

CPRE Response to East-West Rail Central Section Consultation 2019

Introduction

CPRE's response to the Consultation by East West Rail (EWR) on proposed route corridors for a new railway between Cambridge and Bedford has been prepared by representatives of CPRE Bedfordshire and CPRE Cambridgeshire and Peterborough on behalf of CPRE nationally.

The headings taken from the EWR Feedback Form are shown in italics. The response was transcribed onto the Form for submission to EWR. This document is provided for information.

Preferred route corridor

Please provide any comments on the route corridor in which the route options below are located. This is described at page 10 in the Consultation Document.

The reasons CPRE supports East-West Rail in principle are that it closes an important gap in the rail network and provides new non-road-based journey opportunities, reducing air pollution, carbon footprint, road congestion and dependence on the private car. An essential outcome of this project should be to encourage a modal shift from road/ private car to rail.

We do not believe that it should be a purpose of EWR to open up greenfield areas for housing or commercial development, or to contribute to an arc of urban development from Oxford to Cambridge.

However, EWR should wherever possible serve existing communities and those already planned. Local service provision should be a major factor in route choice, route design and technology and should not be sacrificed to speed, which has low economic and environmental value.

We have to say that there should have been public involvement at an earlier stage, i.e. before the (15km wide) corridor 'via Sandy' was selected. Many good ideas could have been injected into the project by taking on the public's comments and local knowledge at this earlier stage.

A full Strategic Environmental Assessment should be undertaken at the next stage, i.e. the identification of actual potential alignments within the Preferred Route Option corridor. Several alignments should be presented for consultation before a Preferred Alignment is chosen.

We understand that the line would be constructed 'electrification ready'. In the interests of eventually eliminating diesel power from the network, we look forward to electrification at an early date.

Choosing a preferred route option: main factors

On a scale of 1 to 5, where 5 is most important and 1 is least important, how important do you believe each of the following factors should be in deciding on a preferred route:

Supporting economic growth 2

Supporting delivery of new homes 1

Cost and overall affordability 3

Benefits for transport users 4

Environmental impacts and opportunities 5

[Note: it is appropriate for us to answer the above for the project in general, but not for each Route Option.]

Route option A: Consultation Document Page 15

Do you have any comments on the other considerations associated with this route?

In Route A, the interchange with Thameslink should be located at Wixams, where a station site has already been identified and a developer contribution is promised. A 'Bedford South' station at any other location would lose this and not be easily accessible from the Wixams new settlement.

At Sandy, we cannot support this route as published because it would cut across Biggleswade Common. Biggleswade Common is well-loved and historic common land which must not be severed. We also have significant concerns about the effect on the RSPB bird reserve at Sandy Warren should the route as published pass close to it. In addition, the effect of noise on local residents will be a severe adverse impact if, as we believe, a viaduct across the Ivel Valley will be required.

For the above reasons, we reject Route Option A.

Route Option B: Consultation Document Page 16

Do you have any comments on the other considerations associated with this route?

Within Bedfordshire, our preference generally is for Route Option B, provided that the interchange with Thameslink is located at Wixams, where a station site has already been identified and a developer contribution is promised. A 'Bedford South' station at any other location would lose this and not be easily accessible from the Wixams new settlement.

This Route has the advantage of not adding to road congestion in Bedford town or parking problems at the existing Bedford station. However, an adequate cycleway from the town centre to Wixams would need to be completed.

However, we cannot support having a station at Tempsford because of the severe adverse environmental consequences of opening up this unspoilt area for development and the danger of potential eventual coalescence with Sandy and/or St Neots. CPRE has already opposed proposals for new towns and urban extensions, several of them along the EWR corridor, put forward by Central Bedfordshire Council in their submitted Local Plan, because they have not undertaken and published detailed assessments of the evidence base for the locations chosen. This includes land at Tempsford identified by the Council with potential for the development of 10,000+ new homes. We reject this out of hand. The suggested Sandy North station would be a more sustainable solution.

We are very concerned that the historic Croxton Park has not been mentioned in any of the consultation materials provided to stakeholders or to the public. This is a major omission which makes this consultation incomplete. Croxton Park has the following designations:

- Listed Buildings,
- Scheduled Monument
- Registered Parks & Gardens
- County Wildlife Site
- Member of Natural England's Higher Level Stewardship scheme.

See www.croxton-park.com and https://en.wikipedia.org/wiki/Croxton_Cambridgeshire. Like Wimpole Hall in respect of other Routes, it must be avoided.

We support a route via Cambourne as this would serve the existing new town there and also the new settlements proposed for Cambourne West and Bourn Airfield. EWR should have an interchange in the Cambourne/ Bourn area with any new 'Cambridge Metro' service that is proposed.

We believe that the route east from Cambourne would provide a more integrated and sustainable solution if the suggestions of the group CambBedRailRoad (CBRR) were taken into account and instead of routing south east, the route from Cambourne were routed north-east. This would enable it to provide a service to the Northstowe new development, to the Cambridge Science Park and to the St John's Innovation Centre, by approaching Cambridge via the new Cambridge North station.

Route option C: Consultation Document Page 17

Do you have any comments on the other considerations associated with this route?

