RESPONSE TO EAST WEST RAIL 2026 NON-STATUTORY CONSULTATION

Construction Impacts on Communities

Submitted by Cambridge Approaches — June 2026

Summary of demands

Below is a summary list of requests as identified within the response.

a) EWR Co must publish its current working assumptions on construction phasing, sequencing, duration and area-by-area start and completion dates as a supplement to this consultation, clearly caveated as indicative and subject to revision through contractor engagement as a supplementary consultation.

b) EWR Co should use haul roads for all HGV vehicles to avoid damage to minor roads.

c) The speed limits on any roads that are unavoidably needed for construction traffic should be re-assessed prior to the works being carried out to incorporate the additional volume of traffic anticipated – EWR Co should take the action to recommend appropriate reductions to the council.

d) EWR Co should factor the use of very large agricultural vehicles into the construction programme.

e) EWR Co publish, based on current construction assumptions:

- quantitative daily and peak HGV movement forecasts by route, construction phase and approximate timings;
- a structural assessment of each designated road against expected loading;
- cumulative axle loading calculations;
- bridge and carriageway edge assessments where heavy traffic is proposed;
- local congestion modelling for affected settlements and junctions;
- detailed diversion route assessments;
- evidence of on-the-ground assessment of all proposed HGV routes;
- a binding and monitored commitment to ongoing road maintenance to a defined standard throughout construction.

f) EWR Co are requested to provide, by affected route section, the schedule of planned blockades and possessions, including anticipated dates, durations and

frequency, together with its proposed arrangements for maintaining connectivity for rail users during closures. Exact dates cannot obviously be confirmed at this stage but ranges and indicative phasing can be provided based on the planning assumptions that EWR Co have made. This should be provided well before the submission to the Planning Inspectorate (PI) so that stakeholders can make their own submissions to the PI accordingly.

g) EWR Co are requested to provide an Economic Impact Assessment of the construction phase by affected area, covering the full range of business and agricultural impacts, with clearly stated assumptions about the duration and phasing of disruptive activity. This should be provided well before the submission to the Planning Inspectorate (PI) so that stakeholders can make their own submissions to the PI accordingly.

h) EWR Co are requested to provide site-specific ecological impact assessments for each significant habitat and designated site within or adjacent to the construction corridor, with explicit detail on seasonal working constraints, the temporary and permanent extent of habitat loss and the location, timing and specification of all compensatory and mitigation habitat delivery.

i) EWR Co must provide heritage impact assessments at the level of individual designated and known non-designated heritage assets within the construction corridor, including vibration impact zones for listed buildings and their settings and a proposed strategy for archaeological watching brief and mitigation recording.

j) EWR Co must provide predicted noise and vibration levels at a representative set of affected properties for each phase of construction, the quantitative noise standards to which contractors will be contractually bound, a monitoring regime with named responsible parties and the process by which residents can seek remediation where standards are exceeded.

k) EWR Co are requested to provide air quality impact assessments for affected communities, covering predicted particulate concentrations during construction, contractually required dust suppression measures and the monitoring and enforcement arrangements that will apply.

l) EWR Co must provide photomontages and visualisations of the construction corridor at a representative set of viewpoints, during and after construction, in a form accessible to non-specialist readers, together with site-specific landscape and visual impact assessments.

m) EWR Co must provide a Community Impact Assessment for any village or settlement directly affected by the construction corridor. The assessment

should examine the combined effect of all construction impacts on daily life, accessibility, safety and amenity over the projected construction period.

n) EWR Co must provide a construction water management plan quantifying demand, identifying sources and demonstrating compatibility with existing licence conditions and the Environment Agency's abstraction reduction programme.

o) EWR Co must provide a site-specific dewatering impact assessment for the Highfields Caldecote tunnel that models the predicted extent of groundwater drawdown, assesses the effect on the hydrology and microclimate of the adjacent ancient woodland and addresses the implications for barbastelle hibernation roosting suitability, supported by a monitoring and mitigation programme agreed with Natural England. A similar assessment should also be provided for Chapel Hill tunnel.

p) EWR Co must also provide site-specific flood risk and water environment assessments for the construction phase, covering management of surface water during earthworks, protection of watercourses from pollution and the arrangements — including timescales and verification — for restoring drainage systems to their pre-construction condition.

q) EWR Co must provide Agricultural Land Classification surveys for all directly affected land, site-specific soil management plans for construction and restoration phases and a binding commitment to restoration standards and timescales, with an independently verified sign-off process before any temporarily used agricultural land is returned to farming use.

r) EWR Co must provide a **Residents' Charter** which sets out contractor behaviour, standards and construction commitments in specific, measurable terms.

s) EWR Co must appoint **Construction Ombudsman** with the authority to ensure that EWR Co and its contractors meet the commitments in the Residents' Charter and provide independent decisions and mediation on unresolved construction-related disputes between contractors and residents, community groups or local authorities.

t) EWR Co must provide a public information and complaints system should accompany these arrangements, providing a website with real-time and forward-looking information on works, road impacts and planned disruptions; a transparent complaints system through which residents can submit and track complaints; and a freephone community helpline operating throughout the construction period.

No basis for meaningful engagement on construction impacts

1. The Planning Inspectorate has consistently stated, and Examining Authorities in multiple Nationally Significant Infrastructure Project (NSIP) cases have confirmed, that a statutory consultation is only meaningful if stakeholders can understand the likely impacts of a proposal — not merely its broad concepts or the processes by which those impacts will be managed. In many major projects, examiners have criticised applicants for a lack of site-specific detail and a failure to explain alternatives or the constraints that rule them out. EWR Co's 2026 Non-Statutory consultation documents do not meet the required standard in respect of construction impacts.

2. Throughout the documents, EWR Co describes processes, frameworks and management intentions. It does not describe outcomes. The description of measures that *may* mitigate an impact is not the same as evidence that the impact *will* be mitigated to an acceptable level. This distinction is not technical or pedantic; it is the difference between a consultation that informs and one that reassures without foundation. Taken as a whole, the consultation creates an impression of a carefully managed process that will have little impact on residents. The experience of communities in Buckinghamshire during an earlier EWR connection stage — documented formally by Buckinghamshire Council, raised repeatedly in Parliament and reported extensively in the local press — demonstrates that this impression, if repeated in Cambridgeshire, will prove to be a serious misrepresentation.

