Appendix A

Consultation response on EIA Scoping Report – relating to application by East West Railway Company Limited (the applicant) for an Order granting Development Consent for the East West Rail (the proposed development) (PINS ref: TR040012- 000019)

Table 1: Response to EIA Scoping Report

This table sets out comments from Cambridge City Council (**the Council**) in relation to the EIA Scoping Report and associated documents (as listed in Table 2).

ID	Section of report	Description	Comments	'Scoped out' assessment items to be scoped in
General comments				
EWR-MWJV Technical Partner Routewide – Environmental - EIA Scoping Report				
GEN.1	4.2	Defining the environmental baseline: Landscape and historic environment surveys	Understanding how criteria for short-term, medium-term and long-term, as well as permanent and temporary effects can vary among settings (urban and rural) is essential for the assessment outcome and its feasibility. More details of how these criteria will be structured to capture level of impacts/effects in such varied settings should be discussed and agreed with the local planning authority once surveys and data gathering are completed.	-

GEN.2	4.5	Wider development and cumulative effects	The proposed route may intersect with or impact other projects, including strategic growth sites, as well as other initiatives. Given that work on these projects might commence concurrently with or prior to the EWR project, it is crucial to establish communication with the respective project teams. This collaboration will facilitate a comprehensive understanding of the cumulative effects, as each project may have varying environmental priorities.	-
GEN.3	4.5	Wider development and cumulative effects: Defining other developments and monitoring area	The Council would welcome early sight of the gathered GIS data and projects shortlisting through the four stages.	-
GEN.4	-	Artificial lighting	There is reference to the use of lighting for construction (including for security purposes or to illuminate working areas) and operation in the CoCP and Landscape and Visual Method Statement - however, no specific detailed lighting assessment or strategy has been included at this stage. Along with the other improvements and newly installed infrastructure, it is noted that there would be a need for artificial lighting to be provided for various assets and activities along the route. Most of the lighting would be needed for depots and maintenance activities. In addition to these areas, there would be a need for lighting to be provided for stations, car parks and railway junctions/compounds. It is stated that all lighting would comply with standards and best practice for the safety of passengers and staff. Low-level lighting would be used where possible to illuminate walkways and working areas and directed to minimise light pollution beyond railway boundaries. Consideration would be given to motion and	-

			timer-activated lighting where applicable, so lights do not remain on unnecessarily. This approach is noted. In terms of light pollution and human impacts any artificial lighting levels off site should be assessed in accordance with and should meet the levels recommended in the Institution of Lighting Professionals (ILPs) - 'Guidance Note 01/21- The reduction of obtrusive light, 2021 (GN01-21). Artificial lighting can have adverse impacts on health and quality of life / amenity. ILPS PLG04 – Guidance on Undertaking Environmental Lighting Impact Assessments, 2013 may also be relevant to any Es assessment. This document outlines good practice on lighting design and provides practical guidance on production and assessment of artificial lighting impacts within new developments. It is required to establish the impact of lighting on the surrounding environment that details are provided of any artificial lighting of the site and an artificial lighting impact assessment is undertaken with predicted lighting levels at existing residential properties. Artificial lighting on and off site must meet the Obtrusive Light Limitations for Exterior Lighting Installations contained within the Institute of Lighting Professionals Guidance Notes for the Reduction of Obtrusive Light - GN01/20 (or as superseded). The artificial lighting impact assessment will be required to establish lighting during pre and post curfew, in accordance with the ILP guidance notes. The assessment of light intrusion into receptor windows as vertical lux levels is also required.	
Environmental assessment topics: Landscape and visual				
EWR-MWJV Technical Partner Routewide – Environmental - EIA Scoping Report				
LV.1	6.13	Landscape and visual	Whilst no specific detailed lighting assessment has been included at this stage, it is expected that more detailed assessment will be carried out before the planning application stage. This should include consideration of any artificial lighting impacts in	-

			accordance with the Institute of Lighting Professionals “Guidance Notes for the Reduction of Obtrusive Light”. It should be made clear for easy reference where the artificial lighting is to be installed and an assessment will need to be presented within the document. When comparing the existing site and its lighting environment against the proposed development’s lighting requirements, by virtue of the nature, size and location of the proposals there will be an increase in the lighting levels on site This will result in a change of the existing lighting environment. However, the Council appreciates this will be considered more at the detailed design stage, but it would be beneficial to consider impacts as early as possible. The proposed study, assessment and mitigation approach to the ES appears satisfactory at this time from an Environmental Health perspective. However, further consideration needed regarding other impact / effects on other environments such as businesses, other interested organisations such as Astronomy Organisations (sky glow), ecology (wildlife / animal behaviour & breeding), drivers on public highway, landscape or secured by design requirements. These effects should be considered by respective specialists in those areas.	
LV.2	6.13	Sources and types of impact	The approach for considering impacts within 500m distance of the route/area of intervention, and up to 1km for areas with designated historic assets and up to 2km when assessing impacts upon landscape or townscape is welcomed. The Council would welcome an opportunity to have early sight of how this impact distance was determined in some locations to help us better understand the potential impacts & effects on landscape and townscape character of these areas and the practicality and effectiveness of the mitigation measures that will be implemented. Additional viewpoints are likely to be required once the data is gathered and more detailed information on the design	-

