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30th June 2021

Ms Vanessa Ralph
East West Rail Company

Sent by email to: consultation@eastwestrail.co.uk

Dear Ms Ralph,

Re. East West Rail - Making Meaningful Connections Non-Statutory Consultation

I am writing on behalf of Huntingdonshire District Council (HDC) in relation to the above non-statutory consultation on the East West Rail (EWR) project.

Thank you for confirming in the email dated 15th April 2021 to Mrs. Burton that HDC's comments would be accepted after the end of the consultation period in order to enable the responses to be considered by our Cabinet.

The Council's response is attached as appendix 1 to this letter. You will see from the information that the Council is of the view that a lot of information remains outstanding and we are therefore unable to recommend a route, and instead focus on key principles.

The Council would welcome close collaboration with East West Rail as the project progresses. Recognising that feedback will inform next steps we strongly encourage EWR to share the evidence bases that inform route alignments to aid the public understanding of the rationale in the approach. Furthermore, in future consultations it is recommended that information be more transparent, easily accessible and simplified to allow members the public to understand proposals insofar as sections relate to communities.

If you have any further queries on any of the comments raised within this response please email implementation@huntingdonshire.gov.uk .

Yours sincerely,



Cllr Ryan Fuller
Executive Leader

Appendix 1

- 1.1 Huntingdonshire District Council Cabinet met on the 17th June 2021 and resolved to offer its continued support for this project, indicating a preference for a station to the south of St Neots.
- 1.2 It is evident that the OxCam Arc, including EWR, provides significant potential economic opportunities that weigh in favour of continued support of EWR. The Huntingdonshire Economic Growth Strategy signposts infrastructure improvements as one of the district's conditions for economic growth and improved road and rail infrastructure is essential to achieving that ambition.
- 1.3 Having reviewed the documentation it is considered that detailed information was lacking, not least the lack of rationale or evidence for the two alignments now proposed. For that reason, and the reasons from technical specialist colleagues it is not possible to give a definitive support for one alignment. Therefore, the following comments are based solely on the consultation on the 2 alignments, as published and are made without prejudice to the final route alignment. Significantly more information is required in order to fully understand the impacts of the scheme, the mitigation required and the strategic fit with other significant infrastructure projects.
- 1.4 Comments are only provided on the Section D Clapham Green to the Eversdens local section of the route insofar as it directly affects Huntingdonshire rather than the overall scheme. It is noted that the current consultation document concludes with two emerging preferred options for this local section of the route which are the focus of the Policy Team comments. Alignment 1 involves a station at St Neots South (option A) and runs to a station at Cambourne North. Alignment 9 involves a station at Tempsford and also runs to a station at Cambourne North. Both options run on the same route via the A428 improvement scheme with the only variation in this being the first section of the route depending on the choice of station location. All assessments in the consultation material were completed against Alignment 8 as the baseline scenario which involves stations at Tempsford and Cambourne South.
- 1.5 A new station closest to St Neots (Option A St Neots South) would provide an opportunity to establish north/south and east/west connectivity within close geographic proximity. However, limited availability of evidence means that the economic advantage or disadvantage of either of the stated preferred options of Alignment 1 or Alignment 9 is difficult to assess at this stage.
- 1.6 As highlighted in HDC's 2019 consultation response, the risk of coalescence between St Neots and any growth has been cited. It could, with careful planning, provide a corridor to form a spinal buffer zone between existing and future development with a new station accessible to both communities. Alignments 1 & 9, the preferred routes by EWR, have similar impacts on St Neots and are closely co-located with the A428 Black Cat to Caxton Gibbet Improvement Scheme. Environmental aspects are a key consideration. Opportunities to combine mitigation to maximise environmental benefits may also be possible.
- 1.7 As stated at para 1.4, a key concern is the lack of detailed information evidencing how the assessments in the consultation document were made and supporting detail on the impacts and mitigation of the scheme. Of particular note is the lack of detail regarding land considered for housing and growth despite conclusions being drawn on this assessment factor in Table 9.2 of the Consultation Technical Report. As the East West Rail proposal forms part of the wider OxCam Arc growth aspirations the absence of this is critical to the ability to make fully informed judgements and responses to the choice of alignment that should be supported.

