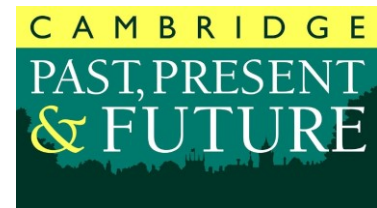


East West Rail Company



By email to:

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09/06/2021

Dear East West Rail

Response to consultation 2021 on route options between Bedford and Cambridge

Cambridge Past, Present & Future is Cambridge's largest civic society. We are a charity run by local people who are passionate about where they live. We operate in the greater Cambridge area and working with our members, supporters and volunteers we:

- Are dedicated to protecting and enhancing the green setting of Cambridge for people and nature.
- Care about Cambridge and are an independent voice for quality of life in the strategic planning of Greater Cambridge.
- Are working to protect, celebrate and improve the important built heritage of the Cambridge area.
- Own and care for green spaces and historic buildings in and around the city for people and nature, including Wandlebury Country Park, Coton Countryside Reserve, Cambridge Leper Chapel & Barnwell Meadows, Bourn Windmill and Hinxton Watermill.

CambridgePPF's area of interest is Cambridge and the surrounding area, for this reason, we have restricted our consideration to the route options east of the A1198. Our charitable aims are concerned with landscape, heritage and ecology and the impact on the amenity of local communities and so our concern is focussed on these. Our response is set out below.

1. Principle of East West Rail

We understand the need to increase capacity to move more people and goods via public transport, to tackle climate change and reduce traffic congestion. As well as East West Rail, proposals to the west of Cambridge have been put forward (or are being delivered) for a new dualled section of the A428, a new bus road and a "metro". Any of these large infrastructure projects will have a negative impact on the landscape, local communities, natural habitats and heritage features – even more so cumulatively.

The COVID pandemic has highlighted that there are other ways of tackling congestion, for example through home/remote working, which have minimal environmental impacts. We believe that the design and business case for East West Rail needs to be re-evaluated in light of potential long-term social changes that will result from the pandemic, as well as central and local governments' evolving policies on decarbonisation, bus franchising, active travel, rail electrification, Levelling Up, spatial planning, housing and the CAM 'metro'.

It is also clear to us that there is not a need for a new road, railway, new metro and new offroad busway in the same corridor all competing for the same travellers. The cumulative impacts of all of them would be significantly damaging for local communities and the environment. There has been a failure of governance for our area which has allowed competing schemes to proceed through different organisations and funding programmes. These schemes should not continue until a single, coherent planning framework has been

agreed for the Oxford–Cambridge Arc and beyond. That will then provide a sound basis for making far-reaching decisions on which scheme(s) should go forward.

CambridgePPF has produced a report setting out the options for travel from Cambourne based on a new rail station being provided. This report can be accessed at <https://www.cambridgeppf.org/Handlers/Download.ashx?IDMF=19b623a9-920d-425e-b8bd-41f2c95dc0fd>

2. Northern Route into Cambridge

We are very disappointed that the community and stakeholders have never been presented with an option for a route into Cambridge from the north. There are clearly pros and cons of both options. We feel strongly that the community should have been given the opportunity to comment on a northern route on the same basis as the southern options - to help inform your decision.

As a result of lobbying, we can see that you have taken the northern option seriously and you have set out the reasons for your decision in a lengthy appendix. Inevitably, at this stage in the process, some of your decisions are based on assumptions, which may, or may not, be accurate. Showing us your workings in an appendix is not the same as openly giving people the opportunity to put forward their own suggestions and questions, which you could then consider.

For example, you have referred to the possible negative impact on the Cambridge Leper Chapel, of which we are guardians. However, the current rail bridge is an ugly example of Victorian engineering which detracts from the setting of the Chapel. The requirement to replace this bridge could result in a positive outcome through a more sensitively designed bridge that would improve the setting of the Chapel.