In Route C, the interchange with Thameslink should be located at Wixams, where a station site has already been identified and a developer contribution is promised. A 'Bedford South' station at any other location would lose this and not be easily accessible from the Wixams new settlement.

We cannot support having a station at Tempsford because of the severe adverse environmental consequences of opening up this unspoilt area for development and the danger of potential eventual coalescence with Sandy and/or St Neots. CPRE has already opposed proposals for new towns and urban extensions, several of them along the EWR corridor, put forward by Central Bedfordshire Council in their submitted Local Plan, because they have not undertaken and published detailed assessments of the evidence base for the locations chosen. This includes land at Tempsford identified by the Council with potential for the development of 10,000+ new homes. We reject this out of hand.

Incidentally, we doubt that the East Coast Main Line (ECML) as currently laid out has sufficient capacity to share tracks with EWR and therefore believe additional track capacity would be required.

Biggleswade Common is well-loved and historic common land which must not be severed or otherwise damaged.

A route serving Cambourne and Bourn is preferred to one via Bassingbourn to which we would strongly object.

We believe that the route east from Cambourne would provide a more integrated and sustainable solution if the suggestions of the group CambBedRailRoad (CBRR) were taken into account and instead of routing south east, the route from Cambourne were routed north-east. This would enable it to provide a service to the Northstowe new development, to the Cambridge Science Park and to the Innovation Centre, by approaching Cambridge via the new Cambridge North station.

For all of the above reasons, we reject Route C.

Route option D: Consultation Document Page 18

Do you have any comments on the other considerations associated with this route?

Route D is likely to increase both road and rail congestion at the existing Bedford station, where station parking is already inadequate. CPRE rejects a route through unspoilt countryside north of Bedford.

We cannot support having a station at Tempsford because of the severe adverse environmental consequences of opening up this unspoilt area for development and the danger of potential eventual coalescence with Sandy and/or St Neots. CPRE has already opposed proposals for new towns and urban extensions, several of them along the EWR corridor, put forward by Central Bedfordshire Council in their submitted Local Plan, because they have not undertaken and published detailed assessments of the evidence base for the locations chosen. This includes land at Tempsford identified by the Council with potential for the development of 10,000+ new homes. We reject this out of hand.

Biggleswade Common is well-loved and historic common land which must not be damaged or severed.

We reject a route via Bassingbourn, preferring one serving Cambourne and Bourn.

For the above reasons, we find Route Option D unacceptable.

Route option E: Consultation Document Page 19

Do you have any comments on the other considerations associated with this route?

Route E is likely to increase both road and rail congestion at the existing Bedford station, where station parking is already inadequate. CPRE rejects a route through unspoilt countryside north of Bedford.

We cannot support having a station at Tempsford because of the severe adverse environmental consequences of opening up this unspoilt area for development and the danger of potential eventual coalescence with Sandy and/or St Neots. CPRE has already opposed proposals for new towns and urban extensions, several of them along the EWR corridor, put forward by Central Bedfordshire Council in their submitted Local Plan, because they have not undertaken and published detailed assessments of the evidence base for the locations chosen. This includes land at Tempsford identified by the Council with potential for the development of 10,000+ new homes. We reject this out of hand.

Although we prefer a route via Cambourne and Bourn, this should include an integrated transport solution with a northern approach to Cambridge via the new Cambridge North station.

We repeat that we are very concerned that the historic Croxton Park has not been mentioned in any of the consultation materials provided to stakeholders or the public. This is a major omission.

For the above reasons, we find Route Option E unacceptable.

The route into Cambridge

Do you agree that EWR Co are right to prioritise route options that approach Cambridge from the south rather than from the north?

We do not agree that EWR are right to prioritise route options that approach Cambridge from the south rather than from the north.

There is already congestion and a technically difficult junction where the Kings Cross and Liverpool Street lines diverge south of Cambridge. We believe that approach of EWR from the south would require a major upgrade in addition to the land take at this rural location.

The EWR consultation makes only passing reference to a station at Cambridge South (Addenbrookes). As with Cambridge North a majority of potential users of Cambridge South are likely to be commuters from local communities and other technology clusters. They could include a significant number of business users travelling between Cambridge South and Cambridge North.

Therefore we consider that far more attention should be paid to serving the local communities which potentially could make most use of the system and the highest return on investment, and the greatest contribution to sustainability through encouraging modal shift away from road/private car.

We believe that with proper choice of rail vehicle and design of signalling systems it is now technically feasible for the EWR to be fully integrated with the proposed Cambridge Metro. Such integrated systems are in use or being built in other cities in the UK and all over the world.

EWR should not be focused solely on highest speed of travel to Oxford. There must be proper consideration of its role in providing an integrated solution to the well-known transport problems of Cambridge and its environs.

If you disagree, please explain your view, including any additional factors that should be taken into account.

A route via Cambourne/ Bourn continuing north-east via the Oakington area could provide an integrated transport solution for Cambourne/ Bourn, the new town of Northstowe and users of Cambridge North station. It would allow easy access to the route to Oxford for the many high-tech businesses located in the northern fringe of the City as well as those in the south and centre.

