## HARSTON PARISH COUNCIL

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21st January 2025

East West Rail
The Quadrant Elder Gate
Milton Keynes
MK9 1EN

Re: Response to East West Rail consultation

This submission sets out the concerns, opinions and suggestions of Harston Parish Council (HPC), as part of the East West Rail (EWR) non-statutory consultation which closes on January 23<sup>rd</sup> 2025.

The contents of this submission reflect the discussions and outcomes of a number of meetings that have been held between Harston Parish Council and residents of Harston and adjoining villages.

This document is divided into two sections. The first describes the concerns that the HPC has, having seen and discussed the proposed EWR route into Southern Cambridge. The second section contains a number of suggestions, that HPC considers could mitigate some of the issues raised in the first section, where this is possible, and points EWR to issues that it considers need to be addressed, but where it does not have the expertise to offer specific technical suggestions for improvement of the plans to date.

The Issues

HPC foresees a large number of issues, during the 8-10-year construction period of EWR and ongoing, after that during its operational phase, where current EWR plans will have a negative impact on village residents' lives, on businesses operating within the village and on residents of other villages who are connected in some way to Harston. We list these issues below, and will make suggestions for their mitigation during EWR construction and operation in Section Two: Solutions.

1. Disruption of connectivity to adjacent villages, specifically to Newton, Haslingfield, Hauxton and Little Shelford, and farther afield to places of employment in particular in other areas. The EWR stated intention is to close the Station Rd/Newton Rd level crossing. This will have a major impact on the substantial traffic passing between these villages to the A10 and to points farther afield; to deliver children to the Harston Newton Primary School, which is already close to minimum pupil numbers; to villagers travelling to services in Harston such as the Doctor's surgery and its associated Dispensary; to garages and the village store and post office in Harston as well as other businesses e.g. Button End Industrial Estate; to the Churches in Harston; to active travel along this road of bicycles, wheelchairs and pedestrians. EWR plans for alternative access to the village do not in HPC's view sufficiently mitigate this serious community disruption

Clerk to the Council: Miss Jessica Ward; Chairman: Mr Dominic Bellamy

- 2. Road closures. During the construction period it is expected, and born out by evidence from EWR construction in North Bucks, that road closures will have a significant impact on access to facilities in villages along those closed roads. In North Bucks roads have often been closed without little or no notice, and remained closed for weeks and even months. Harston is currently connected by one major A road, the A10, which passes through the village, and which carries heavy traffic day and night. During the construction of the A10 overpass (which is intended to be very near the West side of the village, in the EWR current plans) it seems likely that there will be major disruption of traffic flows, with attendant increased pollution from often stationary traffic. Other roads which connect to the village including London Road, Station Road and Church Street, where the GP surgery and dispensary are located which serves several villages, are likely to be also seriously impacted by road restrictions and closures over many years, leading to potentially serious delays for emergency services and medical treatment let alone day to day travel issues.
- 3. Increased traffic on the A10. The EWR railway construction works and the major work to move and rebuild the mainline from Cambridge to Kings Cross, is certain to shift a large number of passengers carrying vehicles onto the A10, as we have currently seen during current railway maintenance, where coaches have to transport passengers between e.g. Royston and Cambridge. Currently this occurs at weekends, when there is little or no commuter traffic. One can imagine how many coaches would have to operate to carry all the thousands of commuters at peak times on the London line, in both directions five days a week along the A10, to maintain a functioning commuter service on that line towards London. This will add serious additional traffic on the A10 at its busiest time of the day, delaying other travellers, and disrupting life in Harston, with attendant increases in pollution and risks to road safety.
- 4. Proximity to Harston village edges on South West and East. Currently the EWR plans show the line running very close, within a few hundred meters in some cases, to these village edges, as it crosses the River Rhee and loops round to join the Kings Cross Mainline near Station Road. Plans include demolition of a house and farm buildings at New Farm. In HPC's view this will have a very significant impact on those living on these edges of the village, and in some case even impacting those living within the village, as high levels of light, noise and particulate/dust/mud pollution occur. It is not clear why the intended line has been brought so close to the edges of Harston, when open fields are available to the West. This observation is supported by other Parish Councils.
- 5. Major construction yards adjoining Harston. It has become clear, from observing what has happened in North Bucks along the EWR line being developed there, that there have been high levels of pollution (sound, dust/mud, watercourse etc.), which have required substantial monitoring, suppression and management. In North Bucks the railway line already exists so the scale of the working and therefore the magnitude of disruption caused will be much more significant. It is not clear why some of these construction yards and water holding ponds have been positioned so close to the Harston village, and why they have not been placed further away to avoid high impact nuisance of the type described.
- 6. The EWR intention is to bridge the A10 over the EWR line, which it is believed may be three lines wide, on account of a freight/siding loop for traffic towards Cambourne, as well as the two passenger lines. The HPC is very concerned about the impact this high bridge over the railway will have on the South West side of the village, as the bridge itself and the lorry traffic over it will be nearly 15m high and will create major light and noise pollution that will carry for a long way, into the village, day and night. There does not appear to be any assessment of the impact of this change and therefore we cannot comment on construction mitigation
- 7. The Raising of the Kings Cross Mainline, on the East side of the village, between Harston and Newton, will increase the volume of sound that travels into the village from the many trains per hour

