



FAO Borough Councillors and Bedford Borough Exec Team
2 Horne Lane
Bedford
MK40 1RA

Mike Barlow
BFARe
Bedford For a
Reconsultation

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Postal Address
Available on request

Info@bfare.org.uk
www.bfare.org.uk

Dear Councillor,

Re: Bedford Borough Council's Handling of East West Rail Consultations

BFARe is a group of Parish Councils, CPRE Bedfordshire and concerned residents that believe there is a much better solution to an East West Rail route than Route E. The current consultation into alignments through Bedford and North Bedfordshire stems from the 2019 Route selection consultation by EWRCO, which was flawed for many reasons:

- Lack of adequate communication with impacted residents
- Unexplained and uncommunicated cost changes pre and post consultation
- Hidden and vague information regarding the aspirations for freight
- A Cambridge focussed consultation

*****Health warning***:** There is a lot of detail in this letter. It is long. We highly recommend you settle in with a cup of Fairtrade tea and read it, absorb it, and ask yourself the challenging questions. Because there will be a lot of noise to come on EWR between now and when it will be built. There will be:-

- the alignment decision in the autumn/winter,
- there may be Judicial Reviews,
- there will be the statutory consultation,
- and the decision from that,
- and may be more Judicial Reviews
- Then there will be the DCO application
- And may be Judicial Review into its outcome

The DCO application, if EWR run to time, **will be around the time of the next local and Mayoral elections in 2023**. People will be reminded of the actions you chose to take, when you were fully aware of all the facts in this letter, in 2021. The votes you made in 2021. Whether you chose to listen, understand and respond positively to the concerns of your constituents who so loudly and clearly expressed their views in 2021. Constituents and voters will not forget the sense of betrayal felt currently, nor will they be allowed to. No-one will be in any doubt whatsoever of how you reacted.

Just think for a second. When was the last time Bedford Borough Council had 400 questions on one single subject? These concerns are not going away, indeed they will grow in volume over the coming weeks, months and years

Therefore we make no apology for the length and detail of this letter, because it is precisely the tactic of the Mayor and Cllr Headley to hide behind their soundbites and accuse others of “myth” “fantasy” and “not living in the real world”, to assume that people will not research or get into the detail behind the facts and to sell their own agenda rather than engage in open and transparent dialogue on the detail.

BFARe particularly has many of concerns regarding the conduct of Bedford Borough Council and its role in lobbying for Route E. Specifically, the dictatorial nature of the direct and personal engagement of the Mayor and Cllr Headley in this process.

In an exercise of orchestrated confirmation bias, the approach has very much been that Route E is the answer, let’s find reverse-engineered facts to make it fit the question. For a Nationally Significant Infrastructure Project with such a high degree of impact on homes, lives and the environment, this is simply not appropriate or acceptable.

BBC should have taken into account the views and concerns of residents at every stage of the process. But until 2021, there was no public consultation, no public debate and no full council vote. For a project such as this, that includes demolishing over a hundred residents’ homes and negatively affecting thousands of peoples’ daily lives, it shows a disgraceful disregard for transparency and democratic process.

In short, the subterfuge, sleight of hand and overt snake-oil salesman ship of BBC officials responsible for this process has permanently fractured residents’ trust in the administration. Even amongst those that support Route E.

The Council events of 12th and 13th May 2021 were a thinly veiled sales pitch aimed at handling objections, rather than listening to residents’ concerns. The very fact there were over 400 questions (the answers to which are yet to be published!) shows the inadequacy of the communication from both EWR and BBC.

We have broken this down into sections, to aid your consumption:

- 1.0 Knowledge of Six track option through Bedford – SLC reports
- 2.0 Total Disregard for Constituent Views
- 3.0 Lack of a balanced approach – Kilborn reports
- 4.0 Dubious Economic calculations and Assertions
- 5.0 Lack of Rigorous Supporting Environmental Investigations
- 6.0 Denial of the Role of Freight
- 7.0 Overstated Benefits, Understated Challenges
- 8.0 The Democratic Deficit
- 9.0 BFARe’s Alternative Route

1.0 Knowledge of Six track option through Bedford – SLC reports

At present there are four railway lines running through Bedford. The Mayor and Cllr Headley have publicly acknowledged knowing about the six-track option north through Bedford Midland Station (which would involve the compulsory acquisition and demolition of numerous homes).

