

EAST-WEST RAIL CONSULTATION June 2021

Appendix 2

RAVENS DEN PARISH COUNCILS'S ENVIRONMENTAL CONCERNS

1 Introduction

This report highlights the concerns held by Ravensden Parish Council and reflects the views of the many residents who contributed to the Green Infrastructure Plan. The Parish Council (PC) commissioned a GI Plan as part of the Neighbourhood Plan process; the outcomes have helped the PC understand the concerns and affection for the countryside held by residents. Efforts have been made to understand the impact of the alignments on the natural environment using material published in the Consultation Documents. Only general conclusions can be drawn as so little information is available, but it is clear that either alignment will have a devastating impact on Ravensden's countryside.

The level of environmental information available is woefully inadequate. The Parish Council (PC) considers it unacceptable that detailed studies of biodiversity and heritage have yet to be undertaken. Also, it does not appear that baseline tranquillity and visual assessments have been made. If surveys have been undertaken, then it is very disappointing that the results have not been made publically available.

The weighting given to the different environmental concerns, including visual intrusion, within the "Option Assessment Outcomes" is also not explained.

The PC is highly critical of the proposal being progressed without full awareness of the environmental constraints. Even when precious resources are well known and obvious the scheme has not avoided sites of national significance. It is very disappointing that one alignment will damage ancient woodland and the other would adversely affect the immediate setting of Mowsbury Hillfort, our Scheduled Monument, to raise just two concerns.

EWRCo did not contact the Parish Council to ask for information. Had they done so, the PC would have raised the importance of these protected sites and provided valuable local knowledge which could have been helpful to the understanding of the natural resources, heritage and the importance of informal recreation within the Parish.

The Parish Council is also very disappointed about the lack of information regarding the budgeting of and strategy for essential mitigation measures. The design of major infrastructure needs to be undertaken with mitigation as an integral part of the design. It is too late to consider these aspects at a later stage, particularly after the costings and the approach to the compulsory purchase of land has been agreed. Significant areas of land will need to be purchased to enable landscape planting in scale with the structures and the intrusive nature of the railway, particularly where it is proposed to be on embankment.

Sympathetic design is a key aspect of mitigation. This could involve the use of tunnelling and green bridges, high quality finishes for the viaducts and recessive colour used for electrification structures. Sufficient land needs to be included within the proposal area in order to fully mitigate the harm and secure the required nett environmental gain.

Mitigation will also be required to reduce the intrusion of any construction compounds within the Parish.

The Parish Council maintains its total objection to Route E and is convinced that alternative routes can meet the objectives in a manner less damaging to the environment. Comments made on mitigation are put forward to highlight the way mitigation has not been considered as an integral part of the design process.

The visual and noise impact affecting residents is a major concern but this report focuses on the implications for the natural environment and heritage.

2 Overview of Ravensden's Countryside

Ravensden is a rural parish where farming is the predominant land use. The countryside is known for its tranquillity and the extensive rights of way network, with the quiet lanes well used by cyclists and horse riders. Ravensden's countryside is distinctive for its varied topography of hills, ridges valley and plateau. The elevated land at Mowsbury Hillfort and Graze Hill separated from Sunderland Hill to the north by the relatively steep valley of the Ravensden Brook. The open views gained from the Hillfort across the valley are an important feature. There are limited areas of woodland but large woods, most notably Great and Little Wood, form distinctive features in the west of the Parish. The hedgerow network is varied. Roadside hedgerows are particularly significant, providing strong enclosure such as at Graze Hill and Wood End. The hedgerow pattern north of the Cleat Hill ridge is particularly distinctive but where the landscape is intensively farmed, the field pattern is very open allowing far-reaching views. The valley bottom and the clay plateau in the north and west of the Parish both have a larger scale field pattern, with more limited stretches of hedgerow.

In terms of heritage, Mowsbury Hillfort is of extreme importance and designated as a Scheduled Monument. Roads such as Graze Hill Lane retain a strong sense of place, having a number of listed buildings, mature trees and hedgerow. Historic buildings are often hilltop landmarks, exemplified by All Saint's Church and also The Grange, which is prominent on Sunderland Hill. The Green Lane dates back to at least the Roman period and there are small areas of ridge and furrow.

In the south-east of the parish, Mowsbury Golf course creates a rural setting to Bedford. Mowsbury Park includes natural features such as the Renhold Brook and Putnoe Woods.

