

CPRE Response to East West Rail Consultation 2021

Introduction

CPRE's response to the 2019 Consultation by East West Rail (EWR) into the proposed route corridors for a new railway between Cambridge and Bedford to connect with the upgraded "Varsity Line" to Oxford beyond Bedford was prepared by representatives of CPRE Bedfordshire and CPRE Cambridgeshire and Peterborough on behalf of CPRE nationally.

This document, prepared by the same team, concentrates on the principles of the current EWR proposals and the serious damage that will be done to the countryside and communities in both counties if these proposals proceed as described with Route 'E' as the preferred corridor.

As stated in CPRE's response to the previous consultation in 2019, CPRE has supported EWR in principle believing that it would close an important gap in the rail network and provide 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.

Purpose of EWR

CPRE does 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.

EWR should focus delivering improvements to connectivity, serving 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.

CPRE is very concerned that these principles seem to have been almost completely ignored in the current proposals and the choice of Route 'E'. The only concession to the provision of local services appears to be the insertion of a station at Cambourne in Cambridgeshire.

Consultation

In 2019 CPRE expressed the view that there was a complete failure on the part of EWR Co to effectively engage the participation of residents in the 2019 Route Option consultation. Now there is a consequent lack of evidence to justify the assertion by EWR Co that the preferred Route 'E' enjoys popular support. Glaring examples of failures to notify significant interested parties include some parish councils with boundaries crossed by the proposed alignments and the authorities and communities in Suffolk, should EWR Co trains travel on beyond Cambridge as indicated but without any proper route evaluation.

The way that the Route Option consultation responses from members of the public were collected did not allow for recognition, e.g., by post code, of local views. It has become apparent that almost half of the 7,000 responses from members of the public were prompted by encouragement by the Woodland Trust to make a general plea to protect ancient woodlands. These responses appear not to have included specific comments on individual routes.

During the current consultation it has even been reported in the local press in South Cambridgeshire that residents attending 'consultation' meetings electronically were placed 'on mute' permanently by the EWR Co organisers and thus unable to express an opinion or ask a question.

<https://www.cambridgeindependent.co.uk/news/east-west-rail-consultation-has-placed-us-on-mute-say-south-9202056/>

This is totally unacceptable.

The timescale for the current consultation, especially when face-to-face meetings cannot be held due to the pandemic, has been far too short.

In Bedfordshire and Cambridgeshire local groups and their MPs have requested that the consultation be expanded and extended to allow proper and public consideration of a northern approach into Cambridge station. So far this request has been totally ignored.

It is CPRE's view that this 'consultation', and the previous one have been box-ticking exercises designed to fulfil a statutory requirement for consultation rather than a meaningful conversation with communities and their elected representatives.

Whilst the level of engagement with some local communities has improved in this consultation, there has been no evidence of any real listening to the points made by the public, many of whom are experienced rail and transport professionals, planning professionals, farmers and countryside specialists in their own right. There is certainly no indication of any willingness to genuinely re-evaluate some of the major weaknesses of EWR Co's proposals as perceived by consultees.

Strategic Environmental Assessment

CPRE stated previously that a full Strategic Environmental Assessment (SEA) should be undertaken before the preferred route is confirmed. There should be an SEA that allows for a comparative assessment of Route 'E' against the options which CPRE advocate in Bedfordshire and in Cambridgeshire.

Motive Power

At the time of the 2019 consultation, CPRE understood that the EWR line would be constructed 'electrification ready', in the interests of eventually eliminating diesel power from the national rail network. This now appears not to be the case and instead EWR appears to be relying on as yet unproven new technologies, such as hydrogen power, to meet its environmental obligations.

Preferred Route

There is a complete lack of evidence to support the assertion made by EWR Co that Route 'E' outperforms Route 'B' against the criteria adopted to assess the route options put forward in January 2019.

CPRE preference is for a route which follows the existing A428/A421 transport corridor between Cambridge and Bedford. In the previous consultation Route 'B' provided the closest match to this preference.