			of the extension to Cambridge city station and associated structures are available.	
LV.3	6.13	Proposed scope	Generally, the scope is acceptable; however, the Council reserves the right to amend the lists of criteria based on survey results, site walkovers, local knowledge and collaborative consultation with local authority officers.	-
Routewide – Environmental - EIA Scoping Method Statement – Landscape and Visual				
LV.4	1.1.7	Method Statement – Landscape and Visual	Section 1.1.7 is too limiting regarding landscape impacts. It correctly identifies the impacts on landscape character but fails to identify impacts to other landscape designations both national and local which may exist.	-
LV.5	1.1.8	Method Statement – Landscape and Visual	Section 1.1.8 identifies people and groups of people as the visual receptors for the assessment but does not include an indication of the differing sensitivities of different groups of people and their activities which is an important facet of a Landscape and Visual Impact Assessment (LVIA). It is understood that the above are just introductory statements about landscape and visual differences, but more detail would give clarity to the text.	-
LV.6	5.2.4	Landscape baseline	Impact to designated landscape features must also be included along with the National and Local Landscape Character Areas which are mentioned. Designations may come at a variety of scales (national to local) and sensitivities along the route and must be considered and assessed (e.g., the Greenbelt, nature reserves, TPOs etc.).	-
LV.7	5.2.11	Townscape baseline	Reference to the Cambridge Inner Green Belt Boundary Study (2015) is acceptable. However, reference and weight should also be given to the Greater Cambridge Greenbelt Assessment (2021) that forms part of the evidence base for the emerging Greater	-

			Cambridge Local Plan. It covers more areas than the previous document and is more up to date.	
LV.8	5.2.21	Photography	The Council questions the need to reference use of a tripod at this stage. There may be views where a tripod may be needed to ensure consistency and focus on the subject.	-
LV.9	6.2	Landscape and townscape sensitivity	The proposed rail corridor is next to areas of existing transport infrastructure and routes/infrastructure that are in construction stages (e.g., A428 and Cambridge South station). The baseline assessment and sensitivity of these parts of the east west rail corridor should consider the conditions before and after other adjacent projects in construction. The Council reserves the right to amend or alter the sensitivity criteria and assessment based on further survey and desktop work alongside local knowledge.	-
LV.10	6.2	Landscape townscape and visual elements	The text should include a description of the Cambridge North area and the areas around Coldham's Common, Cambridge East and Cherry Hinton which are distinct from other parts of the city alongside the rail corridor.	-
Book of Figures				
LV.11	Figures 155 to 159	Visual receptors	Additional and amended viewpoints are likely to be required once the baseline data is available and more detailed information on design of the corridor and associated structures are available. More detailed drawings showing viewpoint locations are required. The Council reserves the right to amend and request additional viewpoints.	-

Environmental assessment topics: Historic Environment				
EWR-MWJV Technical Partner Routewide – Environmental - EIA Scoping Report				
HE.1	6.12	General	The Council would like to have early sight of the work on the historic environment assessment to assist in better understanding, and where appropriate help inform, the design and mitigation strategies to reduce the impact of the proposal on the historic environment. The methodology for assessing the impacts and effects of the construction and operation of EWR are understood.	-
Method Statement– Historic Environment				
HE.2	3.3	Standards and guidance	There is no mention of Historic England Good Practice Advice Note: The Setting of Heritage Assets (GPA 3).	-
HE.3	4.3	Study area	The provision of the baseline data within 1 km of the draft order for designated assets and 500m for NDHA is accepted with the acceptance that any other assets outside these areas that are highlighted by stakeholders may also be included.	-
HE.4	5.8.18	Heritage assets-non-designated heritage assets	The Council understands that Cambridgeshire County Council's Historic Environment Team provided a GIS dataset to EWR Co which included a dataset for local heritage listings for both Cambridge City Council and South Cambridgeshire District Council. This showed the status of buildings as Locally Listed, Candidate Ready and Candidate in Preparation for the preferred route plus a buffer of 4km. This information needs to be included within the scoping report.	-

Environmental assessment topics: Air Quality				
EWR-MWJV Technical Partner Routewide – Environmental - EIA Scoping Report				
AQ.1	6.3	Air Quality	The report confirms that the proposed development will introduce four passenger trains per hour each way into Cambridge with a commitment of full electrification if discontinuous electrification was not found to be possible. Section 2.4.4 confirms there are no plans for diesel powered passenger trains to operate on this stretch even in the short to medium term. Very limited information on potential freight train movements is included in Section 2.4.13; although it is assumed this information will be available at the full application stage as there is a commitment in Section 6.3.12 to assess the potential impact of freight trains in accordance with LAQM.	-
AQ.2	6.3	Proposed scope	The proposed scope of the report is considered acceptable.	-
Method Statement – Air Quality				
AQ.3	6	Air Quality	At the time of this consultation 2023 data is available with 2024 data likely to become available in June 2025. The Council would expect the most up to date monitoring data to be used for any future assessment. It is also worth noting that automatic monitoring data for $PM_{2.5}$ is also available for Montague Road within the 2023 ASR. The assessment of diesel trains in accordance with LAQM is noted, the Council expects an assessment of $PM_{2.5}$ exhaust emissions in addition to SO2 and NO_2. in accordance with the Environmental Targets (Fine Particulate Matter) Regulations 2023 exposure reduction targets. This legislation requires a reduction in $PM_{2.5}$ even where compliance with the annual target is achieved. The impact of the proposed development, most notably potential emissions from diesel freight trains needs to be considered as part of the assessment. The conclusions of the Air Quality Assessment will	-

