



East West Rail Non-Statutory Consultation – Winter 2024/5

Clapham Parish Council Response

Introduction

The parish of Clapham is the most directly impacted village in the Bedfordshire section of EWR, and will suffer the highest disruption, and receive none of the benefits of the scheme.

Clapham Parish Council (CPC) has long been concerned about the level of engagement from EWR, considering the large impact the scheme will have on their locality. Moving forward the Council expects a high level of engagement, and greater amount of information and consultation events in Clapham. On approaching EWR staff at consultation events, it feels that Clapham is caught between 2 sections, Bedford and the North Beds section, and no-one is taking ownership of the considerable challenges the parish faces as a result of the scheme. This must change.

CPC is fundamentally opposed to the current route choice which takes the railway through the town, given the significant impacts it will create. We question the process undertaken in developing the preferred route and feel that insufficient consideration has been given to an alternative southern route. It is noted that of all the towns along the route between Oxford and Cambridge, Bedford is the only one not to include a parkway station. Given the engineering challenges of the topography of the proposed route, the impacts on Clapham and the likely disruption due to construction in and around the town, we consider the stated projected benefits to be minimal.

We question the published costings of the proposed railway, and note the estimated costs are £1bn greater than an alternative southern route proposed by BFARe. Consequently, we question if the proposals do give the most favourable business case and highest value for money.

Clapham will be significantly impacted by the proposed route, and CPC has specific and extensive concerns including flooding, the environment to congestion during construction, which are set out below. The commentary is drawn from close consideration of the consultation documents, and discussion with local residents. CPC are disappointed that the route sections cut across the Clapham area, and the questions posed in the consultation are fairly general in nature. Our responses are therefore set out in an alternative format to the Feedback Report which we trust will be acceptable.

Clapham Parish Council is in constant and close liaison with neighbouring north Bedfordshire parishes and share many of the same concerns in our consultation responses. The parishes, which are either directly or indirectly impacted by the scheme, will continue to work together through the forthcoming statutory consultation and towards any submission of the Development Consent Order.

The sections in *italic* are paragraphs taken from the consultation documents. Comments refer to the extracts and are split into various topic areas.

1 Environmental Impact on Biodiversity

Extracts from Environment Update Report - Biodiversity

8.2.2 Although the population is relatively sparse in this area, the change resulting from the project would heighten the risk of visual and noise impacts in particular, and present a risk of severance. The way that the project is integrated into the landform, the comprehensive use of sensitive landscaping and other mitigation, and the overall design Environment Update Report Clapham Green to Colesden

Non-statutory consultation Page 79 of 163 principles that are applied between Clapham and Colesden would be fundamental to limiting adverse impacts on people and communities.

8.2.7 The avoidance of community severance and isolation would need careful design and planning through maintenance of good access across the alignment



Clapham PC comments

- The railway corridor will create significant severance across the open countryside between Clapham and Bedford and will restrict the ability for wildlife to move in east/west directions. This applies not only to deer and other ground-based mammals, but bats which are extensive in the area. The current proposed arrangements provide discontinuous habitat areas.
As a suitable mitigation, it is suggested that the railway corridor in this area is set in a tunnel. An alternative and less acceptable mitigation but an improvement on what is proposed would be a linear wildlife corridor created adjacent to and between the cutting and the golf course running from the proposed embankment to at least bridleway 54. Whilst this will not ameliorate the severance and address the disruption to movement, it provides a continuous corridor of habitats.
- The impact of construction of the cutting, and the embankment will have significant impact of wildlife in the area creating a 'dead area' for a number of years, before any regeneration or reestablishment can take place. It is suggested that land to the western end of the Carriage Drive, away from the scheme is used to create habitat areas which are in place before works start, to ensure existing wildlife has an opportunity to survive and endure.
- From 2025, all nationally significant infrastructure projects must deliver a 10% biodiversity net gain. It should be ensured that actions to provide the 10% gain are focused within the redline boundary, rather than credits applied elsewhere in the country. CPC would wish to see that the scheme provides for an enhanced environmental

- landscape. Local residents and landowners have grave concerns that the types of habitat/landscape which are planned as part of the restoration of the land used for construction, are not the type of land required locally for sustainable farming and land use.
- Given the scale of the cutting across the landscape, and in the absence of a tunnel which would address a significant part of CPC's concerns, a short section of tunnel (a green bridge) in the vicinity of Carriage Drive is proposed by CPC. This would provide an environmental corridor which could incorporate Carriage Drive, facilitate the retention of the protected trees along its border, maintain a green/wildlife corridor and retain an environmentally friendly pedestrian access. The nature and character of Carriage Drive would be retained. The following are examples of successful green bridges elsewhere on major infrastructure projects.

