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 South Cambridgeshire District 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 the Cambourne to Cambridge busway, the new Bourn Airfield development, 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.	-
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 such as Cambourne, Bourn Airfield new village and Cambridge City 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 new station at Cambourne 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 walk overs, 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	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.9	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.10	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.2	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.3	3.3	Standards and guidance	There is no mention of Historic England Good Practice Advice Note: The Setting of Heritage Assets (GPA 3).	-
HE.4	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.5	5.8.18	Heritage assets-non-designated heritage assets	Section 5.8.18 notes that there is no local list for South Cambridgeshire District Council. 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	Construction phase dust emissions can be reduced by the adherence to a scheme wide Dust Management Plan (or similar), or as part of a Construction Environmental Management Plan and Code of Construction Practice with specific areas that require more detailed assessment and/or additional mitigation being identified. Considerable information is provided on this topic and comments with regard to this section will require further specialist advice and comments from the Council regarding air quality.	-
AQ.2	6.3	Air Quality	The project requires both temporary and permanent changes to road infrastructure, including the temporary diversion of the A428 and permanent closures of several level crossings in the Harston and Hauxton area. These changes to road layouts will undoubtedly have an impact on air quality in these particular areas, which could potentially be positive or negative and are likely to require assessment. The impact of diesel freight trains using the project will also need to be assessed.	-
AQ.3	6.3.8 – 6.3.9	Establishing the baseline	In establishing the baseline, it is welcomed that a significant nitrogen dioxide monitoring programme has taken place and that a variety of other sources are being used to establish a baseline. However, particulate matter (PM2.5 and PM10) have not had any scheme specific monitoring. Given the potential impacts from the scheme and the relatively limited	-

			information held by the Council on PM baseline levels, additional baseline monitoring for PM would be welcomed.	
AQ.4	6.3.10 – 6.3.12	Study area	For the study area, where moving diesel freight trains are in use, assessment is only proposed where background levels of NO2 are above 25µg/m3. Assessment criteria should also be set for PM2.5 and PM10 as diesel trains can be a significant contributor to PM levels.	-
AQ.5	6.3.	Proposed scope	The Council acknowledges that the preference is for electric passenger trains. However, this does not appear to be guaranteed at this stage. Diesel freight trains will also be using the railway line. Any study should consider a worst-case scenario including diesel passenger trains to ensure worst case impacts are considered.	Emission to air from operational phase diesel trains to include passenger services.
Method Statement – Air Quality				
AQ.6	3.3	Standards	Section 3.3 does not discuss the population exposure reduction target as specified in The Environmental Targets (Fine Particulate Matter) Regulations 2023. This legislation has two legal requirements relating to PM2.5: • A target of 10µg/m3 to be reached by 2040 • A population exposure reduction of at least 35% by the end of 31st December 2040 compared to the baseline period of 2016 to 2018 This population exposure reduction is important because the legislation requires a significant reduction	-

			in PM2.5 and therefore any development that contributes to an increase in long term PM2.5 levels may not be acceptable, even if compliance with the PM2.5 target of 10µg/m3 is demonstrated. Although a considerable monitoring programme has taken place for nitrogen dioxide, all data relevant to the Council's administrative area was collected during 2021 and therefore may be atypical as per the position statement from the IAQM and advice from Defra. This data should not be relied upon, unless heavily caveated and adjustments made.	
AQ.7	3.5.6	Study area	For the study area, where moving diesel freight trains are in use, assessment is only proposed where background levels of NO2 are above 25µg/m3. Assessment criteria should also be set for PM2.5 and PM10 as diesel trains can be a significant contributor to PM levels.	-
AQ.8	5.3	Automatic monitoring	Section 5.3 does not include data from the Harston automatic monitor which would be directly relevant to the proposed scheme. Data from 2023 is available and should be considered as part of a future assessment.	-
AQ.9	6	Sources of impact	Exhaust emissions of SO2 and NO2 from diesel trains using the project (including idling) during the operational phase are included, but PM2.5 from exhaust emissions from diesel trains is not included for assessment. PM2.5 from diesel trains using the project must be considered as part of the assessment.	-
AQ.10	7.1.4	Operational diesel trains	The assessments in relation to diesel trains need to be expanded to cover PM2.5.	-