On various dates in different interviews, recorded meetings and discussions. When they have been questioned, they have been evasive, but when pressed they have given different answers including:

- Summer 2019,
- August 2019,
- 17th July 2019
- 31st July 2019
- Sometime in 2020 (This was the Mayor's answer on Look East television a couple of weeks back)

The tone and the panic of the second Kilborn report in March 2019 ([Appendix E](#)) and the references in it hint at BBC being aware sooner.

A great cacophony of publicity claiming saviour status was made when the SLC report was released by the Mayor on 10th May 2021, the report declared that the six-track option was unnecessary.

However, this report is not new. It is a regurgitated report by SLC from August 2019 that EWR have already seen and therefore considered and rejected when preparing their preferred six line proposal in the current consultation. Please see attached:

- [Appendix A – Cllr Headley's letter to EWR describing the 4-track solution to counter EWR's 6 track solution. \(August 2019\)](#)
- [Appendix B – the SLC report to support this \(August 2019\)](#)
- [Appendix C – The copy-and-paste SLC report \(which is almost identical to the original report\) published on 10th May 2021.](#)

This is clearly simply political positioning to give the illusion that the Mayor is fighting for the residents. It is about deflecting the blame to EWR should the worst happen or taking credit in the very unlikely event that it is successful.

This report, paid for yet again by the Mayor with our money, ignores EWR's ambition to build a railway with room for expansion "for the next hundred years". The report forwards the idea that it will only ever be operational at today's capacity requirements without the need for any future growth over the next century. This is laughable.

One objective of EWR is to facilitate the building of 1 million homes in the Ox-Cam Arc. That is a lot of construction and to build those homes there will be a lot of aggregate to move and a lot of concrete to be used. Most of the tonnage will at one time or another be on the very railway that the Mayor's report says will not require expansion.

EWR's ambition is for six passenger trains per hour, (not just the 4 as SLC consider for the Mayor's report) plus 1 freight path per hour in each direction, add to this the fact that Network Rail is forecasting 30% growth in freight traffic by 2030 and the growth of rail traffic is obviously inevitable. This growth impacts both EWR and importantly the capacity on the N/S lines. By the time EWR opens for trains the SLC report will already be untenable, clearly this fact alone severely negatively impacts the EWR business case to the extent to make it obsolete. EWR's ambitions cannot be met with a 4-track option. **EWR stated insisted in their webinars during week commencing 24th May 2021 that the NEED the two additional tracks because of the constraints on the North / South lines.**

Perhaps the worst part of this sorry tale is the practical impact on the residents whose homes are at risk: Although the Mayor and Cllr Headley were aware of the 6-track option in at least August 2019, by not revealing this six track "blight" to residents until 30th March 2021 the Mayor and Cllr Headley severely curtailed Poets' residents' legal options. The Secretary of State announced the route decision in January 2020 – Poets residents, and all of those living in houses along the track north of



Bedford, had 3 months in which to raise a Judicial Review to save their homes – after that the opportunity timed out.

The BBC's subterfuge denied residents that chance to launch a legal challenge to defend their homes and their lives.

Certainly, EWR would have been fully aware of the six-track option and the impact on properties when Network Rail handed over to them in 2018. See [Appendix G \(Network Rail's plan dated 25th October 2018\)](#) before the 2019 consultation. Why was this information not shared in the consultation so residents had the opportunity to express their views and concerns when it could have made a difference to the Route selection? What have BBC done about challenging EWR on this? Unless BBC also knew?

The Council says ([Appendix F - BBC EWR Response March 2019](#)) it was provided with a Briefing Paper entitled "East West Rail – Central Section Bedford Midland Cost Drivers" on 25th February 2019 which was the subject of a meeting on 1st March 2019, presumably when the six-lane necessity was discussed. This appears to have triggered the panic second report by Kilborn mentioned above and discussed later with remodelling for Route E and the station layout etc.

We have asked for this briefing paper, the agenda for the meeting, the minutes of that meeting and any supporting e-mails and documentation before or after the meeting from both EWR and Bedford Borough Council. The responses we have received are:- The 25th February Briefing paper can no longer be found (only one from March with no version control), there was no agenda, there were no minutes and no e-mails have been produced.

We strongly suspect that the six-track option was first revealed to Bedford Borough at that meeting – before the end of the 2019 consultation. But the meeting appears to have occurred in a vacuum with no paperwork.

Everyone hopes that six tracks and the demolitions are not necessary. But Hope is not a strategy. And if EWR rebuff BBC's flirtations – what will BBC do – will you still support the demolitions caused by Route E? Or will you challenge EWR to reconsider the route on the basis this is new information. BBC needs a Plan B.

