



**Bedfordshire
Cambridgeshire
Northamptonshire**

**The Wildlife Trust
The Manor House
Broad Street
Great Cambourne
Cambridge CB23 6DH
Tel: 01954 713500
Fax: 01954 710051**

By EMAIL

To: East West Rail

Date: 8th June 2021

Dear Sir / Madam,

East West Rail consultation spring 2021

This response is provided by the Wildlife Trust for Bedfordshire, Cambridgeshire & Northamptonshire in response to the East West Rail consultation spring 2021.

The Wildlife Trust supports moves to de-carbonise the UK transport network, which a well-considered and designed rail network can contribute to, particularly if it replaces motorway expansion or internal flights.

East West Rail however has significant potential to impact designated nature conservation sites, priority habitats and species and to compromise local nature recovery networks. These impacts will arise from direct impacts from the construction and operation of the rail route and indirect and cumulative impacts from other infrastructure and the Ox-Cam Arc housing growth that East West Rail is explicitly designed to support.

The Wildlife Trust therefore urges East West Rail and the Government to:

- Demonstrate the need for East West Rail and how it will contribute to sustainable development and reduce the UK's contribution to climate change including carbon emissions, not just from the route itself, but from any associated future development that will be facilitated by the new railway.
- Undertake a Strategic Environmental Assessment (SEA) of the route options between Bedford and Cambridge, to select the route which is best for the natural environment.
- Fully assess the cumulative environmental impacts in combination with other major infrastructure projects and associated housing development, so that the scale, location and design of infrastructure and housing has the minimum impact on the natural environment.
- Select a final route between Bedford and Cambridge that best avoids and minimises adverse impacts on nature, including cumulative and indirect impacts, and prevents loss or damage to irreplaceable habitats such as ancient woodland, and does not compromise local nature recovery networks.
- Achieves a minimum 20% net gain in biodiversity through the creation and restoration of priority wildlife habitats, helping to expand and connect existing wildlife sites, and supports local nature recovery networks.
- Achieves the highest levels of nature-friendly design, incorporating features such as wildlife tunnels, green bridges, Sustainable Drainage Systems, and native planting.

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- Commits to decarbonising East West Rail from first operation, consistent with Government commitments to decarbonise the transport sector.

We will now briefly consider impacts on nature from the current proposed route alignments, should the overall case for East West Rail be proven, notwithstanding our current view that the case for East West Rail has not yet been made.

Bedfordshire

We have analysed the latest East West Rail route options to understand the potential impacts on designated nature conservation sites. The tables below summarises this information.

Nature Conservation Site Assessment Summary	Route Options
Section C Bedford	
Sites directly affected (or within 100 m)	2
Sites within 500 m	3
Total sites potentially affected	5

Nature Conservation Site Assessment Summary	Route Options			
	EWR 1/2	EWR 6	EWR 8	EWR 9
Section D Clapham Green to The Eversdens				
Sites directly affected (or within 100 m)	1	3	3	3
Sites within 500 m	4	4	5	6
Total sites potentially affected	5	7	8	9

*The data behind this analysis is available as a separate document. Sites within 100 m are not also included in the sites within 500 m category.

Destruction of the connections between wildlife rich sites across the landscape is a key concern within Bedfordshire. The proposed route for section C (Bedford) combined with any of the route options within Bedfordshire in Section D involve three crossings of the River Great Ouse and also go between numerous small woodland County Wildlife Sites north and east of Bedford. The importance of the connections between these woodlands in the east of the County has recently been highlighted by the ecological studies for the A428 improvement proposals. Strong networks between wildlife rich sites are vital to the maintenance of populations of many species. Based on the information currently available, all of the Section D route options within Bedfordshire would be equally damaging to this landscape scale connectivity.

The additional development proposals, which would accompany the new railway, are likely to have further negative impacts on the wildlife of Bedfordshire through the loss, degradation and isolation of more wildlife sites.

Cambridgeshire

Should East West Rail proceed, the Wildlife Trust still favours a route for East West Rail approaching Cambridge from the north, as set out by the CamBedRailRoad group. Such a route would have the lowest impact on the natural environment and priority species and would not cut across or fragment areas with significant potential for landscape-scale enhancement of nature.

The East West Rail suggestion for a Cambourne North station and a route closely following the alignment of the A428 from Bedfordshire to Cambourne North (EWR Route Alignments 1 & 9) would strategically

make the most sense, creating one single transport corridor rather than multiple corridors. This option will avoid the West Cambridgeshire Hundreds, a priority area for landscape-scale nature conservation, where we are working with over 20 landowners to enhance the farmland around and connecting our nature reserves. It will also avoid the destruction of part of Cambourne Country Park, another WT nature reserve.

We have analysed the latest East West Rail route options and compared them to the Cam Bed Rail Road (CBRR) proposals to understand the potential impacts on designated nature conservation sites. The table below summarises this information.

Nature Conservation Site Assessment Summary	Route Options			
	EWR 1/9	EWR 2	EWR 6/8	CBRR
Sites directly affected (or within 100 m)	6	4	4	2
Sites within 500 m	5	5	6	0
Total sites potentially affected	11	9	10	2

*The data behind this analysis is available as a separate document. Sites within 100 m are not also included in the sites within 500 m category.

The analysis presented by EWR of impacts on nature conservation sites is flawed because it has looked at a wider 2 Km corridor. This gives a false impression of the scale of impacts of their route alignments compared to a northern approach to Cambridge. Our analysis summarised in the table above therefore represents a more accurate picture of impacts on nature conservation sites.

Through our work on the Cambridge Nature Network, we have identified the landscape west of Cambridge as having significant potential to connect Cambridge to the West Cambridgeshire Hundreds, for the benefit of wildlife and people. The East West Rail favoured route alignments from Cambourne to Cambridge will fundamentally compromise this goal of creating a local nature recovery network in this part of the county, or provide a pleasant and largely undeveloped green lung accessible to the people of Cambridge.

As well as avoiding most nature conservation sites, and priority areas for landscape-scale nature recovery, the CBRR alternative route could also potentially have the advantage of removing the need for the current Cambourne to Cambridge Guided Bus proposals which will directly damage a number of local wildlife sites west of Cambridge. It is essential that a more joined up approach to planning transport infrastructure nationally and locally is taken than has happened to date.

Summary

At this stage, the Wildlife Trust remains to be convinced that the business case for East West Rail is coherent or aligns with local development plans in Bedfordshire or Cambridgeshire, or local transport proposals such as the Cambourne to Cambridge guided bus. There is a lack of explicit recognition of the cumulative, and in combination impacts of the proposals on the natural environment, borne out of a failure to undertake Strategic Environmental Assessment, or a demonstration of how both the rail proposal and all other anticipated development off the back of it will be sustainable, and reduce the UK contribution to global emissions and climate change. At this stage the Wildlife Trust therefore remains opposed to East West Rail's proposals as they are currently set out.

Yours sincerely



Martin Baker
Conservation Manager

Direct Tel: 01954 713508

Email: martin.baker@wildlifebcn.org

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