AQ.11	7.2.9	Construction road traffic	Section 7.2.9 states: “Where the duration of construction activities is less than two years it is unlikely that the construction activities would constitute a significant air quality effect given the short-term duration”. Although in most parts this statement is true, the temporary re-routing of the A428 to construct the cut and fill tunnel could cause significant local disruption, depending on the exact nature of these works. Possible significant air quality impacts should be considered for this particular construction activity. It should be noted that any air quality modelling from road traffic should only take place once the traffic models have been agreed with the relevant highway authorities to minimise risks of error or dispute.	-
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 parish councils, the Council’s Communities Team and relevant community groups including affected schools.	-
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 Council agrees with the sources of data to establish 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 rural communities.	-
Environmental assessment topics: Land quality				
EWR-MWJV Technical Partner Routewide – Environmental - EIA Scoping Report				
LQ.1	6.6	Establishing the baseline	The following comments relate to risk in terms of human health only. Consideration of risks to controlled waters is outside the remit of this consultation. Given the site overlies a Principal Aquifer, comments should be sought from the Environment Agency in relation to controlled waters risks. The Land Quality Method Statement covers both land contamination and geo-conservation. It is noted that site walkovers and desk-based assessment will be carried out; reviewing any existing reports and completion of desk studies in	-

			areas not yet covered. It is also noted that proposals for site investigation are underway, and the findings are to be reported as part of a quantitative risk assessment in line with guidance. Section 6.6.7 states that that Local Authority Part 2A contaminated land designations will be utilised and Table 3 within the Land Quality Method Statement lists the Councils where the Part 2A designations have been reviewed. SCDC's public register of Part 2A designations does not appear to have been included and the applicant should be aware that a significant Part 2A designated site in Hauxton is located approximately 1km from the draft order limits. The applicant may want to comment on any risk this does, or does not, pose. Though the majority of land within the draft order limits is agricultural, there are some potential sources of contamination such as petrol filling stations, disused railways, agricultural contractor, Lords Bridge MOD site and a couple of landfills. However, a new railway is not particularly sensitive to the presence of contamination and there are various mitigation measures required as standard in accordance with the Environment Agency's Land Contamination: Risk Management (LCRM) guidance, and further through the use of the CoCP and accompanying documents, including any excavated soils being managed via the Department of Waste: Code of Practice and associated Materials Management Plans. There is also a requirement for a procedure to cover unexpected contamination. Effects resulting from the operation of stations and infrastructure is not considered to be significant and has therefore been scoped out. The documentation states that management of contamination risks will	

			remain central to the project, with investigation works completed in accordance with LCRM, and therefore likely significant effects in respect of land contamination are not anticipated. Overall, comments with regard to this topic will require further specialist advice and comments from the Council.	
LQ.2	6.6	Proposed scope	The Council is satisfied that land contamination can be scoped out since it is not expected to be significant, with the documents stating the only aspect of land quality to be scoped in is in relation to geodiversity within the Comberton to Shelford section. However, the Council reserves the right to amend the lists of criteria based on survey results, local knowledge and collaborative consultation with local authority officers.	-
Environmental assessment topics: Sound, noise and vibration				
EWR-MWJV Technical Partner Routewide – Environmental - EIA Scoping Report				
SNV.1	3.6.8	Project description: Croxton to Toft	Section 3.6.8 states that in the location of the Bourn Airfield development, A428 crossing, a “tunnel services building, housing operational and maintenance equipment, would be required at each end of the tunnel.” This facility would need additional noise assessment (in accordance with BS:4142) as this use has the potential to cause adverse noise impacts to nearby residential properties during its construction and operation, and suitable mitigation will need to be considered and provided.	-

SNV.2	3.7.6	Project description: Comberton to Shelford	Section 3.7.6 refers to another 700m tunnel in the Harlton to Haslingfield section, which will need similar services. This should also be assessed using the same methodology (see SNV.1 above).	-
SNV.3	3.7.17	Project description: Comberton to Shelford	Section 3.7.17 of the report refers to “a new rail systems compound would be provided to house equipment supporting the widened railway.” It is not clear where this facility is to be located, but if in close proximity to residential properties, it is recommended that this use is restricted to the housing of equipment only and any use for train maintenance, etc (including cleaning) be prevented.	-
SNV.4	4.2.10	People-focused surveys	Section 4.2.10 confirms 60 noise surveys have been completed to date and some vibration assessments have been carried out in order to establish the baseline conditions that currently exist; however, the duration of each assessment has not been given.	-
SNV.5	4.2.27	Modelling: Air quality and noise and vibration	Section 4.2.27 confirms that “noise impacts from trains and road traffic will be assessed using noise models to calculate temporary and permanent noise levels at receptor locations.” This is considered an acceptable approach, but detailed information will need to be supplied accordingly.	-
SNV.6	5.3	Construction and the code of construction practice	Section 5.3 makes reference to the draft CoCP that will be developed and submitted with the application. It is confirmed this will convey responsibility to the “Principal Contractor” to carryout monitoring as required. This will be for noise and vibration during construction for this environmental topic. Operational	-