that travel on that track. The HPC is concerned that people who live in the Lawrence Lea and nearby areas will be seriously impacted by this raised line, and its enlarged envelope of ambient noise and pollution. In addition, it is anticipated that elevating this line will mean many years of additional construction disturbance to people on the East side of Harston.

8. Potential environmental damage to Harston. The River Rhee and associated water meadows, crossed by an EWR viaduct, are a fragile environment, as are a number of other green fingers of the Green Belt that reach into the village. HPC needs to be assured that EWR is intent on commissioning an independent Environmental Impact Assessment, based on international standards, that will be able to assess those areas in Harston that are at risk, and produce plans to mitigate and manage any environmental and geological damage that occurs during construction and subsequent operation of EWR - should this not have been done at the outset.

## 9. Impact on and viability of local farms

Considerable damage will be inflicted on local farms. One example, Baggot Hall Farm, will have 50% of their land adversely effected creating small irregular shaped fields that cannot be worked by modern machinery and causing damage to the shallow surface growing layer because of the chalk substrate. The temporary use of farm land - much of it grade 1 and 2, shown pink on the EWR maps, cannot be reinstated to arable use. **This is potentially a life-threatening situation for this farming business.** 

- 10. Freight Trains and associated pollution. EWR, though it will not manage freight traffic on its lines (a National Rail responsibility) is nevertheless enabling diesel freight traffic to run very close to Harston. Two freight loops are intended where 750m long freight trains can linger for perhaps up to 30-45 minutes engines running, while being passed by fast passenger trains to and from Cambourne. The sound and air pollution caused by this parking of freight trains will impact heavily on Harston, and it is difficult to see how it can be managed downwards. Also, we understand that there are no guarantees that later on these freight trains will not run at night. There is much evidence to show that Cambridge and South Cambridgeshire generally will be negatively impacted by such freight traffic, and that any benefits from freight will accrue to North London which currently has the two freight paths and locations very far away from Cambridgeshire; there are alternatives to having freight on the EWR lines at all.
- 11. Disruption to children's education. It is anticipated that there will be very high levels of construction traffic along Station Rd, Harston, during the construction period. There is a risk that the education of children at the Harston & Newton County Primary School in Station Rd will be impacted, not only due to the problems of attendance but also due to pollution (sound, particulate matter) and its effect on children's physical and mental health. In addition, EWR construction in North Bucks on their railway lines has resulted in documented disruption for residents in getting to and from school, with the impact that this has had on compliant attendance and anxiety and mental health of the children and their parents. This Harston and Newton Primary school is at a close point to minimum viability in pupil numbers, and any further disruption to parents committing their children to be educated there may lead to its closure. EWR must treat this as a serious issue, and pay particular attention to operations along Station Rd at opening and closing school times in addition to the longer-term operational impact.
- 12. Compliance with speed limits. There is evidence that it has been difficult to control the speed of HGV vehicles working for EWR, in other locations such as North Bucks. Station Rd and Church Street are both to become 20mph limited in 2026. The authorities with responsibility for road safety and adherence to speed limits need to take note of the requirement for any vehicle to proceed within these limits, largely put in place to provide safety for residents and travellers, or be fined. EWR also needs to publish a policy of compliance on this issue

