



RSPB response to East West Rail 2021 Public Consultation

31 March - 9 June 2021

This is the RSPB's official response to the non-statutory consultation on the East West Rail scheme running from 31 March to 9 June 2021, including Bedford-Cambridge section route options following the announcement of the [preferred route corridor](#) in 2020.

We have not followed the structure of the consultation feedback form as our interest and charitable purpose mean that **our response necessarily focuses on the significance of the scheme for the natural environment**, including but not limited to:

- **Priority species and habitats,**
- **Species of conservation concern,**
- **Internationally and nationally designated sites** (in particular, Sites of Special Scientific Interest, Special Areas for Conservation, Special Protection Areas and Ramsar wetlands),
- **Non-statutory sites of importance for wildlife** (Local Wildlife Sites),
- **Wider impacts on the environment** including hydrological and ecological impacts, as well as climate impacts,
- **Habitat connectivity** and the ability to preserve and enhance connectivity between important habitats and wildlife sites to aid nature recovery through the creation of a 'Nature Recovery Network',
- **Cumulative and indirect impacts** on the above from the EWR scheme itself and in combination with the associated growth and development, in particular housing and new settlements, that EWR is explicitly designed to facilitate as the flagship transport infrastructure scheme of the Government's Oxford-Cambridge Arc growth proposals.

About us

The RSPB is the charity that takes action for wild birds and the environment. We are the largest wildlife conservation organisation in the country with over one million members. We own or manage over 160,000 hectares of land for nature conservation on more than 220 reserves throughout the UK. The RSPB's policy and advocacy work covers a wide range of issues including planning policy, climate change, energy, transport, marine issues and water. Our casework team is involved in responding to major infrastructure projects where these could result in significant harm to nature. We have also undertaken significant large-scale habitat restoration and nature conservation projects in partnership with major transport infrastructure projects to realise benefits for nature, the environment and society.

The RSPB's interests in East West Rail

Our UK headquarters is at the Lodge, east of Sandy, but we also have staff based in Bedford, Cambridge and London, and close working relationships with the BirdLife International Secretariat in Cambridge. Our interests in EWR therefore cover not only the potential impacts on statutory nature conservation sites and important habitats and species across the preferred route corridor, but also:

- Protection of important habitats and species at our own 220-hectare nature reserve at The Lodge, nr Sandy (which includes Sandy Warren SSSI): one of the largest contiguous areas managed for nature in Bedfordshire, and the more than 4,000 hectares of land the RSPB manages for nature in the Oxford-Cambridge Arc,
- As a significant local employer with roughly 500 employees at The Lodge, many of whom also live in the preferred route corridor, as well as more than 85,000 members and circa 550 volunteers across the Oxford-Cambridge Arc,
- The amenity value to visitors to the Lodge nature reserve, a significant local visitor attraction with up to about 60,000 visits made annually,
- Our interests as a business, hosting well over 2,000 official visitors from the UK and around the world every year.

Our position on expansion of the UK's strategic rail infrastructure network

Strategic investment in low carbon rail infrastructure is preferable to alternatives like motorway expansion or internal aviation, which could be significantly worse for the UK's greenhouse gas emissions and would have their own impacts on wildlife.

East-West Rail (EWR) does, however, have the potential to have significant impacts on wildlife and priority habitats and species, both through direct impacts resulting from the construction and operation of the new railway line and through indirect impacts, including cumulative impacts with other major infrastructure projects and with the associated housing growth that EWR is explicitly designed to facilitate as part of the Government's Oxford-Cambridge Arc proposals.

It is also significant that the Department for Transport has decided not to make East West Rail a fully electrified route from first operation, leaving open the potential that it will operate diesel electric rolling stock which will significantly increase the carbon and greenhouse gas emissions from the operation of the line – undermining its low carbon credentials and Government commitments to decarbonise the transport sector, which contributes more than any other to domestic greenhouse gas emissions.¹

Summary of our response to the current consultation:

1. We welcome efforts EWR Co. have made to ensure the route options being considered avoid directly impacting on designated wildlife sites (SSSIs, SPAs, SACs, Ramsar wetlands), nature reserves and irreplaceable habitats such as ancient woodland.