3. A further structural problem is that EWR Co's consultation relies substantially on engineering drawings to convey the scale and nature of construction works. Drawings are essential technical instruments. They are not, however, adequate as the primary means of communicating scale and impact to non-technical residents, who rely predominantly on the text sections and 3D representations of the consultation document. The drawings do not convey, in terms a general reader can readily interpret, the volume of earthworks, the extent of land take, the duration of activity at specific locations, or the density and weight of construction traffic that the project will generate. Where the text is vague, the drawings do not compensate for it. This matters because the consultation process exists to elicit informed responses from affected communities, not merely from technical specialists who can decode engineering drawings.

4. The inadequacy of the information currently provided is reinforced by the Planning Inspectorate's own Scoping Opinion of February 2025[1]. The Inspectorate repeatedly identified areas where EWR Co had failed to provide sufficient detail to enable meaningful environmental assessment. This included construction compounds, freight assumptions, piling methods, construction interfaces with the existing railway, likely locations of overnight working, construction traffic routes, vibration impacts, traffic diversions, lighting impacts, cumulative effects and the relationship between mitigation commitments and enforceable Development Consent Order requirements. The Scoping Opinion specifically states that the Environmental Statement must provide sufficient detail regarding the "design, size, capacity and locations" of project elements and assess a worst-case scenario where flexibility is retained. The consultation documents published by EWR Co do not provide this level of information to communities now, despite the fact that the Inspectorate has already identified these deficiencies as material to proper assessment.

5. The sections below address each principal category of construction impact. In each case the same pattern is evident: EWR Co's consultation documents are insufficient to allow consultees to understand what will actually happen during construction. The Buckinghamshire evidence is not cited as historical background. It is cited because it is the direct, documented consequence of consulting on the same kind of assurances that EWR Co is now offering to a new set of communities.

6. The East West Main Line Partnership's February 2026 "Lessons Learned" report[2] also directly undermines confidence in EWR Co's current approach to construction engagement. That report, based on interviews with local authorities involved in the Oxford to Milton Keynes construction stage, identifies the need for "consistent monitoring and communication around agreed traffic management mitigations", "joint responsibility" to resolve issues quickly, and binding Development Consent Order conditions to give local authorities sufficient leverage to control impacts on communities. The report specifically emphasises that ambiguity and non-binding commitments create significant problems during construction delivery. These lessons are directly relevant because the current consultation repeatedly relies on vague assurances and discretionary language rather than enforceable commitments.

[1] https://nsip-documents.planninginspectorate.gov.uk/published-documents/TR040012-000022-East%20West%20Rail%20Scoping%20Opinion.pdf
[2] https://eastwestrail.org.uk/wp-content/uploads/2026/02/Item-5-Lessons-Learnt-East-West-Main-Line-Partnership-Board-260226.pdf

The Absence of a Construction Programme

7. EWR Co's 2026 consultation refers prominently to an "accelerated construction programme" as one of its headline updates, and describes a new approach of phased delivery in which stations and sections of the railway will open as soon as they are ready rather than awaiting completion of the whole route. This is presented as a benefit to communities. Yet the consultation provides no programme — no start dates by area, no sequencing of works, no duration by phase or location, and no indication of when construction in any particular village or corridor would begin or end. EWR Co is asking communities to welcome an acceleration of a programme whose content and timing it has not disclosed.

8. This is not a minor omission. A construction programme is the foundational document against which every category of construction impact must be assessed. Without it, the impact assessments described throughout this response cannot be adequately evaluated. Noise and vibration impacts depend on when and where works will occur. Road damage depends on the volume and duration of HGV movements, which depend on the construction programme. Ecological survey timing constraints depend on the phases of earthwork. Agricultural restoration planning depends on when land will be taken and returned. In the absence of programme information, this consultation asks communities to respond to impacts without knowing whether those impacts will fall in one year or five, or whether their village will face construction in the first phase of the programme or the last.

9. Section 47 of the Planning Act 2008 requires the developer to prepare a statement of community consultation, and government guidance advises developers to consider how they can "engage communities in a way that supports them to understand the necessary issues and how they will show how they have responded to their issues of concern." It is not possible to understand the necessary issues of a construction project without understanding when that construction will take place. The government has stated that it expects "high-quality early, meaningful and constructive engagement and consultation to take place with those affected," enabling "positive changes to be made to proposals without causing undue delays." Positive changes to a construction programme cannot be made if the programme has not been shared.

10. The absence of a programme affects different groups in distinct but equally serious ways. For residents, a construction programme is not simply a planning tool; it is the information they need to make major life decisions. A family considering whether to sell their home before the construction corridor arrives, a couple planning a wedding or a birth around the period of maximum disruption, parents choosing a

school for a child who will be attending during the construction years, an elderly resident deciding whether to remain in a home that will be affected for years — all of these decisions depend on knowing when construction will begin and how long it will last in their area. The consultation provides no basis for any of them to plan.

11. For businesses along the route, the absence of a programme is a material commercial concern. A farm business needs to know when land will be taken and returned in order to manage its cropping and rotation programme. A rural pub, restaurant or hotel needs to know whether the construction period will coincide with peak trading seasons and for how many years, in order to plan staffing, investment and lease commitments. A haulage or logistics business operating from premises on a designated construction traffic route needs programme information to manage its own fleet movements and customer commitments. The construction programme is not background information for these businesses; it is the basis on which they will make investment, staffing and financial decisions in the years ahead. Good practice guidance on managing construction disruption to businesses stresses that affected businesses need to "engage with the project management team, including on the timing of works" and should "take steps before construction starts" to adapt their operations — but this is only possible if the timing of works is disclosed.

12. For local authorities, the programme is essential for planning road maintenance budgets and resource allocation. Buckinghamshire Council's experience — in which it was required to allocate £5 million from reserves to repair roads damaged by EWR and HS2 HGVs — was partly a consequence of not being able to plan for the scale and duration of that damage in advance. A highway authority that knows construction traffic will use specific roads for a defined period can assess the structural capacity of those roads against the expected loading, plan a maintenance and inspection regime, and budget accordingly. Without a programme, it cannot.

13. For schools, GP surgeries, community centres and other public facilities whose catchment areas overlap with the construction corridor, the programme is needed to manage capacity and accessibility planning. A school that knows its access road will be a designated HGV route for two years can plan traffic management, communicate with parents and seek mitigations. One that discovers this during construction cannot.

14. EWR Co's response to requests for programme information will likely be that the construction programme will be developed in detail through engagement with contractors following DCO consent, and that a detailed programme cannot be committed to at this stage. This is a legitimate and well-understood position. But it does not justify the disclosure of nothing. EWR Co is not being asked for a contractor-level programme, a critical path analysis or a resource-loaded schedule. It is being asked for the working assumptions that must already exist within the

organisation — because without them, EWR Co could not have prepared cost estimates, cannot have planned the land acquisition programme, cannot be running ecological surveys with appropriate seasonal windows, and cannot be preparing the Environmental Statement that will accompany its DCO application in 2027. An "accelerated construction programme" that EWR Co is prepared to describe as a selling point of this consultation is a programme defined enough to share in outline with the communities it will affect.