- 13. Concerns about Harston villagers' health, wellbeing and financial security. It seems likely that EWR construction and operations, in years to come, will have a variety of impacts on these areas of villagers' existence. EWR needs to take note of this and have in place published schemes for compensating people affected in any measurable whether short term during construction or longer term.
- 14. Compensation to Councils. There is evidence from other EWR works that local councils and authorities have had to bear a burden in terms of the cost of monitoring and managing EWR operations and their impact. Local authorities need to be aware of this and put in place officers who can carry out the management of such measures, and EWR needs to totally compensate such councils for this cost over both the full construction period and the longer operational period, so these costs do not fall on local residents or their local government authorities
- 15. The Northern Approach to Cambridge. As far as HPC can ascertain the Northern Approach to Cambridge, which would loop from Cambourne round past Northstowe and Histon to join the mainline to the North of Cambridge North Station, has not received a full economic assessment to determine if it offers better value for public money; lower impact on the environment; lower impact on the lives of those who are impacted by a railway that passes their villages; denial of a potential important transport artery to the substantial housing developments and associated jobs to the North of Cambridge (e.g. Barhill, Longstanton, Northstowe, Histon and Waterbeach).

Furthermore, we believe there have been a number of shortcomings in the processes in formulating the Southern over the Northern Approach to Cambridge.

This includes: -

The choice of consultation methods.

Lack of clarity as to how responses to previous consultations have been analyzed.

The problems of using previous consultations to shape materially important decisions

The construction and application of the Assessment Factors.

The neglect of the distinctive geology and ecology of the Southern Approach and comparison with alternative routes.

In HPC's view it would be absolutely necessary to revisit this option, and have it assessed independently, so any doubt about best value for money can be resolved at a National Level and Explained to all residents in South Cambridge.

**16. Environmental Impact Assessment (EIA).** HPC is aware that the Planning Inspectorate currently requires an Environmental Impact Assessment of EWR plans, whichever route is chosen. Currently EWR has proposed a structure for this EIA.

HPC intends to review this scope document to ensure it deals with all the concerns that HPC and its residents have, and it will respond to the Planning Inspectorate by the closing date on January **31st.** It is essential that this EIA is carried out within the international guidelines published by e.g. The World Bank or The Equator Principles and investigated by independent parties.

Section 2. The Solutions

This section of the report provides suggestions to EWR for further work and analysis to determine how the HPC concerns can be addressed, mitigated and ameliorated. It is not our job to suggest specific engineering solutions, but rather to identify options that EWR can apply their engineering and other analysis skills to, to

determine if any costs identified with such solutions can be outweighed by general benefits to Harston, or by avoidance of cost elsewhere within current route plans.