A new Country Park will be established in the south west of the Parish, linked to the new Ravensden Park development. This will combine with the existing Brickhill Country Park alongside the Woodlands community, forming new green infrastructure linking Ravensden to Clapham Park Wood.

To the north, east and west Ravensden lies between the parishes of Clapham, Thurleigh, Wilden and Renhold. The farmland of Ravensden flows seamlessly between these areas; the open and undeveloped countryside is a common characteristic.

3 The Ravensden Green Infrastructure Plan

The Green Infrastructure Plan has been produced jointly by the Bedfordshire Rural Communities Charity and has been endorsed by the Parish Council. The Plan consulted the community to find out which environmental features were most valued in the Parish and where improvements or enhancement could be made. The exercise underlined the importance of the many features which provide a unique and highly valued asset for the Borough as a whole.

The most significant sites include Mowsbury Hill, Cleat Hill, the Ravensden Brook, Great and Little Woods and Tilwick Woods and Meadows. The most valued sites are being taken forward for potential designation as Local Green Spaces (LGS). Key views, particularly from sites on elevated ground, were also identified through the GI process. With reference to the approved GI Plan, the following table lists the most valued sites and views, with those directly affected by the proposals highlighted in bold:

Table 1 – Summary of Impacts on Highly Valued Sites

Site	Key View	Alignment	Comment
Mowsbury Hillfort SM	C	9 Direct Impact	Route within historic setting of Scheduled Monument. Line would emerge from cutting then run on embankment transforming the open landscape over which the Hillfort overlooks, detracting from the context of the site. Potential LGS but already designated as SM and LNR.
Cleat Hill/ Graze Hill Lane	A, B, F	1 & 9 Direct Impact	Both alignments sever the Cleat Hill ridge, resulting in loss of hedgerows. Both will detract from the valued open views
Great and Little Woods		1 Direct Impact	Loss and unknown extent of clearance in SE corner of Great Wood, an ancient woodland. Severance of Footpath 45. Noise and visual intrusion highly damaging to enjoyment of valued countryside. Major impact in widespread views.
The Green Lane (BOAT 61)	E	1 Direct Impact	Historic green lane linking Church End to Kimbolton Road. Provides links to wider footpath and bridleway network. Affords attractive views over open countryside of Wilden. Priority site for enhancement. Candidate LGS.
Ravensden Brook		1 & 9 Direct Impact	A1: Severance of Footpath 29. Noise and visual intrusion highly damaging to enjoyment of value of wooded countryside. A9: Severance of Footpath 14. Noise and visual intrusion highly damaging to enjoyment of peaceful walks by brook.
Church and Churchyard		9 Indirect Impact	Tranquil nature of the Church is noted in the Local Green Space Assessment. Noise impact would disturb visitors.
School Playing Field		9 Indirect Impact	Noise will detract from amenity of playing field and for users accessing Footpaths 13 and 36 to east.
Tilwick Meadow and Woods		9 Indirect Impact	Route 1 passes within SSSI buffer zone. Railway would introduce noise into a very remote and tranquil area.

Looking to the future, the GI Plan also prepared a list of enhancements suggested during the community consultation. These aspirations covered the improved management of rights of way, safe access beside roads, enhanced management of woodlands and new tree planting initiatives.

The improvement of the Green Lane surface and the enhanced protection of Mowsbury Hillfort and surroundings were the second and third priority. The first priority was to secure safe access on Bedford Road, highly relevant as the railway construction will lead to an increase in traffic.

Eighteen specific suggestions were put forward and endorsed by the community. Of these 9 projects would be directly affected by the rail proposals and (importantly) during the extensive period of construction. Noise and visual disturbance and the severance of paths would greatly diminish the enjoyment and overall rural setting of these proposed enhancements.

Table 2 – Priority Enhancement Projects Which will be Affected

Ref	Aspirational GI Enhancements	Affected by Alignment
1	Improving surfaces of Footpaths 4 and 28, alongside Ravensden Brook	1 & 9
2	Enhance wildlife habitats alongside Ravensden Brook	1 & 9
4	Improve surface of BOAT 61- The Green Lane for walkers and cyclists.	1
6	Protect Mowsbury Hillfort and Surroundings	9 but also 1 to wider setting.
7	Improve accessibility in the area of Mowsbury Hillfort, e.g. from rights of way network	9
8	Enhanced management of Footpath 25	9
10	Upgrade Footpath 14 to a bridleway	9
13	Create accessible greenspace near Crossroads	1 indirect – noise and visual disturbance
14	Create a Community Orchard –preference near Village Hall	9 indirect – noise and visual disturbance

The full GI Report will be available on the Parish Council and Ravensden Neighbourhood Plan webpages.