<https://www.gov.uk/government/news/a556-green-bridge-is-winter-wonderland>

<https://oppla.eu/casestudy/19198>

<https://www.fira-la.com/our-work/scotney-castle-land-bridge/>

- In providing new habitat, it is suggested that EWR set up nurseries as did MKDC in the early days of the development of Milton Keynes to grow trees, so that when they are planted they are semi mature and provide coverage and screening at the earliest opportunity. They should be interceded with land left to wild and cultivate naturally.

2 Maintenance access/compounds

Extracts from Environment Update Report - Construction Compounds

8.2.12 There would be four main construction compounds proposed in the Clapham Green to Colesden route section: at the interface with the Paula Radcliffe Way and River Great Ouse viaduct; adjacent to Sunderland Hill; off Chequers Hill (supporting the new viaduct construction in the Wilden area); and adjacent to Colesden Road (supporting the passing loops construction).

8.2.13 Construction compounds would be partly interconnected by on-site construction routes that would run alongside the new rail corridor and enable some construction traffic to avoid the public highway network. Where heavy goods vehicles (HGVs) would be required to use local roads, they would take the shortest suitable route between compounds and the strategic road network. HGVs would access the area from the A6. For compounds on the west side of this route section, construction traffic is expected to use the A6. The construction compounds close to Thurleigh Road and further to the east side of this route section would use either the A421 or the A1. Tranquillity would be reduced along the route section due to the noise and activity generated by construction and construction traffic

Clapham PC comments

- The plans show an extremely high density of construction/logistics compounds alongside the main road into and out of Clapham, and in the Carriage Drive area – this is further evidence of the high impact on residents' daily lives which will be for a number of years. Consideration must be given to consolidating the number/location/scale of these compounds.
- Given the distance of the A6 from the proposed construction compounds north of Clapham Road, they cannot be directly accessed given the remoteness of the railway corridor in relation to the road. There is no information in the consultation documents on how access will be provided.
- CPC expect to see a comprehensive list of existing highways which are unsuitable to construction traffic and will be restricted. Clapham High Street/Green Lane/The Baulk/Carriage Drive should be included in this list.
- It should be noted that if the intention is to use Clapham Road as a point of access, the road is well used both by residents, those from adjacent villages, it is the main access point to Greenacres School and acts as a diversion route when the A6 is closed. Any access is likely to cause significant disruption to both the road and to Sainsbury's Roundabout which is at capacity at peak times
- Given the proposed depth of the cutting, it is not clear how construction/haulage routes running alongside the new rail corridor can be achieved.
- CPC would wish that the compounds are placed in locations where potential environmental impacts and disturbances are minimised. Without the benefit of an Environmental Impact Assessment, it is not clear how the locations shown have been determined, and what are their specific purposes. It is not clear to CPC how compound locations can be fixed without an understanding of access, and if consideration of access is undertaken at a later stage, the current locations may not be optimum. CPC concerns also apply to noise, vibration and light pollution that will affect local residents during the construction period. CPC consider the siting of the compounds should be an iterative process, with an environmental assessment as a baseline, and wherever possible minimised.
- The timescales proposed for the construction of the railway may run in parallel to when the proposed 500 dwelling development along Milton Road is delivered and to when mitigation measures proposed to the High Street are implemented. Any conflict should be avoided and EWR should engage closely with the developer.
- CPC are concerned that the environs of Clapham will effectively be one large construction site for over 5 years and will make the village a no-go area. This will be unacceptable and must be satisfactorily mitigated.

3 Public Rights of Way

Extracts from Environment Update Report

8.1.4 The railway route in this section would bear north and east from Bedford on a new viaduct. Crossing Clapham Road south of the villages of Clapham and Clapham Green, the new railway would continue from this viaduct onto an embankment up to around 10m high. It would enter a cutting and cross beneath Carriage Drive between Clapham Green and Clapham Park, continuing in cutting up to about 14m deep to the east of the Bedford and County golf club. Several public rights of way (PRoW) would be diverted onto new bridges over the route, including Carriage Drive, Clapham Footpaths 5 and 6 and Brickhill Bridleway 54. Clapham Footpath 9 would be closed with users diverted to Clapham Footpaths 8 and 24.

8.2.5 Existing views from residential properties and PRoW in this route section are often limited by the undulating topography, woodland belts and vegetation lining country roads and property boundaries. However, they are more expansive north-east of Clapham Green where the landscape is more open and the large-scale new structures – such as the new embankments, viaducts and overbridges – would be prominent additions to views.

