

Transport and Works Act 1992

**Transport and Works (Applications and
Objections Procedure) (England and Wales)
Rules 2006**

**The Network Rail (East West Rail Western
Section Phase 2) Order**

**Draft Planning Statement 4: Central
Bedfordshire Council**

June 2017

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EWR Alliance

June 2017

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Executive Summary

This draft Planning Statement is one of a suite of five being submitted as part of the Round Two Consultation for the East West Rail Western Section Phase 2 (EWR2) Project. This consultation will inform design development and an application for a Transport and Works Act Order (TWAO) to authorise the construction of EWR2 is scheduled to be submitted in Spring 2018.

This draft Planning Statement addresses development within the administrative area of Central Bedfordshire Council (referred to as the Central Bedfordshire sub-section).

The Central Bedfordshire sub-section commences east of Woburn Sands at the administrative boundary of Milton Keynes Council and Central Bedfordshire Council and concludes south of Stewartby at the administrative boundary with Bedford Borough Council. The route within the Central Bedfordshire sub-section is approximately 11km in length.

There are no proposed works to the railway line itself within the Central Bedfordshire sub-section, which currently benefits from the existing double track railway. The proposed development includes extensions to both platforms at Ridgmont Station and a new highway overbridge at Marston Road, Lidlington. A number of changes to existing vehicle and pedestrian crossings and bridges are also proposed.

Proposed development within the Central Bedfordshire sub-section will be assessed for its compliance with national planning policies provided in the National Policy Statement for National Networks (NPS) and the National Planning Policy Framework (NPPF), as well as those in the local Development Plan, which comprises the following documents:

- Core Strategy and Development Management Policies (North Bedfordshire)
- Site Allocations (North Bedfordshire)
- Mid-Bedfordshire Local Plan (Saved Policies)

The main material considerations raised by the proposed development are considered within the context of planning policies in the above documents. The main material considerations relate to sustainable development, land use and agriculture, cultural heritage, air quality, ecology, noise and vibration, geology, landscape, flood risk and highways. These topics are assessed and discussed in detail in the Draft Environmental Statement (Draft ES) submitted for consultation.

In the context of the findings of the Draft ES, it is considered that, following the implementation of mitigation measures and the significance of residual impacts in relation to residual amenity and visual impact, the scheme at this stage is in compliance with planning policies of relevance to the main material considerations. However, it should be noted that the assessments reported in the Draft ES are not complete at this stage. Additionally, it should be noted the Draft ES assessed a project boundary that has since been superseded

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by the boundary shown in the drawings referenced in this Statement. The boundary assessed in the Draft ES is generally larger than that shown.

Section 38 (c) of the Town and Country Planning Act 1990 (TCPA 1990), as well as paragraph 14 of the NPPF, confirm that planning applications should be determined in accordance with the Development Plan unless material circumstances indicate otherwise. Proposals which accord with the Development Plan are to be approved without delay. In this respect, the scheme within the Central Bedfordshire sub-section, and the scheme in its entirety, is considered to be in full accordance with national planning policies and the local Development.

1. Introduction

1.1. Transport and Works Act Order

- 1.1.1. Network Rail Infrastructure Limited (Network Rail) intends to apply for a Transport and Works Act Order (TWAO) to authorise the construction of East West Rail Western Section Phase 2 (EWR2).
- 1.1.2. This involves the construction, operation and maintenance of an upgraded and reinstated rail link between Bicester and Bedford, Milton Keynes and Princes Risborough, as well as the construction of new railway infrastructure (including new overbridges, footbridges, a new station and station platforms) and improvements to existing infrastructure (such as station platform extensions).
- 1.1.3. The scheme also includes the need for powers of compulsory land acquisition. As the scheme is beyond the scope of Network Rail's permitted development rights, a TWAO is required to authorise all proposed development. The application process for a TWAO is governed by the Transport and Works Act 1992 ('the 1992 Act') and the Transport and Works (Applications and Objections) (England and Wales) Rules 2006 ('the Application Rules').
- 1.1.4. The application under the Transport and Works Act 1992 will be determined by the Secretary of State for Transport. As part of the TWAO submission, Network Rail will also seek a direction from the Secretary of State under Section 90 (2A) of the TCPA 1990, which if given, would deem the grant of planning permission for EWR2.
- 1.1.5. On behalf of Network Rail, the East West Rail Alliance (EWR Alliance) is responsible for the design and construction of the scheme. The EWR Alliance (made up four equal parts between Network Rail, Atkins, Laing O'Rourke and VolkerRail) will prepare and make the TWAO submission.
- 1.1.6. At the time of submission, the following documents will make up the TWAO submission for EWR2:
 - Draft Order;
 - Explanatory Memorandum;
 - Statement of Aims;
 - List of consents, permissions or licences required under other enactments;
 - Consultation Report;
 - Environmental Statement;
 - Funding Statement;
 - Declaration of Status
 - Order Plans;

- Book of Reference; and
 - Formal request for Deemed Planning Permission.
- 1.1.7. In addition to the above, the following documents have also been produced for the Round Two Consultation and TWAO submission:
- A suite of Planning Statements;
 - A Design and Access Statement;
 - Detailed Planning Drawings; and
 - Detailed Scheme Drawings.
- 1.1.8. In parallel to the TWAO submission, Network Rail will also seek Listed Building Consents under the Planning (Listed Buildings and Conservation Area) Act 1990 for the works affecting listed structures that will be necessary to implement the scheme.

1.2. Deemed Consent Planning Supporting Statement

- 1.2.1. This draft Planning Statement (Statement 4) is one of a suite of five being submitted as part of the Round Two Consultation for EWR2. The proposed development would be undertaken across the following 7 District, Borough and County Council administrative areas:
- Cherwell District Council;
 - Aylesbury Vale District Council;
 - Milton Keynes Council (Unitary Authority);
 - Central Bedfordshire Council (Unitary Authority);
 - Bedford Borough Council (Unitary Authority);
 - Buckinghamshire County Council; and
 - Oxfordshire County Council.
- 1.2.2. A draft Planning Statement has therefore been produced to cover the proposed development in each administrative area.
- 1.2.3. This draft Planning Statement addresses development within the administrative area of Central Bedfordshire Council. The other four draft Planning Statements consider the following:
- Draft Planning Statement 1: Development within Cherwell District Council / Oxfordshire County Council;
 - Draft Planning Statement 2: Development within Aylesbury Vale District Council / Buckinghamshire County Council;

- Draft Planning Statement 3: Development within Milton Keynes Council; and
- Draft Planning Statement 5: Development within Bedford Borough Council.