17. Disruption of connectivity to adjacent villages (see 1 above)

The HPC is of the view that EWR should look again at the closure of the Station Rd level crossing and evaluate alternatives that might include:

Building a two-lane vehicle crossing bridge, plus cycle lanes, on the site of the current level crossing, that would go over the existing and EWR rail lines, which might at that location be four in number, if the whole junction of the mainline and EWR is moved towards Foxton by around 500-600m (see 4 above and 19 below). If such a grade separated junction is feasible at or near Hoffers Brook, the line structure that such a bridge would have to cross would be much simpler at the Station Rd location. The cost of such a bridge could be offset by not having to build the Option 1 road linking Newton with the A10 or Option 4 road which intends to link Station Rd and London Rd. It would also, if it is sufficiently wide to carry an active travel lane, avoid the need to build the very large and visually intrusive pedestrian bridge, intended to be located over the rail lines adjacent to the existing level crossing in Station Road, which it is worth noting increases the distance travelled by pedestrians and wheelchairs of all descriptions by around 1km, over the current level crossing and road.

Importantly such a bridge would maintain the existing and very important Station road link between Newton and Harston, which is used extensively by residents of the two villages to get to the Harston school, local medical and other services and businesses, and to the main arterial A10 road for onward journeys in both directions, and to the North. The continuation of this road link has been near the top of all consultations that HPC has run with residents, and that Newton PC has undertaken. So EWR needs to investigate this possibility very seriously and discuss options with both villages.

- 16. Road closures. As indicated in 2 above there is a lot of evidence that road closures are extremely disruptive, and have on other parts of the EWR line been implemented without sufficient notice, causing very significant delays to local residents, and those taking children to school, as well as traffic congestion on other roads, and disruptions to other forms of transport (including but not limited to emergency services and local bus services that are important for travel to work, hospital visits and connection with distant locations). The HPC suggests therefore that EWR should have a policy of never closing any road without due notice being made public, as agreed by all relevant local authorities and residents affected. Compliance with such policy should also be monitored and penalties and compensation for non-compliance should be built into the policy and its management
- 17. Increased traffic on the A10. HPC would like EWR to estimate and publish the volume and impact of increased traffic (mainly owing to rail commuters on the Kings Cross line having to be transported on rail replacement buses between e.g. Cambridge and Royston) that is expected to have to travel along the A10, while railway engineering work is done for many years, that will be the result of the partial or full closure of the Kings Cross mainline, while it is moved, and the new EWR tracks are built into Cambridge South and towards Cambourne. It would also be useful to have an estimate of the likely increased journey time that travel on such buses will impose on commuters, particularly at peak times, when it should be noted that traffic can be delayed within Harston on the A10. Current train journey times from Cambridge central to Royston are typically around 15 minutes. Estimates of time taken via a rail replacement bus, at peak and other times, might be in the region of an additional 15-30 minutes of travel time. Train travelers will need to be made extensively aware of such potential delays.

18. Proximity to Harston village edges on South West and East. Currently the EWR plans show the line running very close, within a few hundred meters in some cases, to these village edges. HPC is of the view that the EWR lines are currently planned to be built much too close to the South West and East boundaries of the village, as it crosses the River Rhee and loops round to join the Kings Cross Mainline near Station Road, in some cases within 100-200m of existing buildings. HPC would therefore suggest that there is potential to investigate and establish the potential to move the EWR lines, and the associated junction with the Kings Cross mainline, towards Foxton by around 500-700m. This would allow the major junction of the two lines, and any associated tunneling and embankments etc., to be implemented near Hoffers Brook, which is approximately equidistant between Harston and Foxton. The land in this area is largely arable fields, with few dwellings, unlike the current route preferred by EWR which is hard up against the edges of Harston village, with the increased impact that has on the village. Such a change of route would not be very much longer, then that shown on the current EWR preferred route, in terms of distance from the exit from the Chapel Hill tunnel to the Kings Cross line, between Harston and Foxton. In addition, there may be advantages in terms of less earthwork excavation at the south western end of Rowleys Hill, at this point equidistant between Harston and Foxton, as the hill is somewhat lower at that point and less complex road interchange from either Option 1 or 4.

