

Your ref: TWA 2/2/140  
Our ref: CLFR/NR/TWA  
Date: 13<sup>th</sup> January 2017  
Contact: Mrs Camilla Rhodes  
Direct Dial: 01223 715621  
Contact Centre: 0345 045 5212  
E Mail: [camilla.haggett@cambridgeshire.gov.uk](mailto:camilla.haggett@cambridgeshire.gov.uk)



Economy, Transport & Environment  
Executive Director, Graham Hughes

Robert Fox  
Transport and Works Act Orders Unit  
Department for Transport  
Zone 1/14-18  
Great Minster House  
33 Horseferry Road  
LONDON  
SW1P 4DR

**Highways Service, Box No. SH1313**  
Infrastructure & Management Operations Directorate  
Shire Hall  
Castle Street  
Cambridge  
CB3 0AP

BY EMAIL ONLY

Dear Mr Fox,

**Re: TRANSPORT AND WORKS ACT 1992 –  
PROPOSED NETWORK RAIL (ANGLIA LEVEL CROSSING REDUCTION STRATEGY)  
(CAMBRIDGESHIRE) ORDER:  
REQUEST FOR A SCREENING DECISION**

Thank you for consulting Cambridgeshire County Council on the matter of Network Rail's application for a request for a screening decision as to whether or not an environmental impact assessment of the proposed works is required.

Cambridgeshire County Council is responding with regard to the following areas of interest for which the Authority has statutory responsibility:

1. Flood risk management
2. Ecological – County Wildlife Sites
3. Archaeological

**1. Flood risk management**

The County Council's Flood & Water Team has reviewed the documentation and has identified that some of the proposed options may require new rights of way to be constructed adjacent to or over watercourses. The County Council is content that no EIA is required to cover this particular interest, as the relevant consents that may be required can be managed through the appropriate Land Drainage Act processes.

However, the County Council as the Highway Authority has repeatedly requested that the Applicant provide flood data with regard to sites C03, C21 and C22, because the proposals would take the public rights of way concerned off the flood banks and onto the flood plains adjacent to major rivers. We need to understand the flood pattern in order to understand if it will be possible to move these highways onto these alignments. It will not be acceptable for the routes to be regularly flooded, and mitigation in terms of structures may be required. The County Council will not be able to agree to any of these proposals until this has been resolved.

It may be that an EIA will be needed to understand the impact of any such structures on water flow.

## 2. Ecological

The County Council was disappointed that the Applicant had not consulted with the County Council or the Wildlife Trust (which manages local wildlife sites) with regard to ecological impact prior to this consultation. On reviewing the information provided, it was clear that there had been no consideration of the impact on local wildlife sites, habitats or species.

The environmental assessment must consider impact to County Wildlife Sites. Of particular concern is work proposed within/immediately adjacent to River Great Ouse County Wildlife Site (crossings C03, C21, C22, C24 & C25), Chettisham Meadows County Wildlife Site (crossing C10) and River Lark and Associated Habitat County Wildlife Site (crossings C16 & C17).

The environmental assessment should also consider UK and local Priority Species and Habitats. A list of local Priority Species is available at [www.cpbiodiversity.org.uk](http://www.cpbiodiversity.org.uk).

Adverse impact on these features should be avoided wherever possible. If not, appropriate mitigation/compensation should be included in the design. The Applicant was advised of these concerns on the 15<sup>th</sup> December. The Applicant's agent has since proposed mitigation measures, which are under discussion but have not yet been agreed.

Whilst these may cover some of the proposals, the County Council is concerned that it is not yet known what impact the scheme will have on routes that have not yet been agreed due to missing flood data (C03, C21, C22) (see above under 1. Flood risk management).

In addition, the County Council has specified that it requires ramps (whether detached structures or embedded) for C16 and C17, not steps as specified in the EIA document. This is to enable driven maintenance vehicles (mitigating the Council's ongoing maintenance liability) and to comply with the Equality Act duty for accessibility for pedestrians. Therefore the assessment will need to cover the impact of creating ramps.

I would also note that discussions are still ongoing with the County Council regarding specification and detailed design, which cannot be known until the County Council has had opportunity to inspect the proposed route for each scheme. For example, the County Council has specified that culverts will be requested in certain locations, such as at the watercourses for the C24 proposals, rather than bridges as specified in the EIA documentation. Culverts require consent from the relevant drainage authority, and may also impact adversely on ecology. However, as noted above, it should be possible to manage impact through the Land Drainage Act consenting process.

It is therefore requested that an EIA be undertaken covering the above ecological matters, and that the Applicant be required to agree appropriate mitigation measures to the satisfaction of the County Council and Wildlife Trust.

## 3. Archaeological

The County Council does not recommend an EIA on archaeological grounds, nor alterations to the locations of proposed scheme features. However, a number of mitigations are required. The mitigation intentions are shown on the attached spreadsheet. It is therefore requested that the Applicant be required to undertake these mitigation measures to the satisfaction of the County Council.

Yours sincerely,



Mrs Camilla Rhodes MA MLE MRICS  
Asset Manager - Information