			noise mitigation will need to be assessed after the schemes completion, to ensure the methods employed are working as effectively as predicted and provide the level of protection expected. The Council would expect this to be included within DCO conditions imposed as part of the examination process. This is an acceptable approach, however the concept of using confidential strict/sensitive documents that are supplied as supporting information as part of the DCO process should be avoided as they cannot be fully scrutinised at a later date if necessary (e.g., private contractual obligations, penalties for sub-contractor non-compliance, etc.). It is recognised that the construction phase of the A428 Bourn Airfield tunnel will be particularly disruptive. Existing residential properties at Highfields and Caldecote will be affected and depending on the expected timeline, potential occupiers of the Bourn Airfield development will be adversely impacted (particularly from the extensive construction and tunnel works). Also, it is recognised that noise levels will be increased at Cambourne due to the railway and Cambourne station construction works and future operation of the railway. The effect of increased vehicle movements using the station will need to be considered in relation to increased road traffic noise levels affecting properties enroute to the site. As a result of the operation of the railway, a new noise source will be introduced into many rural areas and detailed impacts will need to be considered throughout the route. Acoustic mitigation is to be used including the use of acoustic barriers and/or bunds will be developed as noise assessment progresses and	

			details of the mitigation will need to be made available as part of the more detailed design moving forwards.	
SNV.7	6.8	Sources and types of sound, noise and vibration	Construction and transportation noise have the potential to cause significant adverse impacts on the health and quality of life of existing residents if not adequately controlled/mitigated. It will need to be demonstrated that significant adverse impacts/effects or just adverse impacts have been avoided, minimised or mitigated and must apply to both construction and operational phases of the scheme. Decommissioning impacts have not been considered as there are no current plans to decommission the project at this time. Provided the road surfaces in question are kept in a good state of repair, vibration from vehicle movements will not be an issue. However, if the road surface is in a poor state noise and vibration could be an issue at nearby sensitive premises. This is confirmed in Section 7.1.3 of the Sound Noise and Vibration Method Statement. This is outside of the applicant's control, although there may be scope for an agreement with the highway authority to make good areas of damage caused by heavy construction traffic. Further consideration of these issues and HGV movements, etc are given in the Traffic and Transport (journeys and access) section of the report (Section 6.9).	-
SNV.8	6.8	Study area	In addition to direct noise and vibration impacts, as a result of the construction and operation of the railway, noise impacts as a result of other works such as road realignments will need detailed assessment.	-

SNV.9	6.8	Mitigation	It is noted that large lengths of “indicative mitigation” are shown on the previous route plans submitted. However, no information is currently given as to the types/height/construction or expected levels of attenuation obtained have been provided. This will need to be reported in detail as the EIA process progresses and more information becomes available. In some cases, such as the proximity to the villages of Harston and Hauxton, where the existing roads are moved and then affect new receptors not previously impacted, detailed assessment will be required and appropriate compensation may be payable to occupiers of eligible properties.	-
SNV.10	6.8.14	Mitigation	The content of Chapter 6 (in relation to noise and vibration) the hierarchy of mitigation presented in Section 6.8.14 does not include the option to “Avoid” the noise source altogether. This mitigation section refers to control and mitigation at source and receptor, but avoidance (if possible) seems to be omitted. This needs to be addressed.	-
SNV.11	6.8.17	Mitigation	Reference is made to reliance on the CoCP to propose measures to mitigate construction noise impacts. It is understood that a draft Code of Construction Practice (CoCP) will be developed and submitted as part of the application and will continue to be developed, in consultation with local authorities and relevant stakeholders, and further information will be presented at statutory consultation. The typical elements and measures likely to be included in the draft CoCP set out in Table 26 of Appendix B are acceptable in high-level principle regarding sound, noise and vibration.	-