We still believe that Route 'B' or a variation based on Route 'B' is the optimum route corridor for several reasons including, ability to serve the maximum number of existing communities, construction cost, operating revenue, least disruption to the countryside and to agriculture, least opening up of scarce agricultural land for development, speed of delivery, clear alternative to the now cancelled Ox-Cam expressway.

We stated that within Bedfordshire, the interchange with Thameslink/Midland Mainline at Wixams, as proposed by EWR Co in the Route Option consultation, remains a viable alternative and should be capable of providing an effective solution for the railway and be able to serve communities in the southern areas of Bedford.

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.

Like the new Mayor of the Cambridgeshire and Peterborough Combined Authority (CAPCA), CPRE cannot support 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. Instead, as the Mayor has indicated publicly, a route via the existing St Neots station should be considered to serve the growing population of St Neots.

CPRE Bedfordshire has previously 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

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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.

In Cambridgeshire, CPRE remains very concerned that the effects of EWR on the historic Croxton Park have still not been properly considered. This remains 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.

CPRE supports a route via Cambourne which will serve the existing new town there and also the new settlements proposed for Cambourne West and Bourn Airfield. However, it is our view that this is only a practicable option if it is designed as part of an integrated transport solution, carrying light rail vehicles as well as heavy ones, such that a Metro service can be provided to Cambourne and Bourn via EWR. This has become even more important with the announced cancellation of the 'Cambridge Metro' by the incoming CAPCA Mayor.

CPRE continues to believe that the route east from Cambourne would provide a more integrated and sustainable solution if the suggestions of the groups CambBedRailRoad (CBRR) and Cambridge Approaches were taken into account.

Instead of routing south east from Cambourne, the existing A428 corridor should be followed north-east. This would enable EWR 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 Cambridge North station.

Detailed Issues

The following sections describe issues specific to Bedfordshire and Cambridgeshire which appear not to have been considered effectively by EWR in our view.

Issues Specific to Bedfordshire

CPRE Bedfordshire believes that this consultation is fundamentally flawed because it is entirely focused on the EWR Company (EWR Co) preferred corridor (Route 'E'), which passes north through the urban area of Bedford before turning east, through tranquil open countryside and rural villages, causing huge environmental damage.

CPRE Bedfordshire has been working with the campaign group Bedford For a Re Consultation, (BEFARe), a coalition of Parish Councils and residents in north Bedfordshire, to put pressure on EWR and Bedford Borough Council, demanding that the current consultation arrangements are abandoned to allow for reconsideration of the choice of the EWR Cos preferred Route 'E'.

CPRE Bedfordshire and BEFARe say that a better alternative could be developed passing to the south of Bedford, based on a remodelling of Route 'B' from the previous consultation, which minimises environmental damage by utilising the existing A421 travel corridor south of Bedford.

The options for railway alignments within Route 'E' proposed in this consultation for Bedfordshire are therefore completely unacceptable.

The options under consideration in Bedfordshire are concerned with;

- The number and location of stations between Bletchley and Bedford on the existing Marston Vale line (Section B of the Consultation Document).
- The alignments for the railway on a new line between Bedford and the boundary with Cambridgeshire, where an interchange station with the East Midlands Mainline is to be located somewhere between St Neots and north of Sandy (Sections C and D of the Consultation Document).

Bletchley and the Marston Vale Line (Section B)

Section B of the Consultation Document looks at the options for operating EWR between Bletchley and Bedford using the existing Marston Vale line. EWR Co proposals are focused on the frequency of services, how vehicles and pedestrians cross the railway, and the number and location of stations.

EWR Co has developed two alternative concepts for the train services and stations on the Marston Vale Line;

- Concept 1 - retains the existing hourly service that stops at all current intermediate stations and introduces a fast limited-stop Oxford – Cambridge services alongside it.

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- Concept 2 - merges a number of the existing intermediate stations together to provide five new stations on the Marston Vale Line with improved facilities and more frequent and faster trains.