4 Impact on Biodiversity

The Parish Council considers the lack of information on biodiversity – and therefore the understanding of the impact - to be totally inadequate. For an undertaking of such consequence, a Strategic Environmental Assessment should already have been undertaken to inform the corridor selection. The area of Route E is not so extensive that this level of survey could not have been undertaken at the route alignment stage.

The Parish Council is particularly concerned about the damage to irreplaceable habitats such as our ancient woodland and hedgerows, which are already fragmented and of limited extent. The few isolated largescale semi-natural features are of high quality; the ancient woodland at Tilwick and Great and Little Woods are of National and County

significance respectively. It is extremely disappointing that Alignment 1 has not been designed to avoid Great Wood or its setting. There is surely scope to divert the alignment away from the wood and safeguard a habitat of national importance.

The following paragraphs outline the Parish Council's concerns regarding specific habitats:

Ancient Woodland

Alignment 1 is described as having "*indirect impacts to just one ancient woodland*" but the wood is not specified and the assessment therefore is questionable. To the west of Ravensden, Clapham Park Wood is "indirectly" affected by the close proximity of the route. Within Ravensden, the alignment either destroys the south-east corner of Great Wood (a County Wildlife Site) or passes immediately beside it. This by any judgement is a direct impact which cannot be mitigated by new planting. The degree of clearance required for railway safety is not known but trees and shrubs would need to be cleared beyond "topple distance". The woodland edge contains both young and mature oaks, ash and field maple. If a mature edge to a wood is felled, the new "edge" trees become vulnerable to wind damage, so if any clearance is undertaken there will be significant change to the woodland habitat at this point. This is unacceptable – damage to ancient woodland is contrary to the NPPF, which seeks to protect woodland, which is a BAP (Biodiversity Action Plan) Priority Habitat, and all Biodiversity and Sustainability Policies.

The woodland is of high amenity value, being bordered by a well-used right of way, which forms part of the well-established Ravensden Circular Walk. Construction of the railway in this location would destroy or impact on irreplaceable habitat and create severance and disturbance for wildlife and the public using the paths.

Although unlikely to be directly affected, Alignment 1 is stated as being "*outside the SSSI Impact Risk Zone*" at Tilwick Woods and Meadows, but this is not the case.

Hedgerows

The impact on hedgerows does not appear to have been considered. Hedgerows are a BAP Priority Habitat and provide vital corridors in the intensively farmed landscape. The rail proposals would destroy sections of some of the most ecologically rich hedgerows within the Parish – e.g. at Graze Hill, Wood End, beside the Brook and the Green Lane. These mature hedges are known to be important foraging habitats for bats and other mammals. Hedgerows likely to be damaged by the routes include those which would receive protection under the Hedgerow Protection Act.

Hedgerows to the north of Mowsbury Hill create a strong framework providing connectivity for wildlife. The potential severance of the hedgerows and ditches by the 12m deep cutting at the Green Lane would be particularly damaging. The lane is a well-used path for badgers, information that EWRCO must have considered. The Parish Council is keen to explore wildlife (and recreation) supportive solutions, such as a Green Bridge in this location.

Other notable hedgerows which would be severed include those beside Thurleigh Road and the hedgerow beside Footpath 25. The hedges of Shrubbery Lane are also locally valued as features in the view and connect with hedges within Ravensden.

Grassland Habitats

Species rich grassland is extremely limited in extent within Ravensden. More surveys are required, but the western end of the Green Lane is floristically rich, containing locally rare species such as ladies bedstraw. Most road verges and field boundaries have limited biodiversity, but those beside Graze Hill Lane are a notable exception. Field boundaries to the south of the ridgeline hedge retain some floristic interest, such as cowslips and knapweeds. The Roadside Nature Reserve is designated along the western section of the lane.

Rare or Protected Species

The Parish Council is concerned about the detrimental impact the construction and operation of the railway will have on wildlife. The Parish contains a number of badger territories which will be disrupted by the extensive engineering proposed.

The Parish is also known for its relatively high numbers of Brown Hare, a Red Data Book species, which will also be disturbed by the railway severing fields.

