

Thank you for your invitation to comment on the EWRCo consultation as a Local Member. I am in fact not listed as such but would highlight that Orwell and in particular Barrington will be significantly impacted by the proposed route. Additionally Gamlingay and surrounding villages will be of course be very seriously impacted by any largescale development such as proposed at Tempsford.

This might be a good point to remark that EWR say that all housing development is a matter for Local Plans and nothing to do with EWR. EWR also include a new town at Tempsford and significant development at Cambourne as EWR-derived housing. These two statements by EWR cannot both be true.

The draft response you have published has a lot of detail, but aside from mentioning an eastern entrance to Cambridge Station and the possibility of a new station at Cambridge East, it does not raise any specific overarching or strategic concerns. It should do so. I have listed below those which should be considered for highlighting.

1. *Everyone is busy making plans for Greater Cambridge* – but they appear not to be talking to each other. Neither the Cambridge Growth Company (chaired by Peter Freeman) or the EWR Economic Growth Board set up by the Treasury over a year ago are mentioned in any of EWR's consultation documents. This is despite the fact that the National Audit Office report on EWR over a year ago identified this as a significant issue saying "DfT and DLUHC should work together on bringing forward a shared vision for growth in the Cambridge region, with future investment decisions on East West Rail and development in Cambridge taking account of progress on that vision." The MHCLG letter appointing Peter Freeman makes no mention of EWR. We should surely at least ask EWRCo what is happening and why the consultation documents are silent on these important matters?
2. *EWR's business case is dependent on development decisions made locally* – but, for example, SCDC says in its covering paper to its response to the EWR consultation that "officers consider there to have been a lack of meaningful engagement with EWR Co. to date, particularly limited information sharing by EWR Co". This is not encouraging, especially as the dependent development at Cambourne that forms part of EWR's business case is not in the emerging Local Plan. It also suggests that the statement in the technical comments that (emphasis added) "The Council strongly encourages EWR *to continue* to work closely with Local Authorities.." under the heading "link to growth proposals and Local Plan" should be rephrased. I applaud the fact that the technical comments call for EWRCo's full Business Case to be shared with the County Council, but would suggest that this should be highlighted in the covering letter and also say that it should be published at an early stage.
3. *EWRCo's chosen southern approach has some very significant problems and alternatives must be considered* – for example, in its comments the Council has identified that "impacts to Eversden and Wimpole Woods SAC barbastelle bat population [from a southern approach] are unacceptable and scheme should be redesigned". This must be highlighted up

front. An obvious alternative is a northern approach to Cambridge or a very long mined tunnel which avoids the impact on the bats. As regards the former, concern was raised at the SCDC Cabinet meeting last week that EWRCo has been frugal with the truth in its description of the relative merits of the northern and southern approaches and that staff at drop-ins have admitted that the northern approach is better and cheaper, but too much money has been spent on the southern approach for them to be able to pursue it. EWRCo should be pressed to look again at the northern approach, which by its own admission is cheaper, more environmentally friendly and potentially quicker to construct.

4. *Freight* – the response assumes that freight will be electrically powered. Unfortunately, if EWRCo continues with its preferred solution of discontinuous electrification, this will not be so. The DfT admitted in oral evidence to the Transport Select Committee on 11 December that “it is relatively difficult to decarbonise freight without full electrification. Therefore, potential freight use is also a factor when thinking about the long-term strategy of the railway”. The County Council must press for full electrification and highlight the need. I would also suggest that there is too much enthusiasm in the comments about the use of the Newmarket Line for freight. There are no detailed proposals (for example, no-one knows how many properties would have to be demolished) and no-one has any idea of the cost. Network Rail’s East West Main Line Strategic Statement makes clear in the first column on page 61 and the second column on page 62 that the works required are extensive and more extensive for freight than for passenger trains. A southern approach to Cambridge bakes in the use of this unsuitable line for freight and also means that freight will pass through parts of urban Cambridge. A northern approach would allow freight to avoid Cambridge altogether. We should highlight the lack of plan and lack of cost estimates in respect of the Newmarket Line, despite the fact that its use is an integral part of EWR’s proposals, and the undesirable consequences of using it for freight. In addition, figure 140 in the Technical Report suggests that EWRCo may be considering a northern chord onto the Newmarket Line for freight, which would involve a reversing manoeuvre for freight trains. This is a detailed point, but we should ask a question about this and draw their attention to paragraph 2.5.81 Appendix F to their 2021 Technical Report and diagram 43 under it.
5. *More cars on the roads not fewer (and so more roads)* – the draft response accepts, without question, that EWR will take cars off the roads. Unfortunately, EWR’s own figures (figure 4.1 Appendix 4 May 2023 Environmental and Technical Report) shows that this is not so. A very high proportion of the inhabitants of the new houses at Cambourne and Tempsford who work in Cambridge will not use the train. More roads will be needed. This point needs to be highlighted. In addition, these inhabitants and those of development from the Greater Cambridge emerging Local Plan have not been taken into account in EWRCo’s Transport Update Report. All these points need to be highlighted.
6. *Lack of door-to-door connectivity* – as the technical comments note, many communities will be disadvantaged by EWRCo’s proposed route. Yet EWR

