vibration	Environmental Update Report	<u>Cambridge station current noise - new train reception, parking / stabling and carriage servicing sidings / platforms</u> 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. It is understood these sidings / platforms are considered permitted development and did not require any planning permission. Since commencement of operation, the City Council Env Health service has received a number of noise complaints (at least nine to date) from residents living in the in apartments / flats on Rustat Avenue (Bailey, Lichfield and Adam's House) directly opposite and	EWR to 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.

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			overlooking the railway in this area. The trains and carriages currently park / stable in this area and undergo some servicing during the late evening and night-time period. This has resulted in complaints about idling trains and noise associated with 'high-pitched' / 'buzzing' sounds from electrical plant (continual when present) and from compressors / compressed air systems activating (intermittently throughout the night). Allegedly the noise levels and nature / features of the sound are preventing sleep and or when awoken it is not possible to sleep, especially with external windows open for normal ventilation purposes. The noise complaints are subject to an ongoing statutory noise nuisance investigation. There are also ongoing meetings / discussions with Greater Anglia and Govia Thameslink Railway and consideration of possible management / engineering options to mitigate the noise to acceptable levels. 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 Environmental Statement.	
NV.12	Noise and vibration	Environmental Update Report	<u>Cambridge station current noise - train wash and enclosure (not shown on submitted plans)</u> A relocated / new train wash enclosure has recently been completed immediately to the North of Mill Road on railway land that was previously sidings. The train wash was in the main considered Permitted Development under the planning regime (did not require full permission) so there was limited consideration of noise as a material planning consideration. Therefore, the train wash facility has very few planning related operational noise restrictions or controls. It is understood that it will mainly operate during the late evening (1900 to 2300hrs) and early nighttime (2300 to 0700hrs), hours when trains are out of service, the most noise sensitive time of day. Although noise impacts, as assessed, indicate that unacceptable noise impacts should not arise, noise prediction is not an exact science and therefore, the true / actual impact of the train wash operation is yet to be confirmed / established. 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.	EWR Co. to work closely with Network Rail in relation to this source of noise and reduce potential future adverse noise impacts.
PROW.1	Public Rights of Way (PROW)	The Council is not the statutory consultee for this subject area. EWR are expected to consult Cambridgeshire County Council on this matter regarding the proposal (the site and any associated infrastructure that falls within Cambridgeshire County Council's administrative boundary. The Council would defer to Cambridgeshire County Council for a detailed response. However, the impact of the construction and operation phases on the effective and enjoyable use of the PROW network, and opportunities for enhanced accessibility through the design and thoughtful implementation of the project is a matter of interest to the Council and it therefore reserves the right to comment on this subject through technical working groups and future consultation.		
RW.1	Route wide matters	Environmental Update Report	It is an expectation that all indirect and cumulative impacts of the project are assessed, as well as impact interactions and inter relationships.	
RW.2	Route wide matters	Technical Report	<u>Section 14.3 – EWR Co's approach to freight</u> It is understood that the potential for rail freight is a large part of the economic growth case for EWR. The existing freight proposals appear to be fairly limited, and it is understood that there is significant potential for freight expansion on EWR, but this is currently restricted by capacity constraints along the line such as at Haughley junction near Ipswich and dualling of the line to east of Cambridge, but also to the west and north of the line. The Council would like further information on the constraints to future freight expansion, the level and nature of future the freight activity along the EWR route and to understand whether these have been taken this into account in current mitigation proposals.	More details required.
RW.3	Route wide matters	Technical Report	The project presents an opportunity to explore opportunities for infrastructure that could share the corridor (e.g. digital infrastructure or potable water pipelines). In particular, the Council believes that opportunities for enhancing NMU access between the city and the Countryside alongside the railway should be explored fully.	Further engagement with wider stakeholders needed.
TT.1	Traffic and transport	The Council is not the statutory consultee for this subject area. EWR are expected to consult Cambridgeshire County Council and the Cambridgeshire and Peterborough Combined Authority (CPCA) as Transport Authority. The Council would defer to Cambridgeshire County Council and the CPCA for a detailed response concerning the projects contribution to the delivery of the objectives within the Local Transport and Connectivity Plan. The Growth plans for Greater Cambridge outlined in the emerging Joint Local Plan and the commitments from both Councils to maximise sustainable travel options to achieve sustainable growth objectives means that the Council reserves the right to comment on this subject through technical working groups and future consultation.		

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T.1	Trees	Environmental Update Report Technical Report	Other than an overview of nearby woodlands and pockets of trees potentially being classed as ancient or important in respect to habitat as part of certain sections of the route, overall, there is limited information and data provided regarding trees to reflect the potential impact by the EWR route. This is also reflected in images (figures) as part of the Technical Report not showing complete tree cover, only pockets of woodland or tree groups.	Detailed information on existing trees, trees with TPO's, tree removal and retention and compensatory planting must be provided.
WRFR.1	Water resources and flood risk	The Council is not the statutory consultee for this subject area. EWR are expected to consult Cambridgeshire County Council on this matter regarding the proposal (the site and any associated infrastructure that falls within Cambridgeshire County Council's administrative boundary. The Council would defer to Cambridgeshire County Council for a detailed response. However, the Council reserves the right to comment on this subject through technical working groups and future consultation.		