Clapham PC comments

- The network of Public Rights of Way (PRoW) that lie to the north and east of Clapham has been highlighted on the plan below. These footpaths may historically have provided access routes across the terrain. Today, they primarily provide access for residents to the countryside for recreational purposes with a more scenic, peaceful and tranquil route, away from traffic and exhaust fumes. With access users enjoy an environment with lower emissions, improved air quality, with knock-on health benefits. In addition to the paths shown, Carriage Drive forms part of the 86 mile John Bunyan Trail



- In contrast, there is no access to the countryside for residents to the south of the village given the constraints of the river (Note The Ford is a river crossing so not easily accessible), there is no access to the west of Clapham and limited access to the north via Twinwood Road and The Baulk. Given the extensive network of PRowS between Clapham and Bedford, CPC consider these to be a precious asset/resource and unique to the residents of Clapham and should be protected.
- CPC appreciate that an attempt has been made to retain footpath routes by combining and diverting with new bridges over the railway cutting. Given the scale of the cutting this does not address the loss of the wider purpose and benefits of the network of footpaths. The proposed arrangement reduces significantly the tranquillity and benefits of accessing the countryside devoid of infrastructure. We consider that given the relative concentration of footpaths around Clapham to the east, these are important to protect and recommend the railway is set in a tunnel through this section, or at the very least a green bridge is provided.

4 Visual Impact of Viaduct

Extracts from Environment Update Report

8.2.4 The project would require earthworks to carry the railway through the undulating landscape north-east of Bedford. Commencing from Clapham Road, south of the Clapham and Clapham Green, the railway would be prominent as it drops from viaduct onto an embankment up to around 10m high and then passing into a cutting up to 14m deep. Proposed blocks of woodland as well as landform would be important in limiting the extent of visibility, but visual impacts from the earthworks are expected from several nearby roads and footpaths, as well as from some locations within the Bedford and County golf club to its west and North Brickhill country park to its east.

8.2.5 Existing views from residential properties and PRow in this route section are often limited by the undulating topography, woodland belts and vegetation lining country roads and property boundaries. However, they are more expansive north-east of Clapham Green where the landscape is more open and the large-scale new structures – such as the new embankments, viaducts and overbridges – would be prominent additions to views. Removal of vegetation along roads and field boundaries would further open up views but replacement planting and mitigation planting would, in time, fully or partially screen the new structures.

Clapham PC comments

- As noted in 8.2.5, the visual impact of the railway will be prominent to residents of Clapham Green, which will be exacerbated by the removal of vegetation and field boundaries. As noted elsewhere, CPC would welcome inclusion of the railway within a tunnel which would significantly reduce this impact. However, there will still be a significant impact where the railway viaduct passes onto an embankment before going into cutting. CPC would wish for this to be screened where possible, possibly with sympathetic fencing as well as woodland.

- The viaduct is huge and will be a dramatic change to the landscape of the area. As a visual comparison, CPC estimate it will at least 1m higher than the EWR viaduct at Bletchley, excluding the addition of gantries (see image). This structure is monolithic, dominating and unattractive.



- Given its prominence CPC will be disappointed if the design of the new viaduct is not of a high aesthetic value. It will be unacceptable if the design approach is functional in a bid to minimise costs of the structure, given this will be a legacy structure. It will be a permanent structure in a location – not in open countryside, but where it is will visible to residents of Clapham and road users on a continuous basis. To date there has been no consultation on the form of the viaduct which CPC find disappointing. The following article covers a similar situation with HS2 which highlights the issue:

<https://www.birminghammail.co.uk/news/midlands-news/council-reach-verdict-plans-monstrous-27313469>

CPC see no reason why the structure cannot be visually attractive such as the HS2 Colne Valley Viaduct, or New Wear Footbridge, Sunderland





5 Fencing

Extract from Technical Report

3.8.2.7The EWR route would be continuously fenced for environmental, safety and security reasons. The type of fencing would vary to reflect the requirements of the line and the local surroundings. The placement of the fencing relative to the railway tracks would vary depending on whether the railway is on embankment, in cutting or at grade. Where a railway is on embankment or in cutting, sufficient width would need to be provided to ensure a stable earthworks slope and make provision for drainage ditches to protect the earthworks and railway from flooding

Clapham PC comments

- The proposals for continuous fencing will present a significant visual impact and CPC will want to be consulted on the type of fencing which will need to be unobtrusive and blends into the landscape. If necessary, appropriate screening to the fencing should be provided.