			only be supported once methodology and trip generation figures have been agreed for the Transport Assessment as air quality impacts are intrinsically linked to changes in vehicle movements. The impact of potential changes in vehicle movements around Cambridge Station; most notably along Great Northern Road should be considered as part of the assessment given the sensitivity of this site due to it being the only access road into the station and the proximity of sensitive receptors.	
Environmental assessment topics: Communities and health				
EWR-MWJV Technical Partner Routewide – Environmental - EIA Scoping Report				
CH.1	6.4	Communities and health	The assessment should involve relevant resident associations, the Council's Communities Team and relevant community groups including affected schools/colleges.	-
CH.2	6.4.2	Communities and health	As per government guidance, EWR may result in changes to existing geographical boundaries defining communities and may result in the need for community governance reviews.	-
CH.3	6.4	Sources and types of impact	Emphasis must be made to the importance of mental health impacts that begin at the planning consultation stages; whilst temporary, the effects to human health will be long-term and therefore should be a main focus of the evaluation on communities and health.	-
CH.4	6.6.8	Sources and types of impact	Any reduction in walking/ cycling can impact on social cohesion by reducing opportunities for interaction, this impact should be considered.	-
CH.5	6.4	Establishing the baseline	The applicant should make reference to Cambridgeshire Insight which hosts a range of Joint Strategic Needs Assessments including District Summaries and Ward profiles. The applicant is	-

			also directed to the public health data held on the PHE Fingertips webpage.	
CH.6	6.4.12	Establishing the baseline	Surveys should also be used to determine the impact on other areas of impact not selected areas of public space alone. The Council should be consulted on which community infrastructure will be impacted and surveys on identified infrastructure completed.	-
CH.7	6.4	Evaluating effects	The Council agrees with the approach to evaluating effects of the proposal, which must consider age, socio-economic status and/or pre-existing health conditions.	-
CH.8	6.4	Proposed scope	Changes in demand for public services should be included in scope. The sustainability of rural public services can be sensitive to changes in numbers of service users. EWR changes may result in changes to access of public services which may affect viability. As per comments above community structure and institutional arrangement should be included within the scope.	Changes in demand for public services and community structure and institutional arrangement to be scoped in.
Method Statement – Communities				
CH.9	4.3.1	Surveys and stakeholder engagement	Community surveys should be undertaken for all community facilities.	-
CH.10	4.3.2	Surveys and stakeholder engagement	Affected residents as well as community receptors should be engaged in the development of a shared understanding on the impact of EWR on community facilities.	-
CH.11	5.2.4	Community elements	Public rights of way should be considered both as part of travel and transport and as community infrastructure, these routes are	-

			frequently used for recreation and amenity such as dog walks or ways of spending time with friends/ family and serve a wider use than a path. Sites of ecological value should also be considered as community receptors as they hold much significance for communities.	
Environmental assessment topics: Land quality				
EWR-MWJV Technical Partner Routewide – Environmental - EIA Scoping Report				
LQ.1	6.6	Land quality	The Scoping Report identifies the issue of land quality as an issue of potential concern and a well-informed preliminary (desk-based) assessment (Section 6.6) has been undertaken. This initial assessment proposes to scope out land quality as an Environmental Statement issue due to the nature of the project and the lack of exposure of rail users to potentially contaminated soils. This conclusion is entirely reasonable. The Scoping Report presents a robust approach to the general issue of environmental assessment and there is a very welcome emphasis on the embedding of mitigation measures into the construction works at an early stage. The Scoping Report proposes to use a Code of Construction Plan (CoCP) and material management plans (MMPs) as a way of mitigating/controlling any land quality issues. The structure, content, and approach of these proposed plans have been presented in Appendix B of the Scoping Report, specifically in the EIA Scoping Method Statement – Land Quality document. These methodologies robustly follow well established best practice and are entirely appropriate to the development. As such, the Council supports their use through the use of suitably worded conditions/agreements on the DCO in due course.	-

Environmental assessment topics: Sound, noise and vibration				
EWR-MWJV Technical Partner Routewide – Environmental - EIA Scoping Report				
SNV.1	6.8	Sound, noise and vibration	The approach as detailed is substantively in accordance with national and industry standards and best practice guidance and in our view generally meets the requirements of the EIA Regulations. However, there may be some omissions / shortcomings as detailed below: • There appears to be no specific reference to and or assessment of impacts for the EWR route '*alternatives'* such as the Northern and Southern approach options to Cambridge City Central Station and how the final approach has been selected. To comply with EIA Regs this should be included. Also, alternatives for the proposed Cherry Hinton turning point should be considered and assessed to fully justify the location in a noise sensitive location surrounded by residential. • There appears to be no specific reference to the '*Nationally Significant Infrastructure Projects: Commitments Register'* advice note- Nationally Significant Infrastructure Projects: Commitments Register - GOV.UK. The advice is that from EIA scoping and drafting of application documents at the pre-application stage of the NSIP process through to the end of examination, commitments to a number of measures are likely to be required to ensure that good design objectives will be secured and implemented. This is to ensure that potential environmental effects arising from the project are mitigated as far as possible and in accordance with the mitigation hierarchy. It is suggested that these commitments should be recorded on a 'live' Commitments Register. To maximise the benefits of the Commitment Register, it is recommended that versions of the register are agreed with relevant stakeholders	-