¹ The transport sector was responsible for 27 per cent of the UK's total greenhouse gas emissions in 2019 according to [2019 UK Greenhouse Gas Emissions, Final Figures \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/824242/2019-UK-Greenhouse-Gas-Emissions-Final-Figures.pdf), BEIS.

We expect EWR Co. to continue to fully apply the mitigation hierarchy of ‘avoid, mitigate, compensate’ in its approach to minimising adverse impacts from the scheme.

2. We support the concerns of the Wildlife Trust for Bedfordshire, Cambridgeshire and Northamptonshire that insufficient consideration has been given to impacts on Local Wildlife Sites and the goal of improving habitat connectivity between the West Cambridgeshire Hundreds and area to the west of Cambridge in the decision to continue to support the preference for a southern approach into Cambridge over a northern alternative.

We call on EWR Co. to

- **undertake a full Strategic Environmental Assessment of the different route options between Bedford and Cambridge, including the alternative northern approach into Cambridge**
 - **select the route that best avoids and minimises adverse impacts on nature, including cumulative and indirect impacts, and maximises opportunities for habitat creation and restoration to contribute to strategic nature recovery.**
3. Insufficient evidence has been presented that any additional environmental impacts of a southern route compared with an alternative northern route can be adequately mitigated.
A more detailed assessment of the relative environmental impacts of a southern approach compared with a northern approach into Cambridge is needed before any conclusions can be drawn about the ability of additional adverse impacts of a southern route to be adequately mitigated. This follows on from point 1. about following the mitigation hierarchy.
 4. There is inadequate explanation of the process EWR Co. has used to weigh environmental impacts against other factors in choosing their preferred route options, and in excluding a northern approach into Cambridge from further consideration.
EWR Co. should publish clear and comprehensive details of the weighting given to environmental impacts compared with other factors in their decision to favour a southern approach into Cambridge.
 5. As the flagship strategic transport infrastructure project of the Government’s Oxford-Cambridge Arc growth programme, the final route for EWR between Bedford and Cambridge and the locations of new stations are the most important determinants of the location of significant new housing development including new settlements in the Arc. The location of new housing and settlements is in turn a crucial factor in their environmental impacts and sustainability. A Strategic Environmental Assessment (SEA) is essential for identifying the cumulative impacts of the rail scheme in combination with the transformative growth and development it is designed to enable.

Government is committed to undertaking a Sustainability Appraisal to SEA standards as part of the development of a spatial framework for Arc², but the timeline for the selection of the final route and station locations for the Bedford to Cambridge section of EWR risks these decisions being taken without a full and proper understanding of

² [Planning for sustainable growth in the Oxford-Cambridge Arc: An introduction to the Oxford-Cambridge Arc Spatial](#), HM Government, February 2021.

the environmental impacts. This could result in significantly worse environmental outcomes from the scheme from unforeseen negative impacts, including cumulative and indirect impacts, on everything from air and water quality to flooding and the ecological condition and healthy functioning of terrestrial and freshwater ecosystems.³

For the Arc spatial framework's Sustainability Appraisal to inform the selection of the final route for EWR between Bedford and Cambridge and the location of new stations, these decisions must wait until after the SA has been completed.

We urge EWR Co. and the Secretary of State for Transport to delay any decision about the final route and station locations for the Bedford-Cambridge section of the line until after a Sustainability Appraisal to SEA standards has been carried out as part of the development of the Government's spatial framework for the Oxford-Cambridge Arc.