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6 Flooding

Extract from Technical Report

8.4.2 River Great Ouse Viaduct North of the A6 Great Ouse Way, the new railway would continue to rise before passing over the River Great Ouse twice and the A6 Paula Radcliffe Way on a new viaduct as shown in Figure 78. The use of a viaduct rather than earthworks is essential to provide resilience to flooding and reduce the impact on flood storage volumes. The proposed viaduct would be approximately 1.1km (0.68 miles) long and up to 18 metres (60ft) high above the floodplain (rail to ground level). Parapets, approximately 1.5m (5ft) tall, and OCS equipment, approximately 8m tall, would extend above rail level on the viaduct. Overhead power lines would be rerouted to avoid clashing with the proposed viaduct as it crosses the A6 Paula Radcliffe Way. Once east of the second crossing of the River Great Ouse, the railway would pass over Clapham Road where it would connect to the next route section (Clapham to Colesden)

Clapham PC comments

- CPC is disappointed with minimal reference to the impact of the viaduct construction on the flood plain of the River Ouse. Clapham has a record of flooding with the High Street being underwater on several occasions following increasingly intensive rainfall and consequently high river levels. These occurrences have increased recently with three floods in the past year. Given the reporting of climate disruption, CPC is concerned that this will be an increasingly regular occurrence.
- The flooding in Clapham has caused damage to local properties and businesses with distress and inconvenience to residents affected. This current situation will worsen with the impact of the proposed 500 dwelling development along Milton Road, which will increase pressure on drainage systems with the ongoing need to manage surface water during high levels of rainfall. This will worsen with the construction of the proposed railway.
- The footings for the proposed viaduct lie downstream to the south of Clapham High Street, so won't interfere directly with the water flow from the north. However, the free flow of the river water flows will be interrupted by the footings and their foundations and thus will have an adverse impact on the water table, and the flood plain. It is likely that construction of the embankment and the cutting may disturb any aquifers and focus run off to an area north of the Sainsbury Roundabout increasing the flood area and flood risk. The areas indicated on the plans for flood plain are already insufficient, and do not cover the land current subject to regular flooding.
- CPC is concerned that the flow of the river at high levels of rain fall will be impeded by the rail proposals increasing the risk of more frequent flooding within the built-up area of Clapham. This will not be acceptable, and robust mitigation will be necessary. CPC requests that the identification of adequate mitigation includes consideration of levees along the Clapham side of the river, together with natural flood attenuation areas on the Bromham side to reduce the risk and consequence of flooding in the future.

7 Landscape Character

Extracts from Environment Update Report

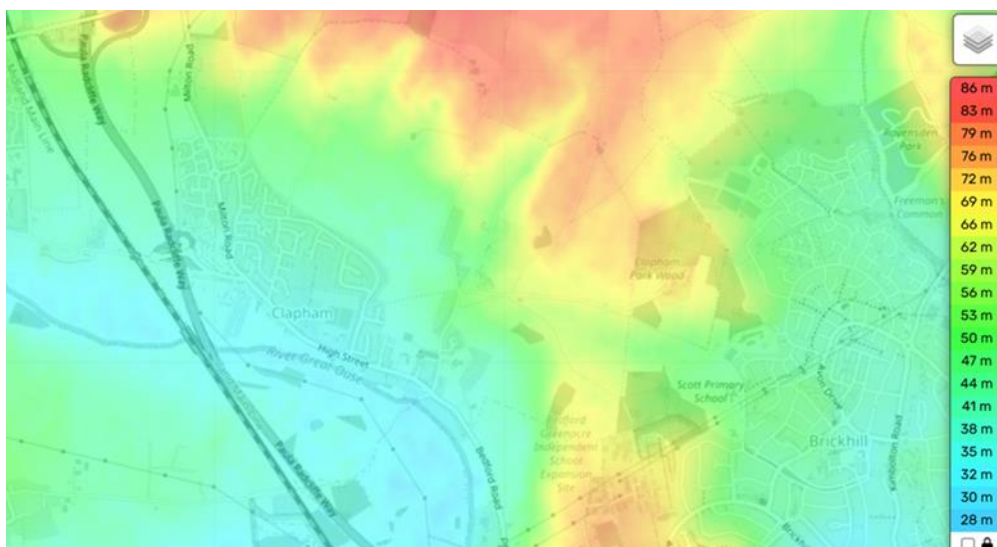
2.3.8 The area from Milton Keynes through to Cambridge falls within Natural England's Bedfordshire and Cambridgeshire Claylands National Character Area (NCA Profile: 88 Bedfordshire and Cambridgeshire Claylands - NE555 (naturalengland.org.uk)), the profile for which includes the following description (paraphrased).

2.3.9 North and east of Bedford, hills mark an ascent out of the town. The undulating but lowlying landscape is dominated by arable farmland though with scattered woodlands often crowning the horizon in long views across the level fields (Bedford Borough & Central Bedfordshire Landscape Character Assessment, October 2020).