CPRE Bedfordshire favours Concept 1 because it:

- Retains all existing stations, providing easier access for local people to rail services for local travel. A 'greener' and more sustainable option.
- Avoids the extensive development and relocation of some stations involved in Concept 2, which involves building new stations in open countryside.

CPRE Bedfordshire believes that it is essential that the views of Parish Councils and local people are fully considered, and that resident's current travel patterns are fully understood, before making decisions about which option will be chosen.

Bedford to St Neots/Tempsford (Sections C and D)

CPRE accepts that some environmental harm will be inevitable in the construction of a major new railway line. However, we recognise the benefits of better east/west rail connections which will provide important opportunities to reduce reliance on roads for cars and heavy goods vehicles.

Nevertheless, we believe that EWR Co have got their priorities totally wrong in their choice of Route 'E';

- CPRE Bedfordshire believe it is essential that the railway is developed in a way that makes minimising environmental harms to both urban and rural areas, a primary priority.
- By their own admission EWR Co state in the Consultation Document that the key project priorities are to develop the railway in a way which best supports economic growth and new large scale housing growth.
- Although EWR Co state that environmental considerations are taken into account, these are largely absent from the Consultation Document as far as the Bedford Borough area is concerned.

CPRE Bedfordshire believe the case against Route 'E' can be demonstrated as follows;

1. Environmental Impact - a detailed Environmental Impact Assessment of the choice of Route 'E', both on the urban areas of Bedford and the rural areas of the north Bedfordshire countryside, has not been undertaken.

- Implications for the urban areas of Bedford not considered;
 - Impact on properties in the Ampthill Road/Kempston Road areas of Bedford
 - Impact on the surrounding areas of increased use of St Johns Station, potentially as the principal EWR station in Bedford
 - No impact assessment of Route 'E' on the Poets area of Bedford town, and no clear estimate of the cost implications
 - EWR proposals involve increased train speeds in urban areas from 25mph to 50/60 mph, no safety or health risk assessment
 - Freight trains will operate 24/7, no noise or vibration risk assessment.

- Implications for the rural areas of the Borough not considered;
 - Impact of the massive viaduct over the A6 on the River Great Ouse Valley area
 - Impact on north Bedfordshire countryside across the length of Route 'E'
 - Impact on rural communities from Route 'E'
 - Potential environmental impact of New Towns associated with Route 'E' e.g., Twinwoods/Clapham/Milton Ernest/Bletsoe and Sharnbrook/Colworth
 - Impact on biodiversity - EWR Co say they are committed to achieving biodiversity net gain across the programme, yet there is no detail of the steps that will be taken to achieve it, by what date, how and what level of biodiversity net gain is expected.

2. Freight on East West Rail - in its communications with the public EWR Co has continually played down the potential for the line to develop as a strategically important route for freight.

The impact of freight has been ignored by EWR Co in this consultation. The true extent of EWR Cos ambitions for freight can be found in the East West Rail Consortium's Terms of Reference, which state their intention to seek out opportunities to use EWR to;

- *'Develop freight services as part of the UK rail network, recognising the opportunity EWR brings in terms of better connectivity to eastern ports, and as an alternative to routing traffic around London.'*

CPRE Bedfordshire recognises the extremely important part that EWR can play in reducing road freight and the associated carbon footprint.

However;

- Taking large freight trains through the urban areas of Bedford is not a good idea. Residents whose homes are already close to the rail network e.g., the Ampthill Road area, will be subjected to additional noise, vibration and air pollution.
- Route 'B', utilising an existing transport corridor, is a much more environmentally suitable route for the new railway for both passenger and freight traffic.
- Bedford Borough Council appears not to have thought this through in their enthusiastic support for Route 'E'.

3. Project Costs - the Costs of Route 'E' should be subject to independent review and comparison, between Route 'E' and the principal alternative, Route 'B'.

CPRE Bedfordshire believe that EWR Company's assertion that Route 'E' is the most cost-effective route is simply not credible.