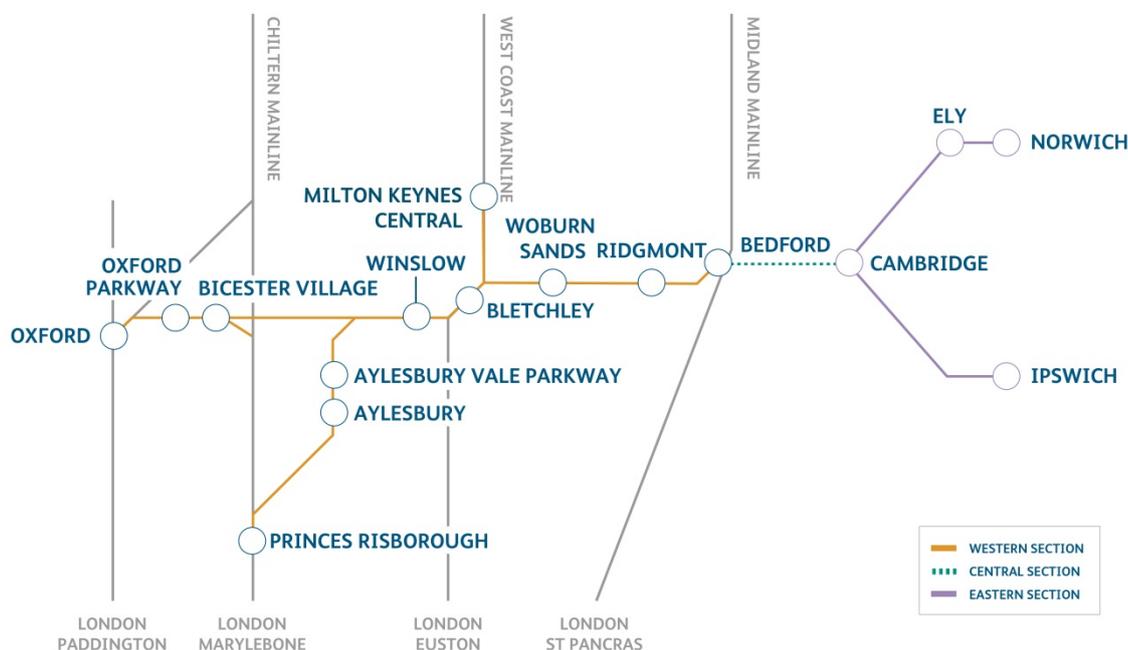
1.3. Background to East West Rail

1.3.1. East West Rail (EWR) aims to establish a strategic railway connecting East Anglia with Central, Southern and Western England. Once built, EWR would link the strategic growth areas along the M11 corridor, Milton Keynes, Aylesbury, Bedford and Oxford and support growing hi-tech digital economic sectors by connecting the key hubs between Oxford and Cambridge. It would, via connections with Great Eastern, East Coast, Midland, West Coast and Great Western Main Lines, connect to the ports of Felixstowe and Harwich, avoiding travel on congested tracks around north London and could provide an extra route for north-south freight traffic from the port of Southampton.

1.3.2. EWR falls into three distinct sections as illustrated in Figure 1 below.

1. Western Section (Oxford to Bedford and Milton Keynes to Princes Risborough);
2. Central Section (Bedford to Cambridge); and
3. Eastern Section (Cambridge to Norwich and Ipswich).

Figure 1: Diagram of EWR Sections



1.4. East West Rail Western Section

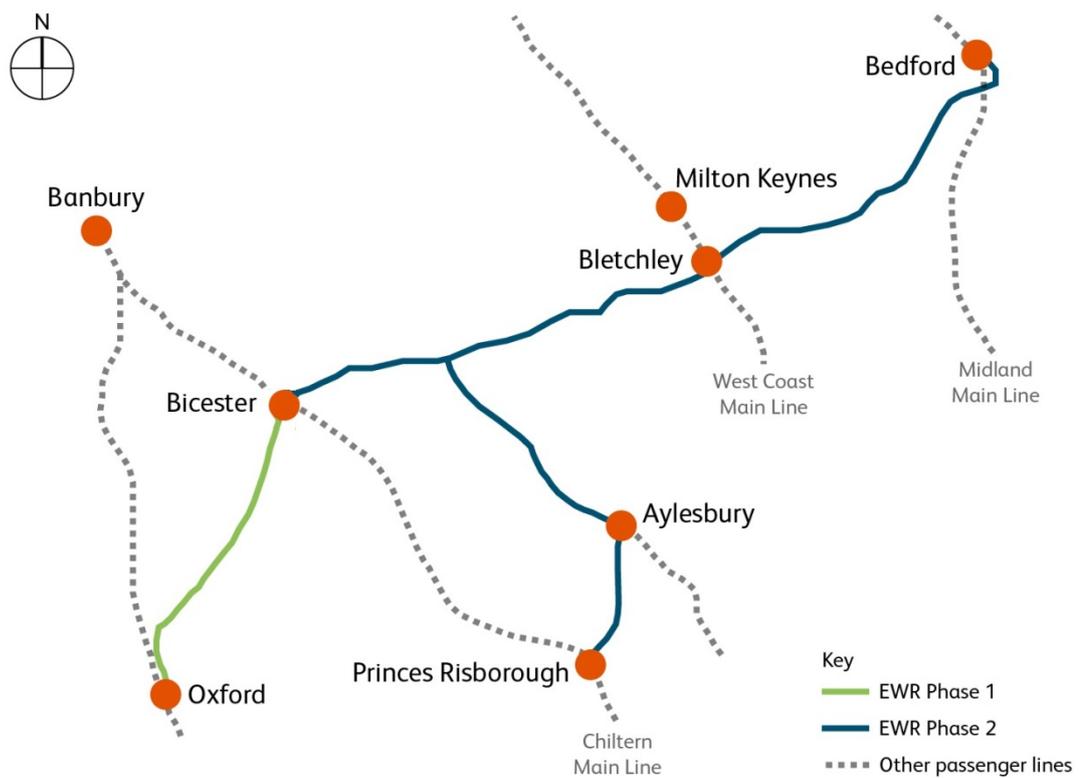
1.4.1. The EWR Western Section is the most advanced in terms of design and funding. Development of this section of railway would result in the introduction of direct rail passenger services as follows:

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- Bedford to Oxford;
 - Milton Keynes to Oxford; and
 - Milton Keynes to London via Amersham.
- 1.4.2. This would require upgrading and reinstating the Oxford–Bicester–Bletchley–Bedford and Princes Risborough–Aylesbury–Claydon Junction railway lines.
- 1.4.3. Within the Western Section, there are two distinct phases of work; EWR Phase 1 and EWR Phase 2 as illustrated in Figure 2 below.

Figure 2: Layout of EWR Phases 1 and 2



- 1.4.4. EWR Phase 1 was completed in December 2016 and involved the upgrade of the Oxford-to-Bicester line and new section of track to link Oxford and Bicester Village (formerly Bicester Town) stations directly to the Chiltern Main Line allowing new direct passenger services from Oxford to London Marylebone. It also involved widening the existing track bed; doubling over 18km of track; increasing the line speed to 100mph; constructing new overbridges, underbridges and footbridges; closing 37 level crossings; building the new Oxford Parkway station at Water Eaton; upgrading Islip station and installing a new signalling system.
- 1.4.5. EWR2 requires upgrading and reinstating the Bicester–Bletchley–Bedford, and Aylesbury–Claydon Junction railway lines. The key proposals for EWR2 include alterations to, or replacement of, a number of overbridges and underbridges along the route; improvement of facilities at or closure of a number of highway, private roads and public rights of way (PRoW) level crossings; provision of replacement highway footbridges/underpasses or diversions at closed level crossings; a new railway station and ancillary facilities at Winslow Station and new platforms at Aylesbury Vale Parkway and Bletchley Stations and platform extensions at Woburn Sands, Ridgmont and Princes Risborough stations to support the proposed new train services and increased passenger numbers.

1.5. EWR2: Project Benefits

- 1.5.1. EWR2 has five main benefits:
1. To support Local Authorities' ambition for substantial economic growth based on the creation of new private sector jobs and the development of major areas of new housing;
 2. To positively contribute to tackling climate change by providing a more sustainable means of meeting travel demands;
 3. To provide a connection between existing radial routes out of London meaning passengers won't have to interchange through London;
 4. To enhance the rail network capacity and flexibility by creating opportunities for alternative routes of passenger and freight services; and
 5. To realise the opportunity offered by an upgraded and reinstated rail link.

1.6. Overarching Project Description

- 1.6.1. The majority of EWR2 is located in rural, predominantly arable, surroundings. Where the route passes through towns (Bicester, Winslow, Bletchley, Milton Keynes, Bedford, Aylesbury and Princes Risborough), surroundings comprise residential, commercial, industrial and other urban land uses.