- 1.8 The consultation notes that growth potential around Tempsford has been identified in local development plans, which is not yet the case around the St Neots South station option. However, given the timeline for progressing the East West Rail project compared to that for bringing forward a replacement local plan this should not be considered a significant drawback. The potential capacity of this area will be affected by the land take necessary for the A428 and East West Rail projects and as EWR develop its proposals further it is expected that there will be continued discussions relating to anticipated growth considered alongside the potential appropriate locations for growth in the OxCam Arc, and the appropriate scale of that growth.
- 1.9 It is considered that the EWR proposal is seen as a key opportunity to improve east-west connectivity and unlock growth opportunities. At this time, while recognising that this is a non-statutory consultation and at the very early stages of engagement, the East West Rail consultation document states that Alignment 1 demonstrates preferable environmental improvements on air quality, climate, historic environment and water resources and flooding in comparison to Alignment 9. It goes on to say that Alignment 9 would result in a slight worsening of the impact on ecology and biodiversity, which would not be in line with the ambitions of the OxCam Arc prospectus and it would cost more. However, more detail will be required in order for officers to fully assess the alignments proposed and the necessary mitigation required, including the consideration of the economic, environmental and existing and future community needs.
- 1.10 The Council has liaised with its specialist officers and the responses are set out below. Please note that it has not been possible from these responses to establish a preferred route.

2. Environmental Protection

- 2.1 An Environmental Impact Assessment is proposed to be undertaken. HDC would like the following stressors to be considered within this assessment (please note this is subject to change as the process continues and other items could come forward):
1. Air Quality Assessment, both during construction and operation. The Air Quality Assessment should consider impacts of diesel engines.
 2. Land Contamination Risk Assessment.
 3. Noise Assessment considering existing and proposed noise sources (including the proposed A428) and existing and proposed residential receptors (including Wintringham Park and Loves Farm East in St Neots). Consider noise from warning sirens and horns and night-time track maintenance.
 4. Consider the effect of vibration on residential properties and the built environment.
 5. Consider lighting and its effect on residential dwellings and general light pollution affecting the night sky.
 6. Consider any adverse health effects of electromagnetic radiation.
 7. Consider odour from diesel trains.
- 2.2 During the construction phase - consider noise, vibration, dust, odour, light, contamination, traffic diversions, sound insulation and property purchase. Also, a Section 61 Control of Pollution Act prior consent for work on construction sites is to be considered. A Construction Environmental Management Plan would be an appropriate tool to specify these construction proposals.
- 2.3 The Council notes similar issues on environmental protection matters have been raised by Cambridgeshire County Council and South Cambridgeshire District Council, particularly in relation to the following points:

- Whichever route alignment is chosen will pass close to some communities in Huntingdonshire and impacts on those communities will need to be minimised and mitigated. Existing tranquil areas should be protected from noise.
- In several areas the Route Alignments are shown with very significant lengths of high embankment and viaduct. The Council appreciates the engineering challenges associated with a railway and the shallow gradients required compared to a road. However, the visual impacts of the embankments and structures is likely to be considerable and that there are likely to be greater noise impacts compared to alignments that were at-grade or in cuttings.
- The Council has been unable to fully 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.
- The information presented in terms of potential noise 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.
- 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 also include a consideration of vibration, for both the construction and operational phases of the project. 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. The assessment should consider the noise impacts of increased train movements, including at potentially higher speeds, on sensitive receptors. On-line and off-line route options should also be evaluated in respect of the potential for greater 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.

3. Landscape

- 3.1 The majority of the route, regardless of alignment, lies within the HDC South Eastern Claylands Landscape Character Area (LCA). However, station locations may dictate whether landscape and visual effects on the Ouse Valley LCA also need to be considered.
- 3.2 The principal rationale for this is that the central and southern parts of the character area are well preserved landscapes that enjoy a high level of tranquillity, and as such are highly sensitive to change. It is felt that the level of change demanded by a new rail corridor could be better accommodated by integrating the proposals with the already changing landscape along the A428 and the St Neots Wintringham Park development. The HDC Landscape Character Assessment SPD (2007) states:

'The South East Claylands contain extensive areas of high quality landscape, achieved through the combination of landform, established woodland and hedgerows, well managed farmland and attractive villages.