6. We welcome the commitment of EWR Co. to deliver a net zero carbon railway, but the lack of assurance from the Secretary of State for Transport that the line will not operate diesel electric rolling stock undermines this commitment and the scheme's potential value as a low carbon alternative to driving.⁴

We call on EWR Co. and the Secretary of State for Transport to

- **deliver a full carbon assessment of the scheme to demonstrate how it will be compatible with achieving the Prime Minister's [pledge](#) to reduce the UK's greenhouse gas emissions by 78% by 2035,⁵**
- **commit to delivering EWR as a decarbonised (net zero carbon) line from first operation to support [Government commitments](#) to decarbonise the transport sector.⁶**

In seeking to deliver EWR as a net zero railway, we call on EWR Co. to

- **recognise the potential and prioritise opportunities for habitat creation and restoration to efficiently remove additional carbon from the atmosphere and locking it away in the plants and soils of woodland, heathland, grassland, wetland and peatland habitats.**
- **coordinate with and support local and wider sub-national transport strategies – specifically England's Economic Heartland's [Transport](#)**

³ We are concerned about the potential for indirect impacts of EWR from housing growth associated with planned new EWR stations, in particular the impacts of increased visitor numbers on sensitive habitats at RSPB The Lodge nature reserve and the potential for housing growth at Cambourne to impact on farmland bird assemblages and priority farmland bird species at [RSPB Hope Farm](#) and habitat connectivity in the surrounding countryside. Indirect impacts from EWR and associated developed should be identified through the Sustainability Appraisal carried out as part of the development of the Arc spatial framework, but if the decisions about the final route for EWR and locations of new stations are taken before this work is complete, these impacts will not have been identified and considered.

⁴ As reported by the Cambridge Independent on 7 May 2021.

<https://www.cambridgeindependent.co.uk/news/using-diesel-trains-on-east-west-rail-would-be-ridiculous-9198306/>

⁵ UK enshrines new target in law to slash emissions by 78% by 2035.

<https://www.gov.uk/government/news/uk-enshrines-new-target-in-law-to-slash-emissions-by-78-by-2035>

⁶ The RSPB is calling for a UK target of net zero sooner, by 2045, and for this to be enshrined in law.

Strategy⁷ – to improve and expand infrastructure for walking and cycling around and between rail hubs, residential communities and commercial / business areas.

7. We welcome East West Rail Co.'s commitment to achieving a net gain in biodiversity from the delivery of the scheme.

In delivering on that commitment we call on EWR Co. to:

- **set out to achieve a minimum 20% net gain in biodiversity through the creation and restoration of priority wildlife habitats, helping to expand and connect existing wildlife sites,**
- **recognise that biodiversity gain is not in itself an argument for development and does not reduce the duty to protect existing habitats through full and proper application of the mitigation hierarchy,**
- **work with relevant Planning Authorities, statutory and non-statutory environmental bodies to ensure that habitat creation and enhancement is guided by Local Nature Recovery Strategies and helps to create a broader National Nature Recovery Network.**

8. East Wail Rail could create a significant barrier to the movement of wildlife, including key priority species and species of conservation concern, through the landscape. It is essential to the scheme's efforts to minimise negative impacts on the natural environment that this effect is mitigated.

We expect East West Rail to demonstrate the highest levels of nature-friendly design, incorporating features such as wildlife tunnels, green bridges, Sustainable Drainage Systems, and native planting to minimise the barrier effect of the scheme to the movement of wildlife through the landscape and maximise the benefits of newly created and restored wildlife habitats.

For further information please contact Rupert Masefield, RSPB England Policy and Advocacy Team, rupert.masefield@rspb.org.uk

RSPB

8 June 2021

⁷ England's Economic Heartland Transport Strategy:
<https://www.englandseconomicheartland.com/transport/>

Appendix 1

More detailed consideration is given below to key areas of concern to the RSPB due to potential impacts of the East West Rail scheme:

- a. Climate and carbon impacts
- b. Cumulative impacts in combination with associated proposed growth and development
- c. Bedford-Cambridge route options

a. Climate and carbon impacts

The [State of Nature 2019 report](#) states:

“Climate change is driving widespread changes in the abundance, distribution and ecology of the UK’s wildlife, and will continue to do so for decades or even centuries to come.”

