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East West Rail Company Ltd consultation@eastwestrail.co.uk

Electronic submission only

Dear East West Rail Company Limited

Response to non-statutory consultation by East West Rail Company Limited (EWR Co) for East West Rail (EWR) - Bedford to Cambridge and western improvements Development Consent Order (DCO) proposals (PINS ref. TR040012)

This response is provided by Greater Cambridge Shared Planning Service (GCSPS) on behalf of South Cambridgeshire District Council ("the Council") regarding the non-statutory consultation for the East West Rail (EWR) - Bedford to Cambridge and western improvement Development Consent Order (DCO) proposal, which commenced on 14 November 2024 and closes on 24 January 2025.

The EWR DCO proposal is designated as a Nationally Significant Infrastructure Project (NSIP) due to its scale and importance. This designation is defined under Part 3 of the Planning Act 2008 (as amended) ("the Act"). Specifically, the project meets the criteria for an NSIP because it involves constructing a new railway line

that: is wholly within England; forms part of a network operated by an approved operator; has a continuous route of more than two kilometers; and is not on operational land of a railway undertaker before construction begins.

The Council understands it would act as one of the host authorities for the EWR DCO under Sections 42 and 43 of the Act as the development is located within the district.

Response to non-statutory consultation

The Council welcomes the opportunity to respond to the consultation. Attached to this letter is a table (Appendix A) containing the Council's initial views on the current proposals across a number of technical specialisms, and incorporating comments based on views received from parish councils within the district.

The appended schedule signals areas for further discussion that it would expect to explore with the applicant through structured pre-application engagement, framed by a Planning Performance Agreement (PPA), ahead of any further formal consultation being undertaken. The Council's response is based on the information available in the non-statutory consultation and reserves the right to comment further in the coming months as the proposals develop and more detail becomes available.

A summary of headline issues, which the Council expect to address through further dialogue with the EWR Co, is noted below:

- Access and connections to the new Cambourne Station for the significant number of travellers in existing Communities to the south of the A428.
- The impacts of the design of the A428 Cut and Cover Tunnel on wildlife and the implementation of the Bourn Airfield strategic growth site.
- The vertical alignment of the railway and resulting embankment heights and cutting depths – and potential for greater tunnel lengths to mitigate.
- The design and impact of key structures on landscape, wildlife and visual amenity.
- The length and depth of the Chapel Hill Tunnel and cutting and the impact upon ecology and the landscape.
- Options for landscape mitigation and the creation of new landscape to manage amenity impacts and integration of the rail infrastructure within localities.

- Options for addressing through the construction site extents and detailed schemes the very significant disruption likely to be caused to the villages and community facilities including schools adjacent to but also more remotely from the railway alignment caused by the construction phase of the project – reflecting lessons from HS2.
- The detailed implications from temporary and permanent road and path closures, new structures and the interaction (via bridges, underpasses etc) of the new railway with all users of those local routes.
- The impact of discontinuous electrification on freight and the impacts of continuous electrification on railway structures and the landscape.

The Council acknowledges the responses of other key stakeholders including England's Economic Heartland, Transport East, Cambridgeshire and Peterborough Combined Authority, Cambridge City Council, Cambridgeshire County Council and Huntingdonshire District Council.

Further engagement and duty to consult

It is expected that EWR Co facilitate meaningful engagement with both the Council and local communities to ensure details of the proposals are fully understood in advance of any future consultation. To assist in facilitating structured engagement, the Council - through the Greater Cambridge Shared Planning Service – are currently in negotiations with EWR Co. regarding entering into a PPA.

The Government's Guidance <u>'Planning Act 2008: Pre-application stage for Nationally Significant Infrastructure Projects'</u> clearly outlines the expectation that the consultation process is 'front-loaded'. This includes a strong recommendation for early engagement with expert bodies and the local community, alongside the more formal provisions for engagement outlined in Chapter 2, Part 5 of the Act.

The proposal would be determined having regard to the National Networks National Policy Statement (NPS), the National Planning Policy Framework (NPPF), National Planning Guidance (NPG), and local planning policy where appropriate.

The assessment principles in the <u>National Networks NPS</u> identifies the importance of good design from the outset of a proposal, particularly in applying the mitigation hierarchy to avoid, mitigate, or as a last resort compensate for the identified problems and existing adverse impacts. It is a matter of particular concern that the applicant to date has undertaken limited engagement and consultation directly with expert technical officers at the Council in relation to landscape, design, ecology, heritage, environmental and planning matters. The NPS also emphasises the

importance of meaningful engagement at the earliest opportunity between the applicant and local planning authority

If you have any queries regarding this submission or require any further information, please contact nsips@greatercambridgeplanning.org

Yours sincerely

SJ kelly

Stephen Kelly

Director of Planning & Economic Development
On behalf of South Cambridgeshire District Council

cc. Liz Watts (Chief Executive)

Enclosures

Appendix A: Table of comments (South Cambridgeshire District Council)