The relative lack of settlement in the area, combined with the mature vegetation, creates an intimate and tranquil landscape, which feels remote and has a strong sense of history. The smaller villages also contribute to the area's serenity, with their village greens and 'chocolate box' cottages.

However, in the areas most affected by visually intrusive development, and where vegetation has been lost due to agricultural change, the scale of the landscape becomes much larger, and the sense of intimacy and tranquillity is lost.'

- 3.3 The Campaign to Protect Rural England (CPRE) tranquillity map shows St Neots in the west and Cambridge in the east as red areas (red denotes an area with very low levels of tranquillity). The current A428 corridor is discernible as a yellow/orange line between the two (med/low tranquillity), whereas the areas to the south of the corridor retain a higher proportion of yellow/green areas (med/high tranquillity).
- 3.4 It is inevitable that the proposed new A428/A421 corridor will introduce new detractors within the landscape and influence the landscape character of the area. Combining the proposed new railway route with this corridor would help to reduce the overall extent of landscape and visual effects from large scale transport infrastructure, lessen further fragmentation of the landscape character area, and present an opportunity within the district to deliver a high level of landscape and ecological mitigation targeted in and around the transport corridors.
- 3.5 By the same token, there is concern that the cumulative effects of the EWR and new A428 corridor (alongside the existing A428 corridor) would have a significant harmful effect on sensitive river valley and rural landscapes and the ecological communities they support.
- 3.6 Of particular concern are the visual and landscape impacts of the very significant lengths of high embankment and viaduct, such as the viaduct proposed south of St Neots to enable the railway to cross the River Ouse and East Coast Main Line.
- 3.6 The visual impacts of the embankments and structures are likely to be considerable and there are likely to be greater noise impacts compared to alignments that were at-grade or in cuttings. These raised elements of the line must be fully evaluated, and less intrusive options explored. This impact may well be increased further through the engineering responses required for the railway's construction and operation, including the provision of associated additional operational infrastructure such as lighting and communications apparatus and the need for additional/relocated rail sidings. These associated factors should be defined and considered in the process.
- 3.7 Further assessment of landscape impact should be undertaken. This should also provide a comparison of the route alignments, 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, had been considered – and reasons why they had been discounted. 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.
- 3.8 Notwithstanding the comments above regarding the landscape visual effects of what is considered to be a significant piece of engineering, the opportunities to deliver landscape mitigation that improves upon the existing must be embraced. For the South-East Claylands in particular, this would mean:
- Increased planting around towns to screen visually intrusive urban development.
 - Conservation of historic villages, through the avoidance of ribbon development, and maintenance of attractive historic cores.

- Planting of tree and woodland belts along major roads [transport corridors] to screen visually intrusive development particularly to the edges of the main settlements, subject to the needs of highway maintenance, safety of motorists and the need to maintain verge biodiversity.
- 3.9 It is vital to ensure that the type and amount of vegetation necessary to build upon existing landscape character is carefully considered, and that the reconnection of fragmented woodland parcels is seen as a priority.
- 3.10 The specific requirements to mitigating the landscape and visual effects of development in the Ouse Valley are:
- *Protection and enhancement of a 'Green Corridor' along the river Great Ouse, particularly where it passes through settlements.*
 - *Protection of the setting of historic structures such as bridges and mill buildings which contribute to the valley character.*
 - *Maintenance of the river channel and associated ditches.*
 - *Improving management of flood meadows, particularly those which have been neglected.*
 - *Incentives to encourage management and planting of native wetland trees to maintain the traditional vegetation of the area, and to screen intrusive development.*
- 3.11 The Ouse Valley is considered a highly sensitive host environment, both in landscape and ecology terms, and therefore, in addition to the concerns raised regarding elevated railway features, any new station and associated infrastructure within this landscape must respond carefully to these sensitivities, and be of extremely high architectural quality. The Huntingdonshire Landscape Character Assessment states:
- “The variety of land uses and influences in the Ouse Valley have resulted in a complex mosaic of landscape types, including hay meadows and river valley pasture; river valley arable; urban park; industry (gravel extraction); flooded gravel workings (fisheries, nature reserves etc.) and marinas. Each of the landscape types creates a different atmosphere, but, on the whole, the area feels tranquil and relatively isolated because of the screening effect of vegetation and the calming quality of the slow-flowing water.”*
- 3.12 Regarding the station selection, HDC asks that any station and associated infrastructure to the south of St Neots will be designed with due regard to the sensitive and valued Ouse Valley Landscape Character Area:
- 3.13 It is our hope that any station buildings would be of high architectural quality, and seek a dialogue with the Ouse Valley landscape, its sensitivities, and ephemeral qualities.