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- 1.6.2. Between Bicester and Bletchley, the railway will be upgraded to two tracks, and will see all level crossings replaced by bridges or alternative routes. New signalling and safety systems will be installed to allow trains to operate at speeds of up to 100mph. Between the western edge of Grebe Lake to the level crossing with Queen Catherine Road, all necessary powers for the implementation of EWR2 have been authorised under the High Speed Rail (London - West Midlands) Act 2017 and will therefore not be included within the scope of the EWR2 TWAO.
- 1.6.3. Between Aylesbury and Claydon Junction the upgraded railway will have two tracks and, and all level crossings will be replaced by bridges or alternative routes. New signalling and safety systems will be installed to allow trains to operate at line speeds of up to 90mph. Between Station Road at the Buckinghamshire Railway Centre (near Quainton) to the connection with the Bicester/Bletchley railway, the majority of powers for the implementation of EWR2 have been sought under the High Speed Rail (London - West Midlands) Act and therefore only discrete areas will be included within the scope of the EWR2 TWAO.
- 1.6.4. Between Bletchley and Bedford some level crossings will be replaced by bridges or alternative routes.
- 1.6.5. To meet the operational requirements of a modern railway, it will be necessary to widen the railway corridor in many locations. In such locations earth retaining features may be installed as an appropriate means of achieving an equitable engineering solution.
- 1.6.6. A new station at Winslow will be constructed with two platforms able to accommodate trains of up to 9 carriages, step free access throughout and passenger facilities include a ticket hall, space for retail units, a transport interchange, a car park with 360 spaces (342 standard spaces and 18 restricted mobility parking); and cycle racks.
- 1.6.7. New station facilities at Bletchley and Aylesbury Vale Parkway stations will be constructed. At Bletchley, the new facilities will include two platforms able to accommodate trains with up to 9 carriages and there will be step free access throughout, with the platforms connected by lifts and an underpass. At Aylesbury Vale Parkway, the new facilities will include two platforms able to accommodate trains with up to 9 carriages, connected by lifts and a footbridge with steps.
- 1.6.8. Platform extensions at the existing stations of Ridgmont, Woburn Sands and Princes Risborough will be built.
- 1.6.9. The waste transfer facility at Calvert will be relocated, with necessary authorisation being provided by the High Speed Rail (London - West Midlands) Act 2017.

2. Site and Surrounding Context

2.1. Central Bedfordshire Sub-section Description

- 2.1.1. The Central Bedfordshire sub-section commences east of Woburn Sands at the administrative boundary of Milton Keynes Council and Central Bedfordshire Council and concludes south of Stewartby at the administrative boundary with Bedford Borough Council. The Central Bedfordshire sub-section is approximately 11km in length and is shown in the Scheme Drawings submitted for consultation and listed in Table 1.
- 2.1.2. There are 23 footpath, highway or working crossings within the Central Bedfordshire sub-section (via underbridge, overbridge or level crossing). Major highway routes that cross the line include the M1 and A507.
- 2.1.3. The route within this sub-section continues eastbound towards Bedford, travels into Aspley Guise and through the rail station. Prior to entering Aspley Guise Station, the line crosses over the Salford Road level crossing before proceeding to travel through agricultural land and alongside Berry Lane Farm. The line is then intersected by Berry Lane via a level crossing, as well as a further level crossing to the east which connects agricultural land to the north and south (Long Leys). Beyond Aspley Guise to the east, the line is intersected by a watercourse as well as a further public footpath.
- 2.1.4. The line progresses through Ridgmont Station, which is subject to Grade II listed status, prior to which it crosses under the M1 and A507. Beyond Ridgmont Station, the line proceeds to cross over Station Road via a level crossing before travelling alongside industrial and commercial units at Prologis Park. The line continues through an area of agriculture and travels in close proximity to Brogborough Middle Farm and crosses under an overbridge in use by the farm. The line then travels into Lidlington where it is firstly intersected by a footpath level crossing used primarily by parents and children walking to Thomas Johnson Lower School. Whilst travelling through the village, the line adjoins residential properties located on Hurst Grove to the north and in close proximity to properties along Bye Road to the south. The line travels over Station Road via a level crossing before continuing through Lidlington Station.
- 2.1.5. The line continues eastbound, crossing over Marston Road via a level crossing and travelling through the Grade II listed Milbrook Station. The line later travels adjacent to Milbrook Proving Ground, as well as Marston Vale Millennium Country Park where it is intersected by a public footpath level crossing. As the line continues it travels between two lagoons situated to the east and west before concluding south of Stewartby Station.
- 2.1.6. For almost its entirety, this sub-section does not travel through areas susceptible to flooding, with the majority of the route located within Flood Zone 1. However, a small area located to the south of the M1 crossing, within which the line is located, is identified as being within Flood Zones 2 and 3. This area within Flood Zones 2 and 3 is located around one of several watercourses that intersect the line.

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- 2.1.7. The entire length of the Central Bedfordshire sub-section benefits from being directly located outside of statutory land designations. However, the line does travel within close proximity to a number of Grade II listed structures, including the Crossing House at Apsley Guise Station, Ridgmont Station, Milbrook Station and South Pillinge Farmhouse.

3. Proposed Development

3.1. Railway Works

- 3.1.1. The Central Bedfordshire sub-section of the route currently benefits from the existing double track railway, which is located on the original double track embankments /cuttings. Therefore, there are no proposed works to the railway line itself within this sub-section.
- 3.1.2. There are seven level crossings along the route which would be closed, combined with other crossings and/or replaced with bridges. There are 11 level crossings along the route which would remain in place.

3.2. Ridgmont Station

- 3.2.1. The proposed scheme includes extensions to both platforms at Ridgmont Station. Both platforms (Platform 1 and Platform 2) would be extended at the west end of the station. This is to ensure that the platforms at Ridgmont Station are of a size suitable to accommodate larger trains that would travel along the EWR2 route.
- 3.2.2. At present, Platform 1 measures a total of 60.77m, whilst Platform 2 has a length of 65.25m. It is proposed to construct an extension to Platform 1 of 90.63m to create a total platform length of 140.80m. The proposed extension to Platform 2 would measure a length of 76.82m to create a total platform length of 141.13m. The operational length of both platforms would be 101m, with a width of 2.5m.
- 3.2.3. Each proposed platform extension would be constructed from pre-cast slabs and pre-cast cross walls on new reinforced concrete strip foundations. The extensions would be edged with pre-cast concrete coppers, and would tie into the existing platforms. Such materials are consistent with those of the existing platforms. A 1.5m high steel fence would be positioned along the back (western) edge of the platform extension.
- 3.2.4. Ridgmont Station is Grade II listed and therefore works to extend the platforms represent development within the setting of a heritage asset. Therefore, a separate Listed Building Consent application will be submitted at the same time as the TWAO submission, seeking consent to carry out the proposed works to this heritage asset.

3.3. Proposed Bridges

- 3.3.1. Within this section of the route only one new bridge over the railway is proposed. This is proposed at Marston Road, Lidlington where a new highway overbridge would be constructed to replace the existing highway level crossing. The span of the overbridge would measure 21.07m in length and would have a vertical clearance of 6.1m over the railway line. The overbridge would have a total width of 12.61m and would comprise a carriageway with a width of 7.3m, along with two verges with a width of 2.14m each. Concrete parapets and wingwalls would be constructed on both sides of the carriageway, along with metal vehicle restraint barriers.

3.4. Other Proposed Works

- 3.4.1. Proposed development within this sub-section also includes the construction of a new private road at Berry Lane Farm, north of Aspley Guise. The proposed new road would connect Salford Road with Berry Lane to compensate for the level crossing closure at Berry Lane.
- 3.4.1. Full details of the above proposed works are provided by the drawings listed in Table 1 below. Reference should be made to the draft Design and Access Statement (draft DAS) for further design details.