3.2.1 The mitigation of potential adverse environmental impacts and effects is fundamental to successful environmental assessment and the delivery of EWR Co's objectives.

Clapham PC comments

- The escarpment is a unique feature of Clapham with the village nestling at its toe. The alignment of the ridge is shown on the following contour plan



As the plan shows the ridge extends to the east of Clapham and through Bedford and forms part of a local historic landscape. Over the generations the ridge has been partly obscured by the expansion of Bedford, and development of the Manton Lane area. The development of the Spar Distribution Centre and Greenacres School along Manton Lane has continued this encroachment and now creates a prominent feature on the ridge creating a visual impact for many miles and to some extent has a negative impact of the nature and character of the land between Clapham and Bedford.

- Whilst not of national importance the ridge and this section of landscape has local context (NCA Profile: 88) and is a prominent aspect of the remaining landscape between Bedford and Clapham. CPC consider it is an important aspect of the nature and character of the village and its setting will be further inundated by the proposed viaduct,

embankment and cutting. CPC consider that this is unacceptable, and serious consideration should be given to placing the railway corridor into a tunnel to reduce the impact of the infrastructure.

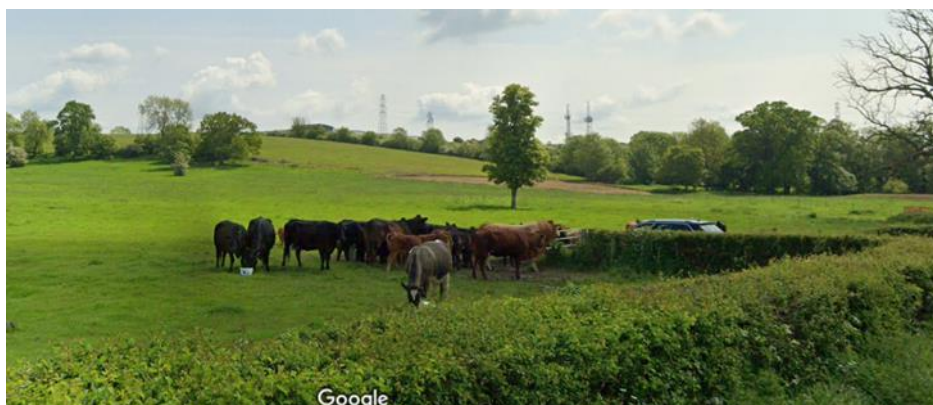


Loss of Strategic Gap between Clapham and Bedford

- Clapham has long cherished the open countryside; the 'strategic gap' between the village and the town. Whilst there are no specific policies in the local plan, the setting of the rail corridor significantly reduces the extent of the area and may in future encourage the build out of the land areas to both sides of the rail corridor, up to its boundary, effectively subsuming Clapham into an extended suburb of Bedford. This must be avoided.

Of the open land remaining, if the railway is built, we would wish to protect the setting and separate identity of the village by avoiding any further coalescence through protective policies/covenants which will;

- Retain the openness and character of the land around the existing village and the 'edge' of Bedford and any land allocations; and
- Provide ongoing access and recreational benefits to Clapham residents with the perceived as well as real benefits of having open countryside near to where they live.



8 Tunnels

Extracts from Environment Update Report

3.2.6 The design that is the subject of this consultation includes many features that have been adopted to mitigate potential environmental impacts; for example, south-west of Haslingfield the use of the tunnel beneath Chapel Hill would avoid or limit potential impacts on landscape, heritage and ecology

10.1.2 Cut and cover tunnel beneath the A428, the proposed Bourn Airfield development and Highfields Caldecote, with associated temporary diversions of the A428 and other local roads.

10.2.5 The cut and cover tunnel under the A428 and Bourn Airfield development site would avoid impacts on most views from Highfields Caldecote and Hardwick.

10.2.17 The construction of the cut and cover tunnel would be one of the more disruptive elements of the work, affecting residents in Childerley Gate and Highfields Caldecote in particular. A temporary realignment of the A428, St Neots Road and (potentially) Cambourne to Cambridge busway would be provided along with a temporary localised diversion of Wellington Way and Highfields Road prior to constructing the tunnel beneath. The tunnelling works would require a particular focus on the phasing of work in order to minimise the duration of potential disruption. In addition, there would be potential for wider effects on b

11.1.3 The proposed works include: Tunnel beneath Chapel Hill, south of Haslingfield

11.2.8 The proposed tunnel beneath Chapel Hill has been introduced in response to the potential environmental impacts of the previously proposed surface route through this area, and the extensive cutting that this entailed. In response to public feedback, and informed by the environmental assessment team, various tunnel options were proposed, with the 700m long mined tunnel identified by EWR Co as the preferred option. Information on the design evolution of this element of the project is contained in Chapter 12 of the Technical Report. The tunnel through Chapel Hill would significantly limit potential visual impacts, and the hill would largely retain its profile. Landscape earthworks around the tunnel portals would screen views of the tunnel entrance from the surrounding area

11.2.17 The tunnel beneath Chapel Hill is expected to be constructed from both sides using mined tunnel techniques,

11.2.47 Recognising the historical and wider importance of Chapel Hill in the landscape, the tunnel design was developed to help to preserve the landscape character (along with other benefits) including the dominance of the hill and its continued cultural relevance.