			and submitted to PINS at various milestones of the planning process, including at the EIA Scoping stage. General requirements are in the submissions in various statements; however, collating them into one Register allows for transparency and ease of reference for all stakeholders.	
Method Statement - Sound, Noise and Vibration				
SNV.2	1.1	Introduction	Clear definitions for '*sound and noise'* should be clearly provided to explain relationship and difference in meaning / context.	-
SNV.3	3	Relevant standards and guidance	It is recommended that reference is also made to the following: • To satisfy and discharge Environmental Health conditions relating to artificial lighting, contaminated land, noise / sound, air quality and odours / fumes, any assessment and mitigation shall be in accordance with the scope, methodologies and requirements of relevant sections of the Greater Cambridge Sustainable Design and Construction SPD, (Adopted January 2020) www.cambridge.gov.uk/greater-cambridge-sustainable-design-and-construction-spd and in particular Section 3.6 Pollution, as well as the following associated appendices: ○ 6: Requirements for Specific Lighting Schemes ○ 7: The Development of Potentially Contaminated Sites in Cambridge and South Cambridgeshire: A Developers Guide ○ 8: Further technical guidance related to noise pollution • Governments 'A Green Future: Our 25 Year Plan to Improve the Environment, 2018', commitment to significantly cut all forms of pollution and ease the pressure on the environment…ensure that noise and light pollution are managed effectively.	-

			• Noise Action Plan: Railways Environmental Noise (England) Regulations 2006: Defra, 2 July 2019. It is stated that this Action Plan will be of relevance to the Department for Transport, the rail industry, and local authorities including those with environmental, transport and planning responsibilities, and interested members of the public. Refer to relevant sections e.g. Planning controls sections 6.14 to 6.17. • International Union of Railways (UIC), Sustainability, Nuisance and Health Impacts of Railway Noise (NOVITÀ project), 2022.	
SNV.4	4	Establishing the baseline	The approach, scope including study areas for establishing baseline sound, noise and vibration levels are acceptable.	-
SNV.5	5.9	Cambridge	It is noted that there is reference to Noise Important Areas (NIAs) associated with road traffic on parts of Hills Road and with rail traffic on the West Anglia Main Line just south of Hills Road. It is stated that the introduction of a new railway and additional services is not expected to greatly affect the acoustic character of this area. Further information, explanation and assessment is required as these NIAs are considered the worst one percent in England in terms of existing railway noise, so any minor increase in noise levels may be considered a significant adverse impact. The noise and vibration impact of trains passing the below facilities is an important focus of ongoing assessment. • Addenbrooke's and Royal Papworth hospitals • St Marys School Playing Field • Long Road Sixth Form College	-

			• Various commercial facilities • Biomedical campus (including the Microbiological Research Centre laboratory and the Ann McLaren Building) It is not clear why Scholars Court is the only noise sensitive residential type premises specifically identified as been assessed for the need for potential noise mitigation. There are numerous other residential type premises (mainly flats / apartments) in this area at similar distances from the existing railway track as Scholars Court. This includes residential type premises entering Cambridge before and after Hills Road bridge and around Cambridge Central Station.	
SNV.6	6	Sources of impact	*'Table 3– Sources of noise and vibration impacts,* is generally acceptable. However, in our view '*Ground-borne noise and vibration'* should be included and assessed under the section '*Maintenance activities …**etc.**',* source – Permanent. The approach detailed to predict / calculation noise and vibration levels from construction and operation is acceptable. It should be clear at all times whether predicted noise levels to receptors are near (at or near facades) or free field levels.	-
SNV.7	7	Potential impacts and effects	The Council is concerned about the proposed Cherry Hinton turnback location - with housing on both sides. It appears that these properties currently experience infrequent train movements at very low speeds, so any current operational railway noise is likely to be very low level. A significant change in the acoustic character of the area may therefore be significant. Due to concerns about long term significant adverse noise impacts in this area, consideration should be given to any other available turnback locations in this area, which are less densely populated by residential and where any adverse noise / vibration impacts and or the numbers of properties potentially impacted could be	-

			reduced. Residential receptors would be likely to experience increases in noise levels both during construction and operation due to the stopping and starting of trains at this location at any time of the day including nighttime, the most sensitive time of the day.	
SNV.8	7	Potential impacts and effects	There is no specific reference to health impacts. The health effects of exposure to environmental noise are well researched and include annoyance, sleep disturbance and longer-term physiological conditions including cardiovascular health effects. Self-reported sleep disturbance and annoyance are two of the key priority health outcomes for transportation noise with a robust evidence base. Consideration to also be given to cardiovascular disease, cognitive impairment, metabolic outcomes, hearing impairment and tinnitus, quality of life, well-being and mental health. Use of Lden and Lnight are shown to be suitable for assessing long-term health effects. It is appreciated that this will be further considered within the 'EIA Scoping Method Statement-Human Health'. However, a clear cross reference should be made accordingly within each method statement.	-
SNV.9	8	Assumed mitigation	Approach acceptable. See comments above regarding no specific reference to the 'Nationally Significant Infrastructure Projects: Commitments Register' advice note - Nationally Significant Infrastructure Projects: Commitments Register - GOV.UK.	-
SNV.10	8.2	Mitigation	Provision of noise mitigation to the east of Cambridge North station is to be clarified following ongoing assessment. The proposed relocation of Chesterton Sidings at Cambridge north station and upgrade to the existing Milton Railway feeder electricity substation may have an impact on the existing and emerging development in the area.	-

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<tr><td>SNV.11</td><td>9</td><td>Evaluating significance</td><td>The Council does not agree with the LOAEL, SOAEL and UAEL criteria chosen for these impacts (e.g., LOAELs of 65 dB $L_{Aeq,12h}$ day 55 dB $L_{Aeq,4h\ evening}$ 45 dB $L_{Aeq,8h\ ni,\ ght}$ SOAELs etc. for construction airborne noise impacts).