Table 1: Proposed Works within the Central Bedfordshire Sub-section

Location	Structure Proposed	Scheme Drawing Number	Planning Drawing Number
Rail Route	Railway Works	133735_2D-EWR-BBM-XXXXXX-DR-T-004009 to 005023	-
Ridgmont Station	Platform extensions	133735_2D-EWR-BBM-XXXXXX-DR-T-005013; and 133735_2D-EWR-BBM-XXXXXX-DR-T-005014	133735_2D-EWR-BBM-XXXXXX-DR-T-016069 to 016071
Marston Road	New highway overbridge	133735_2D-EWR-BBM-XXXXXX-DR-T-005018	133735_2D-EWR-BBM-XXXXXX-DR-T-016064 to 016066
Berry Lane	New road	133735_2D-EWR-BBM-XXXXXX-DR-T-005010; and 133735_2D-EWR-BBM-XXXXXX-DR-T-005011	133735_2D-EWR-BBM-XXXXXX-DR-T-005011 and 005010

4. Planning Policy Context

4.1.1. This section reviews the planning policy framework against which the scheme is to be considered. This includes planning policy and guidance at the national level, as well as adopted and emerging policies in local development plan documents. In addition, this chapter also reviews relevant local transport policy. Planning policies focussing on the design of proposed development have been omitted from this document and are discussed in the draft DAS.

4.2. National Planning Policy

National Policy Statement for National Networks

4.2.1. The National Policy Statement for National Networks (NPS) sets out the need for and the Government's policies to deliver development of national significant infrastructure projects on the national road and rail networks in England. The Secretary of State is to use the NPS as the primary basis for making decisions on development consent applications for national significant infrastructure projects related to national networks.

4.2.2. The NPS concludes that at a strategic level there is a need for development of the national rail network. The NPS outlines the following objectives for the rail network to ensure that it is a driver of economic growth and social development:

- offer a safe and reliable route to work;
- facilitate increases in both business and leisure travel;
- support regional and local public transport to connect communities with public services, with workplaces and with each other; and
- provide for the transport of freight across the country, and to and from ports, in order to help meet environmental goals and improve quality of life (paragraph 2.29).

4.2.3. The NPS sets out a number of potential impacts that are relevant to national networks infrastructure and discusses how these should be assessed by development proposals and appropriate mitigation measures identified. Those of relevance to EWR2 are discussed below.

4.2.4. [Biodiversity and Ecological Conservation](#) - States that appropriate weight is to be applied to designated sites of international, national and local importance, protected species, habitats and other species, as well as biodiversity and geological interests within the wider environment (paragraph 5.26).

- 4.2.5. The NPS states that proposed development located within or outside of a Site of Special Scientific Interest (SSSI) should not normally be granted if it would have an adverse impact on the designation, unless the benefits clearly outweigh the impacts (paragraph 5.29). The same principle applies to proposed developments that affect Ancient Woodland. The NPS also recognises the value of Regional and Local Sites and states that due consideration should be given to these designations. However, it states that such designations should not be used in themselves to refuse development, particularly given to the need for infrastructure. Proposals should ensure that appropriate mitigation measures are included as an integral part of the development (paragraph 5.31).
- 4.2.6. **Flood Risk** – requires the submission of a Flood Risk Assessment alongside proposals located within Flood Zones 2 and 3, or those within Flood Zone 1 that are of 1 hectare or greater or may be subject to sources of flooding other than from rivers and the sea (paragraph 5.92).
- 4.2.7. **The Historic Environment** – requires developments that are subject to an EIA to include an assessment of any likely significant heritage impacts (paragraph 5.126). The NPS states that the Secretary of State should seek to identify and assess the particular significance of any heritage asset that may be affected and its setting (paragraph 5.128). Great weight is to be given to the conservation of a heritage asset and any harmful impact on its significance is to be weighed against the public benefit of development (paragraph 5.131).
- 4.2.8. **Landscape and Visual Impact** – The NPS requires consideration on landscape and visual impact. Proposals are required to consider the nature of the existing landscape likely to be affected and nature of the effect likely to occur. Proposals should aim to avoid or minimise harm to the landscape and provide reasonable mitigation where appropriate (paragraph 5.149). The Secretary of State is required to judge whether the visual effects on sensitive receptors, such as residents, outweigh the benefits of the development (paragraph 5.158).
- 4.2.9. **Noise and Vibration** – Developments are required to be undertaken in accordance with statutory requirements for noise and regard should be given to the Noise Policy Statement for England. Proposals will be considered against the extent to which they achieve the following aims:
- avoid significant adverse impacts on health and quality of life from noise as a result of the new development;
 - mitigate and minimise other adverse impacts on health and quality of life from noise from the new development; and
 - contribute to improvements to health and quality of life through the effective management and control of noise, where possible (paragraph 5.195).
- 4.2.10. **Impacts on Transport Networks** – requires consideration to be given to the impacts of the proposal on wider transport networks and of construction sites on transport networks whilst it is in development. Consideration is to be given by the Secretary of State on the extent of impacts on local transport networks and policies set out in local plans (paragraph 5.211).

- 4.2.11. **Water Quality and Resources** – seeks to prevent new development from contributing to water pollution. It states that for projects that are improvements to the existing infrastructure, opportunities should be taken, where feasible, to improve upon the quality of existing discharges where these are identified and shown to contribute towards the Water Framework Directive commitments (paragraph 5.222). In determining a proposal, the Secretary of State should be satisfied that a proposal has had regard to the River Basin Management Plans and the requirements of the Water Framework Directive and its daughter directives (paragraph 5.226).

National Planning Policy Framework

- 4.2.12. The National Planning Policy Framework (NPPF) was published on 27th March 2012 and provides the Government's planning policies for England and sets out how these are expected to be applied.
- 4.2.13. The NPPF states that for Development Plans and emerging policies, due weight according to their degree of consistency with the NPPF (paragraph 215) should be given. The NPPF is clear that the decision-taker may also give weight to relevant policies in emerging plans according to the stage of preparation, the extent of unresolved objections, and the degree of consistency of the policies to the NPPF (paragraph 216).
- 4.2.14. The NPPF highlights 12 Core Planning Principles which should underpin decision-taking (paragraph 17). These core Planning Principles, all of which are of relevance to EWR2, are as follows:
- be genuinely plan-led;
 - be a creative exercise in finding ways to enhance and improve the places in which people live their lives;
 - proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs;
 - always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings;
 - take account of the different roles and character of different areas, promoting the vitality of our main urban areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities;
 - support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change, and encourage the reuse of existing resources;
 - contribute to conserving and enhancing the natural environment and reducing pollution;
 - encourage the effective use of land by reusing land that has been previously developed;

- promote mixed use developments, and encourage multiple benefits from the use of land in urban and rural areas;
 - conserve heritage assets in a manner appropriate to their significance;
 - actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable; and
 - take account of and support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs.
- 4.2.15. A fundamental principle of the NPPF (paragraph 14) is the presumption in favour of sustainable development, which states that development proposals which accord with the Development Plan should be approved without delay. The NPPF sets out national policy on a number of areas, against which proposals are to be considered. Those of relevance to EWR2 are summarised below.
- 4.2.16. [Section 1: Building a strong, competitive economy](#) – sets out the Government’s commitment to secure economic growth and to ensure that the planning system encourages sustainable growth. It emphasises that significant weight should be placed on the need to support economic growth (paragraph 19). It requires planning policies to seek to address potential barriers to investment, including a lack of infrastructure, and identify areas for infrastructure provision (paragraph 21).
- 4.2.17. [Section 4: Promoting sustainable transport](#) – emphasises the important role that transport policies can play in facilitating sustainable development and highlights that the transport system needs to be balanced in favour of sustainable modes (paragraph 29). It encourages solutions that reduce greenhouse gas emissions and reduce congestion (paragraph 30) and states that Plans should protect and exploit opportunities for the use of sustainable transport modes for the movement of goods and people (paragraph 35).
- 4.2.18. [Section 7: Requiring good design](#) - states the importance which the Government attaches to the design of the built environment and how this should contribute positively to making places better for people (paragraph 56). It is considered important to plan positively for the achievement of high quality and inclusive design for all development (paragraph 57). Securing this involves not just aesthetic considerations, but addressing the connections between people and places and the integration of new development into the natural, built and historic environment (paragraph 61).
- 4.2.19. [Section 8: Promoting Healthy Communities](#) – paragraph 75 seeks to protect PRoWs and access. It encourages local authorities to identify opportunities to enhance existing facilities.