The following facts give cause for concern;

- The cost comparison figures put forward by the EWR Co in the Route Option Consultation of January 2019, where the upfront capital costs for Route 'B' were presented as being significantly less than those for Route 'E', have been substantially revised without explanation, to show the preferred Route 'E' as cheaper in terms of upfront costs compared to all other route options.
- The EWR Co have acknowledged that many substantial costs, for example those due to the proposed demolition of properties in the Poets area of Bedford, were not taken into account when the Route 'E' cost calculations used for this Consultation were published.
- There are very obvious technical challenges for Route 'E' associated with the steep gradient in Bedford from the A6 to Clapham that will clearly carry heavy cost implications.
- For Section D in Cambridgeshire, East West Rail Co have said that they wish to "take advantage of the already established A 428 transport corridor" created by Highways England from the Black Cat roundabout on the A1 to Cambridge, recognising the substantial cost and environmental benefits of doing so.
- Why doesn't EWR Co recognise the same benefits can be achieved in Bedfordshire by using the A421 transport corridor from Bedford to the Black Cat roundabout via Route 'B'?

EWR Company have been persistently asked by CPRE Bedfordshire and BFARe for more information about how the cost estimates were created and revised, but their promises to share more financial information have not been kept. This is despite the fact that they made more detailed financial information available to the consultants engaged by Bedford Borough Council to review the route options in 2019.

4. Economic Growth - the case made by Bedford Borough Council that Route 'E' can deliver greater economic benefits than Route 'B' is unreliable, and inconsistent with the analysis put forward by EWR Co;

- Bedford Borough Council's response to the Route Option Consultation of March 2019 suggested that economic benefits of a Bedford Midland route are 12% higher than a route south of Bedford.
- EWR Cos Technical report published in January 2019 indicated that route options serving Bedford Midland would generate slightly smaller increases in jobs and productivity than routes serving a new station to the south of Bedford, due to faster journey times across the Oxford-Cambridge Arc.

- The EWR Co Preferred Route Option report of January 2020 stated that further economic modelling they commissioned suggests the likely Gross Value Added (GVA) productivity benefits of routes via Bedford Midland and routes via a new station to the south of Bedford, would be very similar.

CPRE Bedfordshire believes that this is the wrong priority for the EWR project and that these unreliable and inconsistent estimates of potential economic benefits, represent a very unconvincing case to justify the extensive damage to the countryside and rural communities that will follow if Route 'E' is pursued.

5. Housing Growth Opportunities - this is another area where EWR Cos position has shifted, presumably due to pressure or persuasion by Bedford Borough Council.

EWR Cos Technical report of January 2019 stated that;

- *“although Route 'E' could support additional housing through the densification of Bedford town centre, this is likely to offer significantly less potential than to the south of Bedford where Route 'B' could support significant additional housing (aligned with the recent strategic allocation of land at Wixams).”*

Bedford Borough Council, in their response to the Route Option Consultation, say there is little or no scope to include development south of Bedford as a benefit of a southerly route for EWR.

In their consultation response the Borough Council highlights;

- *“four new settlement proposals, at Colworth, Twinwoods, Thurleigh and Wyboston. Whilst none of these has yet been allocated, they are likely to be considered for allocation in future plans.”*
- *“Each site is to the north of Bedford and would be better served by a northern route for EWR through Bedford Midland...”*

CPRE Bedfordshire maintain that through their support for Route 'E', the Borough Council are positioning EWR as a means to unlock north Bedford for the development of major new settlements which, with associated road infrastructure, would overwhelm and urbanise the character of this area of precious countryside.

The position that the Borough Council has taken on housing growth in north Bedford is one that CPRE Bedfordshire will be challenging in the upcoming Local Plan Review Consultation.

We will be encouraging our members and local people to vigorously oppose any steps towards planning large New Towns in the north Bedfordshire countryside.

Issues Specific to Cambridgeshire

CPRE Cambridgeshire and Peterborough (CPRE) believes that this consultation is fundamentally flawed because it is entirely focused on a southern route into Cambridge and at no point has there been proper evaluation of or any consultation with the public about an alternative northern route into the City.

