

TRANSPORT AND WORKS ACT 1992

TRANSPORT AND WORKS (INQUIRIES PROCEDURE) RULES 2004

APPLICATION FOR THE PROPOSED CAMBOURNE TO CAMBRIDGE ORDER

REFERENCE: TWA/24/APP/03

STATEMENT OF CASE

ON BEHALF OF EAST WEST RAILWAY COMPANY LIMITED

1 Introduction

- 1.1 This Statement of Case is submitted on behalf East West Railway Company Limited ('EWR Co') in relation to the application for the Cambourne to Cambridge Transport and Works Act Order.
- 1.2 EWR Co was established in 2017 by the Department for Transport to deliver East West Rail ('EWR'), a once in a generation opportunity to connect communities between Oxford and Cambridge with jobs, education and opportunities.
- 1.3 EWR Co strongly supports the principle of the proposed Cambourne to Cambridge ('CtoC') project. The CtoC project will enhance public transport and facilitate sustainable development at key strategic development sites within the Greater Cambridge region, outcomes which are very much aligned with the objectives of EWR.
- 1.4 However, the proposed CtoC busway crosses the planned route of EWR on land that the Secretary of State has safeguarded for the new railway. EWR Co therefore submitted a holding objection to the CtoC application to allow suitable arrangements to be put in place to manage the interface between the two projects.

2 East West Rail

- 2.1 EWR is a project of national significance which aims to deliver much-needed railway connection for communities between Oxford and Cambridge by:
 - (a) Upgrading an existing section of railway between Oxford and Bicester
 - (b) Bringing back a section of railway between Bicester and Bletchley
 - (c) Refurbishing existing railway between Bletchley and Bedford
 - (d) Building brand new railway infrastructure between Bedford and Cambridge
- 2.2 Services will be introduced in three connection stages:

- 2.2.1 **Connection Stage 1** enables services to run between Oxford and Milton Keynes. The first part of this stage, the link between Oxford and Bicester, is already in place. The work to extend services further north and east to Bletchley and Milton Keynes was given planning consent in 2020 by an order made by the Secretary of State under the Transport and Works Act 1992. Construction is well underway and passenger services will start running from 2025.
- 2.2.2 **Connection Stage 2** work is ongoing to bring forward services between Oxford and Bedford from 2030. Planning consent for these works was also granted by the Transport and Works Act order in 2020.
- 2.2.3 **Connection Stage 3** would complete East West Rail and enable passenger services to operate between Oxford and Cambridge via Bletchley and Bedford.
- 2.3 To deliver Connection Stage 3, EWR Co will apply for a development consent order (DCO) under the Planning Act 2008 which (if made) would authorise construction of the new railway between Bedford and Cambridge as well as the other works and upgrades to the existing railway between Oxford and Bedford needed to deliver the full proposed East West Rail service.

Benefits of East West Rail

- 2.4 The Benefits of East West Rail are:
 - 2.4.1 Make access easier to other parts of the UK - East West Rail would connect to most of the UK's north-south main lines making it easier to get to the rest of the UK, opening up new journeys for local communities.
 - 2.4.2 Provide fast, easy travel across the region for everyone - East-west public transport is currently limited to a coach service, which takes 1 hour 50 minutes between Oxford and Milton Keynes at peak times, and the bus journey between Bedford to Cambridge, which takes up to 1 hour 30 minutes. With East West Rail, these journey times could be cut to under 45 minutes from Oxford to Milton Keynes and could take 35 minutes between Bedford and Cambridge.
 - 2.4.3 Bring more jobs within reach of local people - East West Rail would bring more people within commuting distance of high-quality jobs in the region, making it easier to get to employment centres whilst also boosting jobs in local areas.
 - 2.4.4 Reduce congestion on local roads - By offering rail travel as an alternative, East West Rail would help to ease traffic on local roads and provide a reliable, fast and more sustainable public transport option for people. The railway also creates the potential to reduce the number of lorries going through the area's towns and villages.
 - 2.4.5 A greener way to travel - East West Rail aims to be a net zero passenger railway. The railway would reduce local people's reliance on private cars and would lead to cleaner air and fewer emissions.
 - 2.4.6 Open new areas for businesses to grow - Growth in Oxford and Cambridge is constrained. Connecting them with the fast-growing and high potential towns and cities in between, like Milton Keynes and Bedford, would make places more appealing for people wanting to start and grow all types of businesses.