Staying with the subject of Meetings – there were closed door meetings between senior BBC and EWR officials on *at least* the following dates:

- 1st March 2019
- 10th July 2019
- 5th August 2019
- 30th January 2020
- 4th February 2020
- 2nd March 2020
- 15th June 2020
- 22nd October 2020

An FOI request has revealed that there are no agendas, no minutes, no agreed actions noted from any of these meetings. The only supporting documents are the 2 in [Appendix A](#) and [Appendix B](#). Related e-mails to discuss these meetings before and after have not been released.



This is the biggest investment Bedford has ever seen. It is a once in a generation investment designed to support us for the next 100 years *and yet there are no documents whatsoever*. Either something is being hidden or this is being run by amateurs using back of envelope calculations without any notes, project plans or financial input. That hardly seems likely where billions of pounds are involved.

Is this really the typical level of professionalism that BBC and EWR use when they conduct business? Surely this cannot be true, yet if it is, why are we allowing them to promote a project of such national importance with such cavalier off-the-cuff methods? This is all public money, paid for by the hard-working people living in Bedford Borough.

2.0 Total Disregard for Constituent Views

There was virtually no effort made by the Borough Council to alert people to the EWR consultation in 2019. There was one advert placed by EWR in the Times and Citizen on 7th February. There were three tweets that we can find, and the Mayor's column in the Bedford Independent published on 10th March 2019 (the consultation closed on 11th March 2019 for the general public – although BBC conveniently got an extension to put in their second Kilborn report 'rescue package' of bringing the lines through Bedford on the 26th March 2019).

This hardly represents the massive media campaign that the Mayor and Cllr Headley and others shout about. When questioned about this – the links they provide relate to the decision announcement in January 2020 – *not* the consultation in 2019.

There was no effort whatsoever from the Borough to contact residents, share information and gather views, opinions and concerns. There was no public debate and no vote.

This is the behaviour of a dictatorship and we don't understand under which legal framework the Council could possibly claim that there was a democratic process.

There is a huge groundswell of opinion from people living in the Borough that the 2019 consultation by EWR was flawed. Why do Bedford Borough, the Mayor, Cllr Headley and multiple other Councillors continue to misrepresent the facts to constituents by spouting the following EWR marketing hyperbole?

- "120,000 postcards were sent" – There were 169,000 residences in the Route selection zone – this means 29% of the population did not receive one by EWR's own admission. EWR have failed since February to tell us the postcode list (there are no GDPR implications to a one column list of postcodes). Why are Bedford Borough not pressuring EWR on our behalf to ensure your residents were adequately informed? The postcards themselves, looking like a piece of bin-able advertising material, were a shiny piece of paper addressed 'Dear Occupier'. The 'map' on the card was a yellow blob without road names, designations or numbers and without a single village marked, apart from Potton and Sandy, on the entire length of the map all the way from Bedford to Cambridge. It meant nothing to the average person lucky enough to have received one.

- “7,000 individual responses were received by EWR” – No they weren’t – EWR’s own response tables state that there were 3,355 responses from individuals – The Woodland Trust make up the bulk of the rest with over 3,000 (of the 3,370 in the table below) responses mostly using a template that objected to EWR destroying woodland regardless of which route was taken. Why do the Mayor and some councillors continue to “sell” this?

6.1.4 The resulting 6,988 pieces of feedback have been broken down by stakeholder group and how the feedback was received and provided in Table [6.1]:

Group	Contact form	Letter	Email	Feedback form	Totals
The Public					
General Public	136	15	159	3,043	3,355
Interest Groups	0	58	3,370	0	3,428
Prescribed consultees (Groups identified Under Section 42 of the 2008 Act)					
Parish and Town Councils	1	5	23	17	46
Local Authorities	0	0	10	0	10
Other prescribed consultees	0	0	9	0	9
Elected Representatives					
Elected Representatives	0	0	19	32	51
Other Groups					
Various	0	4	51	34	89
Total	139	82	3,641	3,126	6,988

Table 6.1: a breakdown of all feedback received by stakeholder group and contact method

- “A significant number of people preferred Route E” – The number *cannot* be significant. In the 169,000 residences there about 440,000 people. 3,355 is 0.76% of the population. That is not a significant number even if *all* of them selected Route E. For a majority to select Route E, the minimum number could be as low as 672, the population of a small village such as Little Eversden –just 0.15% of the population. An even less significant number. Responses came from the whole corridor between Cambridge and Bedford and nationally as well. EWR have failed to provide a breakdown of the actual number of positive responses for Route E from Bedford Borough. Why therefore is this being promoted – by Bedford BC as well as EWR - as a successful confirmation of public support from within Bedford Borough for Route E? To the average person– it sounds, and is, ridiculous.