4 Biodiversity

- 4.1 HDC has concerns about the effects of such a wide transport corridor on the ecology of the area and would expect to see the bar set high for mitigation and biodiversity net gains.
- 4.2 It is considered, as noted in section 3 above, that the proposal will inevitably cause significant fragmentation of the landscape and result in isolation of biodiversity assets. The scheme must establish coherent ecological networks that are more resilient to such pressure in line with the National Planning Policy Framework (NPPF). This would include those to protect and buffer existing wildlife sites, extending existing networks of natural habitats and enhancements for species / habitats of local interest.

- 4.3 The project should seek to deliver biodiversity net gain, in accordance with NPPF, which contributes to county-wide strategies / projects, including:
- Cambridgeshire Green Infrastructure Strategy (2011);
 - Wildlife Trust's Living Landscape Project (e), including West Cambridgeshire Hundreds and Cambridgeshire Chalk; and
 - Cambridgeshire and Peterborough Habitat Opportunities map (expected to be published in late February 2019)
- 4.4 The Council notes that 10% Biodiversity Net Gain (BNG) is proposed from the overall scheme. This is considered unambitious given the scale of the scheme and the government's stated ambitions for Nature Recovery. A minimum 20% is more appropriate. This would ensure an overall, long term biodiversity net gain is achieved. It would also meet the shared regional principles for protecting, restoring and enhancing the environment in the OxCam Arc, developed through the Ox Cam Arc Environment Working Group. It would also support delivery of biodiversity net gain, in accordance with NPPF, which would contribute to other key strategies / projects, including:
- The government's aspirations for Nature Recovery Networks
 - Natural Cambridgeshire' Local Nature Partnerships Doubling Nature vision and associated Priority Areas
 - Cambridgeshire Green Infrastructure Strategy (2011);
 - Wildlife Trust's Living Landscape Project (e), including West Cambridgeshire Hundreds and Cambridgeshire Chalk; and
 - Cambridgeshire Biodiversity Partnership's 'Mapping natural capital and opportunities for habitat creation in Cambridgeshire' (2019).
- 4.5 Much detail will need to be provided in order to fully assess the impact of the proposal and to demonstrate that biodiversity net gain requirements are achievable in relation to the options proposed. The calculations (including all assumptions made), should demonstrate that best practice has been adhered to. Any deviation from the use of the DEFRA V2 metric should be clearly explained and justified. The value of existing habitats for both biodiversity and local communities should be a high priority when considering route options. It is noted that the consultation documentation states that ecological surveys have informed the consultation to date and are ongoing. This information should be shared in the public domain to demonstrate that all survey work is compliant with BS42020 and associated CIEEM best practice.
- 4.6 It should also be ensured that in the design for biodiversity net gain, and landscaping schemes, the future management plans, delivery bodies, monitoring and reporting must be in place to ensure that these ambitions can be achieved 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.
- 4.7 Cambridgeshire is one of the most biodiversity deprived counties in the country, with many of Cambridgeshire's wildlife sites, habitats, and species in decline as a result of pressure from development, intensive agriculture and climate change. As highlighted by CCC, transport schemes can have significant impact on wildlife as a result of carving-up the landscape. This can leave small isolated pockets of wildlife, which are vulnerable to change. It is therefore important to consider opportunities to best protect and enhance the fragments of wildlife that remains. Evidence that the Ecology Mitigation Hierarchy, with respect to avoiding impacts on the highest quality habitats and priority species is followed must be demonstrated.