CPRE does not agree that EWR's reasons for only considering a route option that approaches Cambridge from the south rather than from the north are technically or financially sound.

CPRE believes that EWR's sole purpose in the choice of Route 'E' is to damage and fragment as much countryside as possible in order to open it up for development. This is not a sound technical or commercial approach to a major infrastructure project such as this.

Transport Planning Strategy

Cambridge is currently faced with a myriad transport issues and parallel transport proposals from different, competing, elected and unelected bodies. These include:

- Highways England, seeking to build an expressway standard road between Cambourne and the A1 Black Cat junction with the A412
- The Combined Authority for Cambridgeshire and Peterborough seeking to build an autonomous Metro, now possibly cancelled following recent local elections
- The unelected Greater Cambridge Partnership seeking to break up the countryside with 'busways' and 'greenways'
- Network Rail seeking to improve local and national passenger services and freight services, including new and improved stations, longer trains and completion of the Felixstowe-Nuneaton East-West freight route
- Developers promising to build new stations as at Waterbeach and failing to deliver
- Cambridge City Council seeking to reduce car usage in the City
- Cambridgeshire County Council seeking to repair and improve the county's unsafe and often badly damaged roads because of lack of funds
- East West Rail ploughing its own furrow towards Oxford without sincere thought about co-operation with local elected authorities or communities.

If East West Rail continues in its current approach this will be a major missed opportunity to provide an integrated public transport plan for Cambridge and its surrounding communities.

CPRE believes that the current exercise should be paused and all the competing bodies, each spending millions and in some cases, billions of public money should be forced to co-operate and deliver a cost effective, integrated transport plan for Cambridge with East West Rail at its core.

Route into Cambridge and Beyond

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.

We are very disappointed that the route for the EWR in Cambridgeshire has not been identified as part of a multi-modal study incorporating the A428 improvement and a strategic transport plan for the Greater Cambridge area.

A route continuing north-east from Cambourne continuing to follow the A428 corridor would provide an integrated transport solution for Cambourne and Bourn, the new town of Northstowe and users of Cambridge North station. It would allow easy access to the route to Oxford for the majority of high-tech businesses located in the northern fringe of the City as well as those in the south and centre.

Cambridge South station could still be accessed from the north via the City station, including by EWR trains continuing to Stansted Airport. Metro-style services could be extended to the high-tech clusters at Harston Mill and Melbourn.

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 frequent engineering closures on the existing Liverpool Street line. There is currently a public campaign for the re-opening of this line to Haverhill as more cost effective and less damaging alternative to a proposed busway:

<http://www.railhaverhill.co.uk/>

Yet, there has been no consideration of the market for passengers wanting to travel on to Stansted Airport or to Liverpool Street, the City of London and Docklands. EWR trains will be facing the wrong way to serve these important markets.

There is already congestion and a technically difficult junction where the Kings Cross and Liverpool Street lines diverge south of Cambridge. It is now clear that the approach of EWR from the south requires a major junction with excessive land take at this rural location.

The EWR plans appear to give little weight to the likely passenger market of the planned new 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. EWR appears to think that its only market is in Cambridge City centre not at either of these two major employment clusters.

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Apart from Cambourne, there has been no consideration of serving local communities which potentially could make most use of the system, deliver the highest return on investment and the greatest contribution to sustainability by 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 track to be used as the core of Metro services around Cambridge instead of the much more costly and possibly cancelled Cambridge Autonomous Metro. Such integrated systems are in use or being built in other cities in the UK and all over the world.

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.

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 St Neots, 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 using the ECML from St Neots to Sandy station. This would facilitate local services as well as avoid any disturbance to RSPB, Biggleswade Common, Wimpole Hall or Croxton Park.

Apart from the exit from Cambridge central station, there has been no consideration of the problems associated with continuing EWR trains east towards Ipswich. Capacity on this route is severely constrained by its single track layout and the single track tunnel at Newmarket. Yet EWR's response to our enquiry on this subject was "*This is outside the scope of EWR Co.*" This is not a responsible approach to transport planning in our view.