Ground borne vibration criteria detailed acceptable.

Airborne noise effect levels should align more with the criteria, time periods and guidance in the code of practice for noise and vibration control on construction and open sites (BS5228-1). The below criteria is suggested for consideration.

Construction airborne noise effect levels for permanent residential buildings (outdoor at the façade)

<table>
<tr><th>Day</th><th>Time (hours)</th><th></th><th>Averaging Period T</th><th>LOAEL LpAeq,T(dB)</th><th>SOAEL LpAeq,T(dB)</th><th>UAEL LpAeq,T(dB)</th></tr>
<tr><td>Mondays to Fridays</td><td>0700 - 0800

0800 - 1800

1800 - 1900

1900 – 2200</td><td></td><td>1 hour

10 hours

1 hour

1 hour</td><td>60

65

60

55</td><td>70

75

70

65</td><td>To be agreed for time periods

10 dB above any of the noise levels for SOAEL</td></tr>
<tr><td>Saturdays</td><td>0700 - 0800

0800 - 1300</td><td></td><td>1 hour

5 hours

1 hour</td><td>60

65

60</td><td>70

75

70</td><td>To be agreed for time periods</td></tr>
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	1300 - 1400 1400 – 2200		1 hour	55	65	
Sundays & Public Holidays	0700 – 2200		1 hour	55	65	To be agreed
Any night	2200 – 0700		1 hour	45	55	To be agreed

In line with BS5228 -1 significant adverse effects on health and quality of life are expected to occur when SOAELs are exceeded for at least the time periods set out in Appendix B. In addition, where existing ambient levels exceed the SOAELs set out in Table 1, significant adverse effects on health and quality of life are expected to occur when construction noise levels are at least equal to the current ambient level and are exceeded for at least the time periods set out in Appendix B - Paragraph 2. Similar construction airborne noise impact levels for noise sensitive non-residential type buildings, outdoor living spaces and shared community open areas or similar (outdoor free field) should also be considered and agreed separately. These do not appear to have been considered.

In terms of any mitigation a '*Noise insulation and temporary re-housing type policy',* should be developed for when SOAELs are exceeded for at least the time periods set out in Appendix B - Paragraph of BS5228-1 and for buildings and occupiers who may be eligible under any such policy. Similar construction airborne noise impact levels for noise sensitive non-residential type buildings, outdoor living spaces and shared community open areas or similar (outdoor free field) should also be agreed. This approach would be consistent with the likely significant effects

			that may arise at noise sensitive receptors as a result of the project. Ground borne vibration and ground borne noise threshold criteria acceptable. Airborne noise (railway and road traffic): The logic for the establishment of the daytime SOAEL is unclear and appears that the use of ProPG: Planning and Noise, has been made to support this - however, this is a standard applicable to new residential development (i.e., assessing a noise climate to determine its suitability for introducing new residential dwellings rather than introducing a new noise source to existing residential developments)). The critical difference being that new residential can be designed to minimise the impact of noise whereas existing residential are, as is the proposal here, stuck with whatever level is imposed on them. The Council would consider the daytime threshold of 65dB 16 hr to be too high, not only because it would exceed the outdoor level of 55dB LAeq 16 hour for gardens, the level identified by WHO for significant annoyance but also because allowing 15dB noise mitigation for an open window, internal levels would exceed the recommended 35dB daytime level set out in BS8233, a level which according to the noise data submitted, many properties are presently enjoying. In keeping with WHO standards and BS8233 and the recognition that single event noises such as the passing of a train at high speed could wake someone up, a criteria for this has been included. The levels set out for this at 80dB Lmax at façade would result in internal levels of circa 45dB for typical well installed double glazing, higher levels for poor installations. The WHO guidelines for community noise identifies 45dB LMax as the level at which single event noises may wake an individual or disturb their sleep.	

			Further clarification and justification required and the Council requests further discussion with the Applicant and their acoustic team to agree a way forward in terms of acceptability / assessment criteria.	
SNV.12	10	Proposed scope	The summary of the impacts scoped in and out of the sound, noise and vibration assessment as set out in Table 7 are acceptable. However, as stated above in our view '*Ground-borne noise and vibration'* should be scoped in and assessed under the section / for '*Maintenance activities …**etc.',*** source – Permanent.	Ground-borne noise and vibration should be scoped in.
SNV.13	-	Other	As part of the ongoing development of options, further assessments should be undertaken to determine the likely impacts / effects, their significance and appropriate sound, noise and vibration mitigation strategies to address these as necessary.	-
SNV.14	-	Other	It is understood that existing formal railway sidings in this area are divided by Mill Road Bridge into a 'north yard' and 'south yard'. There may be other informal type sidings not used for any specific purpose. New train reception, parking / stabling and carriage servicing sidings / platforms (effectively like new platforms) were recently constructed in the 'south yard' sidings on the eastern far end of the main station on railway land (under and to either side of the Carter Cycle / Pedestrian Bridge) and became operational in March / April 2021. Since commencement of operation, the Council service has received a number of noise complaints from residents living directly opposite and overlooking the railway in this area. The noise complaints are subject to an ongoing statutory noise nuisance investigation. Any potential increase in the intensification of use of these new train reception, parking / stabling and carriage servicing sidings / platforms and facilities as a result of any additional EWR services should be included in any noise impact assessment as part of the ES (e.g. new platform and station arrangements). The Applicant should	-