- 4.8 Commentary from SCDC is supported that notes that 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), watercourses, 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.
- 4.9 There are several recognised important species in the proposed EWR corridor immediately to the east of St Neots including great crested newts, barn owls, West Eurasian hedgehogs, water voles and Small Heath butterflies all of which have potential to be significantly detrimentally affected by the proposals. It will be essential for detailed proposals for the scheme to prioritise avoiding harm to any of these species in the first instance and only where this is not achievable to minimise and fully mitigate any impacts.

5. Arboriculture

- 5.1 Routes which pass via the villages of Abbotsley and Waresley are likely to result in the fragmentation of outlying landscape elements (such as woodlands and copses) which are the remnants of historic parkland and estates with little opportunity for arboricultural mitigation.
- 5.2 The routes which follow the proposed new alignment of the A428 have the potential to impact on protected woodland areas to the north of the new highway to the north of Croxton. Route alignments should look to avoid these areas and ensure the protection of these landscape features.
- 5.3 The northern alignments are set in an area where there are opportunities to achieve increased connectivity of existing tree-based habitat and woodland areas and creation of new woodlands and increased tree planting on the eastern edge of St Neots.
- 5.4 Any route should look to increase the tree and canopy cover of the area as a result of the new infrastructure elements, particularly where the route runs in close proximity to residential areas.

6. Heritage

- 6.1 The following comments relate to the anticipated impact of the proposed construction of an East West railway on above ground designated heritage assets within Huntingdonshire.
- 6.2 The information supplied is very basic and limited primarily to the possible alignment of the route; insufficient information exists at this stage to enable impact of the scheme to be understood.
- 6.3 Routes 1 and 2 follow a similar line to the A428, as does route 9 although with a starting point to the south near Black Cat, whilst routes 8 and 6 follow a more southerly route close to the village of Abbotsley.
- 6.4 Designated Heritage assets are protected by National legislation. The setting of these assets may contribute to their significance and there is a statutory duty to pay special regard to preserving the special architectural and historic interest of listed buildings and the desirability to preserve or enhance a conservation area. Factors such as changes to noise, smell and level of activity within the setting of heritage assets may also impact upon the way in which these heritage assets are experienced and should also be included in any assessment. The impact of the proposals on the significance of Heritage assets must be assessed as part of the development proposal.

6.5 As a minimum, the following heritage assets should be given further consideration:

Routes 1,2 & 9

Impact of the proposal on:

- Grade II Tithe Farm, Cambridge Road, St Neots, Cambridgeshire, PE19 6SW
- Barn, Wintringham Hall, Wintringham, St Neots, Cambridgeshire and mediaeval Granary, Wintringham Hall, Wintringham, St Neots, Cambridgeshire
- North Farm, Cambridge Road, Eynesbury, St Neots, Cambridgeshire, PE19 6SR

Whilst slightly further away the significance of the following should also be assessed as detailed proposals are currently not available:

- Farm Buildings, Monks Hardwick, Priory Hill, St Neots, Cambridgeshire
- Toseland and listed buildings within the settlement and notably Toseland Hall, Paxton Road, Toseland, St Neots, Cambridgeshire, PE19 6RU Grade II*
- Yelling and listed buildings within the settlement and including Yelling conservation area.

Routes 8 and 6

Impact of the proposals on the settlements of:

- Abbotsley (listed buildings and conservation area),
- Great Gransden (listed buildings and conservation area) and
- Waresley (listed buildings and conservation area), and
- Milestone, Potton Road, Abbotsley, St Neots,
- Moor Farm, Potton Road, Abbotsley, St Neots,
- Barn, Moor Farm, Potton Road, Abbotsley, St Neots
- Milestone West of North Farm, Potton Road, Abbotsley, St Neots
- North Farm, Potton Road, Abbotsley, St Neots, Cambridgeshire
- Barn North of North Farm, Potton Road, Great Gransden
- Barn East of, Leycourt Farm, Eltisley Road, Great Gransden
- Barn, Hardwick Farm, Caxton Road, Great Gransden

Whilst slightly further away, the significance of the following should also be assessed as detailed proposals are currently not available:

- Valley Farm, Tetworth Hall Estate Road, Tetworth, Sandy, Bedfordshire, SG19 2HU
- Tetworth Hall, Tetworth Hall Estate Road, Tetworth, Sandy, Bedfordshire, SG19 2HU Grade II*
- Coach House, Tetworth Hall, Tetworth Hall Estate Road, Tetworth,
- Cottage, Tetworth Hall, Tetworth Hall Estate Road, Tetworth

6.6 HDC is unable to assess the impact of the proposal on heritage due to limited information but the alignment of routes 1 , 2 & 9 currently appear to result in less heritage harm.