15. HS2 itself has acknowledged that providing communities with "certainty on when construction will complete" is a fundamental obligation, stating explicitly that a reset of its programme "was a necessary step to establish a credible schedule to deliver the remaining works, so communities have certainty on when construction will complete." That acknowledgement was made mid-construction, under pressure from affected communities. EWR Co should not wait for the same pressure to arise before recognising the same obligation.

16. This consultation is, in EWR Co's own description, the last route-wide public consultation before the DCO application is submitted in 2027. The DCO application is intended to be submitted in 2027, after which the project will enter the Planning Inspectorate examination process before a final consent decision is made by the Secretary of State. Once that process concludes and consent is granted, communities will have no further formal mechanism for influencing the construction programme. This consultation is therefore the last realistic opportunity for programme information to be disclosed in a context where communities can respond to it and seek changes to it. EWR Co must publish its current working assumptions on construction phasing, sequencing, duration and area-by-area start and completion dates as a supplement to this consultation, clearly caveated as indicative and subject to revision through contractor engagement as a supplementary consultation.

Transport: Roads, Traffic and Road Damage

17. The scale of road impact in EWR Co’s consultation is obscured by a classification system that is close to meaningless. Local roads are shown on consultation drawings as carrying either fewer than, or more than, ten heavy goods vehicles (HGVs) per day. The upper category is unbounded. A route classified as carrying “more than ten” HGVs could in practice carry one hundred or more HGVs per day. This distinction is critical because the impacts of construction traffic are not a single issue but two separate and independently serious impacts: first, the physical destruction of road structures caused by sustained heavy axle loading; and second,

the congestion, delay and network disruption caused by very large volumes of construction traffic using already constrained local roads.

18. The physical impact on road structures is well understood engineering science. Road damage from heavy vehicles is proportional to approximately the fourth power of axle load. A heavily loaded HGV axle can therefore cause tens, or hundreds, of thousands of times more structural damage to a road surface than a typical car axle. Many rural roads in South Cambridgeshire were never designed for sustained industrial-scale loading over multiple years. The consultation documents contain no quantified assessment of cumulative axle loading, pavement deterioration, bridge impacts, carriageway edge failure risk or the expected frequency of maintenance interventions required during construction. Without this information communities and highway authorities cannot assess the likely extent of structural degradation to the local road network.

19. Furthermore, repairing rut-damaged roads by a cosmetic overlay rarely lasts long – effective repairs are often required to the underlying road strata which is expensive and disruptive. EWR Co should use haul roads for all HGV vehicles to avoid such damage.

20. Congestion and traffic disruption are a separate issue from road damage and require separate assessment. Even where roads remain physically passable, the volume and routing of HGV traffic can fundamentally alter the operation of local transport networks. The impacts include delays at constrained junctions, queuing through villages, obstruction of agricultural and emergency access, increased journey time unreliability, reduced pedestrian and cyclist safety, temporary traffic management, road closures and diversionary traffic onto unsuitable routes. The consultation documents provide no meaningful quantified modelling of these impacts at a local level. Statements that impacts will be managed “as far as reasonably practicable” are not assessments and provide no enforceable standard.

21. Very large agricultural vehicles use the local roads at times to suit farming operations. This activity should be factored into the construction programme and any associated road use.

22. The Planning Inspectorate’s Scoping Opinion (see above for reference) specifically identified deficiencies in EWR Co’s treatment of construction traffic and associated impacts. The Inspectorate stated that the Environmental Statement should include details of roads to be used for construction traffic, construction compounds, vibration impacts from construction traffic, assessment of traffic diversions during road closures and the air quality impacts associated with diverted traffic. The Inspectorate also rejected attempts by EWR Co to scope out significant effects from

construction-related emissions and vibration in advance of adequate evidence being provided.

23. The Buckinghamshire experience demonstrates what these deficiencies mean in practice. Buckinghamshire Council's formal reports documented widespread carriageway deterioration, road defects and severe disruption associated with EWR and HS2 construction traffic. Roads including Queen Catherine Road in Steeple Claydon, Ox Lane in The Claydons, Verney Road, Little Horwood Road, Sandhill Road, Lenborough Road, Whaddon Road in Newton Longville, Herds Hill and Station Roads in Poundon, Swanbourne and Mursley suffered extensive damage associated with construction HGV movements. Buckinghamshire Council was required to allocate substantial emergency funding to repair roads damaged by construction traffic and identified closures and temporary traffic management as one of the most significant ongoing issues affecting communities.

24. The February 2026 "Lessons Learned" report commissioned by the East West Main Line Partnership (referenced above) specifically identified the need for "consistent monitoring and communication around agreed traffic management mitigations e.g. of HGV movements to/from sites." It also highlighted the importance of binding consent conditions and collaborative working arrangements to maintain community trust. The fact that these lessons were formally identified after the Oxford–Milton Keynes stage of the project demonstrates that previous traffic mitigation and engagement arrangements were inadequate and that stronger controls are required for future phases.

25. The inadequacy of the route selection process is further illustrated by specific designations in EWR Co's own consultation documents. Church Street in Harston, for example, is shown as a construction traffic route despite being narrow, containing a sharp blind bend adjacent to the church, further narrowed by frequently parked vehicles, a single carriageway bridge and presenting near-impossible geometry for HGV right turns onto the A10. Similar concerns arise at the hump-backed bridge on Barton Road in a 60mph zone and at junctions on the A603 including the junction adjacent to the Pergola restaurant at Harlton. If these routes have been designated without detailed on-the-ground assessment, the credibility of the entire route selection process is undermined. Furthermore, the speed limits on these roads need to be re-assessed prior to the works being carried out to incorporate the additional volume of traffic anticipated – EWR Co should take the action to recommend appropriate reductions to the council.

26. We request that EWR Co confirm that they will use haul roads rather than local minor roads for all HGV movements during the construction period. We also note that there is no mention of the use of rail freight for construction purposes. Page 10 of the consultation brochure says "EWR would…take lorries off local roads by

supporting rail freight as an essential part of the UK's supply chain". Why is it not planning to use rail for its own deliveries and removals, at least where it is working on or near the existing railway?

27. We further request that EWR Co publish, based on current construction assumptions:

- quantitative daily and peak HGV movement forecasts by route, construction phase and approximate timings;
- a structural assessment of each designated road against expected loading;
- cumulative axle loading calculations;
- bridge and carriageway edge assessments where heavy traffic is proposed;
- local congestion modelling for affected settlements and junctions;
- detailed diversion route assessments;
- evidence of on-the-ground assessment of all proposed HGV routes;
- a binding and monitored commitment to ongoing road maintenance to a defined standard throughout construction.