In terms of advantage to Harston it would mean much less sound pollution from EWR passenger trains, and diesel air pollution from freight trains, that run on the EWR tracks, less impact on Harston businesses, the school, and residents' dwellings. This new route alignment has been discussed at village resident meetings and is widely supported.

- 19. Major construction yards adjoining Harston. Construction yards in North Bucks have been associated with unacceptable levels of pollution (sound, dust/mud, water course etc.), which have required substantial monitoring and management. It is not clear why some of these construction yards have been positioned so close to Harston village, and why they have not been placed further away to avoid high impact nuisance of the type described. If the EWR is repositioned as above equally distant between Foxton and Harston it is presumed that many of these construction yards could also be moved away from Harston, limiting the pollution and disturbance at community level. This land should be returned to the village for amenity use if not required back by the original landowner.
- 20. The EWR intention is to bridge the A10 over the EWR line, which it is believed, within the current route design, may be three lines wide on account of a freight/siding loop, as well as the two passenger lines. The HPC is very concerned about the impact this high bridge over the railway will have on the Southwest side of the village, as the bridge itself and the lorry traffic over it will be nearly 15m high and will create major light and noise pollution that will carry for a long way, into the village, day and night. If the railway track was moved as per the passenger above towards Foxton, it would put this overpass much farther away from Harston, and would undoubtedly lower the light and noise pollution associated with heavy traffic on this raised structure.
- 21. The Raising of the Kings Cross Mainline, if this is to be done adjacent to Station Rd on the East side of the village, between Harston and Newton, it will increase the volume of sound that travels into the village from the many trains per hour that travel on that track. The HPC is concerned that people who live in the Lawrence Lea and nearby areas will be seriously impacted by this raised line, and its enlarged envelope of ambient noise. If, however the line is moved farther towards Foxton, as described above, then the raised mainline will be much farther away from housing in the Station Rd/Lawrence Lea area, avoiding the sound and particle pollution caused by such a rail track being raised substantially

- 22. Potential environmental damage to Harston. The River Rhee, a chalk stream considered a globally unique ecosystem supporting rare flora and fauna, and associated water meadows, crossed by an EWR viaduct, are a fragile ecological environment, as are a number of other green fingers of the Green Belt that reach into the village. HPC would need to be assured that EWR is intent on commissioning an independent Environmental Impact Assessment, based on international standards (World Bank/Equator Principles, which are directly relevant to an infrastructure project like EWR. This EIA will be able to assess those areas in Harston that are at risk, and check that there are plans to review and reconsider to mitigate and manage any environmental damage that occurs during the long construction period and subsequent many decades of operation of EWR
- 23. Freight Trains and associated pollution. Two freight loops are intended where 750m long diesel-powered freight trains can linger for perhaps up to 30-45 minutes engines running, while being passed by fast passenger trains to and from Cambourne. The sound and air pollution caused by this parking of freight trains will impact heavily on Harston, and it appears that one of the ways that this impact can be reduced is by moving the EWR lines and freight loops towards Foxton, as indicated above, in which case the noise pollution and the particulate pollution would both be farther away from human habitation. There is no benefit to Harston, and its surrounding area, and Cambridgeshire more generally of having freight running on this Southern Route into and through Cambridge, whereas there are strong arguments for having freight pass to the North of Cambridge.
- 24. Disruption to children's education. It is anticipated that there will be very high levels of construction traffic along Station Rd, Harston, during the construction period. There is a risk that the education of children at the Harston & Newton County Primary School will be impacted, in terms of pollution (sound, particulate matter) and its effect on children's physical and mental health. In addition, EWR construction in North Bucks on their railway lines has resulted in documented disruption in getting to and from school, with the impact that this has had on compliant attendance and anxiety and mental health of the children and their parents. This Primary school is at a close point to viability in pupil numbers, and any further disruption to parents committing their children to be educated there may lead to its closure. EWR must treat this as a serious issue, and pay particular attention to limiting operations along Station Rd at opening and closing school times at the very least. It should consider other ways of directly supporting the school Of course if the EWR line is moved father towards Foxton and the bridge can be built in Station Road to go over where the level crossing now is, then there is likely to be a dramatic reduction in impact on the school in this way. Attention is drawn to a recent DEFRA report on air pollution and its effect on populations and particularly children (DEFRA Air pollution in the UK 2023. Pub 2024).
- 25. Compliance with speed limits. There is evidence that it has been difficult to control the speed of HGV vehicles working for EWR, in other locations such as North Bucks (see Report from Transport, Environment & Climate Change to Buckinghamshire County Council. 1st Feb 2024). EWR should note that Station Rd and Church Street are both to become 20mph limited in 2026. The authorities with responsibility for road safety and adherence to speed limits will be encouraged to take note of the requirement for all EWR vehicles to proceed within these limits, largely put in place to provide safety for residents and travellers, or be fined. Local authorities with responsibility for this compliance will be urged by HPC to continually monitor EWR HGV traffic to check it is compliant with speed limits. EWR also needs to publish a policy of guidance and compliance to its employees and sub-contractors on this issue, which the HPC will also check and report up to SCDC and County Council and Highways Agency
- 26. Concerns about Harston villager's health, wellbeing and financial security. EWR needs to take note of the variety of detrimental impacts on villager's health, wellbeing and financial security in relation to the building of the EWR line. It is desirable that EWR has in place published schemes for compensating people affected in measurable way along all these dimensions. HPC would intend to