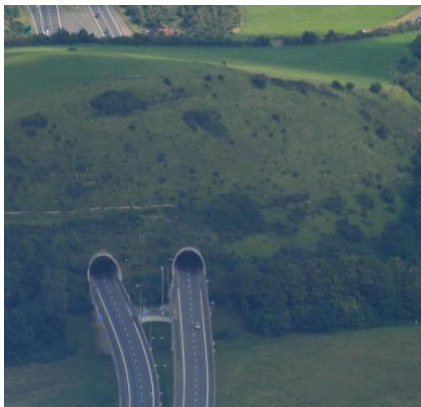
Clapham PC comments

- It is clear from the consultation documents that EWR consider landscape character to be of importance and where extensive cutting will be necessary, design solutions include proposals for a tunnel to mitigate potential environmental impacts. The documents also reference that where tunnel options are being taken forward, they are in response to public feedback. There are proposals for tunnels under Chapel Hill, Bourn Airfield and Highfields Caldecote

It is therefore very disappointing that a tunnel option has been dismissed for the section between Clapham and Bedford, and it is CPC's view a tunnel should be provided instead of a cutting. As noted elsewhere in this response, a tunnel would remove the impacts of the development proposals on:

- Wildlife
- Public access
- Severance between Clapham and Bedford
- Landscape Character
- Visual Impact
- Tranquility
- Viability of local farming

- The pictures below shows the A20 tunnel at Folkestone in Kent and illustrates how a tunnel can significantly reduce the impact on the landscape. Together with an aesthetic design, this may provide a suitable solution to consider



9 Freight

Extracts from Technical Report

14.3.2 Provision for freight

From an infrastructure capability perspective, a railway capable of carrying freight trains means:

- *Gradients will be suitable for rail freight services – generally better than 1:100 where feasible.*

14.3.4 Freight opportunities

Once EWR is fully operational, there will be a freight capable through route from Oxford to Cambridge.

Clapham PC comments

- CPC understand that the design of the railway through the Clapham area has been based on a rail gradient of 1 in 80. However, it is noted from the above extract and discussions at recent consultation events, this would pose a traction problem for freight trains and a shallower gradient better than 1 in 100 would be needed to facilitate the effective passage of freight.
- On this basis, there is a requirement to refine the design of the vertical and horizontal alignment of the rail in the Clapham area. Changing the alignment will alter the footprint of the proposals, and its relative impact on Clapham and its environs. CPC requests confirmation that the design is to be altered, and at the earliest opportunity have sight of emerging designs so that we can offer relevant comment and discussion on the altered impact. CPC request that this action is not left until the Statutory Consultation stage as this will limit the time for engagement during the design development and refinement.

10 Noise

Extract from Environment Update Report - Noise

8.2.31 The project would introduce large-scale structures, including embankments, viaducts, cuttings and bridges into the countryside, changing its character especially where the landscape is more open. Noise and movement generated by the passing trains on embankment or viaduct could reduce the tranquillity of the landscape.

Clapham PC comments

- There is no information on predicted noise levels, and its impact in the Clapham area in the consultation documents. The levels of noise will be based on the proximity of the proposed alignment to dwellings in Clapham, and also by its height above ground level.
- Given the significant elevation of the proposed viaduct any noise created is likely to have a wide footprint, and CPC would wish to see efforts are made to reduce the level and mitigate its impact. CPC understand noise levels are affected by:
 - Design of the trains
 - Type of track/rail used
 - Rail alignment.

CPC ask that noise calculations are undertaken as design is taken forward so that the design can be varied to minimise its impact, rather than mitigated once the design is fixed, and an optimum solution is no longer possible. At the earliest opportunity CPC requests sight of noise contour mapping and details of how many houses will be affected. EWR must confirm that Continuous Welded Rail (CWR) will be used to minimise noise from the rails.