There is an urgent need to mitigate and adapt to the impacts of climate change on habitats, ecosystems and wildlife in the UK, to improve the resilience of the natural environment and ecosystem services that underpin human health as well as economic prosperity.

Despite [committing](#) to decarbonising the UK transport sector, which contributes more than any other to domestic greenhouse gas emissions ([27 per cent in 2019](#)⁸), the Secretary of State for Transport has failed to commit to ensuring East West Rail will not run diesel-electric trains that are more polluting and have higher greenhouse gas emissions than their fully electrified equivalents.⁹

In an [interview with the BBC](#) Mr Shapps’ suggested EWR “might potentially bypass overhead wire technology altogether” and ultimately run hydrogen or battery-powered trains:

"We're building it in such a way that we can use, probably, the very latest technology, potentially, in the future," he said.

But, as the caveats – "might potentially", "probably", "potentially" – highlight, these new technologies are not ready.

Failure to ensure EWR is powered by low or zero carbon energy from first operation will undermine efforts to reach net zero by 2050 and prevent the worst impacts of climate change by keeping global warming within 1.5°C.

Prime Minister Boris Johnson’s [pledge](#) to reduce the UK’s greenhouse gas emissions by 78% by 2035 only highlights the need for EWR to be decarbonised from day one.

To deliver East West Rail Co.’s stated aim to deliver a net zero railway, in addition to designing and building the line to be (net) zero carbon in its operation it will need to

⁸ [2019 UK Greenhouse Gas Emissions, Final Figures \(publishing.service.gov.uk\)](#), BEIS.

⁹ Assuming the electricity used to power these is generated using low carbon or renewable technologies.

account for emissions during construction as well as embedded emissions in the materials used and throughout the supply chain.

It is essential that a comprehensive carbon assessment is carried out for the construction and anticipated lifetime operation of the scheme to inform decisions about the design, construction and operation of the scheme that will deliver on the promise of a net zero railway.

It is inevitable that some implementation of carbon-capture technology or use of carbon credits or offsetting schemes will be necessary to balance any unavoidable residual carbon emissions.

Habitat creation and restoration has an important role to play in increasing carbon storage and sequestration¹⁰, as well as in helping to provide nature-based solutions that can help mitigate and adapt to impacts of climate change such as flooding and loss of coastal habitats.

We urge EWR Co. to recognise and prioritise nature-based solutions, habitat creation and restoration in their efforts to deliver East West Rail as a net zero carbon scheme.

b. Cumulative impacts in combination with associated proposed growth and development

In our response to East-West Rail route options consultation (28 January - 11 March 2019) ¹¹we wrote:

“The implications for nature of large-scale urban growth facilitated by EWR in the preferred route corridor are not clear but could be significant and adverse. The effects these could include increased recreational pressure on sensitive habitats, pressure for urban development in places that would destroy habitats of principal importance, and further exacerbation of severe flooding events on the Ouse Washes Special Protection, which lies downstream in the Great Ouse catchment.

“It is clear that the preferred route for EWR will be chosen at least partly for its capacity to support large scale housing growth, potentially in locations (such as Bassingbourn Barracks) that have not yet been identified as appropriate through the Local Development Plan process and probably are not (for example, because Bassingbourn Barracks is a Local Wildlife Site). The preferred route for EWR will undoubtedly be a significant factor in the future spatial development of this part of the Oxford-Milton Keynes-Cambridge Arc.

“We are concerned at the intention to choose a preferred EWR route without proper consideration of the full scale of impacts likely to arise from not just the railway, but also the urban growth likely to follow it. We therefore call on the Government to undertake a full Strategic Environmental Assessment (SEA) for all the route options now, before the options for a specific route begin to be narrowed down. We have seen the Wildlife Trusts’ response dated 6 March 2019 and fully endorse the points they make therein regarding the

¹⁰ [Carbon Storage and Sequestration by Habitat 2021](#), Natural England.

¹¹ Attached with this response to our email submission the consultation email address.

importance of deploying SEA on this national significant infrastructure project before a decision about a preferred route is made.