Transport: Rail commuting, possessions and blockades

28. Rail closures — blockades and possessions — are an unavoidable feature of constructing a new railway on or adjacent to an operating network. They are also one of the most direct and personal impacts that EWR's construction will impose on communities, particularly those where rail is the primary means of access to employment, education and healthcare. Section 10 of the consultation document states: "These works would be planned and carried out in close collaboration with Network Rail and the relevant station operators to ensure the continued safe operation of the railway….." This indicates that the railway will continue to operate despite the inevitable possessions – but EWR Co know that this will not be the case. The absence of a realistic assessment of impacts on the rail system from the consultation is therefore not a minor omission. Residents who depend on existing services have no basis on which to assess what disruption they will face, for how long and in which phases of the programme. Businesses that depend on rail connectivity cannot quantify the economic cost they will bear. Construction planning documents show that the overall programme length is extremely sensitive to the duration of blockades and would vary between about 5 and 15 years. The argument that detailed timetabling of possessions cannot be confirmed at this

stage does not justify the complete absence of any information about their frequency, duration and expected effect on existing services.

29. EWR Co are requested to provide, by affected route section, the schedule of planned blockades and possessions, including anticipated dates, durations and frequency, together with its proposed arrangements for maintaining connectivity for rail users during closures. Exact dates cannot obviously be confirmed at this stage but ranges and indicative phasing can be provided based on the planning assumptions that EWR Co have made. This should be provided well before the submission to the Planning Inspectorate (PI) so that stakeholders can make their own submissions to the PI accordingly.

Economic and business disruption

30. There is no construction impact assessment in EWR Co's consultation documents that addresses the economic and business costs of the construction period. While the documents discuss the long-term economic benefits of EWR they say nothing substantive about the economic costs it will impose on businesses, landowners and communities during the years before a single train runs.

31. The Buckinghamshire evidence establishes that these costs are real and substantial. Lengthy road closures required by the project to enable construction works and long diversion routes, were disruptive to Buckinghamshire residents and businesses as they went about their daily lives, as the Council stated formally in its Select Committee report[3]. In rural communities where trade depends on road access and passing traffic, and where there are no alternative routes, this kind of disruption has immediate and measurable commercial consequences. Agriculture, tourism, hospitality, rural retail and any business dependent on regular deliveries are all affected. The cumulative effect of sustained construction disruption over a multi-year programme has not been assessed or disclosed. Nor does the consultation address the impact on business rates revenue to the local authority, or on the viability of businesses that cannot sustain years of reduced accessibility. Members of Parliament representing affected areas have called on EWR to include the concerns of local businesses about the potential for disruption and loss of trade that building works would cause[4].

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[3] Buckinghamshire Council, Report to the Transport, Environment and Climate Change Select Committee: East West Rail Update, February 2024. Available at: https://buckinghamshire.moderngov.co.uk

[4] Greg Smith MP, House of Commons Adjournment Debate: Major Infrastructure Projects and Local Communities, 3 March 2023. Video available at: https://www.youtube.com/watch?v=iQHQG5jdimU; summary at: https://theclaydons.org/the-impact-of-hs2-ewr-in-our-communities/

32. EWR Co are requested to provide an Economic Impact Assessment of the construction phase by affected area, covering the full range of business and agricultural impacts, with clearly stated assumptions about the duration and phasing of disruptive activity. This should be provided well before the submission to the Planning Inspectorate (PI) so that stakeholders can make their own submissions to the PI accordingly.

Environmental and ecological impacts

33. EWR Co's Environmental Update Report acknowledges the need for environmental assessment across a range of topics and references ongoing survey work. What it does not provide is the site-specific detail that would allow affected communities, ecological groups and local authorities to assess what will actually happen to specific habitats, species and designated sites during construction. The information is route-level and generic. Statements about adherence to environmental standards and a biodiversity net gain target of +10% are process commitments, not impact assessments.

34. Our response below highlights issues with bats and chalk streams as examples which are particularly sensitive to the construction of EWR but clearly other items would be affected.

35. The route raises significant concerns regarding its impact on the internationally important barbastelle bat population associated with Eversden and Wimpole Woods Special Area of Conservation[5]. This SAC was specifically designated because it supports one of the UK's most important maternity colonies of barbastelle bats (*Barbastella barbastellus*), a rare and highly protected species under the Habitats Regulations ('The Conservation of Habitats and Species Regulations 2017'). The woods themselves provide maternity roosts, but the bats rely extensively on the wider surrounding landscape for commuting and foraging. Natural England and ecological evidence submitted during the consultation process indicate that barbastelle bats regularly travel several kilometres between roosts and feeding grounds using established woodland edges, hedgerows and dark linear corridors.

36. The current EWR proposals risk fragmenting these critical ecological corridors both during construction and operation. The railway corridor would create a substantial physical and behavioural barrier between the SAC roosts and key feeding habitat, particularly in the Hardwick Woods and wider West Cambridgeshire Hundreds

[5] Joint Nature Conservation Committee – Eversden and Wimpole Woods SAC, available at: https://sac.jncc.gov.uk/site/UK0030331

landscape. Construction activity, including vegetation clearance, embankments, lighting, heavy machinery, piling and noise disturbance, would disrupt established flight paths and reduce the bats' ability to access feeding areas safely. Barbastelle bats are known to be particularly sensitive to artificial lighting and habitat fragmentation, preferring dark and continuous woodland-linked routes. Interrupting these routes during both construction and operation could force bats into energetically costly detours, reduce feeding success during the breeding season and isolate maternity colonies from essential foraging habitat. In severe cases, reduced access to insect-rich feeding grounds may lead to starvation of juveniles and lactating females, with potentially significant consequences for the long-term viability of the SAC population. Any 24 hour working planned for the project must take the activities of bats into account to fulfil EWR Co's legal obligation not to disturb the SAC.

37. Ecological surveys undertaken in the area[6] have identified important barbastelle commuting routes crossing the proposed alignment. Conservation organisations have warned that even low levels of mortality could have disproportionate impacts because barbastelles are among the rarest woodland bat species in Britain and have very low reproductive rates. The Wildlife Trust for Bedfordshire, Cambridgeshire and Northamptonshire has stated[7] that the current route threatens to fragment an important landscape-scale habitat network and may undermine decades of conservation work undertaken to support bat populations and associated woodland ecosystems.