			However, more site-specific detail and data used to confirm acceptable noise limits, mitigation, monitoring and working practices will need to be provided.	
SNV.12	6.8.22	Evaluating effects	Section 6.8.22 states that “Noise from train horns sounded at whistle boards used at footpath crossings, or to give warnings to personnel working at the track side, are required for safety reasons. Consequently, these noise impacts are unavoidable but are short in duration and will generally result in a minor contribution to the daytime and night-time LAeq noise levels.” It also concludes “Therefore, train horn noise is not expected to result in significant environmental effects.” Officers disagree with these statements. Although the limited duration of train horn noise will not raise LAeq noise levels significantly, this is due to the relatively long monitoring time period over which the measurements are taken, which will result in an effective “averaging out” of the noise level reported and does not adequately reflect the maximum peak levels produced that can be the source of disturbance and noise nuisance. Historically, it has been a contentious issue as to the identification of the “person responsible for the nuisance” (i.e. the train operating company, rail network owner, driver, etc.) when reacting to whistle boards placed at the approach to rail crossings, which require the approaching train to sound its horn. These boards can be the source of complaint and significant adverse impacts. Safety is often stated as the overriding factor to be considered in these cases and so the noise impacts are legally difficult to control/enforce, once the signs are in position. Officers welcome the intent given in this section for “The	-

			elimination of track crossings and the sensitive siting of whistle boards will be undertaken where feasible and in compliance with relevant safety requirements." It is recommended that serious consideration is given to alternative safety options (e.g., foot bridges, tunnels. etc) that can be used at pedestrian rail crossings, rather than whistle boards throughout the proposed route and particularly near residential properties.	
SNV.13	6.8	Proposed scope	Concerns are raised regarding the scoping out of temporary and permanent airborne noise due to train horn/audible warning devices (see SNV.12).	Temporary and permanent airborne noise due to horns/audible warning devices to be scoped in.
Method Statement - Sound, Noise and Vibration				
SNV.14	3	Relevant standards and guidance	Any information supplied, which informs the content of the ES Sound Noise and Vibration topic must have due regard to current government / industry standards, best practice and guidance and the relevant sections of the: 'Greater Cambridge Sustainable Design and Construction Supplementary Planning Document, (Adopted January 2020)' and in particular section 3.6 - Pollution) and the further technical guidance related to noise pollution (pages 230-256). It is acknowledged that at this stage detailed design information is not available as to potential plant and equipment that may be installed at specific facilities (e.g. the new Cambourne station), but detailed noise data will need to be gathered, assessed and significant effects mitigated, on a case-by-case basis when this	-

			information becomes apparent and is likely to be controlled by the imposition of planning conditions (as necessary) at the more detailed design stage.	
SNV.15	3.2	Guidance	Section 3.2. does not include the 'Greater Cambridge Sustainable Design and Construction Supplementary Planning Document, (Adopted January 2020)'. As mentioned above, information supplied, which informs the content of the Sound Noise and Vibration environmental topic must have due regard to the relevant sections of the aforementioned SPD and in particular section 3.6 (Pollution) and the further technical guidance related to noise pollution (pages 230-256).	-
SNV.16	4.1	Baseline surveys	This approach is acceptable provided all results are presented in a clear and concise way and is fully representative of the conditions/environment that exists, particularly in relation to the potential impacts on noise sensitive receptors. It is anticipated that noise monitoring locations/methodologies etc will be agreed with the Council before the noise monitoring surveys are carried out.	-
SNV.17	4.2.1	Study area	Table 2 – Summary of relevant study areas to be used in the sound, noise and vibration assessment presented in Section 4.2.1 is generally acceptable, but it is recommended that in relation to the 'Construction phase – noise' row of the table, the 300m study area proposed may need to be extended, if particularly noisy work is to be undertaken that is found to cause potentially significant adverse effects to receptors beyond this distance. The Council also seeks	-

			clarification as to why a distance of 300m has been chosen for the study area in respect of the operational assessment of airborne noise from trains, but 600m has been selected for operational assessment of airborne noise from road traffic. Both assessments are in relation to new and altered pieces of infrastructure. The maximum distances proposed for the study area for assessment of ground-bourne noise and vibration (for both road and rail) are acceptable.	
SNV.18	4.3.1	Consultation	The commitment for ongoing consultation during progression of the DCO process is welcomed.	-
SNV.19	5	Preliminary baseline description	The baseline consideration of noise sensitive receptors for the sections of route in the South Cambridgeshire District Council's administrative boundary is generally acceptable. It recognises the vast majority of these sections will cross rural areas, where the introduction of new rail noise could affect the character of the area.	-
SNV.20	5.7	Preliminary baseline description: Croxton to Toft	Bourn Airfield development has been omitted. This needs to be included with regard to existing and future development around this area, particularly in relation to the cut and fill tunnel that is planned to cross the A428 in this locality and is expected to be extremely disruptive and adversely impact delivery rates as a result of construction impacts.	-
SNV.21	5.9	Preliminary baseline description: Comberton to Shelford	Section 5.9. relating to the Cambridge section of the route does not take into account the area near to Cambridge North station and the options to bring into use the nearby sidings. In addition to the receptors identified pertaining to the Cambridge area, there are	-