“Within the preferred route corridor there are numerous non-statutory wildlife sites and habitats of principal importance including semi-natural ancient woodlands. Direct and indirect impacts on these habitats, in a landscape already so denuded of good quality wildlife habitat, should be avoided as far as possible. But just avoiding impacts is not enough. The RSPB believes that EWR must make a significant and measurable net gain for biodiversity, whichever route is chosen, in line with the Government’s ambition set out in [‘A Green Future: Our 25 Year Plan to Improve the Environment’](#).”

Earlier this year Government announced its intention to develop “up to four new or expanded settlements in the Oxford-Cambridge Arc (OxCam Arc) aligned with new stations along the East West Rail (EWR) Central Section.”¹²

The location of these new strategic housing growth areas will be a significant determining factor in their environmental sustainability, impacts on habitats and species, and cumulative impacts on air and water quality, water availability, flooding, and the ecological condition of freshwater and terrestrial habitats.

Government is committed to developing a spatial framework to guide the planning and delivery of growth in the Oxford-Cambridge Arc that will be informed by a Sustainability Appraisal to SEA standards to ensure the natural environment of the Arc is protected and enhanced.¹³

The timetable for the delivery of East West Rail though is running ahead of the development of the spatial framework and its Sustainability Appraisal / SEA, which are explicitly designed to inform strategic decisions about the location and design of development to ensure its environmental sustainability. This means that decisions taken now about the location of the route for EWR between Bedford and Cambridge are not being informed by these essential environmental assessments.

We strongly urge East West Rail Co. and DfT to postpone taking any decision about the final preferred route for the scheme between Bedford and Cambridge until after the aforementioned Sustainability Appraisal has been completed, so that this can inform the selection of the most environmentally sustainable route and station locations. Failure to delay the decision will risk severely compromising the environmental sustainability of the scheme in combination with the associated housing growth and new settlements it is explicitly designed to enable, and could result in unknown cumulative and indirect impacts that undermine the Government’s commitment to making the Oxford-Cambridge Arc an exemplar of the 25 Year Environment Plan and environmentally sustainable, ‘green’, growth.

c. Bedford-Cambridge route options

¹² MHCLG - Engagement strategy for settlements (OxCam Arc) - Invitation to Tender <https://www.contractsfinder.service.gov.uk/notice/69f2407b-8f73-4b5f-9318-29759cdd6058?origin=SearchResults&p=1>

¹³ [Planning for sustainable growth in the Oxford-Cambridge Arc: An introduction to the Oxford-Cambridge Arc Spatial](#), HM Government, February 2021.

The RSPB has not identified a preference for any of the route options considered in the current consultation over any other on environmental grounds as insufficient detail of their likely environmental impacts relative to one another has been provided.

We are pleased that the route options being considered appear to avoid directly impacting on any internationally and nationally designated wildlife sites and that route options that could have seen significant adverse impacts on designated habitats and wildlife at RSPB The Lodge nature reserve were excluded from further consideration following our response to the first non-statutory consultation on these broad route options in 2019.

Depending on the final route chosen for the Bedford-Cambridge section of the line though, the scheme could still affect numerous locally important wildlife sites. These are some of the last best bits of land that provide homes for nature in the heavily modified landscape of Bedfordshire and Cambridgeshire and are treasured as such by local communities.

We want to see the final route for EWR between Bedford and Cambridge minimise the risk of any loss of or damage to these valuable places for nature and people, as well as avoiding any loss of irreplaceable habitats like ancient woodlands and grasslands.