38. The Environment Agency's response within the Planning Inspectorate Scoping Opinion (referenced above) also highlights significant deficiencies in the current level of environmental assessment relating to water resources, groundwater dependent ecosystems, piling, land contamination pathways and chalk stream impacts. The Scoping Opinion states that the Environmental Statement must clearly identify groundwater dependent terrestrial ecosystems, explain construction methodologies including piling, identify remaining data gaps and assess impacts associated with traffic diversions, vibration and pollution pathways. The Inspectorate also required greater clarity regarding cumulative effects and the relationship between Water Framework Directive assessments and the Environmental Statement. These are not minor technical matters but issues central to understanding the likely impact of prolonged construction activity on sensitive chalk geology and hydrology. The consultation material currently available does not

[6] Countryside Restoration Trust report on barbastelle bat impacts, available at: https://www.thecrt.co.uk/news/threat-to-rare-barbastelle-bat-population-at-lark-rise-farm

[7] Wildlife Trust BCN response to East West Rail plans, available at: https://www.wildlifebcn.org/news/wildlife-trust-bcn-responds-east-west-rail-plans

provide the level of detail which the Inspectorate has already stated is necessary for proper assessment.

39. The construction proposals also present serious risks to local chalk streams and associated groundwater-dependent ecosystems. Chalk streams are globally rare habitats, with the majority of the world's examples occurring in England. These streams support highly sensitive ecological communities, including invertebrates, aquatic plants, fish, and protected species such as water voles and otters. Construction works associated with EWR, including bridge crossings, earthworks, dewatering, piling, runoff, accidental spillages, sediment mobilisation and changes to groundwater hydrology, could result in contamination and long-term degradation of these fragile watercourses. Even temporary increases in sediment, hydrocarbons, concrete washout or chemical pollutants can damage the ecological integrity of chalk stream systems because of their naturally clear, nutrient-poor conditions.

40. Particular concern arises where the route intersects watercourses within the Cambridgeshire chalk landscape and connected catchments. Chalk streams depend on stable groundwater flows from underlying aquifers, and major infrastructure works risk altering hydrological connectivity through excavation, compaction and drainage modifications. Such impacts may reduce water quality and flow resilience at a time when many chalk streams are already under significant pressure from abstraction, pollution and climate change and many already require augmentation. It is widely acknowledged that Cambridgeshire is a water-stressed area, with Cambridge Water's supply derived from the chalk aquifer. The Cambridgeshire and Peterborough Combined Authority's 2024 Infrastructure Delivery Framework identifies that "Water scarcity is an existing barrier to development within the area currently supplied by Cambridge Water and needs urgent attention. It will remain so until strategic infrastructure such as the Fens Reservoir and Grafham Transfer schemes come forward… Even with [these] schemes, beyond the Emerging Local Plans water scarcity is likely to return as a barrier to development in the region." Given the irreplaceable nature of these habitats and the reliance of the local population on the aquifer for its drinking water, it is essential that the project demonstrates, through robust independent hydrological and ecological assessment, that there will be no adverse effect on the integrity of these water environments during either construction or operation.

41. EWR Co are requested to provide site-specific ecological impact assessments for each significant habitat and designated site within or adjacent to the construction corridor, with explicit detail on seasonal working constraints, the temporary and permanent extent of habitat loss and the location, timing and specification of all compensatory and mitigation habitat delivery.

Historic environment

42. The historic environment of rural Cambridgeshire — scheduled monuments, listed buildings, conservation areas, registered parks and gardens and extensive undesignated archaeological remains — is highly sensitive to major earthworks. Ground disturbance, vibration, changes to drainage patterns and increased vehicle accessibility through the construction corridor can all have consequences for buried and standing heritage assets that are, by their nature, irreversible. The consultation does not provide site-specific heritage impact data for the Cambridgeshire sections of the route, and affected communities, local planning authorities and statutory heritage bodies are therefore unable to assess the risk to specific assets.

43. This concern is not new to this project. Buckinghamshire Council's formal consultation response[8] on the previous phase recorded that archaeological information was "not detailed enough" and that the opportunity needed to be given to the Council's archaeology team to consider the potential for impact on buried remains, with appropriate mitigation. The same deficiency is present in the current consultation documents for Cambridgeshire.

44. EWR Co must provide heritage impact assessments at the level of individual designated and known non-designated assets within the construction corridor, including vibration impact zones for listed buildings and their settings and a proposed strategy for archaeological watching brief and mitigation recording.

Noise and vibration

45. The consultation acknowledges noise and vibration as impact categories and states in general terms that mitigation will be applied. Buckinghamshire Council's Select Committee reports[9] formally recorded noise pollution as one of the issues caused by the project. The consultation for that phase presumably contained similar assurances of mitigation. The outcome, as documented, was that noise remained a formal and unresolved concern throughout the construction period.

[8] Buckinghamshire Council, Report to the Transport, Environment and Climate Change Select Committee: East West Rail Update, February 2024. Available at: https://buckinghamshire.moderngov.co.uk

[9] Buckinghamshire Council, Transport, Environment and Climate Change Select Committee minutes, East West Rail agenda item, February 2023. Available at: https://buckinghamshire.moderngov.co.uk/mgAi.aspx?ID=17367

46. The consultation for the Cambridgeshire sections provides no site-specific noise or vibration modelling, no predicted noise levels at affected properties by phase and location and no quantitative targets for acceptable noise during daytime and — critically — night-time working. The noise environment of rural Cambridgeshire villages, where background noise levels are very low, means that construction activity that might be unremarkable in an urban setting will be highly intrusive. Road traffic noise from sustained HGV movements through previously quiet villages is a separate impact from construction site noise, and both are unaddressed in quantitative terms. The absence of defined noise standards means there is no basis on which residents can seek remediation if the impact proves unacceptable, and no standard against which contractors can be held.
47. Noise can also have a profound impact on the local wildlife, particularly the barbastelle bats. Noisy operations during construction should managed both in location and time to minimise the impact on wildlife.
48. EWR Co must provide predicted noise and vibration levels at a representative set of affected properties for each phase of construction, the quantitative noise standards to which contractors will be contractually bound, a monitoring regime with named responsible parties and the process by which residents can seek remediation where standards are exceeded.

Air quality and dust

49. Major earthworks generate substantial dust from working areas, material stockpiles and vehicle movements on unsealed haul roads and construction compounds. This can have serious consequences for both humans and ecology. HGV movements on damaged and unsealed road surfaces generate additional particulate matter in villages along construction routes. In Buckinghamshire, dust pollution was formally identified by the Council as one of the documented concerns arising from EWR's construction — appearing alongside mud on roads and noise as a category of impact that had not been adequately controlled.
50. The consultation documents for the Cambridgeshire sections contain no air quality modelling, no predicted PM10 or PM2.5 concentrations at affected properties during earthworks phases, no specification of the dust suppression measures that will be contractually required and no detail of the monitoring and enforcement arrangements. That the same lack of specificity preceded a construction phase in which dust pollution became a formally documented problem in Buckinghamshire should be sufficient reason to require greater rigour in this consultation.