has given little or no consideration to how any of them might benefit from its trains and whether there are realistic ways that communities (including Cambourne's own communities) could, for example, be linked to Cambourne station or be provided with alternative public transport. These are really significant omissions and a great deal of work is required on EWRCo's part. However, I have significant concerns as to whether EWR will ever provide more than a partial answer and, a potentially unsatisfactory one at that. Cambridgeshire needs a many-to-many transport system linking Greater Cambridge's polycentric housing and employment sites. EWR is not such a transport system and does not cohere well with other transport proposals, for example, those put forward by the Greater Cambridge Partnership. The technical comments also note that "Not serving Cambridge North is potentially a missed opportunity of EWR". I agree, but believe it would be more straightforward to serve all three Cambridge stations with a northern approach and a turnback beyond Cambridge South station. EWRCo uses its failure to identify a solution to the Fen Road level crossing issue as a reason against a northern approach to Cambridge. As the technical comments note, a solution must be found.

7. *Long Road* – the sections in the technical comments on Long Road do not mention that EWRCo is proposing to close it for several months while it replaces the bridge. For reasons given in those comments this is unacceptable. The comments point out that there is no realistic cycling alternative. Equally there is no obvious road alternative, especially given the planning requirement applying to the roads in CBC to prevent rat-running. Replacement of the bridge over a weekend (as was done in relation to the M25) or a temporary access for pedestrians, cyclists and blue light vehicles should be suggested. Further, the comments do not note that EWRCo says it will require temporary access across the guided busway.
8. *Schools and noise* – this is only mentioned in relation to Comberton Village College, but there are many other schools either already close to an existing railway line EWR will use (eg Great and Little Shelford primary school) or which will be close to the new line (eg Harston and Newton Community Primary School). Noise is surely an issue in relation to all of them as it impacts educational attainment and behaviour and this point should be elevated to the covering letter. Further, I recall that the LIQs received by the County Council included many schools. What is their significance, as it is not obvious from the consultation documents. Surely you should ask EWRCo?
9. *Construction* – the County Council is likely to bear much of the brunt of the many issues arising as a result of the extensive construction disruption that will arise from the railway being built across rural south Cambridgeshire, the impact of heavy construction vehicles on inadequate rural roads and the undoubtedly adverse experiences of the residents of the thirteen villages along the way. We should be speaking to and learning lessons from the experience of Buckinghamshire County Council. I suggest a construction ombudsman, a close examination of EWRCo's proposed code of conduct to make sure it is sufficiently

comprehensive as regards road closures, diversions, restoration of land and a new code of conduct to govern current dealings with landowners, where I understand that EWRCo is reluctant to provide information and pressures landowners and/or fails to give them proper explanations. EWRCo should also be encouraged to rent land that is only required temporarily, with a commitment to restore it to its original state at the end of the rental period.

10. *Infrastructure, including hospitals* – as you know, Cambridgeshire is facing various infrastructure problems, most specifically water. The comments do not highlight the water scarcity that will impact both water needed for construction and operation and water to supply the dependent development on which EWRCo's business case rests (see 2 above). I suggest drawing their attention to the CPCA Infrastructure Development Framework and reminding them that their dependent housing is not in the emerging Local Plan. Hospital provision does not feature in that Infrastructure Development Framework, but the Cambridge Biomedical Campus is clear that hospital provision is currently inadequate for any population growth. This is not restricted to the rebuild of the Addenbrookes acute hospital (for which land has been reserved at CBC since 2010), but also includes the paused Cancer Research hospital and the Children's hospital, which has a significant funding gap. This is a further very material point for EWRCo, given the heavy reliance of their business case on jobs creation at CBC. How can the clinical research and innovation crucial to Vision 2050 progress in a hospital that has insufficient space, equipment and staff to undertake these activities and a maintenance backlog of over £200 million, of which a significant proportion is high risk?
11. *LIQs* – my recollection is that EWRCo's LIQs to the County Council covered many pieces of land. Has anyone checked how these match up with EWRCo's proposals, as presented in the consultation documents? Surely we should be asking questions of them, especially in relation to areas of land which it is not obvious from the consultation documents that they will need.
12. *Private investment* – there are suggestions that EWR is necessary to unlock private investment. Should we be asking what private investment has been offered, conditional on a rail link between Bedford and Cambridge?

Finally, I am pleased to see the technical comments say "The Council requires sight of the carbon calculations used to calculate emissions relating to the construction, operation and maintenance of this project at the next stage of consultation". Others appear to have been confused by the fact that it says it will be net zero in operation. The net zero statement is referred to several times in the technical comments and it should be made clear that this is only in operation (which suggests it would be appropriate to qualify the Council's enthusiasm for the statements in question).

I am sorry that I am unable to attend the Committee as I am away; but I would be most grateful if Members could have their attention drawn to the issues I highlight. I hope it goes well.