Environmental Impact

There has been no proper Environmental Impact Assessment of the proposed route across South Cambridgeshire.

It is our view that this route will be extremely damaging to to the local countryside, to the surrounding farmland and to the delicate chalk stream tributaries of the River Cam which it will have to cross.

The landscape and heritage impacts of the proposed massive structures is appalling. They have been well described by the team at Cambridge Approaches on their website at:

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<https://cambridgeapproaches.org/wildlife-and-landscape-impacts-of-ewrs-preferred-southern-route-into-cambridge-versus-cbrs-northern-route/>

There is no evidence that EWR Co has considered the effect of the proposed Route 'E' structures and railway operations on the Cam river catchment.

Will the proposed structures in South Cambs. affect the water levels in the surrounding farm land in terms of both flood risk and irrigation?

What will be the effect of the proposed river crossings on the chalk stream tributaries of the River Cam?

It is recognised by the HS2 company that the construction and operation of HS2 could have a negative effect on the underlying chalk aquifer supplying North East London. The local water company there, Affinity Water, has applied for additional abstraction licences in the surrounding Chilterns for use in emergency. Is there a risk that East-West Rail company's activities in South Cambridgeshire could have similar or other unwanted effects on the potable water supply to Cambridge and South Cambridgeshire?

There has been no recognition of the impact of the proposed route and its objective of opening up land for development on the Cambridge Green Belt one of whose primary objectives is to protect the setting of the City of Cambridge. The ugly and massive structures proposed across South Cambridgeshire are a clear contravention of that objective.

Freight on East West Rail

CPRE considers it important that an integrated approach to providing capacity for freight by rail should be taken into account insofar as it affects route options and commercial viability of EWR. 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. Such a comprehensive study appears not to have been done.

There has been no proper assessment of the relative impact of freight on residents in the Cambridge area, particularly those living close to the line in the City whose sleep will be disturbed by the 24/7 rumbling of passing freight trains if current plans come to fruition.

Indeed, EWR has no clear freight strategy or clear estimates of the volumes of freight traffic likely to use its tracks. Neither has Network Rail built use of EWR into any of its detailed plans.

It is CPRE's view that completion of the Felixstowe to Nuneaton upgrade, postponed a few years ago due to the engineering problems at Ely including the new chord at Ely that is

needed to facilitate doubling of the line to Soham would provide a more cost effective solution to east-west freight capacity constraints than the use of the EWR tracks which is complicated by the single track tunnel at Newmarket. CPRE supports the CBRR and Cambridge Approaches suggestion that an additional chord at Ely would provide freight access to an EWR northern route and completely avoid the passage of freight trains through central Cambridge should it become necessary to use EWR for freight.

There has been no attempt whatsoever to assess the likely health effects arising from noise, vibration, air pollution, water pollution or accident risk on those living close to the line or on the surrounding countryside arising from the use of the line by freight trains or even by passenger trains.

Project Costs and Return on Investment

It is quite clear that the projected costs of EWR, currently estimated at c. £5.5 bn, do not represent good value for money, a situation exacerbated by the muddled approach to strategic transport planning described above.

CPRE considers that this project would provide a much better return on investment if it was part of an integrated transport strategy for the Cambridge area.

Planned projects like the Greater Cambridge Partnership busways or the Cambridge Autonomous Metro would be unnecessary, potentially saving billions of capital cost.

Use of EWR as the core of an integrated transport solution as described above would significantly increase ridership and hence the revenue returns of the project.

CPRE believes that EWR Co. are behaving irresponsibly by failing to properly address the cost benefit analysis of the railway and instead relying on the returns from opening up the countryside to development, which may not happen, to support their case.

Climate Change, Farm Land and Housing Growth

It is clear that many farms in Cambridgeshire will be severely damaged and likely made unviable by the effects of this project. The landscape impact is horrific. How many EWR directors will be prepared to live in Harston or Haslingfield if EWR proceeds as proposed?