51. EWR Co are requested to provide air quality impact assessments for affected communities, covering predicted particulate concentrations during construction, contractually required dust suppression measures and the monitoring and enforcement arrangements that will apply.

Natural landscape and rural character

52. The scale of physical change that a new railway imposes on open countryside — earthworks, cuttings, embankments, drainage works, bridge structures, haul roads and compound areas extending across the landscape for the duration of construction — is not conveyed by the consultation documents in terms accessible to non-technical readers. The engineering drawings show alignment and cross-sections in technical format. They do not communicate to an ordinary reader, relying on the text, the visual and spatial transformation of previously open agricultural landscape into an active construction corridor, nor the period over which that transformation will persist.

53. EWR Co's candour on this point varies markedly across different sections of its documentation. In acknowledging the impact of the Newton Longville depot, its own documents referred to loss of woodland belt and the introduction of large-scale infrastructure into an attractive valley. No equivalent site-specific acknowledgement of landscape impact is provided for the Cambridgeshire sections. The rural character of the communities along this route — which is itself part of what makes them attractive places to live and part of what their residents are being asked to accept a permanent change to — deserves more than generic references to landscape mitigation measures.

54. EWR Co must provide photomontages and visualisations of the construction corridor at a representative set of viewpoints, during and after construction, in a form accessible to non-specialist readers, together with site-specific landscape and visual impact assessments.

Rural communities and quality of life

55. The communities along EWR's Cambridgeshire route are predominantly small rural villages. Many are on narrow roads with no alternative routes, limited passing places and a social and economic fabric that is directly sensitive to sustained disruption. The imposition of years of construction traffic, noise, dust, road damage and altered access on these communities is not comparable to the experience of urban or suburban communities adjacent to a typical construction project. It is a

qualitative and prolonged transformation of the environment in which people live, work and carry out everyday life.

56. The Buckinghamshire experience places this in concrete terms. Greg Smith MP's adjournment debate of 3 March 2023[10] was devoted to the impact of HS2 and EWR construction on communities, citing examples from across his constituency where residents and businesses had been failed. Over thirty separate issues were raised with the MP's office in relation to a single street in Winslow alone. The *Bucks Herald* documented[11] roads left in a hazardous state. The Council invested a significant amount of resource and time to work together with the Alliance to find better and more workable solutions[12], effectively redirecting public funds to manage the consequences of contractor behaviour. These are not the complaints of unreasonable objectors; they are the documented record of an elected local authority and a Member of Parliament responding to the lived experience of their constituents during a construction phase that was preceded by the same kind of consultation process now being offered to Cambridgeshire communities.

57. The consultation provides no Community Impact Assessment for any village or settlement directly affected by the construction corridor. Given the proposed scale of construction compounds (those in Harston, for example, are over twice the built area of the village) such an assessment — examining the combined effect of all construction impacts on daily life, accessibility, safety and amenity over the projected construction period — is a minimum requirement for meaningful consultation on a project of this scale and duration.

Water resources, flood risk and dewatering

58. Major earthworks intercept, alter and can contaminate surface water and groundwater pathways. Construction compounds, diesel storage, concrete batching and vehicle maintenance areas create pollution risk to watercourses. In the flat agricultural landscape of Cambridgeshire, where field drainage systems are extensive, carefully managed and often interdependent, disruption to drainage during construction can increase flood risk downstream and cause damage to

[10] Greg Smith MP, House of Commons Adjournment Debate: Major Infrastructure Projects and Local Communities, 3 March 2023. Video available at: https://www.youtube.com/watch?v=iQHQG5jdimU; summary at: https://theclaydons.org/the-impact-of-hs2-ewr-in-our-communities/

[11] *Bucks Herald*, "Rail construction works leave Aylesbury Vale village roads 'in a hazardous state' ", 30 December 2021. Available at: https://www.bucksherald.co.uk/news/people/rail-construction-works-leave-aylesbury-vale-village-roads-in-a-hazardous-state-3510391

[12] *Bucks Herald*, "Bucks roads damaged by HGV vehicles during East West Rail construction, new council report says," 1 February 2024. Available at: https://www.bucksherald.co.uk/news/transport/bucks-roads-damaged-by-hgv-vehicles-during-east-west-rail-construction-new-council-report-says-4501584

agricultural land that persists long after physical works are complete. None of this is addressed in site-specific terms in the consultation documents. The risk is acknowledged as a category; it is not assessed at the level of individual watercourses, drainage systems or flood-sensitive areas.

59. Buckinghamshire Council's formal consultation response (previously referenced) identified concerns about cumulative drainage and water management impacts that it considered had not been adequately addressed in EWR Co's documentation. The same deficiency is present here.

60. The consultation contains no assessment of the volume of water that EWR's construction will require, the source from which it will be drawn or its relationship to the pre-existing and formally documented water scarcity crisis in Greater Cambridge. The CPCA Infrastructure Delivery Framework, approved by the CPCA Board in November 2024[13], identifies Cambridgeshire and Peterborough as a water-stressed area, states that water scarcity is already a barrier to development and confirms that strategic relief schemes — the Fens Reservoir and the Grafham Water Transfer — will not come on stream until 2032 and 2036 respectively. Cambridge Water's own business plan[14] acknowledges that the region will run into a water deficit by 2029 to 2030. This is the window within which EWR construction is likely to take place. The Chartered Institute of Building[15] has noted that water is in high demand on construction sites for dust suppression, material production, concrete washout and wheel washing. For a project of EWR's scale — involving extensive new formation, bridges, culverts, retaining walls, tunnels and multiple compound areas across a multi-year programme — aggregate construction water demand will be very substantial. The consultation acknowledges that the route crosses chalk streams that are already under severe ecological stress from groundwater abstraction, with the level of abstraction from the chalk aquifer being actively reduced through licence changes to prevent further environmental deterioration. If construction water demand places additional pressure on the chalk aquifer, it will compound the ecological harm to the very watercourses EWR Co's own environmental materials identify as sensitive receptors. EWR Co must provide a construction water management plan quantifying demand, identifying sources and

[13] Stantec / CPCA, *Cambridgeshire and Peterborough Combined Authority Infrastructure Delivery Framework*, September 2024, pp. 3–5 (Water Supply and Quality section). Available at: https://cambridgeshirepeterborough-ca.moderngov.co.uk/documents/s1865/Appendix%20A%20-%20Full%20Report%20Infrastructure%20Delivery%20Framework.pdf

[14] Cam Valley Forum / Water Scarcity Group, *Addressing Cambridge's Water Scarcity*, March 2024 (citing Cambridge Water 2025–2030 Business Plan). Available at: https://camvalleyforum.uk/wp-content/uploads/2024/03/21657-final-addressing-cambridge-water-scarcity.pdf

[15] Chartered Institute of Building, "Construction must take water scarcity seriously." Available at: https://www.ciob.org/blog/construction-must-take-water-scarcity-seriously

demonstrating compatibility with existing licence conditions and the Environment Agency's abstraction reduction programme.