- 4.2.20. [Section 10: Meeting the challenge of climate change, flooding and coastal flooding](#) – highlights the key role that planning can have in reducing greenhouse gas emissions, and minimising impacts on climate change (paragraph 93). New development should avoid increased vulnerability to the impacts arising from climate change and that any risks should be managed through appropriate adaptation measures (paragraph 99). In addition, the NPPF seeks to avoid inappropriate development in areas at risk of flooding, but where it is necessary ensure that it is safe without increasing flood risk elsewhere (paragraph 100).
- 4.2.21. [Section 11: Conserving and enhancing the natural environment](#) - emphasises the need for the planning system to contribute to and enhance the natural environment (paragraph 109). Planning policies and decisions should encourage the effective use of land by re-using land that has been previously developed, provided that it is not of high environmental value (paragraph 111). Impacts on biodiversity should be minimised and where possible development should provide net gains in biodiversity (paragraph 109).
- 4.2.22. [Section 12: Conserving and enhancing the historic environment](#) - recognises that heritage assets are an irreplaceable resource which should be the subject of a positive strategy for their conservation and enjoyment (paragraph 126). In determining applications, local planning authorities should ensure that applications are assessed for their impact on heritage assets and seek to avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposal (paragraph 129).

4.3. Local Planning Policy

- 4.3.1. This sub-section of the route is located within the administrative boundary of Central Bedfordshire Council. Local planning policy documents of relevance to this sub-section are:
- Core Strategy and Development Management Policies (North Bedfordshire);
 - Site Allocations (North Bedfordshire); and
 - Mid-Bedfordshire Local Plan (Saved Policies).

Core Strategy and Development Management Policies (North Bedfordshire)

- 4.3.2. Central Bedfordshire Council adopted the Core Strategy and Development Management Policies document in November 2009 which sets out the spatial strategy and policy framework for the north of the district against which development proposals are to be assessed.
- 4.3.3. [Policy CS4: Linking Communities](#) – Accessibility and Transport – seeks to facilitate the delivery of strategic transportation schemes, including rail improvements, identified in the Local Transport Plan. The policy seeks to maximise the capacity of the existing transport network and where this is insufficient provide new such infrastructure.
- 4.3.4. [Policy CS9: Providing Jobs](#) – outlines the Core Strategy objective to deliver a minimum of 17,000 net additional jobs in the district up to 2026.

- 4.3.5. **Policy CS13: Climate Change** – supports development that incorporates measures to take account of climate change.
- 4.3.6. **Policy CS14: High Quality Development** – requires development to be of the highest quality by respecting local context, creating an attractive public realm, ensuring accessibility and reducing opportunities for crime and anti-social behaviour.
- 4.3.7. **Policy CS15: Heritage** – commits to protect, conserve and enhance the districts heritage assets. This includes Listed Buildings, Scheduled Ancient Monuments, Conservation Areas, Registered Parks and Gardens, and archaeology, including their setting.
- 4.3.8. **Policy CS16: Landscape and Woodland** – seeks to protect, conserve and enhance the natural environment, including the Chilterns Area of Outstanding Natural Beauty, areas of valued landscape and woodlands including ancient and semi-natural woodland, hedgerows and veteran trees.
- 4.3.9. **Policy CS17: Green Infrastructure** – seeks a net gain in green infrastructure through the protection and enhancement of assets and provision of new green spaces as set out in the Strategic, Mid Bedfordshire and Parish Green Infrastructure Plans. It also requires development to contribute towards the delivery new green infrastructure and the management of a linked network of new and enhanced open spaces and corridors.
- 4.3.10. **Policy CS18: Biodiversity and Geological Conservation** – supports the protection and enhancement of biodiversity and geological designations, including SSSI's, County Wildlife Sites, Geological and Geomorphological Sites, along with local priority habitats and species identified in the Local Biodiversity Action Plan.
- 4.3.11. **Policy DM3: High Quality Development** – sets out criteria for all new development to ensure high quality design, including respect the amenity of surrounding properties.
- 4.3.12. **Policy DM14: Landscape and Woodland** – states the application are assessed against the impact the proposed development will have on the landscape. The highest level of protection will be given to the landscape of the Chilterns AONB. Proposals that have an unacceptable impact on landscape are to be refused.
- 4.3.13. **Policy DM15: Biodiversity** – seeks to protect habitats and species. Where development is within, adjacent to or in close proximity to designated sites, it is expected that steps will be taken to secure the protection of such animals and plants, or otherwise appropriate mitigation identified.

Site Allocations (North Bedfordshire)

- 4.3.14. The Council adopted the Site Allocations document in April 2011 which allocated land for new housing and employment land development.
- 4.3.15. **Policy E1: Safeguarded Key Employment Sites** – identifies a number of key employment sites that are to be safeguarded for such use. The following sites are adjacent to the line and have been identified as a Key Employment Site:
- Brogborough – Prologis Park;

- Millbrook - Millbrook Paving Ground; and
- Husborne Crawley – Crawley Crossing.

Mid-Bedfordshire Local Plan (Saved Policies)

- 4.3.16. There are no saved policies in the Mid-Bedfordshire Local Plan that are relevant to the proposed development.

4.4. Neighbourhood Planning

Marston Moretaine Neighbourhood Plan

- 4.4.1. The route travels within the designated Neighbourhood Plan Area of Marston Moretaine. The Marston Moretaine Neighbourhood Plan Area was designated in March 2014. However, at this stage, preparation of the Neighbourhood Plan is at an early stage and a draft version has yet to be published. As such, there are no planning policies at present against which this sub-section should be considered.

Aspley Guise Neighbourhood Plan

- 4.4.2. The route also travels through the Neighbourhood Plan Area for Aspley Guise, which was designated in March 2016. However, similar to the Marston Moretaine Neighbourhood Plan, preparation of the Neighbourhood Plan is at an early stage and a draft version has yet to be published. As such, there are no planning policies at present against which the sub-sections should be considered.

4.5. Local Transport Policy

Local Transport Plan 3: The Central Bedfordshire Council Transport Strategy

- 4.5.1. The Local Transport Plan (LTP) sets out a long term framework for investment and strategic objectives for improvement in the transport network across Central Bedfordshire. The LTP supplements the spatial planning policies in the Core Strategy and Local Plan, as well as national planning policies.
- 4.5.2. The LTP highlights the intention of Central Bedfordshire Council to continue to support the EWR Consortium in delivering EWR2.

5. Planning Considerations

- 5.1.1. Section 38 (c) of The TCPA 1990 confirms that planning applications should be determined in accordance with the Development Plan unless material circumstances indicate otherwise. In this section, the planning issues raised by the proposed development are considered against the prevailing planning policy framework.
- 5.1.2. Having established the context within the Central Bedfordshire sub-section, the proposed development and existing planning policy context, the main material considerations raised by EWR2 are considered within the remainder of this section under the following headings:
- Sustainable Development;
 - Land Use and Agriculture;
 - Cultural Heritage;
 - Air Quality;
 - Ecology;
 - Noise and Vibration;
 - Geology, Soil and Land Contamination;
 - Landscape and Visual Impacts;
 - Water Quality and Flood Risk; and
 - Traffic and Transport.
- 5.1.3. With the exception of 'Sustainable Development', the above headings relate to the individual chapters of the Draft ES. Each Draft ES chapter provides a detailed assessment of the impact of the scheme on the above environmental topics. They also provide a detailed discussion of the existing environmental baseline in the Central Bedfordshire sub-section and also identify mitigation measures appropriate to any adverse effects. This chapter of the Planning Statement provides a high level summary of the findings of each Draft ES chapter to a level appropriate to assessment performance against planning policy objectives. Therefore, reference should be made to the Draft ES for detailed content on each environmental topic.