			work closely with Network Rail and other service providers (Greater Anglia and Govia Thameslink Railway) to consider and seek to secure any such environmental improvement opportunities in relation to this noise and reduce existing adverse noise impacts.	
SNV.15	-	Other	A relocated / new train wash enclosure has recently been completed immediately to the north of Mill Road on railway land that was previously sidings and is likely to become operational in early 2025. Any increase in the intensification of use of the new train wash as a result of any additional EWR services should be included in any noise impact assessment as part of the ES. The Applicant should work closely with Network Rail in relation to this source of noise and reduce potential existing and future adverse noise impacts to contribute to the improvement of health and quality of life.	-
Method Statement – Human Health				
SNV.16	3.2	Guidance	There should be full reference to the 'WHO - Environmental Noise Guidelines 2018 for the European Region', which recommends day / evening / night (L_{den}) and separate nighttime noise levels parameters in terms of health impacts. These parameters should be calculated separately - different levels for road and train sources. The main purpose of these guidelines is to provide recommendations for protecting human health from exposure to environmental noise originating from various sources: transportation (road traffic, railway and aircraft) noise. Reference should also be made to the 'EIA Scoping Method Statement - Sound, Noise / vibration'. The following documents may also be relevant:	-

			• Advice on the content of Environmental Statements accompanying an application under the Nationally Significant Infrastructure Planning Regime, (Public Health England, March 2021) • International Union of Railways (UIC), Sustainability, Nuisance and Health Impacts of Railway Noise, (NOVITÀ project, 2022).	
Method Statement – Approach to Code of Construction Practice				
SNV.17	-	Approach to Code of Construction Practice	This is an overarching document with commitments to assess various environmental impact / effects as detailed. See comments above regarding construction airborne noise effect levels for permanent residential buildings (outdoor at the façade) etc.	-
Environmental assessment topics: Traffic and transport				
EWR-MWJV Technical Partner Routewide – Environmental - EIA Scoping Report				
Environmental assessment topics: Water resources				
EWR-MWJV Technical Partner Routewide – Environmental - EIA Scoping Report				
WR.1	4.5.22	Environmental priorities	Para 4.5.22 bullet point one notes that water scarcity is a critical issue in this part of the UK and could be exacerbated by cumulation of projects each with their own demands on potable water supply. Measures to reduce potable water consumption will also need to be included with the Code of Construction Practice (CoCP), and I would recommend that this be included within Section 1.15 of the Method Statement for the CoCP.	-
WR.2	6.11	Water Resources	Section 6.11 on water resources and the associated Water Resources Method Statement do not appear to include an	-

			assessment of the potential impacts on water resource availability in light of potable water requirements associated with both the construction and operational phases of EWR and the likely mitigation measures that could be implemented.	
WR.3	6.11	Proposed scope	Given this recognition of water scarcity, and especially in light of the levels of water scarcity facing the Greater Cambridge area, the Council recommends that consideration of potable water supply and the water requirements of EWR both at the construction and operational stages be included in the proposed scope as outlined in Table 19, with reference to the latest Water Resource Management Plans. If impacts on water resource availability are to be scoped out of the EIA, further information is required to understand the reasoning behind this decision and to ensure that this issue is addressed as part of the wider sustainability commitments of the project.	Consideration of potable water supply and the water requirements of EWR both at the construction and operational stages to be included in the proposed scope.
Environmental assessment topics: Carbon (greenhouse gas) emissions				
EWR-MWJV Technical Partner Routewide – Environmental - EIA Scoping Report				
CE.1	6.14	Carbon (greenhouse gas) emissions	The general methodology for assessing the projects impact on climate change through the changes it causes in the emissions of greenhouse gases (ghg) as outlined in Section 6.14 and the EIA Scoping Method Statement – Carbon, is welcomed.	-
CE.2	6.14.5	Sources and types of impact	It would be helpful to understand early on whether the assessment of ghg emissions from changes in traffic flow referenced in paragraph 6.14.5 has been applied to the assessment to different station location options in terms of the emissions associated with commuting to and from those stations, to help ensure that the best option from a ghg perspective is chosen.	-