The loss of sections of the mature hedgerows will also be detrimental to bats.

The council is also concerned about the impact on wildlife using Ravensden Brook, which will either be crossed by a viaduct at Struttle End or an embankment near Brook Farm. Will the brook be culverted if Alignment 1 is constructed or be required for Alignment 9? What impact will there be on wildlife, including fish. Has a water vole study been undertaken?

The Parish Council has not seen any information on how the alignments would impact on species which use the brook. Have any surveys been undertaken for amphibians? There are ponds close to the routes and Ravensden is in a search area for Great Crested Newts.

5 Landscape and Visual Impact

The Consultation Documents contain virtually no information about the effect on landscape character or the visual landscape changes that will arise. The Parish Council would have liked to have seen visualisations of the routes, particularly in areas where there would be transformative change, such as the embankment at Thurleigh Road and the viaduct at Struttle End. The community has been left to imagine the appearance of the structures and the visual impact which will arise. For a scheme of such consequence, the lack of montages or other illustrations has been a major failure of the consultation.

Local Landscape Character

Ravensden lies within the “*Renhold Clay Farmland*” landscape character area, as described in the Landscape Character Assessment for Bedford Borough.

It is highly typical of this area, displaying many of the key sensitivities, such as the landmark views to the Church tower, the presence of the strategic historic hillfort at Mowsbury and by having a dispersed settlement pattern. Other key aspects of this landscape include:-

- The high level of recreational access via the rights of way network and quiet rural lanes
- Areas of high ecological value ,including ancient woodlands and unimproved grassland , often “isolated” within extensive arable fields

- A network of hedgerows and hedgerow trees surviving in parts but which are vulnerable to further loss through a lack of management and renewal
- The tranquil rural nature of the landscape which is vulnerable to urban influence, particularly immediately to the north of Bedford.

Features identified as being of high sensitivity to change include the villages with their scattered Ends, the tall stone churches, the blocks of ancient woodland and the subtle tributary valleys and streams.

In terms of visual sensitivity, the areas with the highest visual sensitivity are the areas of open elevated plateau at the crest of the subtle valleys and the areas of open, gently rolling landform.

Within Ravensden there are particular areas which have a distinctive sense of place. Areas of distinctive character which will be impacted by the railway include:-

- Graze Hill Lane and its setting, to include the valley sides to the north and south of the ridge. Despite the extension of development in this area, land to the west of Woodlands retains an open, tranquil character with the undulating landform providing extensive views.
- The setting of Mowsbury Hillfort – a SM of national significance.
- Struttle End – the cluster of properties linked to Home Farm, in a highly rural setting.
- Wood End – lanes with enclosed character, parkland setting of listed properties.
- The Grange and Sunderland Hill Farm cottages, which form a distinctive group of properties.
- The Green Lane – ancient route, enclosed by hedges, affords panoramic views mainly to the north over tranquil, undeveloped farmland.

The tranquil nature of all these landscapes would be severely affected by the proposals.

Visual Impact

The Parish Council does not consider that the visual impact of the proposals has been properly evaluated. There are enough details of the route alignments and the structures required to enable some form of Landscape and Visual appraisal to be undertaken. No visual study has been made available. The key visual impacts requiring assessment are:

- the changes that will occur for residents
- the impact on the quality of identified views valued by the community
- the impact in views from recreational or heritage sites.

The Green Infrastructure Plan consultation revealed that residents valued the many peaceful views of the countryside gained from their properties, from rights of way and the open spaces.

Views looking north from Ravensden e.g. from Wood End, Tilwick or the Green Lane include panoramas where hardly a building can be seen, a rare experience and one which is highly valued by residents and visitors alike. The panoramas from Mowsbury Hillfort, Cleat Hill, Graze Lane, the Church and the Green Lane have all been identified as being of particular importance by the community.

The magnitude of change and level of detracting that will occur in these views has yet to be assessed. The visual impact of extensive and large structures imposed on this subtle and historic landscape can hardly be comprehended. No visual imagery has been produced to help understand the scale of the engineering works, but they will transform the parish from a rural, farmed landscape to one dominated by engineered structures, with the linearity of the railway cutting across the contours and the existing pattern of fields and dispersed properties.