- 2.4.7 Expand the labour market locally – East West Rail would help attract and retain the best talent in the region expanding the number of people within commuting distance of high-quality jobs, giving the region's businesses and innovators access to a much bigger pool of people to hire from as they grow.
- 2.4.8 Open up new areas for businesses to grow in the region - East West Rail will bring businesses closer to their supply chains, research sectors, competitors and other sectors. This provides a unique opportunity in the region and the UK for businesses to develop in dynamic ecosystems and clusters.
- 2.5 EWR Co undertook a non-statutory consultation from November 2024 to January 2025 on its proposals for the DCO application which have been developed following feedback from previous consultations undertaken in 2019 and 2021, as well as further technical design work.
- 2.6 EWR Co will continue to develop and refine its proposals and will present these at a statutory consultation before the DCO application is finalised.

3 Safeguarding

- 3.1 On 14th November 2024 the Secretary of State gave safeguarding directions in respect of the land required for EWR in exercise of the powers conferred by articles 18(4), 31(1) and 34(8) of the Town and Country Planning (Development Management Procedure) (England) Order 2015. The safeguarding directions protect the land to which the proposed DCO application relates from conflicting development proposals.
- 3.2 The directions require the relevant local planning authorities to consult EWR Co on applications for planning permission that fall within the safeguarded area. Such applications must not be determined before the expiry of the period for consultation. Local planning authorities are not required to follow any recommendations made by EWR Co, but if they do not accept the recommendation, they are required to notify the Secretary of State for Transport.
- 3.3 The application for the CtoC Order includes a request for a direction that planning permission be deemed to be granted for development under section 90(2A) of the Town and Country Planning Act 1990. Although this does not constitute an application for planning permission which engages the safeguarding directions it is clearly appropriate for the Secretary of State to take account of the EWR safeguarding directions when considering the application.

4 Interface between East West Rail and CtoC project

- 4.1 The section of EWR that is relevant to the CtoC project is the section covering the area between Croxton and Toft.
- 4.2 The CtoC application seeks authorisation for the construction of the busway and associated works on land that falls within the area safeguarded for EWR. The proposed CtoC Order would provide powers to acquire and use land in this area for the purposes of the authorised works.
- 4.3 In this area, EWR is proposed to be in tunnel which would be constructed from the surface using a cut and cover technique and would cross beneath the route of the proposed CtoC busway.

- 4.4 From a point east of Cambourne and Knapwell Wood Road, the proposed railway would descend into a cutting up to approximately 8m (26 feet) deep on the approach to the cut and cover tunnel. The cut and cover tunnel would be approximately 1.5km (0.9 miles) long and would pass beneath the A428, the north-east corner of the proposed Bourn Airfield development, the proposed CtoC project, Wellington Way and Highfields Road. A tunnel services building and an emergency rescue area would be required at each tunnel portal. The tunnel would also require an emergency escape shaft at its midpoint within the northern side of the Bourn Airfield development site.
- 4.5 The proposed cut and cover tunnel would be the most significant construction element of the new railway in this route section. To reduce construction complexity and traffic disruption and maximise programme efficiency, it is proposed that the A428, St Neots Road and the proposed C2C busway would be temporarily realigned. There would also be a requirement for a temporary localised diversion of Wellington Way and Highfields Road.
- 4.6 The main compound to support construction of EWR would be sited at the northern portal of the tunnel, with land along the extent of the whole tunnel required temporarily during construction, including within the proposed CtoC order limits.
- 4.7 EWR Co's proposals for a cut and cover tunnel in this location were developed following the consideration of different options to cross the A428, Bourn Airfield development, the CtoC project, and other features in this area, following feedback received at the non-statutory consultation in 2021. Further detail regarding EWR Co's consideration of options is set out in the Technical Report published as part of the EWR's non-statutory consultation (see section 11.3.4, pp. 284-297).

5 Grounds for objection

- 5.1 As the C2C scheme crosses the land safeguarded for EWR it is essential that suitable arrangements are put in place to manage the interface effectively. The arrangements must ensure that any order authorising the CtoC scheme does not prejudice the delivery of EWR whilst minimising costs and disruption to both projects, transport users and the local communities.
- 5.2 EWR Co, Cambridgeshire County Council and the Greater Cambridge Partnership have been working together in the development of their respective projects. This constructive engagement continues with a view to agreeing suitable arrangements to manage the interface between the two projects and enable EWR Co's holding objection to be withdrawn.
- 5.3 EWR Co reserves the right to supplement or amend this Statement of Case as discussions with Cambridgeshire County Council and Greater Cambridge Partnership on the interface between EWR and CtoC progress. A list of documents on which EWR Co intends to rely is appended to this Statement of Case.

Appendix 1

Relevant documents that EWR Co intends to refer to or put in evidence

	Document
1	Safeguarding Directions given by the Secretary of State (14 Nov 2024)
2	Safeguarding Directions plan
3	EWR Consultation Document
4	Route section plan - Croxton to Toft
5	EWR Technical Report (extract)