7. Economic Development

7.1 HDC's Economic Growth Strategy at page 5 signposts hard infrastructure improvements as one of the District's conditions for economic growth. Improved road and rail infrastructure are viewed as an essential ingredient to aid the growth of the district and an improved A428 and East West Rail is cited as an important part of this package.

7.2 Economic Development are very encouraged by this ambitious project and excited about the potential economic spin offs as part of Huntingdonshire District Council's position within the Ox-Cam-Arc.. Key comments are noted below.

- A shared labour force between the A428 and East West Rail is a desired ambition of the A428 legacy group for skills and economy.
- The OxCam Arc Economic Growth Prospectus page 9 explains how the leadership of the Arc are looking to drive local prosperity while tackling urgent environmental challenges.
- A station dovetailing into the route of the new A428 upgrade from Black Cat Roundabout area would provide an excellent infrastructure interchange for both road and rail.
- A route taking traffic away to the south of St Neots would allow for an excellent flow of goods and people North, South, East & West.
- A route close enough to St Neots, the existing St Neots mainline station and particularly to newer developments such as Wintringham Park would ensure growth or demand for employment.
- Access to excellent infrastructure whilst maintaining "quality of life" is a key benefit for business owners and employees who live in Huntingdonshire.
- Neat and dovetailed hard infrastructure would complement the growth ambitions of the OxCam Arc which currently supports over two million jobs and has an economic output of over £111BN each year.

7.3 The identity of this project should align with the ambitions of the OxCam Arc including:

- Connected and autonomous vehicle pilot projects which align with the ambitions of the OxCam Arc Economic Growth Prospectus at page 22 could be part of the legacy created by East-West Rail.
- A call for action in the Prospectus at page 29 states how the Arc's leadership will pursue innovation led growth to solve major urgent environmental, health and social challenges and at the same time drive UK competitiveness and local prosperity. Aligning with the chosen route of the A428 and utilising the shared skills of the labour force could address some of these challenges and bring local prosperity / job opportunities to our district for years to come.

8. Planning Policy

8.1 As previously noted, it is not possible to give a definitive recommendation on which route should be supported by HDC due to the lack of detailed information on many aspects of the proposals. The following Policy comments are based on the information supplied and tempered with commentary on the limited knowledge currently available about the potential growth opportunities that may arise from introduction of the East-West Rail route.

8.2 One of the major drawbacks of the consultation material presented is the lack of depth of background information upon which assessments were made. Of particular note is the lack of detail regarding land considered for housing and growth despite conclusions being drawn on this assessment factor in Table 9.2 of the Consultation Technical Report. As the East West Rail proposal forms part of the wider OxCam Arc growth aspirations the absence of this is critical to the ability to make fully informed judgements and responses to the choice of alignment that should be supported.

8.3 Alignment 1 would provide a new station in closest proximity to St Neots of all the options put forward. This maximises accessibility to the existing community as well as any potential growth focused on the station site which would both maximise the local

passenger market and offer the greatest opportunities for facilitating access to the new station from St Neots by walking and cycling.