			also residential areas within the Council's jurisdiction (e.g., the traveller sites along Fen Road at Chesterton). Such structures provide residential accommodation, but by the nature of their construction offer relatively little noise attenuating properties, compared to usual brick buildings. This needs the appropriate level of assessment to ensure adverse impacts do not occur at these locations.	
SNV.22	5.10.1	Future baseline	Section 5.10.1 has information relating to climate change and resistance, which is not relevant to the sound, noise and vibration method statement of the ES.	-
SNV.23	6	Sources of impact	The "sources of impact" identified and their proposed assessment in Section 6 are acceptable.	-
SNV.24	7.1.1	Potential permanent and operational effects	Section 7.1.1 presents the potential permanent and operational effects on receptors and identifies those that are likely to experience annoyance or disturbance in different circumstances. The list presented should be aligned with those presented in Section 5.1.2 (Sensitive receptors).	-
SNV.25	7.1.4	Potential permanent and operational effects	If there are any resulting impacts as a result of the change in climate they should be reported. Reference is made to their inclusion in Section 5 of the Climate Resilience Method Statement for further details on the current and projected future climate.	-
SNV.26	8	Assumed mitigation	The section on mitigation of construction and operational effects, provides broad descriptions and options for the use of mitigation, including the hierarchy	-

			to be adopted. This is acceptable, but site-specific details will need to be provided for individual locations where mitigation is required.	
SNV.27	8.4	Code of construction practice	Section 8.4. concerns the content of the Code of Construction Practice and recognises its importance in mitigating construction effects that may occur. This will be an ongoing process but as highlighted above, the use of confidential strict/sensitive documents that are supplied, as supporting information as part of the DCO process, should be avoided as they cannot be fully scrutinised at a later date if necessary (e.g., private contractual obligations, penalties for sub-contractors non-compliance, etc).	-
SNV.28	9	Evaluating significance	The information and limits described/adopted are based upon best practice and national guidance and are acceptable in developing the ES.	-
SNV.29	10	Proposed scope	The proposed scope (Table 7) is generally acceptable. However, the Council disagrees with the assumption that temporary and permanent airborne noise due to horns/audible warning devices are to be scoped out for the reasons stated above in relation to the installation of whistle boards. Serious consideration needs to be given to alternative safety options (e.g., foot bridges, tunnels. etc) that can be used at pedestrian rail crossings, rather than whistle boards throughout the scheme's route and particularly near residential properties.	Temporary and permanent airborne noise due to horns/audible warning devices to be scoped in.
SNV.30	11	Assumptions and risks	The final sections of the Method Statement describing the EIA data collecting assumptions and risks	-

			associated with noise and vibration monitoring and modelling, and the opportunities available to capitalise on mitigation by more unobtrusive noise barrier options are all acceptable.	
SNV.31	Appendix A	Aspects and matters proposed to be scoped out	The aspects and matters proposed to be scoped out of the assessment again refers to the temporary and permanent airborne noise due to horns/audible warning devices. For the reasons stated above, the Council disagrees with this statement in relation to the installation of whistle boards. Additionally, more information is to be provided in relation to noise from audible warning devices. These can be warning devices used at level crossings and around train doors during opening and closing, which are required for safety reasons. The design will need to minimise the impact of audible warning devices on noise-sensitive receptors and additional mitigation may be required.	Temporary and permanent airborne noise due to horns/audible warning devices to be scoped in.
Environmental assessment topics: Traffic and transport				
EWR-MWJV Technical Partner Routewide – Environmental - EIA Scoping Report				
TT.1	6.9	Traffic and transport	Transport matters fall under the jurisdiction of Cambridgeshire County Council as the Highway Authority. As such, GCSP defers to the County Council for these matters.	
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	Water Resources	There are several Community Groups who are care takers for Chalk Streams and who should be involved in assessment of impact.	-
WR.4	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	5.7.4	Croxton to Toft	What existing railway is there between Croxton and Toft?	-
BNG.4	5.7	Croxton to Toft	Skylark should be included in any analysis of impacts. The largest group likely to be impacted by the project will likely be farmland birds due disruption from construction and removal of habitat. The analysis should consider including farmland birds as a receptor group.	-
BNG.5	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.6	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 Licencing 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.7	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 to PINS by 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)