The viaduct crossing Ravensden Brook will appear totally incongruous. Presumably a concrete structure, this will conflict with the nearby buildings – historic brick or thatched and rendered cottages. The height and extent of the structure will transform the peaceful landscape of the brook corridor, detracting in the views from the public footpath it will cross. The viaduct will also be prominent in views from the footpaths on the elevated land to the north and south.

Conversely, the Parish Council consider that a viaduct may be the least worst option for where Alignment 1 would cross Thurleigh Road. At present an embankment is proposed, but at 11m high, this is considered to be a major detracting feature, impeding views and access for the right of way and for wildlife.

Impact on Residents

Of great concern is the visual disturbance and the change in views which will be experienced by residents. Both alignments pass extremely close to properties, and in some instances, will cut through garden or pasture land forming the setting of homes.

Alignment 1 will result in a devastating change in the view for residents on Graze Hill Lane, at Wood End, Butler Street and Sunderland Hill.

Alignment 9 will have a severe impact on the retirement community Wayside Farm Park. The current tranquil setting is a key factor benefitting lifestyle and well-being. There will be a major adverse change in the view, with the impact of the cutting construction and also open views to the section at ground level, where the trains will be a disturbing feature, where previously residents would have had a clear view to the Hillfort and wooded skyline. In addition, the loss of trees on Kimbolton Road will also result in a decline in local amenity.

Views of the embankment north of Oldways Road will detract from the rural views enjoyed by existing residents.

Other residents, such as those on Church Hill and Church End, will experience a major change in the environment as experienced when travelling to and from other parts of the Parish or in to the neighbouring parishes of Renhold and Wilden or to Bedford.

Impact on the Countryside

Alignment 9 would severely detract from the outstanding view across the valley gained from Mowsbury Hillfort. There would also be major change to the views and rural character of the Ravensden Brook corridor. Views from Church Hill looking south would also see the embankments in the foreground to the Mowsbury Hillfort.

Alignment 1 would detract from the very tranquil countryside in the west of the Parish and impact on the setting of Clapham Park Wood, Great Wood, The Grange and the Green Lane.

This assessment fails to address the visual impact of the engineered structures in the countryside, or how they conflict with areas of high amenity such as the natural features of the woodland, brook, public viewpoints and rights of way where residents and visitors experience the highly rural countryside of Ravensden.

The landscape information published in the Consultation Documents is grossly inadequate. It is also extremely disappointing to have minimal information on a mitigation strategy. The Parish Council would have expected a Landscape Assessment to have been undertaken which would have analysed the landscape character and features within Corridor E, to be used alongside studies on biodiversity and cultural heritage, so that a thorough knowledge of the landscape resource could be used to inform the alignments.

The “Options Assessment Outcomes” make some judgements on landscape impact.

The Reference Case Alignment (A8) is stated as having a “*relatively high impact on landscape character*” due to the impacts upon woodland and the overall character of Brickhill Country Park, the Great Ouse and Roxton Park. In terms of visual impact A8 “*has some high visual effects*” but only refers to residential impact e.g. in Renhold.

Compared with this baseline, A9 is “*neutral*”, although the greater impact on the Brickhill Country Park is noted.

A1 is considered to be a “*minor improvement*”, with fewer impacts generally and less impact on the Country Park.

A ZVI (Zone of Visual Influence) is referred to in the Technical Appendices but this has not been made available. There is also a table of the “*Number of affected views*” – but this information is meaningless as the views are not identified or described.

Impact on Tranquillity

This important aspect does not seem to have been considered.

Tranquillity is a recognised perceptual aspect of landscape character. Ravensden’s residents highly value the tranquil nature of the countryside and setting for their homes. Tranquillity was cited by many residents as a key reason for moving to the village. The definition of tranquillity includes visual disturbance as well as noise intrusion. In the Tranquillity Map produced by CPRE, the Ravensden area contrasts markedly with the urban area. The transition to undisturbed, even remote, countryside is almost immediate, with the topography and undeveloped nature of Graze Hill and the greenspace provided by Putnoe Woods and the Golf Course providing a valuable buffer.

The Parish Council is very concerned about the substantial increase in noise pollution which will arise, from construction as well as during operation. Visually, the structures and train movements will be highly disturbing in the view and there is also a concern about the visual intrusion which will be caused by electrification gantries and wiring.