publicise these compensatory policies and relevant schemes, so that villagers are aware of what should be their rights.

- 27. Compensation to Councils. There is also evidence from other EWR works that local councils and authorities have had to bear a burden in terms of the cost of monitoring and managing EWR operations and their impact. There is a cost to local authorities to manage the costs incurred and to make sure the burden of these does not fall on the shoulders of local communities. So Local authorities will be encouraged by HPC to be aware of this issue and put in place council officers who can carry out the negotiation of such compensation and levy fines. To facilitate this EWR needs to have a policy in place to compensate such councils for this cost over the full construction period and the follow on into the operation of the EWR, so these costs do not fall on local residents or their local government authorities
- 28. The Northern Approach to Cambridge. As far as HPC can ascertain the Northern Approach to Cambridge, which would loop from Cambourne round past Northstowe and Histon to join the mainline to the North of Cambridge North Station, has not received a full economic assessment to determine if it offers better value for public money; has a lower impact on the environment; has a reduced impact on the lives of those who live along the Southern Route and connects the new towns of Northstowe and Waterbeach. In addition, there appears to be an unwillingness to see that EWR could be a potential important regional transport artery to the substantial housing developments and associated new jobs to the North of Cambridge (e.g. Barhill, Longstanton, Northstowe, Histon and Waterbeach). In HPC's view it is important to revisit this option, and have the Northern Route investigated by an independent assessor, so any doubt about best value for money can be resolved at a National Government and regional and personal taxpayer level, all of whom are concerned that EWR if built should go where it most contributes to the Cambridge region and the national economy.

Environmental Impact Assessment (EIA). HPC is aware that the Planning Inspectorate will require an Environmental Impact Assessment of EWR plans, whichever route is chosen. Currently EWR has proposed a structure for this EIA to the Planning Inspectorate. HPC intends to review this scope document to ensure it deals with all the concerns that HPC and its residents have, and it will respond to the Planning Inspectorate by the closing date on January 31st. It is essential that this EIA is carried out within the international guidelines published by e.g. The World Bank or The Equator Principles, as they are wholly relevant to an infrastructure project of this size, and that the EWR project is also assessed for its impact against any national infrastructure guidelines being developed by the Government, to ensure that all infrastructure projects are evaluated in the same way for impact.

Yours sincerely,

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**Dominic Bellamy** 

Chairman of the Parish Council
On behalf of Harston Parish Council