61. A specific and acute risk within this category concerns dewatering. Two obvious impacts concern the impact on ecology and on utilities.

62. In terms of ecology, an example of a severe impact concerns the ancient woodland at Waters Wood / All Angels Park at Highfields Caldecote. The proposed tunnel at this location passes near to the woodland. EWR Co has acknowledged the sensitivity of the site by moving the route alignment slightly northward to avoid the railway running directly beneath the trees. That welcome adjustment addresses the most direct structural threat to the woodland, but it does not address the risk arising from dewatering — the controlled removal of groundwater during tunnel construction to enable safe excavation. Peer-reviewed research[16] establishes that tunnel construction in water-bearing geology creates a dewatering funnel that can extend significantly beyond the tunnel itself: groundwater drawdown has been shown to reduce soil moisture available to surface vegetation over a considerable radius, with tree species in affected areas recording reduced growth rates that can persist for years after construction is complete. In ancient woodland, where the ecology is particularly sensitive to hydrological stability and where the woodland microclimate depends in part on consistent moisture levels, this risk is compounded.

63. The significance of this site is not limited to its designation as ancient woodland. The Bat Conservation Trust's guidance[17] on barbastelle habitat describes this species as strongly preferring deciduous woodland associated with water bodies, wet meadows and woodland streams, with roost sites characteristically occurring in dark, humid conditions. The Back from the Brink[18] project's barbastelle species account states that the species forms hibernation roosts in tree crevices and cavities "in dark, humid areas (e.g. wet woodland and areas with dense shrub layer)." A reduction in groundwater or surface water associated with the woodland — whether through dewatering during construction or through long-term drainage effects from the tunnel infrastructure — could alter the woodland's humidity regime sufficiently to degrade or eliminate its hibernation roosting value for barbastelles[19].

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[16] Wang Y. et al., "Calculation of drainage volume during tunnel construction based on the control of negative effects of ecosystem," *Water Supply*, Vol. 21(3), pp.1119–1126, IWA Publishing, 2021. Available at: https://doi.org/10.2166/ws.2021.012

[17] Bat Conservation Trust, *Barbastelle (Barbastella barbastellus)*. https://www.bats.org.uk/about-bats/what-are-bats/uk-bats/barbastelle

[18] Natural England / Back from the Brink Project, *Barbastelle Bat Species Summary*, 2022. Available at: https://naturebftb.co.uk/wp-content/uploads/2022/01/Barbastelle-Bat-BftB-v2.pdf

[19] Gokdemir C. et al., "Vulnerability analysis method of vegetation due to groundwater table drawdown induced by tunnel drainage," *Advances in Water Resources*, Vol. 133, 2019. Available at: https://doi.org/10.1016/j.advwatres.2019.103406

This matters because EWR's 2022 bat surveys discovered a previously unknown barbastelle maternity roost in Hardwick Wood SSSI, close to the Highfields Caldecote area, with the eastern edge of Hardwick Wood estimated to be only 600 metres from the EWR alignment. The broader woodland complex in this area therefore already carries known barbastelle presence and confirmed maternity roosting function. The cumulative risk of dewatering to both the ancient woodland at Waters Wood / All Angels Park and to the barbastelle population known to be active in this landscape has not been assessed or disclosed in the consultation.

64. Dewatering in proximity to utilities needs to be carefully managed to avoid damage to the utilities themselves and to the consequential effects of, for example, sewage spillage.

65. De-watering could impact the important archaeology of the Moated Complex of Fryers Cottage in Harlton by the proposed realignment of Long Brook. Note that Long Brook is sensitive to any possible pollution during construction.

66. EWR Co must provide a site-specific dewatering impact assessment for the Highfields Caldecote tunnel that models the predicted extent of groundwater drawdown, assesses the effect on the hydrology and microclimate of the adjacent ancient woodland and addresses the implications for barbastelle hibernation roosting suitability, supported by a monitoring and mitigation programme agreed with Natural England.

67. EWR Co must also provide site-specific flood risk and water environment assessments for the construction phase, covering management of surface water during earthworks, protection of watercourses from pollution and the arrangements — including timescales and verification — for restoring drainage systems to their pre-construction condition.

Agriculture and food production

68. Cambridgeshire contains some of the highest-quality arable land in England. Permanent loss of Grade 1 and Grade 2 agricultural land to the railway corridor is irreversible. The temporary use of agricultural land for construction compounds, haul roads and material storage causes soil compaction, disruption to soil structure, loss of drainage function and potential, but likely, contamination with sub-soil — impacts that can reduce agricultural productivity for years or decades after the land is nominally restored. The consultation documents do not provide Agricultural Land Classification surveys for affected areas, do not set out soil management plans and do not contain binding commitments on restoration standards, timescales or verification processes.

69. The Buckinghamshire precedent is instructive. Buckinghamshire Council's formal consultation response (previously referenced) called for soil and Agricultural Land Classification surveys wherever detailed maps did not exist and requested a clear methodology for soil health assessment. Compound and temporary land reinstatement and permanent highway repairs and reinstatements, were among the items rated as "red" in the Alliance's own community impact assessments — signifying the highest level of concern. Farmers whose land was affected by construction were still awaiting confirmed restoration timescales as the first connection stage approached handback. Greg Smith MP also specifically raised with the Rail Minister the question of the agricultural expertise available to construction projects when it comes to farmland used by EWR and HS2. If this is the outcome of a construction phase where restoration commitments existed in principle, the absence of specific restoration commitments from the current consultation is a serious concern.

70. EWR Co must provide Agricultural Land Classification surveys for all directly affected land, site-specific soil management plans for construction and restoration phases and a binding commitment to restoration standards and timescales, with an independently verified sign-off process before any temporarily used agricultural land is returned to farming use.

71. Further arguments relating to destruction of farmland by EWR and Cambridge Approaches' demands are articulated in our separate response on farming.