6 Cultural Heritage

The Mowsbury Hillfort Scheduled Monument is not referred to specifically within the Consultation Documents and yet references are made to other sites of national heritage significance. The Hillfort is of the highest importance to the community, as evidenced by the GI Plan. Views from the site are currently of the undeveloped valley with the Church,

The Grange and the iconic water tower standing out as landmarks. Construction of the railway would introduce an incongruous structure dominating the foreground, destroying the openness and tranquillity of the setting of the monument.

The Parish contains a number of listed or otherwise notable buildings. All Saints Church is Grade 1 listed; the views of the Church will be affected if the embankments and viaduct at Strutt End disturb the view such that the Church tower is no longer the dominant structure in the view.

Ravensden Grange is a listed building and a landmark in the view from Mowsbury Hillfort and Cleat Hill as well as from properties on Oldways Road. It forms a focal point at the top of Sunderland Hill, and is set within a parkland style garden. The Grange, Grange Farm and the row of farm workers cottages form a significant group of historic buildings in the north of the Parish.

Both alignments would destroy the historic and tranquil character of Graze Hill Lane, impacting on the setting of two Listed Buildings.

At Wood End, Alignment 1 would impact on the wider setting of listed buildings at the western end of Graze Hill Lane. It would also detract from the historic houses and parkland at Ravensden House and Brook Farm. These are buildings of local importance and the parkland is a rare example within Ravensden.

The historic Green Lane is a route of particular importance. It may be of Roman origin, or older, and is associated with sites of archaeological interest such as a deserted medieval village. The proposal to simply cut across the Green Lane and create a deep cutting is not acceptable. As a minimum, a “green bridge” should be provided. The Parish Council considers the heritage, recreational and wildlife value of the Green Lane to be so important locally that a tunnel would be the most appropriate solution.

7 Informal Recreation

Impact on Public Rights of Way

There is an extensive and attractive network of public rights of way within Ravensden, which provide connectivity with Bedford, Clapham, Thurleigh, Wilden and Renhold and also connect with the Bedford Green Wheel. These routes are important for recreation, with many users coming from Bedford and elsewhere. For local residents and the school they are a highly valued resource.

Either alignment would have a devastating impact on the quality and experience of the park network.

Table 3 – Impact on Rights of Way

Alignment 1

BW54
BW 56
FP46
FP4
FP45/ FP 9
BOAT 61
FP35

Alignment 9

BW 55
FP 6
FP 21
FP 25
FP 14

The Parish Council requires that all affected footpaths will be safeguarded and not blocked up. It will not be acceptable to divert paths as they provide connectivity. Bridges and tunnels will be required. Underpasses for the bridleways would avoid the requirement for large, visually intrusive bridges. Consideration also needs to be given to the design of structures to enable disabled or less able users to continue to access the countryside.

Rights of way within Ravensden are heavily used as they are directly linked to routes from Bedford. The paths which connect with Mowsbury Park provide a link to the Bedford Green Wheel- a strategic cycleway which links to Renhold and to the River Ouse. Routes from Oldways Road are important – the bridleway to Putnoe Woods provides the route to the secondary school and the footpath to Mowsbury Hillfort and Cleat Hill. These provide safe routes to Bedford away from traffic. The paths leading west to Clapham from Graze Hill Lane and Freeman’s Common extend over rolling countryside and offer panoramic views, providing access from Bedford.

The paths by Great and Little Wood are wide, with a good surface - The Green Lane at Church End is a “Byway Open to all Traffic”, recent seasonal restrictions preventing vehicular use have limited damage to the surface.

Footpaths beside the brook provide connections with the neighbouring parishes.

The elevated locations of many paths afford panoramic views, with notable views gained from Graze Hill, the paths to Tilwick and from those leading to Renhold from Church End.

The new Country Park at “Ravensden Park” will become an asset in the south-west of the Parish. Alignment 9 will be highly damaging to the setting of the new Park, although

Alignment 1 will also cause severance and visual and noise disturbance. Much more information is required on how this impact will be mitigated.

Impact on Golf Course: The rural and tranquil setting of the Golf Course will be disrupted by the views and noise from the railway. The Golf Course is a local amenity which needs to be safeguarded.

8 Mitigation

The PC considers that an outline mitigation strategy should have been prepared for each alignment, otherwise this aspect of the development could not be included in the cost. It may be that additional landowners might need to be advised that land in their ownership would be required for essential mitigation and the landowners already contacted would need to be made aware of the potential additional land take if they had only been shown the areas for construction of the lines. Outline details of mitigation needed to have been included within the comparison assessments. Good practice (Landscape Institute and the Institute for Environmental Management and Assessment) recommends that mitigation should be considered at the earliest opportunity. The Parish Council is concerned that despite the transformative change that will arise, mitigation has been treated as a secondary issue and not with an integrated approach. This is not acceptable.