For example, do EWR trains have to run through Cambridge to the east? If, instead, they terminate at Cambridge South, the operational complexities may be significantly reduced. It may be that some of those services could continue south, replacing or supplementing existing services, to Stansted Airport, Harlow Town, Haverhill (should that be reconnected to the rail network) and London. Through-passengers going East-West would have to interchange at Cambridge station.

We remain of the view that a northern route into Cambridge would, overall, be less detrimental to landscape and ecology and we would like to see a Strategic Environmental Assessment (SEA) of the route options between Bedford and Cambridge, to select the route which is best for the natural environment.

If there are any aspects of the northern alignment, including suggestions in the consultation responses, that have not been fully analysed, we urge EWR to consider whether these call for a re-evaluation of the northern alignment.

3. Biodiversity

We understand that the proposed routes will directly impact some wildlife sites and habitats and the proposed routes will run close to many more, all of which are therefore threatened by the EWR. As yet the work compounds for EWR have not been identified and so their impact is not yet known. It is unclear from the information presented what the indirect impacts would be on designated wildlife sites, for example changes to drainage, water quality, pollution from dust during construction, noise pollution or severance of ecological connectivity. The proposed routes will also have an impact on undesignated wildlife areas such as Westfield Farm at Comberton where the Countryside Restoration Trust has been working for 27 years to increase populations of farmland wildlife.

It is difficult for us, and others, to make judgements on the options that are being presented without understanding what these impacts could be and whether they can be avoided. It is essential that this information is made available as soon as possible.

We would also like to draw your attention to the nature recovery network for the Cambridge area, Cambridge Nature Network, which has recently been launched. As EWR would pass through some of the high priority areas identified as part of the network, we ask EWR to take it into consideration when planning the route and options for habitat creation. Maps of the network and a 137-page report can be found at www.cambridgenaturenetwork.org. In particular, the severance between the West Cambridgeshire Hundreds and the Cambridge Boulder Clay & Woodland Priority Area identified as part of the Cambridge Nature Network.

We welcome the aim of EWR to deliver biodiversity net gain (5.30.5. *Biodiversity. EWR Co shall enhance biodiversity, reducing impacts on species and creating and enhancing habitats, to deliver biodiversity net gain.*). However, we could not see in the consultation documents the level of net gain to be achieved. The Greater Cambridge Partnership has made a commitment to target a net gain of 20% for its infrastructure schemes and we urge EWR to adopt the same target. It would seem inappropriate for Cambridge decision-makers to have set a 20% target for their schemes only for EWR to set a lower one for this scheme.

You should note that there is considerable variability in the success of biodiversity net gain, such that anything under 10% cannot guarantee that it will actually achieve a net gain when it is delivered.

4. Options for Cambourne to Eversdens

The two options proposed are a route and station to the south of Cambourne and a route and station to the north of Cambourne.

4.1 South of Cambourne

We have significant concerns regarding the impacts of a station and route to the south of Cambridge, which can be summarised as:

- Damage/negative impact to Cambourne Country Park/Nature Reserve, its wildlife and its amenity to the community of Cambourne.
- Impact on the setting of Bourn Windmill, the oldest surviving windmill in the UK and a Scheduled Ancient Monument.
- Merging of the distinct village of Caxton with greater Cambourne. The original concept of the Cambourne developments was to set them on open rural land so that they should not envelope surrounding villages.
- Indirect impacts on the country park, Bourn Windmill and Caxton caused by increase in future development pressure. Or that these features will prevent future development associated with the railway.
- Indirect impacts on the country park, Bourn Windmill and Caxton caused by increase in traffic to access the new station.
- This alignment would pass through the complex heritage resource area of the Bourn Valley, which may result in the loss/ disturbance of buried archaeology and would impact on the setting of listed buildings and scheduled monuments and the Conservation Areas of Bourn, Caldecote and Kingston.
- Poor road connectivity to Great Cambourne, Upper Cambourne and Bourn Airfield, which would make it very difficult to run connecting bus or shared-transport feeder services efficiently.

4.2 North of Cambourne

We believe that of the two options presented this would be preferable because:

- Avoids impacts highlighted above (Country Park, Bourn Windmill, Caxton village, Bourn Valley).
- Easily connected to A428.
- Can better serve greater Cambourne area.
- Does not preclude additional development associated with new station.