CE.3	6.14.10	Mitigation	The use of the carbon reduction hierarchy, as outlined at paragraph 6.14.10 is welcomed. The Council would welcome early sight of the Carbon Management Plan as this is developed to help us better understand, and where appropriate help inform, the mitigation measures that will be implemented to reduce ghg emissions.	-
CE.4	6.14	Proposed scope	No comment – all areas scoped in.	No comment – all areas scoped in.
Method Statement - Carbon				
CE.5	3.3.1	Local policy	Note that at paragraph 3.3.1 of the Carbon Method Statement, reference should also be included to South Cambridgeshire District Council's Zero Carbon Strategy (2020) and Cambridge City Council's Climate Change Strategy, 2021 to 2026.	-
Environmental assessment topics: Biodiversity Net Gain				
EWR-MWJV Technical Partner Routewide – Environmental - EIA Scoping Report				
BNG.1	7.2	Biodiversity Net Gain	The key consideration of what habitats to create and where should take into consideration two very important factors. Firstly, is the habitat proposed suitable for the location? Grasslands, woodlands, and wetlands can require specific environmental resources to grow and, for example, turning a habitat such as cropland into high distinctiveness habitat is likely to take more than 30-years, therefore, unlikely to be a feasible option. Secondly the applicant will need to consider who will be responsible for the management of these habitats. Will they remain within the Network Rail estate, or with they be given back to landowners? Each of these created habitats may require a form of legal agreement to manage them for the required 30-year	-

			period. This will be through either a S106 agreement with the relevant authority or a Conservation Covenant with a Responsible Body. The agreement will be with the landowner (or their tenant with permission from the Freeholder), and given the length of the scheme and possible number of landowners there is the possibility that this will be a complicated process. Monitoring data will need to be given to the relevant body on a regular basis as they will have the responsibility of reporting such matters to Central Government through their new duty required by the amended NERC Act (section 40a). The ongoing management of the newly created and enhanced habitats could be secured under Requirements of the DCO; however, without further legal agreement the responsibility of collecting monitoring data would, presumably, fall to the Planning Inspectorate. There are several areas where the scoping document has fallen short of expectations: • Insufficient justification for scoping out reptile surveys. • Use of generic passages where details are required (e.g., HRA process). • General use of generic passages, for example, stating there are existing railways within sections where are none. • BNG requirements for monitoring have not been considered when describing potential post intervention outcomes. The requirement for legal agreements will have a significant impact on the delivery of enhanced and created habitat.	
Method Statement - Biodiversity				
BNG.2	4.3.5	Surveys	The document scopes out reptile surveys as populations were assumed to be low. This needs further justification, for example, publishing survey results from 2020-2021 (methods, limitations,	-

			data gaps etc.). Reptile population tend to take one of three routes in the general area of EWR: 1. no reptiles 2. low populations spread out over large areas 3. high populations found in localised areas Unless the applicant can provide data and a clear justification of scoping out reptile surveys, they must remain in scope. Many of those population comprise of common lizard and grass snake and the applicant will need to have a clear plan of how impacts will be mitigated. For example, avoiding the breeding bird season to clear vegetation does not avoid the hibernation season for reptiles, so potential conflicts of mitigation need to be identified, and alternatives recommended.	
BNG.3	5.9.1 – 5.9.3	Cambridge: Designated sites	The section states that there are no statutory protected sites within 2 km of the project; however, Local Nature Reserves (LNR) are classed as statutorily protected and Nine Wells LNR is within the 2 km buffer. This must be amended and Nine Wells LNR included within any analysis on indirect and direct impacts to statutory sites. This must include in-combination impacts with proposed busways currently under TWAO application and Greenway applications that will be coming forward in the next 12 months, both of which will lie adjacent to the project boundary and have possible direct and indirect impacts to Nine Wells LNR.	-
BNG.4	8.1.2	Proposed scope	Only mentioned great crested newt as scoped out due to the provisional agreement to take part in the District Level Licensing Schemes in both Bedfordshire and Cambridgeshire. There is no mention of reptile surveys being scoped out (see BNG.2).	All species to be scoped in unless sufficient justification is provided.

BNG.5	9.1	Assumptions	If the entire length of the route does not have completed surveys, then, other than great crested newts, no species should be scoped out. For example, the submitted document scopes out further reptile surveys without sufficient justification, if a complete set of surveys already undertaken has not informed this decision, then the decision to scope out surveys appears to be unjustified.	-
Environmental assessment topics: Habitat Regulations Assessment				
EWR-MWJV Technical Partner Routewide – Environmental - EIA Scoping Report				
HRA.1	7.3	Habitats Regulations Assessment	The only HRA that is likely to take place specifically focusses on Eversden and Wimpole Woods SAC which is designated for the presence of an Annex II species and not habitat. Therefore, this section appears to be a very generic description of HRA analysis rather than focusing on the relevant issues concerned with the relevant SAC.	-
HRA.2	7.3.9	Habitats Regulations Assessment	“A number of Habitat Sites relevant to HRA have been identified…”. This is far too generic and does not focus on the revenant sites as identified in the document.	-
Environmental assessment topics: Climate resilience				
EWR-MWJV Technical Partner Routewide – Environmental - EIA Scoping Report				

CR.1	5.4	Designing for a changing climate	The approach outlined for designing for a changing climate and the development of the Climate Change Resilience Assessment is welcomed.	-
CR.2	7.4	Climate resilience	Section 7.4 of the report and the EIA Scoping Method Statement – Climate Resilience outline the assessment of climate change resilience in more detail, and the approach to assessing both the RCP 6.0 (medium) and RCP 8.5 (high) scenarios as part of the climate projects is welcomed. The Council would welcome an opportunity to have early sight of the work on the Climate Change Resilience Assessment to help us better understand, and where appropriate help inform, the mitigation measures that will be implemented to reduce climate impacts and enhance the climate resilience of East West Rail.	-

Table 2: List of documents submitted by PINS to EWR Co.

This table lists all documents submitted by the Applicant to the Planning Inspectorate in relation to the EIA Scoping Opinion Request.