5.2. Sustainable Development

- 5.2.1. EWR2 would make a valuable contribution to achieving the objectives of national and local planning policies and strategies. The scheme would deliver a number of social and economic benefits. Firstly it would deliver a strategic link between key economic centres and would support the ambition of local authorities for substantial economic growth. The scheme would support new commercial and residential development key centres along the route. It would make a valuable contribution towards reducing congestion on the local road network and would improve connectivity between communities. Additionally, the development of new crossings over the railway line and works to existing structures would significantly improve safety for vehicles and PRow users.
- 5.2.2. In this context it is clear that the scheme would achieve the objectives of national and local planning policies. At a national level, the objectives for the rail network set out in the NPS would be achieved through facilitating a reliable route for commuters to the workplace and other communities, as well as increasing business and leisure travel. Additionally, the route would support the transport of freight across the region.
- 5.2.3. As referenced in Chapter 4, the core principles of the NPPF seek to support sustainable economic development to deliver homes, commercial units, infrastructure and thriving local places, along with making the fullest possible use of public transport. The scheme would contribute towards achieving these objectives. It would also support the delivery of policy objectives provided in Section 1 and Section 4 of the NPPF, in particular through addressing an evident barrier to investment in the region through the existing lack of suitable infrastructure.
- 5.2.4. At a local level, the scheme would deliver the objective of Central Bedfordshire Core Strategy and Development Management Policies DPD Policies CS4 and CS9, as well as the Local Transport Plan 3: The Central Bedfordshire Council Transport Strategy.
- 5.2.5. The EWR Alliance has adopted a Net Positive biodiversity target for the entire EWR2 scheme. A Biodiversity Net Positive assessment of the scheme is provided in Technical Appendix 9.19 of the Draft ES. Through the achievement of a net positive biodiversity target, the scheme would achieve the objective of biodiversity enhancement sought in NPPF Section 11 (paragraph 109) and Central Bedfordshire Core Strategy and Development Management Policies DPD Policies CS16 and CS18.
- 5.2.6. Additionally, EWR2 includes the closure of a number of existing level crossings and diversion of PRowS over the railway line via proposed new overbridges and footbridges. Such work would ensure that access over the railway line via all PRowS would remain open, as well as significantly improving the safety of users. In this regard, the scheme delivers the objective of NPPF paragraph 75 and Central Bedfordshire Core Strategy and Development Management Policies DPD Policy CS17.

5.3. Land Use and Agriculture

- 5.3.1. An assessment of the impact of the scheme within the Central Bedfordshire sub-section on existing land uses and agriculture is discussed in Chapter 6 of the Draft ES.
- 5.3.2. The scheme as a whole would require both temporary and permanent land take, most of which agricultural land. Temporary land take is required during the construction phase for compounds, storage and access, whilst permanent land take is required for the scheme itself.
- 5.3.3. The scheme in the Central Bedfordshire sub-section would result in an approximate total temporary land take of 49.72ha and permanent land take of 2.09ha. The majority of temporary land take would be agricultural land. Other temporary land take would include a small part of a garden at Crossing Cottage, Berry Lane whilst there is potential for access disruption at other residential properties. Permanent land take would be required at Chuffer Cottage, Marston Road in Lidlington and an adjacent building, both of which would require demolition.
- 5.3.4. No significant effects are predicted on land quality is predicated as a result of temporary and permanent agricultural land take. The scheme would result in the temporary and permanent loss of 0.33ha of Grade 2 agricultural land, which is considered in the Draft ES to be of negligible significance. Whilst the scheme would result in the temporary loss of over 20ha of medium sensitivity Sub-grade 3a land, this is assessed as being of minor adverse significance. There would also be a small loss of Sub-grade 3b and Grade 4 land, the impact from which is not considered to be significant.
- 5.3.5. It is proposed that following construction works, the scheme would restore temporary land take to its previous condition. Construction working areas would be managed so that access to residential properties, community facilities and commercial enterprises are maintained, whilst disturbance to such receptors would be managed. With regards to agricultural land, construction areas would be fenced off to prevent access into adjacent land and arrangements would be put in place to ensure farm access is maintained during construction.
- 5.3.6. There is potential for temporary amenity impact on residential properties during the construction phase. This would represent some conflict with NPPF paragraph 17 and Central Bedfordshire Core Strategy and Development Management Policies DPD Policy DM3. However, it is important to note that such impact would not be permanent and through appropriate mitigation measures the significance of such impact would be substantially reduced and greater compliance with these policies achieved. The long term residual effects on agricultural land quality would be limited to the permanent loss of agricultural land. As permanent agricultural land take within the Central Bedfordshire sub-section, and across the scheme as a whole, would be small, no significant effects on agricultural land quality are predicted as a result of the scheme. In this context, the permanent impact of the scheme is fully compliant with the NPS and NPPF Section 3

5.4. Cultural Heritage

- 5.4.1. An assessment of the impact of the scheme within the Central Bedfordshire sub-section on cultural heritage assets is discussed in Chapter 7 of the Draft ES.
- 5.4.2. The Draft ES identifies three Conservation Areas within the Central Bedfordshire sub-section at Aspley Guise, Aspley Heath and Husborne Crawley (Church End). There are two Scheduled Monuments and six Grade I and Grade II* Listed Buildings within 1km of the route. With regards to Grade II Listed Buildings, 23 were identified within the Aspley Guise Conservation Area, nine within the Husborne Crawley Conservation Area and one within the Aspley Heath Conservation Area and 11 outside of a Conservation Area but within 1km of the route. In addition, 58 non-designated assets were identified within 250m of the route. The Draft ES did not identify any Registered Parks and Gardens within this sub-section.
- 5.4.3. Against this baseline, the Draft ES demonstrates there would be no significant effects on the setting of designated historic assets within the Central Bedfordshire sub-section. However, prior to mitigation the scheme would have a significant effect on six non-designated buried archaeological remains.
- 5.4.4. Mitigation measures to reduce the significant effect on non-designated assets are identified in the Draft ES. As a result of implementing the identified mitigation measures, the scheme would have no residual significant effect on buried archaeological remains.
- 5.4.5. In the context of the above, the scheme within the Central Bedfordshire sub-section is in full compliance with national and local planning policies related to the historic environment. The scheme is fully compliant with the NPS, NPPF Section 12 and Central Bedfordshire Council's Core Strategy and Development Management Policies DPD Policy CS15.

5.5. Air Quality

- 5.5.1. An assessment of the impact of the scheme within the Central Bedfordshire sub-section on air quality is discussed in Chapter 8 of the Draft ES. However, it should be noted that the ES has not assessed the operational traffic impacts of EWR2.
- 5.5.2. There are no Air Quality Management Areas within or adjacent to the study area (350m from construction activities and 100m from haulage roads) in the Central Bedfordshire sub-section. The ES assessment found that air quality in Central Bedfordshire is currently good with no monitored exceedances or risk of exceedances of air quality objectives in respect of Nitrogen Dioxide and PM₁₀.
- 5.5.3. The assessment identifies that although diesel rail locomotives would be in operation, no significant effects are likely to result from emissions, which would be partially offset by a decrease in emissions from road transport. Likewise, no significant impacts would arise from dust deposition or construction traffic.
- 5.5.4. The air quality assessment demonstrates that the part of the scheme within the Central Bedfordshire sub-section, and as a whole, would have no significant effect on air quality. In this context, it is demonstrated that the scheme is fully compliant with the NPS, NPPF Section 11 and Central Bedfordshire Core Strategy and Development Policies DPD Policies CS13 and DM3.