11 Congestion and Access

Extracts from Transport Update Report

2.2 To support the non-statutory consultation, a qualitative impact analysis has been undertaken on account of the following factors:

- The design is at an early stage of development. In some locations options are still being considered. Further design development and the choice of option has the potential to influence how the project is constructed and how people would travel, during the construction phase, and once EWR is operational

16.1.6 The Construction Strategy would rely extensively on the application of a Code of Construction Practice (CoCP). This would be a fundamental part of the project proposals in that it would outline the measures needed during construction to avoid likely significant adverse effects on people and on natural and cultural assets. The TA would assume that these measures would, as a minimum, be implemented. The measures would represent a best practice approach and would be generic to most construction activity for a project of this nature

Mitigation thresholds (transport)

16.1.7 Following consent, measures set out in the CoCP (including any changes to them required as part of the consent) would be used as the basis for more detailed measures that would be developed by the principal contractor. These measures would take account of the detailed designs, and to the specific approach to construction that they support, accommodating where necessary, local and specific sensitivities. For transport, there would be a CTMP and a Construction Workforce Travel Plan (CWTP) to manage and mitigate the impact of construction traffic. These Travel Plans and the CoCP would all be embedded in the project.

16.1.8 From a transport perspective, mitigation would be considered in the following instances:

- Where links or junctions are forecast in the traffic models to increase to a level that pushes them over capacity (defined as being over 0.85 VoC) in a 'with project' scenario (i.e., the difference between the 'with project' scenario and the baseline scenario), or locations which were already operating over capacity within the baseline scenario, which are then further increased in the 'with project' scenarios. Mitigation considerations for these locations could include any combination of:
 - Changes to junction layouts or operation.
 - Changes to link widths, layouts, or configurations.
 - Changes to signage to manage route choice.
 - Changes to the provision of NMU crossing facilities or infrastructure.
 - Changes to the provision of on-street parking, traffic regulation orders or markings.

Monitoring

16.1.13 There may be a requirement for monitoring of some impacts and locations, which could:

- Review the effectiveness of implemented mitigation to allow early identification of where further mitigation may be required.
- Review locations where levels of impact were initially not deemed sufficient to warrant mitigation (by agreement with stakeholders) but where mitigation may become necessary if impacts are realised differently.

Clapham PC comments

- Like many towns, Bedford suffers from significant levels of congestion at peak times. On the west side of the town, the 'Sainsbury' and 'Manton Lane' roundabouts together with adjoining roads were upgraded in 2023 and it is understood that the highway layout is at the maximum highway capacity that can be achieved within the existing highway boundary. Nevertheless, on typical school days, the network is at capacity with traffic at a standstill, traffic poor lane discipline on the junctions as people try and force their way through, and excessive queuing on the A6 bypasses: The Great Ouse Way queues extend at times back from the Sainsburys roundabout to Bromham Road with traffic rat running along St James Way to 'jump the queues'. The levels of congestion experienced is not recognised or noted within the Transport Report.
- The new GreenAcres School, the 500 housing development in Clapham, further housing delivery in Biddenham and adjacent to the Gt Ouse Way will exacerbate this situation.
- CPC is consequently very concerned with the significant amount of railway related construction that is proposed in this area and needs to be assured that Clapham residents will be able to travel in and out of the village without any significant additional delay during the construction period and to be able to access various facilities in Bedford such as the hospital in a timely manner.
- The transport modelling detailed in the report appears to be based on a baseline highway network as shown in Figure 40. This primary network is not sufficient as we consider that such roads as Manton Lane which provides part of an arterial corridor should be included.
- We ask that the site access strategy to the compounds and construction areas are clearly set out together with the proposed methodology for assigning construction trips via primary and secondary access points onto the surrounding highway network, noting as mentioned previously many of the roads in Clapham and other villages are not suitable for construction traffic.
- There should be consideration of the likely changes in flow/route choice and increased queuing which will incur because of the proposed works. This would include Clapham Road as it is the only access route to Clapham from the south and may act as a rat-run when the A6 is blocked. These considerations will identify a need for a refinement of the network to be modelled. Given the proximity of a number of main schools to Clapham, we consider particular attention should be given to educational trips and journeys made which could be impacted.
- In addition to the modelling of route corridors, we would expect to see detailed junction modelling to demonstrate how the highway network can cope with any additional traffic. Given the junctions are at capacity at times, we would expect that modelling is not