A proposed framework for resident protection

72. The eleven categories above identify what is missing from EWR Co's consultation in terms of impact disclosure. This section addresses the parallel and equally important question of governance: what independent mechanism will exist to protect residents from contractor behaviour during construction and to provide genuine recourse when that behaviour falls short of what has been promised?

73. EWR Co's consultation documents propose to rely on the Code of Considerate Constructors (CoCC) as the primary mechanism for managing contractor behaviour and handling resident complaints. This is the same system used during EWR's construction in Buckinghamshire. The documented outcome — HGVs using non-permitted routes, roads left in a damaged and hazardous state, mud accumulating for extended periods without adequate response and lengthy road closures disrupting residents and businesses — was not remedied by the CoCC system. It was addressed, where it was addressed at all, through the efforts of the local authority and local MPs. EWR Co has direct evidence, from its own previous

construction activity, that the CoCC is not adequate for a project of this scale in a rural setting. No justification for its reuse is offered in the consultation documents.

74. A more robust model was developed for HS2. The independent HS2 Residents' and Construction Commissioner[20],[21] is responsible for making sure HS2 and its contractors fulfil their commitments, providing independent decisions and mediation on any unresolved construction-related disputes between HS2 Ltd and individuals or bodies and providing advice to members of the public on how to make a complaint about construction. The Commissioner also monitors and scrutinises HS2 Ltd's performance against the obligations set out in its Residents' Charter and Community Engagement Strategy, meeting representatives of local communities, elected representatives and stakeholder bodies and acting impartially and independently of HS2 Ltd and the Department for Transport. This is materially better than the CoCC and EWR Co should adopt a comparable model as a minimum.

75. However, the HS2 model has a structural weakness that must be addressed if EWR is to do better. The HS2 Residents' Commissioner does not investigate individual cases or act as an arbitrator for individual resident concerns, or deal with complaints, except specifically with regard to small-value disputes. More fundamentally, neither the Residents' Commissioner nor the Construction Commissioner, as constituted under HS2, has any basis on which to intervene when a contractor changes its construction sequence or work methodology at short notice — one of the most disruptive actions available to a contractor — because the HS2 Residents' Charter contains no quantitative standard against which such a decision can be assessed. A commissioner operating under a charter that specifies only qualitative commitments cannot make a technical judgement about whether a contractor's proposed work sequence is the least disruptive available.

76. A framework that builds on the HS2 model and addresses this weakness directly is presented below for EWR Co to adopt.

77. A **Residents' Charter** should set out contractor behaviour standards and construction commitments in specific, measurable terms. Where relevant — for example in relation to advance notice of programme changes, noise limits, hours of working and the maximum duration of specific traffic restrictions or road closures — the Charter should provide quantitative targets rather than qualitative

[20] GOV.UK, Independent HS2 Commissioner. Available at: https://www.gov.uk/government/collections/independent-hs2-commissioner
[21] HS2 Ltd, Independent Residents' and Construction Commissioner — role description. Available at: https://www.hs2.org.uk/in-your-area/hs2-independent-commissioners/

aspirations. Vague commitments cannot be independently enforced and cannot form the basis for adjudication.

78. A **Construction Ombudsman** should be appointed with the authority to ensure that EWR Co and its contractors meet the commitments in the Residents' Charter and provide independent decisions and mediation on unresolved construction-related disputes between contractors and residents, community groups or local authorities. The Ombudsman should be independent of EWR Co and of the Department for Transport and should be supported by a **dedicated construction professional** — the element absent from the HS2 model — whose role is to review contractors' construction methodologies and work programmes, assess their community impact and identify practicable alternatives where that impact is unreasonable. Without this technical support, an ombudsman has no independent basis on which to challenge a contractor's assertion that a disruptive work sequence is unavoidable. With it, residents have genuine assurance that if a particularly disruptive approach is ultimately necessary, it has been independently assessed and no reasonable alternative found.

79. A **public information and complaints system** should accompany these arrangements, providing a website with real-time and forward-looking information on works, road impacts and planned disruptions; a transparent complaints system through which residents can submit and track complaints; and a freephone community helpline operating throughout the construction period.

80. Critically, this framework must be established before construction contracts are let, so that the Residents' Charter forms part of the contractual obligations on all contractors from the outset. A framework imposed after contracts have been awarded will be significantly less effective in practice. EWR Co should therefore commit at this consultation stage to the adoption of this model to agree the framework prior to contract award.

General Conclusion

81. The deficiency that runs through all sections of this response is the same. EWR Co's consultation documents describe what will be attempted. They do not describe what will result. Mitigation processes are presented as if they were mitigation outcomes. Contractual requirements on contractors are presented as if they were guaranteed results for residents. The cumulative impression created is of a construction phase that, while acknowledged to cause some temporary inconvenience, will be carefully controlled and will leave communities largely undisturbed.

82. The Buckinghamshire record — compiled not by opponents of the project but by an elected local authority in formal committee reports, by a Member of Parliament in a House of Commons debate and at the Transport Select Committee and by journalists reporting the lived experience of affected residents — demonstrates that this impression does not survive contact with the reality of EWR construction. Buckinghamshire Council's leader stated that the county had "seen significant deterioration of our roads," and that the council had been carrying out emergency repairs at a rate many times higher than normal specifically as a result of HGV traffic from EWR and HS2. Roads were left in a damaged and hazardous state. Mud accumulated for months without adequate response. Dust, noise and road closures affected communities over extended periods. Agricultural land and public rights of way remained unrestored long after physical works were complete.

83. The most important point arising from both the Planning Inspectorate Scoping Opinion and the East West Main Line Partnership “Lessons Learned” report is that the concerns being raised by communities are not speculative. They are consistent with issues already identified by regulators, local authorities and public bodies with direct experience of earlier phases of East West Rail. The combination of vague commitments, insufficiently quantified impacts, non-binding mitigation language and inadequate construction detail has already produced serious problems elsewhere on the scheme. Communities affected by the Cambridge section are entitled to substantially greater transparency and specificity before the project proceeds further through the Development Consent Order process.

84. EWR Co is the same organisation. Its contractors will operate under the same frameworks. The rural communities of Cambridgeshire are, if anything, more exposed — with less road infrastructure resilience and, in some cases, even fewer alternative routes than the Buckinghamshire villages that bore the burden of the first connection stage.

85. The Examining Authority, when this application comes before the Planning Inspectorate, will be asked to determine whether the consultation has been adequate to the requirements of the NSIP process. This response submits that, in its current form, on the subject of construction impacts, it is not. EWR Co should remedy these deficiencies, in the form of substantive supplementary information, before this consultation closes.