However, we note that this option will also have significant impacts, including:

- Potential for inappropriate development north of the A428 which could be damaging on the landscape, environment and local communities.
- Potential impact on Bourn Brook and habitats adjacent to it (between Comberton and Little Eversden).
- On some of the residents of Highfield Caldecote.
- Impacts of a raised embankment on landscape, ecological connectivity and public access.
- Severance of the Wimpole Way and proposed new cycle route between the new developments at Cambourne/Bourn Airfield and Cambridge.

These impacts need to be taken seriously and ways found to avoid or mitigate them. For example could the railway dive under the A428 and Highfields Road?

In terms of the **station location**, we would encourage you to consider locating the station over the A428. This would be the best way to ensure that the station could serve both the current Cambourne and any future development north of the A428, in the same way that the east and west sides of Hatfield are connected over the A1. It would limit the environmental impact of building a new station on greenfield land and reduce the social and ecological severance created by the road.

5. Eversdens to Cambridge South

There are several significant landscape features in this location which will be negatively affected by EWR. We note:

5.30.11. Landscape. EWR Co shall protect and enhance the quality of landscapes, townscapes and visual amenity.

- Harston and Haslingfield nestle closely to the northern side of a ridge of relatively high ground. The latter is 36m lower than the summit of Chapel Hill only about 400m to the south. That high ground is the setting of those villages and major and conspicuous earthworks would be required to take the railway between them and to skirt Haslingfield closely to the south, earthworks which would destroy that setting and also require a crossing of the road to Barrington. A line skirting those villages to the north over relatively flat ground would obviate all this. If the line must go to the south of these villages, we believe the line should be tunnelled through Chapel Hill in order to minimise the impacts.
- Rowley's Hill is not large, but it is an important and conspicuous feature in a flat terrain. It is vital to protect the setting of Newton and Harston and to preserve the connection between them. It is essential that any impacts on the hill are minimized. According to the OS map the hill also has archaeological features.
- The impact on several rivers and streams (the water courses themselves, water quality, their wildlife and their landscape setting). This includes the Bourn Brook, River Rhee (chalk stream), Hobson's Brook and some of their tributaries.
- The impact on habitats at the River Rhee

If EWR decides to pursue an alignment that will impact these features then the utmost care, attention and budget will be needed at the next stage in order to avoid and minimise those impacts.

We are especially concerned about the length, height and width of proposed embankments. These will involve considerable land-take and have a significant detrimental impact on the landscape, ecology and heritage. We urge you to reconsider whether there is an alternative alignment or other ways of engineering in order to reduce the impact. For example, once the line crosses the River Rhee going north west can it be kept as low as possible so that it also hugs the landscape east of the Eversdens rather than crossing it on an embankment? The A603 could therefore go over the EWR on a bridge rather than the other way round.

We are concerned that EWR will result in the closure of some roads and the separation of communities. We would encourage you to listen to the views of those communities and work with them to find viable solutions to maintain connectivity between communities and shared community facilities such as schools. The idea of closing the level crossing between Little Shelford and Hauxton needs further study, especially as its closure would affect the pattern of traffic over a wide area.

We urge EWR to take into consideration the full range of impacts of elevating the railway to avoid at-grade road crossings. These include the wider social and ecological impacts of increased severance, as well as impacts on the landscape. These should be balanced against the safety and operational factors which are the sole concern of the Office of Rail and Road.

Shepreth Junction

A grade-separated junction would be visually intrusive in this location, which is in the green belt adjacent to the Gog Magog Hills and will be seen by the thousands of people who use the popular DNA cycle path (which connects the villages south of Cambridge to the city and Biomedical Campus). A new busway is also proposed within sight of this location and the cumulative impacts of a grade-separated junction and new busway would be significant and unwelcome. We strongly prefer Option 1 (keeping the junction at the same level) However, if a grade-separated junction is considered necessary then we would want to see a dive-under configuration rather than a flyover, in order to preserve the setting.