- 8.4 Of the EWR preferred options, both Alignment 1 and Alignment 9 would have similar impacts in the immediate vicinity of St Neots as both are closely co-located with the A428 improvement scheme. Opportunities for comprehensive combined mitigation works between the two projects should be explored to maximise the environmental benefits that can be achieved. Coalescence of additional growth with St Neots is a risk for both of these alignments. In particular, they are close to the existing built up area where they would cross Cambridge Road requiring very careful mitigation of impacts on local residents. However, with appropriate masterplanning and substantial landscaping there is potential for a joint A428 and East-West Rail corridor to form the spine of a buffer zone between existing and future development whilst still allowing for a new station that would be accessible to both communities.
- 8.5 Potential growth opportunities that may be opened up as a result of the construction of East West Rail should form a significant consideration in selection of the ultimate alignment and location of new stations. Table 9.2 provides a comparative assessment of the merits of each alignment against a list of factors reflecting the project's objectives. One of the factors is housing and growth. Both Alignment 1 and Alignment 9 have a rating of 'minor improvement' over the baseline scenario. Only very high level commentary is presented to indicate how the conclusions have been drawn. It is noted that the comparative analysis of a station at Tempsford versus St Neots South indicates that potential housing and growth opportunities between the two are finely balanced and emphasises potential placemaking challenges around a St Neots South station option.
- 8.6 It is acknowledged that while much growth potential around Tempsford has been identified in local development plans this is not yet the case around the St Neots South station option. However, given the timeline for progressing the East West Rail project compared to that for bringing forward a replacement local plan this should not be considered a significant drawback.
- 8.7 Environmental impacts of the proposals also form a very significant consideration in which alignment should be preferred. Table 9.3 of the Consultation Technical Report provides a comparative assessment of a range of environmental factors and indicates from the EWR analysis that Alignment 1 is preferable over Alignment 9 on environmental grounds in as far as this can be judged based on the high level information provided.
- 8.8 Relative to the baseline alignment, Alignment 1 offers major improvements regarding impacts on air quality, climate, historic environment and water resources and flooding. It also offers minor improvements on community, ecology and biodiversity, landscape and visual impact and noise and vibration. In contrast Alignment 9 only offers a major improvement regarding impact on the historic environment and minor improvements for climate, community and water resources and flooding. Notably Alignment 9 would result in a minor worsening of the impact on ecology and biodiversity; all but one other alignment scores better in terms of environmental impact than Alignment 9. Environmental impact of the proposed route should be a strong determining factor in the final decision making.
- 8.9 Table 9.4 presents summaries of the assessment outcomes for the five shortlisted routes. This demonstrates that Alignment 1 offers the greatest level of improvements of any alignment considered within the scope of the analysis undertaken, with benefits over Alignment 9. However, this is insufficient basis upon which to express a preferred route in terms of cost, performance, safety and environmental factors.

9. Climate Change

- 9.1 The UK Government released their 10 point plan for a green industrial revolution in November 2020 in preparation for hosting the 26th UN Climate Change Conference of the Parties (COP26) in November 2021. Point 5 in the plan points towards green public transport options. Thought should be given to providing low carbon transfers between St Neots (East Coast Mainline) and the new EWR station. This should also include walking and cycling routes.
- 9.2 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.
- 9.3 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.
- 9.4 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.
- 9.5 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 Programme Wide Output Specification (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.

Electrification of the Rail Network

- 9.6 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 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'.
- 9.7 As noted by East West Rail, the route 'should' be electrified between Bletchley and Cambridge and contribute to the decarbonisation of the transport sector from day one of operation, contributing to the achieving of net zero carbon emissions by 2050. However,

HDC would wish to understand why this would not be a definite point and why the entire route cannot be electrified.

10. Sustainability

- 10.1 High quality pedestrian and cycle links meeting the standards set out in LTN 1/20 should be provided between Central Section stations and existing settlements, or adequate funding for such provision made available to the Local Highways Authority.
- 10.2 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.

11. Other Points

- 11.1 There is little information provided about expected freight traffic along with the EWR passenger services, 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 and clarification are required in respect of these elements.
- 11.2 Scheme design and service specification should allow for a flexible mix of fast inter-regional and local stopping passenger services, and for freight services.

12. Summary

- 12.1 Until such time as more detailed information is provided by EWR, it is not possible to respond in terms of stating a preferred alignment and station location. The Council would welcome the opportunity to provide further response on this as detailed information is provided.
- 12.2 Further detail is required to enable fuller consideration of the potential environmental impacts. As above, the Council would welcome the opportunity to provide further response on this as detailed information is provided.
- 12.3 The Council continues to support the project and looks forward to continuing work with EWR to bring about the delivery of a key project of local, regional and national importance.