5.6. Ecology

- 5.6.1. An assessment of the impact of the scheme within the Central Bedfordshire sub-section on Ecology is discussed in Chapter 9 of the Draft ES.
- 5.6.2. The Draft ES identifies, within 5km of the route, designated sites relating to; one National Nature Reserve (NNR), four National SSSIs, four Local Nature Reserve (LNR), 14 County Wildlife Sites (CWS) and one Roadside Nature Reserve (RNR).
- 5.6.3. The Draft ES identifies that the Central Bedfordshire sub-section is dominated by intensive agricultural land between Woburn Sands and Lidlington. Within this landscape the agricultural fields are typically large and demarcated by typically straight hedgerows which are intensively managed. Positioned to the north of Lidlington are large areas of former industrial land now reverting to semi-natural habitat with several large lakes present. A particular focus for these habitats is in the Marston Vale Millennium Country Park and south of the village of Stewartby. Large expanses of woodland are located to the south of Woburn Sands and to the south of Lidlington.
- 5.6.4. Within these landscapes, the Draft ES identifies habitat types relating to woodland and scrub, hedgerows, grassland, watercourses, ponds, lakes and wetlands, arable/cultivated land and urban areas, all located within or in close proximity to the route.
- 5.6.5. The Draft ES recognises that there are no significant operational ecological effects on designated sites but the proposed scheme may impact upon other sensitive or protected species.
- 5.6.6. The Draft ES identifies that 11 barn owl nesting ranges overlap with the proposed scheme with two collision hot-spots identified, the increased train speed and frequencies once the scheme is operational would likely result in an increased risk of collision, especially at the collision hot-spots. Proposed works may also result in disturbance to a single barn owl nest, close to the proposed scheme. Mitigation is proposed through liaison with landowners within the vicinity whilst the residual effect of a loss of one barn owl nest would be reduced to a level that is not significant.
- 5.6.7. The proposed construction works associated with the scheme would require the removal of a habitat which is suitable for Great Crested Newts, reptiles and notable species of invertebrates. The proposed scheme would provide mitigation through the creation of new freshwater habitats to support Great Crested Newt populations.
- 5.6.8. The construction of the Marston Road overbridge would require the demolition of a building used as a roost by bats, resulting in the loss of the roost. The proposed scheme would include mitigation measures to compensate for the loss of Bat day/transitional roosts through the creation of replacement roosts.
- 5.6.9. The scheme would also require the construction of a compound adjacent to a ditch, which would require vegetation upon the bank to be cleared. This would likely cause hydrological changes from increased erosion and sediment reaching the watercourse. Impact upon the aquatic habitat and fish species would be limited as a result of mitigation.

- 5.6.10. The Draft ES recognises that there is no requirement for Otter or Water Vole mitigation and no badger setts were recorded within the proposed scheme (or impacts to their foraging).
- 5.6.11. The mitigation techniques reduce the operational ecological effects to a level that is not significant, except for those relating to barn owls. The Draft ES predicts that there would be no adverse operational ecological effects on habitats in the Central Bedfordshire sub-section and accordingly the scheme would comply with the requirements of the NPS, NPPF Section 11, Central Bedfordshire Council Core Strategy and Development Management Policies DPD Policy CS18 and Policy DM15.

5.7. Noise and Vibration

- 5.7.1. An assessment of the noise and vibration impact of the scheme within the Central Bedfordshire sub-section on sensitive receptors is discussed in Chapter 10 of the Draft ES. It should be noted that the ES has not assessed the impacts associated with traffic noise.
- 5.7.2. At present, noise levels are typically dominated by traffic on the road networks. Measured levels typically fluctuate depending on the time of day due to the morning and afternoon rush hours, and train movements. The Draft ES establishes that train movements are also more frequent during the busier rush hour periods. The level of audible noise from train movements differed at various locations along the route due to distance, screening, topography and existing buildings and structures.
- 5.7.3. Activities during the construction phase of the scheme would result in some degree of noise disturbance at nearby receptors. However, it is important to note that such impact would be temporary. Mitigation measures to reduce noise during the construction phase have been identified. A number of measures to manage noise generated during construction activities would be agreed with the local authority and set out in a draft Code of Construction Practice. Through implementation of mitigation measures, such as phased construction activities and acoustic screening in appropriate locations, it is anticipated that the scheme would meet with appropriate noise thresholds at all sensitive receptor locations during the construction phase.
- 5.7.4. The Draft ES identifies that no significant noise effects would occur within this sub-section during the operation of the scheme. In this context and given there are no proposed rail infrastructure changes within the Central Bedfordshire sub-section, no mitigation is proposed. Impacts arising from vibration during the operation of the scheme is anticipated to occur at a number of locations during the operation the scheme.

- 5.7.5. The NPS and NPPF (paragraph 123) highlight that it is important to recognise that new development will often create some noise. The key consideration is whether any noise impact would result in significant adverse impact on health and quality of life. The Draft ES identifies that the scheme would not result in significant noise impact within the Central Bedfordshire sub-section. Whilst vibration impact is predicated to occur at some locations, it is considered that such impact would not result in a significant adverse impact on health and quality of life. As such the scheme is considered to comply with the NPS and NPPF, as well as Central Bedfordshire Core Strategy and Development Management Policies DPD Policy DM3.

5.8. Geology, Soil and Land Contamination

- 5.8.1. An assessment of the impact of the scheme within the Central Bedfordshire sub-section on geology, soils and land contamination is discussed in Chapter 11 of the Draft ES.
- 5.8.2. The Draft ES determines that no significant impacts would arise during the construction phase of the scheme within the Central Bedfordshire sub-section in respect to exposure of contaminants to nearby residents, built environment receptors, pollution to surface water courses and pollution of groundwater.
- 5.8.3. In respect to the operational phase of the scheme, mitigation measures have been incorporated into the design of the scheme to reduce impact and as a result it is considered that no significant impacts would occur. The scheme is considered to result in moderate/low risk for ground gas from surrounding historic landfills impacting on nearby properties. Other potential impacts, such as exposure of contaminants to nearby residents, pollution of surface water courses and pollution of groundwater are considered to be either very low risk or low risk.
- 5.8.4. In terms of the risks to geology as a resource within this Sub-section no local geology sites or 'Really Important Geology Sites' (RIGs) are located within 500m of the scheme.
- 5.8.5. The Draft ES demonstrates that through the incorporation of mitigation measures into the design of the scheme, it would result in no significant residual impact with respect to geology, soil and land contamination within the Central Bedfordshire sub-section and across the entire route. In this context, it is demonstrated that the scheme is fully compliant with the NPS and NPPF Section 11.

5.9. Landscape and Visual Impacts

- 5.9.1. A full Landscape and Visual Assessment of the impact of the scheme within the Central Bedfordshire sub-section on landscape and visual receptors is discussed in Chapter 12 of the Draft ES.
- 5.9.2. Within the Central Bedfordshire sub-section there are a number of statutory designations representing areas that are potentially sensitive to the scheme. Such designations include Scheduled Monuments, SSSIs, Conservation Areas, Listed Buildings, Tree Preservation Order, the Aspley Guise Green Belt, one Registered Parks and Garden and Ancient Woodlands. There are five Landscape Character Areas within the Central Bedfordshire sub-section, along with a number of viewpoints within from sensitive visual receptors that have the potential to be affected by the scheme.
- 5.9.3. The Landscape and Visual Impact Assessment (LVIA) finds that the adverse impacts on landscape would be mitigated by embankment design and planting to help integrate the new overbridge at Marston Road into the local landscape setting. Overall effects on landscape reduce from large or moderate adverse at Construction and Year 1 to slight adverse or neutral by Year 15. The adverse impacts on the visual amenity of residents and recreational walkers would be mitigated by planting to help screen the new overbridge and trains on the railway. Overall effects on visual amenity would reduce from very large to neutral at Construction and to moderate adverse to neutral by Year 1 once mitigation has been implemented and established.
- 5.9.4. Following mitigation, the LVIA identifies that there would be residual effects on three visual receptors in Lidlington. Whilst tree and shrub planting would help screen the new overbridge there would be a discernible deterioration in the view from these locations in the vicinity of the village.
- 5.9.5. The LVIA finds that the scheme within the Central Bedfordshire sub-section would have no significant impact on landscape and is therefore compliant with the NPS, NPPF Section 11 and Central Bedfordshire Core Strategy and Development Management Policies DPD Policies CS16 and DM14. Whilst the majority of visual receptors within the sub-section would not be impacted significantly, the view from three receptors within Lidlington would be affected. However, it is considered that such impact would not result in visual intrusion or loss of amenity for these properties and as such, compliance with national and local planning policy is achieved.