Shepreth Junction to Addenbrookes Bridge

We agree that the constraints on this section are Nine Wells Nature Reserve, Hobson's Conduit, the DNA cycle path and the archaeology on the western side but would also add Hobson's Park. We encourage EWR to consult the survey work already carried out for the Cambridge South Station and South East Cambridge Busway (CSETS) projects, and to co-ordinate with these projects in developing solutions and mitigations. This must of course also take into account the cumulative impacts of all three schemes, as required by national and local planning guidance.

We ask that particular attention is paid to Hobson's Conduit, which is already culverted by the railway. If the length of the culvert were significantly increased by both EWR and busway, this could have negative impacts on wildlife, including Water Vole which are present in this location (we observed one ourselves next to the culvert in 2020).

We understand that the other projects are already experiencing difficulties agreeing suitable mitigations with landowners. Is it possible that EWR could use national infrastructure CPO powers to overcome these? We would encourage EWR to speak with the other project directors as soon as possible.

Locations for work compounds have been identified for Cambridge South Station and CSETS. We encourage EWR to re-use these for EWR so as to minimise the cumulative impacts of the three schemes.

If you have not already been made aware, we would also encourage you to view the latest plans for the long-term expansion of the Cambridge Biomedical Campus which include the creation of new nature parks in this location.

6. Long Road College to Cambridge Central

This section of railway is bounded by habitat (eg woodland) and is part of a wildlife corridor reaching into the city adjacent to Hobson's Brook, as identified in the Local Plan and for the [Cambridge Nature Network](#). It is uncertain from your consultation material whether the addition of 1 new track can be achieved within the boundary of the current railway or whether there would be a loss of habitat. We understand that some of this habitat is designated as local wildlife site (eg Triangle North of Long Road). This is of concern and all efforts should be made to avoid habitat loss.

7. Cambridge Station

There has been a long-held ambition to have an eastern entrance to Cambridge station to provide quicker and more convenient access to communities east of the station (first suggested in 1951!). This would also relieve pressure on the congested main station entrance and access, and the platform overbridge. Additional services through Cambridge are already being planned (e.g. 1 train per hour from King's Lynn, 2 trains per hour from Wisbech, 1 train per hour from Ipswich, which could also be serving a new Cambridge East station). So, by the time the central section of EWR opens, congestion at the station is likely to be a severe problem, potentially even a safety issue. We therefore urge EWR to include a new eastern station entrance as part of its proposal.

8. Freight

There is a lack of clarity regarding the use of the line for freight. It is clear that freight is being considered and that some freight trains will run on it but that is about all we know. The requirements of freight are likely to have implications for the design of the railway and the impacts that it might have on those communities close to it. It is unfair that communities are being asked to give opinions on the route and design of the railway without this knowledge. It is important that clarification on the use of the route for freight is provided as soon as possible. Running a significant amount of freight through central Cambridge is clearly undesirable and, in such circumstances, would bring into question whether a northern route would be preferable.

9. Electrification of the Line

We urge EWR to secure from the government a mandate and sufficient funding to electrify the line at construction, and for all services, including any freight, to use electric traction. As well as carbon reduction, this will minimise the noise and eliminate air pollution where the line unavoidably runs close to people's homes.

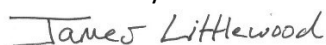
We wish to highlight that this would require the use of gantries/posts which would have an additional visual impact. This will especially be the case if the railway is raised on embankments because the posts and wires will be visible against the skyline. Therefore, we also ask EWR to select a design for the overhead line support structures that minimises their visual impact, especially atop embankments.

10. Community Compensation

You have provided some information regarding the compensation that might be expected for property owners who would be affected by the new railway. However, the railway will have significant impacts on the wider community, and we would encourage you to set out, as soon as possible, the package of benefits that will be made available to compensate communities for the wider impacts. We draw your attention to the [A14 Community Fund](#), which supported a wide variety of community projects.

I trust that you will take our comments into consideration.

Yours sincerely



James Littlewood

Chief Executive