- based on averages during the peak periods as this would mask higher levels of impact and consequent queuing and delay.
- It is noted that measures to address, manage and monitor congestion will be covered by a Code of Construction Practice (CoCP). CPC infers that this will be a framework document with detail developed by the principal contractor. CPC would expect to see that CoCP is sufficiently robust to ensure all transport impacts are reasonably addressed and that there will be enforcement measures included to ensure contractors sufficiently address likely impacts and any concerns raised by impacted parties. It will be essential that a partnership approach is taken with full engagement with stakeholders including CPC.
- It is CPC's understanding that area wide and town transport models are typically difficult to calibrate and validate sufficiently over the whole area. CPC will expect to see validation statistics are included in transport reporting, and confirmation that it validates accurately in the Clapham area, so we can have confidence in the outputs reported.
- In reporting of delay on the network, we would expect to see included in the report details of link capacity issues, queue delay information and output of journey time routes assessments. Journey time assessments are important as CPC want confidence that residents will be able to travel to their destinations without undue impediment. This will also apply to those accessing the schools.
- Given the scale of construction in the Clapham area with a new viaduct and other structures, there may be a need for high and heavy load movements. There is no mention in the Transport Update of routeings for such loads. CPC wish to see clarification and detailed information, to understand the likely impact on the village and its environs.
- It is noted that to construct the railway through the Clapham area, there will be a need to realignment a section of the Gt Ouse Way to accommodate the proposed elevation of the railway. CPC would like assurances that any design will not inhibit the opportunity for future widening of the A6 including major upgrades of the Sainsburys roundabout. CPC understands that the original design allowed for resilience if there is a need to dual the route at a future time.

13 Farming

Extract from Environment Update Report

4.5.11 Farm business interviews are currently underway to understand how the project and its construction could impact farming practices. Both soil resource surveys and Agricultural Land Classification surveys will be carried out to understand soil types and the quality of farmland affected by the project. Much of this can rely on existing survey data undertaken for other projects, with further surveys planned.

Clapham PC comments

- Beyond reference to undertaking farm business interviews and acknowledging historically that Bedford was an agricultural town, there is no mention of the impact on farming in the Bedford area and in particular Clapham.
- The route of the proposed route passing to the east and north of Clapham passes through Class 3 agricultural land. The landforms part of the last mixed farm, Park Farm located in the immediate Clapham Area. The extent of the proposed redline boundary for the scheme takes about 303 acres and it is CPC's understanding that this land take for both the rail corridor and environmental mitigation measures put into question the viability of the farm. CPC consider this is an unacceptable consequence of the current proposals and strongly promotes the idea that the railway should be in a tunnel. By such a provision, there will be negligible loss of farming land

14 Clapham Park

Clapham PC comments

- CPC draw to EWR attention the specific impacts of the proposed railway on Clapham Park which is located at the end of Carriage Drive and only can be accessed via Green Lane. This is a private community comprising a number of properties which will be severely and uniquely impacted by the proposals given its location. In particular the proposed cutting which will cut across its access.
- The key areas of concern which will need to be addressed include:
 - During construction, 24-hour access will need to be provided at all times.
 - Residents will effectively be passing through a construction site. Measures to ensure safety of residents must be maintained at all times
 - The need to minimise the impact of the proposals on the nature and character of the community and its access. This is best achieved through the provision of a tunnel and less so by a Green Bridge
 - Noise, vibration and dust will be a particular concern during construction
 - On completion of the works, the quantality of the community will be lost and will need to be compensated
 - Environmental impacts as mentioned elsewhere in this response.

15 Compensation.

Clapham PC comments

- There will be significant disruption and inconvenience to residents in and around Clapham during the construction, commissioning and operation of the proposed railway. Many of these impacts will not be adequately mitigated through the provision of appropriate infrastructure, and as a fallback position there is a need for opportunities to compensate those affected.

- As part of the development and delivery of HS2, the following Funding Opportunities have been made available:
 - Homeowner Payment Scheme – Homeowners may be eligible for a payment if they live in an eligible homeowner payment zone
 - Community & Environment Fund - fund aims to leave a sustainable legacy, aimed at the voluntary/community sector.
 - Business & Local Economy Fund - Created to support local economies that are demonstrably disrupted by the construction
 - Road Safety Fund aimed for measures which will improve a road safety issue caused or exacerbated as a result of the rail construction
- CPC asks that those in the Clapham area affected by the scheme are suitably compensated and that EWR consider appropriate mechanisms like those provided by HS2 to address issues raised that can't be otherwise be addressed.

Clapham Parish Council asks that all the comments made in this response are taken onboard as the design of the project progresses. Clapham is an area significantly and uniquely impacted and unless the issues raised are adequately addressed, the lives of residents, businesses and the community will be irreversibly and detrimentally affected.

It is appreciated that there has to be a balance between costs and mitigation; however, it is a fundamental imperative to ensure our communities quality of life is maintained. It should be noted that these comments are not exhaustive and as the scheme progresses, CPC may have further concern and comment.

We are happy to provide any clarification on the points raised and look forward to close and continuing engagement.