Reliance upon the returns from development as the main economic case for the railway is completely flawed because in Cambridgeshire and Bedfordshire, the protection of farm land is now a national economic imperative due to the rapidly advancing effects of climate change.

As a consequence of climate change, north Cambridgeshire and Cambridge are facing major threats from sea level rise. IPCC 2019 estimates this will be 1 metre by 2100. Climate Central

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(Surging Seas) estimates a 4.7 metre rise if global temperature rise is limited to 2°C. Either estimate will put the Fens under water without major infrastructure investment.

Taking good farm land out of production in a country under such threat which already imports c. 60% of its food supply in order to enable housebuilding like the Ox-Cam Arc is just ignoring the facts about issues which we will all have to face up to very soon.

East Anglia is often known as the national bread basket but actually our farmers grow a lot more than bread, especially in the Fens which some estimate as being responsible for growing as much as 60% of the food which is grown in the UK. Therefore protecting higher level land, none of which is Grade 1 is a national issue. Grade 1 is a designation reserved for the Fens and other peatlands.

It is not just a matter of protecting land which is in DEFRA categories, 1, 2 and 3a. All land capable of growing crops must be protected as a national imperative. The DEFRA land categorisation maps show clearly that the majority of land in Cambridgeshire and Bedfordshire that will be affected by the 'growth' that EWR is seeking to facilitate in order to make its economic case is Grade 2 with some Grade 3 land.

<http://publications.naturalengland.org.uk/publication/127056?category=5954148537204736>

Furthermore, according to the International Panel on Climate Change and others, the future global food supply situation is going to be rapidly and negatively affected by climate change .

<https://time.com/5663621/climate-change-food-supply/>

<https://theecologist.org/2019/nov/15/climate-change-impacts-food-production>

The Environmental Audit Committee has clearly warned UK Government about climate change reducing the food available for import in future years but to date Government has failed to take any action to further protect farm land. This project will facilitate further damage.

<https://www.foodnavigator.com/Article/2019/09/18/UK-s-food-supply-at-risk-from-climate-change-and-imports-report>

CPRE considers that EWR in its current form and with its current economic case being based upon the returns from development, is acting irresponsibly and making a bad situation far worse.

Therefore, if it is to continue, EWR must make an economic case which is based upon transport delivery and not on housing growth delivery.

Viability and Conclusions

Viability

The EWR case for passenger traffic revenue with the railway in the form proposed is clearly unviable.

The EWR case rests on returns from housing growth in an area where all productive farmland must be protected in the medium term national interest due to the increasing effects of climate change.

EWR should return to the drawing board and examine how it can deliver an economic case and a return on investment based upon transport need, preferably by serving local markets with an integrated transport solution.

Unless this is done voluntarily, HM Treasury should intervene and halt the project in its current form.

Conclusions

In Bedfordshire, CPRE believe that a better alternative can be developed for Sections C and D with a route passing through the Bedford area which utilises the A421 travel corridor, based on a variation of Route 'B' from the EWR Co Route Option consultation. A southern route offers the same benefits of supporting economic growth and improved connectivity, whilst minimising environmental damage.

In Cambridgeshire CPRE believes that EWR must be re-configured to become part of a cost effective, integrated transport solution for the Greater Cambridge area. For this to happen, a northern approach to Cambridge is essential.

The options for railway alignments within Route 'E' proposed in this consultation are therefore completely unacceptable.

In response to the information put forward in this response, and the views put forward by residents and their elected MPs in Bedfordshire and Cambridgeshire, EWR Co should give recognition to the strength of these arguments and accept the case for a major reset of the project timetable, so that a closer examination of the pros and cons of the northern and southern routes around Bedford and Cambridge can be undertaken, before coming to a final decision.

Alan James
Chairman CPRE Cambridgeshire & Peterborough
9th June 2021

Martin Christopher
Chairman CPRE Bedfordshire