Northern vs southern approach to Cambridge

The Wildlife Trust for Beds, Cambs and Northants (WTBCN) has indicated that a northern route would have reduced impact on Local Wildlife Sites and on their efforts together with Natural Cambridgeshire, the Local Nature Partnership for Cambridgeshire and Peterborough, to extend and connect the priority woodland habitats of the West Cambridgeshire Hundreds with remnant native woodland patches to the west of Cambridge. **We support their call for a northern route to be considered as part of a Strategic Environmental Assessment of the alternatives to the emerging preferred route that approaches Cambridge from the south.**

We are also aware of a [study](#) commissioned by the Cambridge Approaches group, which is campaigning for a northern approach into Cambridge, that presents a detailed comparison of the wildlife sites and species it is likely will be affected by a northern vs a southern route into Cambridge. While the RSPB has not had time to scrutinise the evidence it presents, we would expect a detailed assessment by East West Rail Co. of the relative environmental impacts of a northern vs a southern approach into Cambridge, and the ability to mitigate any additional impact of a southern route, to specifically consider the potential impacts identified by this study.¹⁴

¹⁴ Wildlife and Landscape Impacts of EWR's Preferred Southern Route into Cambridge versus CBRR's Northern Route. Kevin Hand MSc MCIEEM, May 2021.

Appendix 2

Supplementary information: support for Strategic Environmental Assessment, decarbonisation of East West Rail, assessing cumulative impacts to ensure development is kept within environmental limits, and ambitious targets for 20% biodiversity net gain.

Two key publications support the need for East West Rail to implement the measures we have called for above in the approach to planning and delivering this strategic transport infrastructure project as part of Government's wider programme of growth in the Oxford-Cambridge Arc:

1. England's Economic Heartland's Transport strategy

The [Regional Transport Strategy](#) published by sub-national transport body England's Economic Heartland (EEH) in March 2021 **supports the need for Strategic Environmental Assessment to identify the cumulative environmental impacts of all strategic transport projects in the region** covered by the strategy – which includes all of the counties through which the East West Rail scheme passes and the wider counties of the Oxford-Cambridge Arc programme of which East West Rail is an integral part – in combination with associated development of other forms, including housing. The Strategy's accompanying Sustainability Appraisal identifies the potential for significant cumulative environmental impacts from strategic transport infrastructure projects in combination with associated growth and development, including housing and new settlements.

It is disappointing therefore that EWR, as a project identified as a priority in EEH's Transport Strategy, has not followed this approach itself – and in particular in order to identify and select the route between Bedford and Cambridge that would minimise environmental harm and maximise opportunities for the project to make a positive contribution to the protection and enhancement of the natural environment.

The Transport Strategy also supports the electrification of the East West Rail line to achieve the ambitious target to achieve net zero carbon for the region's transport network by 2040.

2. Arc Leadership Group Environment Principles

The [Shared regional principles for protecting, restoring and enhancing the environment in the Oxford-Cambridge Arc](#) published by the Arc Leadership Group in March 2021 sets out the Leaders' ambition for the Arc to be an "exemplar for environmentally sustainable development, in line with the ambitions set out in the government's 25 year plan" [for the environment].

The Leaders' ambitions include:

- Understanding the impact of development on the natural environment, including cumulative and indirect impacts (taking into account associated housing and other forms of development), so that these can be addressed in line with the mitigation hierarchy, and carrying out environmental and strategic assessments as appropriate for the type and scale of development programmes including options and proper community consultation
- Working towards a target of net zero carbon at an Arc level by 2040, including in construction, operational and transport activities.

- Delivering biodiversity net gain for all developments of 20% with a minimum requirement of 10% including Nationally Significant Infrastructure and projects brought forward outside of the Town & Country Planning Act. This is to reflect the Arc's world leading environmental ambitions.
- Establishing human and nature mobility corridors across the Arc – using existing or new transport corridors for maximum environmental benefit/gain.
- All new settlements, urban extensions and infrastructure contributing to the achievement of delivering net biodiversity gain, net environmental gain, and net zero carbon both in site and route selection and in the design of settlements and transport corridors. In addition, areas of tranquillity will be protected and measures taken to avoid light pollution and protect dark sky areas. Making cycling and walking more attractive ways to travel and investing in zero emission public transport of the future

It is our hope that East West Rail Co. and the Secretary of State for Transport will support and embed Arc Leaders' and England's Economic Heartland's environmental ambitions in their approach to planning and delivering East West Rail.