5.10. Water Quality and Flood Risk

- 5.10.1. An assessment of the impact of the scheme within the Central Bedfordshire sub-section on flood risk and the water environment is discussed in Chapter 13 of the Draft ES.
- 5.10.2. The route within the Central Bedfordshire sub-section crosses or is located in close proximity to a large number of surface water features including ordinary watercourses, drains, lakes and ponds. A review of the Environment Agency (EA)'s Flood Map for Planning indicated that the vast majority of the scheme within the CBC sub-section is located within the low risk Flood Zone 1. The most significant fluvial flood risk is associated with the Broughton Brook to the east of Junction 13 of the M1 Motorway, with land either side of the scheme identified to be located in Flood Zone 3. Land within and to the north of Stewartby Lake is also identified to be located within the medium risk Flood Zone 2 and high risk Flood Zone 3.
- 5.10.3. A review of the EA's Risk of Flooding from Surface Water map indicated a number of overland flow routes within the vicinity of the scheme. The most notable of these is to the east of Aspley Guise Station. Ponding of surface water was also indicated at a number of locations adjacent to the eastern embankment of the scheme between the M1 Motorway and Stewartby Lake.
- 5.10.4. The assessment identifies a number of proposed works that have the potential to temporarily impact on the water quality of water features during construction, as well as flood risk during operation. This includes the new road at Berry Lane, which has the potential to impact on a ditch which travels alongside the road, as well as nearby residential properties through increased surface water run-off. The proposed new overbridge at Marston Road, Lidlington and the construction of access tracks may also impact on a minor watercourse located approximately 65m to the north, along with nearby residential properties through surface water run-off. However, it is anticipated that the potential increase in surface water runoff generated in these areas would be less than 25% when compared to the current situation.
- 5.10.5. Additionally, a construction compound located between Bedford Road and Junction 13 of the M1 is located in the floodplain associated with Broughton Brook and therefore construction activities have potential to result in loss of floodplain and increase the risk of flooding.
- 5.10.6. A Code of Construction Practice (CoCP) has been prepared, a draft of which forms an appendix to the Draft ES for consultation. The CoCP includes mitigation measures to protect the water environment during the construction phase and would be reviewed regularly. For construction compounds and areas of the proposed works located within areas deemed to be at risk of fluvial and surface water flooding, a Flood Emergency Response Plan will be prepared for implementation during the construction phase.
- 5.10.7. With regards to the operational phase, Chapter 13 identifies that the majority of potential adverse impacts on the water environment can be mitigated through appropriate design of the scheme. General mitigation principles that would be implemented are summarised as follows:
 - If construction in the existing floodplain is unavoidable, compensation of lost flood storage capacity on level for level basis would be provided;

- Design footbridges that are required to be located within the existing floodplain as light, open structures with a small footprint to minimise obstruction to flows during flood events;
 - Design new watercourse crossings to have appropriate capacity so as to not increase flood risk elsewhere;
 - Retain the capacity of existing culverts and bridge openings so as to not increase the risk of flooding in the area or elsewhere;
 - Avoid the diversion or culverting of watercourses. If this is unavoidable, consult with the EA and local authority to agree design and mitigation requirements;
 - Provide appropriate drainage systems in areas identified as being susceptible to flooding from surface water;
 - Surface water runoff from new stations, platforms, extensions to existing platforms, car parks, sidings or other potentially polluting areas would be drained via appropriate pollution prevention measures before discharge to the receiving water environment;
 - Surface water runoff from new impermeable surfaces would be drained via appropriate attenuation measures to limit runoff; and
 - Surface water that drains from track areas where this is not from station or sidings locations would percolate through the gravel track ballast to provide natural treatment prior to overland flow to an adjacent surface water feature or infiltration to ground.
- 5.10.8. In respect of water quality, the Draft ES identifies, in general, that construction activities have the potential to result in adverse impact. However, implementation of mitigation measures to avoid polluting water courses would mean no significant effects would occur.
- 5.10.9. Chapter 13 of the Draft ES demonstrates that through the implementation of the above identified mitigation measures, the part of the scheme within the Central Bedfordshire sub-section, and as a whole, would have no significant effect on flood risk and the water environment. In any case, the 'Technical Guidance on Flood Risk' (as referenced in the NPPF), makes it clear that essential infrastructure is appropriate and acceptable in Flood Zone 3 provided flood risk is not increased elsewhere. In the context of the Draft ES findings, in particular the confirmation that flood risk would not be increased elsewhere, it is demonstrated that the scheme is fully compliant with the NPS, NPPF Section 10 and Central Bedfordshire Council's Core Strategy and Development Management Policies DPD Policy CS13.

5.11. Traffic and Transport

- 5.11.1. An assessment of the impact of the scheme within the Central Bedfordshire sub-section on traffic and transport is discussed in Chapter 14 of the Draft ES. However, a full impact assessment arising from traffic and transport has not been reported in the Draft ES at this stage.
- 5.11.2. The highway network within the Central Bedfordshire sub-section includes three road overbridges. There are also seven existing highway level crossings within the sub-section, some of which would be closed as part of the scheme and replaced by new highway overbridges. The closure of level crossings would result in significant safety benefit for users of the highway network.
- 5.11.3. The Draft ES identifies that construction compounds would generate traffic during the construction phase and have the potential to affect the road network during this time. Such traffic would consist of HGVs and car trips generated by staff. Operational changes to traffic flows at Ridgmont Station due to changes in passenger demand as a result of the scheme would also occur.
- 5.11.4. The assessment of construction and operational effects from traffic and transport changes within the Central Bedfordshire sub-section is ongoing and has yet to be established. Consultation with Local Highway Authority stakeholders with regards to traffic projections and methodology is currently being undertaken. Once the full assessment is available in the final ES, its findings and an assessment of performance against planning policy will be included in the final Planning Statement.

6. Conclusion

- 6.1.1. The EWR2 scheme, as proposed at this stage, has been considered against the national and local planning policy framework of Central Bedfordshire Council.
- 6.1.2. It is clear that the scheme would deliver significant economic and social public benefits and presents an opportunity to make a substantial contribution to achieving the strategic objectives of national and local planning policies. It would do so through the creation of a strategic link between economic centres, facilitating economic growth, reducing congestion of the highway network, providing a reliable rail route for commuters, ensuring net gain in biodiversity and enhancing the local PRow network.
- 6.1.3. The current findings of the Draft ES identify that the scheme would not result in significant adverse impacts in relation to the main material considerations and environmental topics within the Central Bedfordshire sub-section (notwithstanding that a full assessment has not been reported in the Draft ES at this stage). The majority of potential residual impacts arising from the scheme can be mitigated through measures identified in the Draft ES to a level that is not significant.
- 6.1.4. It is anticipated that there would be some residual impact within the Central Bedfordshire sub-section limited to temporary amenity impact at residential properties arising from construction land take, vibration and the viewpoints from three receptors within Lidlington. However, it is considered that such impact would not be of a level whereby the objectives of national and local planning policies are compromised. In any case, the significant public benefits that would be brought about by the scheme would demonstrably outweigh any less than significant impacts.
- 6.1.5. Section 38 (c) of the TCPA 1990 confirms that planning applications should be determined in accordance with the Development Plan unless material circumstances indicate otherwise. This is reiterated in NPPF paragraph 14 which provides a presumption in favour of sustainable development, stating that development proposals which accord with the Development Plan should be approved without delay.
- 6.1.6. The scheme must therefore be considered in the context of the TCPA 1990 and NPPF paragraph 14. Using the current findings of the Draft ES, it is considered that the scheme within the Central Bedfordshire sub-section, and as a whole, is currently in full compliance with national planning policies and the local Development Plan, therefore representing sustainable development in the context of planning policy.
- 6.1.7. Findings of this draft Planning Statement may be subject to change at the time of the TWAO submission as the ES is updated and aspects of the proposed development amended.