Cambridge South could still be accessed from the north via the City station and Metro-style services could be extended to the high-tech clusters at Harston Mill and Melbourn.

Additionally, this approach would open up the opportunity of extending EWR via a reopened line to Haverhill and ultimately to the existing rail station at Sudbury, thus providing a through route to Colchester, Harwich, Ipswich and Felixstowe as well as an alternative route to Liverpool Street during the many engineering closures on the existing Liverpool Street line. This would add freight capacity between Felixstowe/ Harwich and the west which is constrained by the existing Ipswich/ Cambridge line due to the single-track tunnel at Newmarket.

By proper use of current vehicle designs and signalling technology, Haverhill and Sudbury could be served by Metro-style services, right into Cambridge city centre. This would take commuter traffic away from the overcrowded and dangerous A1307 with its appalling fatalities and seriously injured accident rates.

General feedback

Please provide any other views or comments on the overall approach that has been taken to developing the project including on the route corridor selected, in identifying potential route options and station locations, and feedback on any other aspect of the project.

We are very disappointed that the route for the EWR Central Section has not been identified as part of a multi-modal study incorporating the A428 improvement (preferred route now announced) and a strategic transport plan for the Greater Cambridge area.

We expect the thorough and transparent identification of all environmental and planning designations and landscape impacts before selecting a final route option, with these designations and constraints fully published and available for public inspection. Indeed, we understand that more detailed maps have been made available to local authorities but not to other consultees. What sort of transparency is that? We believe that the manner in which this study has been carried out to date could also be in breach of the legal requirement for Strategic Environmental Assessment in just the same way as the Expressway whose case is now to be heard by the High Court.

We believe that by focusing on speed rather than service and by failing to consider the use of modern vehicle design, modern signalling systems and appropriate passing places, this proposal will provide only a very limited point-to-point service. This will miss the opportunity to address the overall journey times of the majority of users which in turn will minimise usage and reduce return on investment.

Currently, transport and development proposals in the area are coming forward piecemeal with no overall plan or - more importantly - strategic environmental assessment or public

consultation into either the local travel needs, total travel time or the wider Arc proposals. This is a lost opportunity. History will not be kind to those failing to grasp it.

It is important that an integrated approach to providing capacity for freight by rail should be taken into account insofar as it affects route options. One implication of this is that this study should include provision of viable through freight routes from Felixstowe and Harwich to the rest of the country avoiding London. This is a major opportunity to shift goods from road to rail, and increase the return from the new railway line.

In this respect we think that funding should be found as quickly as possible for the new chord at Ely that is needed to facilitate doubling of the line to Soham and completion of the Felixstowe to Nuneaton upgrade, postponed a few years ago due to the engineering problems at Ely.

We think that re-opening the line via Haverhill and Sudbury would provide a second viable freight route from Harwich and Felixstowe onto EWR and beyond to the West Country which would avoid the capacity problems posed by the single-track Warren Hill tunnel on the Cambridge-Newmarket line and complement that route.

Currently, Huntingdon (and the planned new station at Alconbury) do not have a through rail route to Cambridge, yet there is much traffic between the two towns and a planned new station on the ECML at Alconbury. Even the guided busway never reached Huntingdon off-road. By creating a junction with the ECML in the St Neots/ Tempsford/ Sandy area, through trains or fast Metro-style vehicles from Huntingdon and St Neots to Cambridge would be possible. This and Metro-style services beyond Cambourne towards Gamlingay could be facilitated south of Cambourne by connection to a Sandy North station. This would facilitate local services as well as avoid any disturbance to RSPB, Biggleswade Common, Wimpole Hall or Croxton Park.

We are concerned that failure to use any the old infrastructure in Cambridgeshire, where it would not conflict with essential constraints as noted in our comments under the relevant Route Options, would increase both the financial and the environmental cost of the new railway. With the rapid onset of climate change, every attempt should be made to avoid carbon dioxide emissions arising from construction. Financially, the re-use of old track bed would not only minimise ongoing maintenance costs because settlement has already occurred but could also reduce construction cost to as little as 25% of the cost of a completely new railway (source: CKP Railways plc). However, we are also aware that much of the old route and its location has very significant wildlife habitat and we recognise and support the issues raised in this respect by the Bedfordshire, Cambridgeshire and Northampton Wildlife Trust (BCNWT).

When choosing a final route, County Wildlife sites must be taken into account as well as any national and international designations. (Annex D of the Technical Report refers). County Wildlife Sites can provide protection for collections of very rare species, flora and fauna, which are so localised and rare that national or international designation cannot be afforded.

Lastly, whilst we were prepared to rank the 'Main Factors' in order of importance to us (and, we believe, to the rural communities along the corridor), we were not prepared to rank these for each Route Option. The Main Factors are not our objectives. Outcomes such as closing an important gap in the rail network, providing non-road-based journey opportunities, reducing air pollution, carbon footprint, road congestion, dependence on the private car and potential for modal shift are either not mentioned or are hidden within the more general categories of 'Benefits for transport users' and 'Environmental impacts', thus demoting their importance for consultees.

8th March 2019