Document	Document number	Date published	Prepared by
EWR-MWJV Technical Partner Routewide – Environmental - EIA Scoping Report	133735-MWJ-Z0-XXX-REP-EEN-000035	5 December 2024	Mott MacDonald WSP-Joint Venture (MWJV)
Routewide – Environment - EIA Scoping Method Statement – Air Quality	133735-MWJ-Z0-XXX-REP-EEN-000016	5 December 2024	Mott MacDonald WSP-Joint Venture (MWJV)
Routewide – Environmental – EIA Scoping Method Statement – Agriculture and Soils	133735-MWJ-Z0-XXX-REP-EEN-000015	5 December 2024	Mott MacDonald WSP-Joint Venture (MWJV)
Routewide – Environmental - EIA Scoping Method Statement – Biodiversity	133735-MWJ-Z0-XXX-REP-EEN-000019	5 December 2024	Mott MacDonald WSP-Joint Venture (MWJV)
Routewide – Environment - EIA Scoping Method Statement – Carbon	133735-MWJ-Z0-XXX-REP-EEN-000030	5 December 2024	Mott MacDonald WSP-Joint Venture (MWJV)
Routewide – Environmental - EIA Scoping Method Statement – Climate Resilience	133735-MWJ-Z0-XXX-REP-EEN-000032	5 December 2024	Mott MacDonald WSP-Joint Venture (MWJV)
Routewide – Environmental - EIA Scoping Method Statement – Communities	133735-MWJ-Z0-XXX-REP-EEN-000021	5 December 2024	Mott MacDonald WSP-Joint Venture (MWJV)
Routewide - Environmental - EIA Scoping Method Statement - Flood Risk	133735-MWJ-Z0-XXX-REP-EEN-000023	5 December 2024	Mott MacDonald WSP-Joint Venture (MWJV)
Routewide – Environmental – EIA Scoping Method Statement – Historic Environment	133735-MWJ-Z0-XXX-REP-EEN-000022	5 December 2024	Mott MacDonald WSP-Joint Venture (MWJV)
Routewide - Environmental - EIA Scoping Method Statement - Human Health	133735-MWJ-Z0-XXX-REP-EEN-000024	5 December 2024	Mott MacDonald WSP-Joint Venture (MWJV)
Routewide – Environmental - EIA Scoping Method Statement – Landscape and Visual	133735-MWJ-Z0-XXX-REP-EEN-000029	5 December 2024	Mott MacDonald WSP-Joint Venture (MWJV)
Routewide – Environmental - EIA Scoping Method Statement – Land Quality	133735-MWJ-Z0-XXX-REP-EEN-000025	5 December 2024	Mott MacDonald WSP-Joint Venture (MWJV)

Routewide – Environmental – EIA Scoping Method Statement – Material Resources and Waste	133735-MWJ-Z0-XXX-REP-EEN-000018	5 December 2024	Mott MacDonald WSP-Joint Venture (MWJV)
Routewide - Environmental - EIA Scoping Method Statement Technical Appendix - Resources and Waste	133735-MWJ- Z0-XXX-REP-EEN-000044	5 December 2024	Mott MacDonald WSP-Joint Venture (MWJV)
Routewide – Environment - EIA Scoping Method Statement – Socio-economics	133735-MWJ-Z0-XXX-REP-EEN-000026	5 December 2024	Mott MacDonald WSP-Joint Venture (MWJV)
Routewide – Environmental - EIA Scoping Method Statement - Sound, Noise and Vibration	133735-MWJ-Z0-XXX-REP-EEN-000017	5 December 2024	Mott MacDonald WSP-Joint Venture (MWJV)
Routewide - Environmental - EIA Scoping Method Statement – Traffic & Transport	133735-MWJ-Z0-XXX-REP-EEN-000028v	5 December 2024	Mott MacDonald WSP-Joint Venture (MWJV)
Routewide- Environmental - EIA Scoping Method Statement – Water Resources	133735-MWJ-Z0-XXX-REP-EEN-000036	5 December 2024	Mott MacDonald WSP-Joint Venture (MWJV)
Routewide – Environment - EIA Scoping Method Statement Technical Appendix – Water Resources	133735-MWJ-Z0-XXX-REP-EEN-000046	5 December 2024	Mott MacDonald WSP-Joint Venture (MWJV)
Routewide – Environmental - EIA Scoping: Approach to achieve Biodiversity Net Gain	133735-MWJ-Z0-XXX-REP-EEN-000031	5 December 2024	Mott MacDonald WSP-Joint Venture (MWJV)
Routewide – Environmental – EIA Scoping Method Statement – Approach to Code of Construction Practice	133735-MWJ-Z0-XXX-REP-EEN-000041	5 December 2024	Mott MacDonald WSP-Joint Venture (MWJV)
Routewide – Environmental – EIA Scoping - Approach to Equality Impact Assessment	133735-MWJ-Z0-XXX-REP-EEN-000027	5 December 2024	Mott MacDonald WSP-Joint Venture (MWJV)
Routewide – Environmental – Social Baseline	133735-MWJ-Z0-XXX-REP-EEN-000040	5 December 2024	Mott MacDonald WSP-Joint Venture (MWJV)
EWR-MWJV Technical Partner Book of Figures	133735-MWJ-Z0-XXX-REP-EEN-000063	5 December 2024	Mott MacDonald WSP-Joint Venture (MWJV)