It is accepted that there will be scope to enhance biodiversity, but this will entail the purchase of land to provide the new habitats, particularly woodland where appropriate, which will also provide some screening benefit.

The scope to mitigate the visual intrusion of the viaducts, embankments and views of the electrification gantries will be limited in view of their scale. The viaduct height at Ravensden Road is c 16m. Typical growth rates of appropriate native trees and shrubs is at best 40cm a year, although willows and alders which would be acceptable within the Brook corridor will achieve faster rates. Even so, it will take around 25-30 years before the structures will be partially screened. This is a major concern.

The open views from Mowsbury Hillfort are of intrinsic importance to the heritage asset. Traditional screening to enclose the rail corridor would not be acceptable in this location as planting would separate the Hillfort from the countryside it surveys.

Alignment 9 in particular would require substantial additional mitigation to help reduce the impact of the rail corridor through the new Country Park. Both Alignments are highly damaging to the rural edge in this location.

The Parish Council considers that no decision should be taken with regard to the choice of the preferred alignment until a mitigation strategy is made available, which shows how each route would be integrated as best into the landscape. Details of mitigation would also help in the understanding of the impact of the railway for the property owners most directly affected.

9 Conclusion

This report has aimed to highlight the potential impact of the alignments on Ravensden's countryside and environmental resources. It raises the serious concerns held by the Parish Council with regard to the lack of environmental information available to inform

decision making about the proposed routes. It appears that decisions have been taken only using knowledge of the designated sites and a limited range of species records.

EWRCo were heavily criticised for the very basic level of environmental information used in the corridor selection process and the failure to undertake a SEA. Now it appears that the detailed level of environmental assessment required will only be undertaken at the next stage, which will be the design of the chosen alignment.

This approach is contrary to best practice and is unacceptable.

Ravensden has a tranquil, open and largely undeveloped countryside which would be transformed by either alignment. It is an area where farming practice has produced a predominantly large-scale field pattern with a limited structure of wildlife habitats. The main landscape features remaining, such as Great and Little Woods, the hedgerows of Graze Hill Lane, the Green Lane and the Brook corridor therefore have a high level of significance. These and other historic features in the landscape are highly valued as rural features. All of these features and the Hillfort would be directly impacted by the alignments.

Highly valued views would be transformed by the proposals, detracting from the amenity of the rights of way network. These are typically panoramic views across undeveloped countryside, a recognised sensitivity of the landscape character area.

Many of the sites and paths identified in the GI Plan as being of particular value by the community will be irreversibly damaged by the construction of the railway. The operation of the railway will also bring highly intrusive noise and visual intrusion.

The Parish Council is highly critical of the design approach which has failed to take landscape and visual impacts into sufficient consideration. The lack of specialist environmental input has also led to the failure to produce anything other than an outline approach to a mitigation strategy.

The inadequate detail on which to make objective assessments of the landscape and visual harm is a particular weakness of the Consultation. The Parish Council and the community have been forced to interpret the potential impacts using, for example, the basic information from the longitudinal sections to interpret where the embankments, cuttings and viaducts would be located.

It is accepted that major infrastructure results in largescale change but the baseline condition needs to be fully assessed before decisions of such consequence can be made. Ravensden Parish Council are also very mindful of the environmental damage which would arise in Clapham, Renhold and Wilden. The north Bedfordshire countryside is both seamless and connected – damage to the natural environment and the rights of way network affects everyone. The unnecessary environmental impact arising from an additional river crossing and the impact on Clapham Park Wood, a skyline feature to the south – west of Ravensden and the loss of woodland within Renhold and Colesden are key reasons why the Parish Council is pressing for a re-consultation over the route corridor selection.

The very nature of the countryside, its challenging topography and rural setting makes it unsuited to railway construction and operations. It is the Parish Council's view that there are route options which would create less environmental disturbance and impact on natural resources. For the railway to be sustainable, the starting point must be selection a route causing least environmental harm. To achieve this, a much higher level of baseline information is required and made available to Consultees.

It is the Parish Council's view that the environmental resources within the Route E corridor have not been properly studied or evaluated.

This is not a sound basis for the selection of an alignment.