If these disingenuous facts were regulated by advertising standards, EWR would be fined. Residents have not been quiet about their not being consulted in 2019. Far from it. But the Mayor and Cllr Headley have been cheerleading a response that belittles those concerns with a swagger that says “you missed it – tough luck – we don’t care” Indeed the mocking manner that Cllr Headley belittles



questions from members of the public is breath-taking in its arrogance and dis-respect. Terms such as 'Fantasy' 'Mythical' and 'You're not living in the real world' trip from his laughing mouth instead of factual answers to serious questions.

Incidentally, as at 26th May 2021, the BFARe petition has over 3,500 signatures – and we know they are all objecting to Route E. That is more than the individual responses to the 2019 consultation in total. If you want to sign it – go here: <http://chnng.it/BZ6HjvJ8Lx>

Far from holding EWR to account for EWR's promotional hyperbole – some of our elected officials are promoting them as confirmation for the predetermined outcome that has dire consequences for homes, lives and our environment, quite literally the air that we breathe.

Further reflection of this disregard could be seen in the 2021 Bedford Borough Council public meetings to discuss EWR. They were a clumsy, self-serving sales exercise. The prime objective often appeared to be not to listen, but to perform a calculated "objection handling" to further their own agenda. Again. It was not a consultation designed to listen – it was a sales pitch, and a bad one, espousing spurious undocumented and anecdotal benefits and bullyingly and sometimes sarcastically, brushing aside any public call for facts.

The fact that it called for public "questions" not public "views, concerns or opinions" and provided only closed answers and no chance to come back to say that the answer given was meaningless and wrong set the tone from the start.

The panel often came across as smug and patronising to the point of being rude. The public, graced with a 3-minute slot, were often cut short by the chair, only to be lectured for a much longer period with garbled, seemingly pre-written responses. Many of the question posed were not answered, and no opportunity to probe the ridiculous and oft-incorrect responses was offered.

Cllr Headley seemed to be particularly defensive – rudely referring to "myths" and "misinformation" and "fantasy", whilst continuing to propagate his own half-truths and avoiding inconvenient facts.

3.0 Lack of a balanced approach – Kilborn reports

It has frequently been said by the Mayor that the Borough Council has been campaigning for EWR to come through Bedford Midland since 1995. A lot has changed since 1995, not least of which is universal access to the, then unknown, internet and the advent of homeworking. Pursuing a unilateral opinion-based decision made 26 years ago, without the opportunity for it to be debated by full council or discussed with Borough residents since, seems completely undemocratic.

EWR, we are repeatedly told, is a once in a generation investment for an infrastructure to last 100 years and the most significant investment for Bedford in decades (the constantly escalating total is now £5.6bn). Given this significance – why have the Mayor and Cllr Headley not chosen to pursue an open, transparent and even-handed approach? Why were constituents and Borough Cllrs not given the opportunity to engage with BBC on the route selection favoured by BBC in 2019? Why instead was this massively significant venture barely shown the light of day in 2019?

Furthermore – why were the two reports commissioned by BBC from Kilborn, paid for from Council taxes, hidden from public view and even from Councillors not within the inner sanctum? Below are the invoices we can find on the BBC website. Are there any more payments to Kilborn?

File		PO number	Date	Value	
Jun-2018	Kilborn	10675856	05/06/2018	£9,889.00	Consultants Fees
Sep-2018	Kilborn	10688800	10/08/2018	£14,696.00	Consultants Fees
Nov-2019	Kilborn	10750616	04/11/2019	£34,208.76	Consultants Fees
Nov-2019	Kilborn	10750625	04/11/2019	£15,090.49	Consultants Fees
Jan-2020	Kilborn	10757232	14/01/2020	£8,800.00	Consultants Fees
Aug-2020	Kilborn	10785247	28/07/2020	£25,895.00	Consultants Fees
Sep-2020	Kilborn	10788980	22/09/2020	£15,962.00	Consultants Fees
Total				£124,541	

Cllr Headley and Jon Shortland, Chief Planning and infrastructure Officer, have, at public meetings, stated a number of times that Kilborn did not recommend looking at a Southern option as being more sensible. However, in their report of February 2019 (see [Appendix D](#)) are the following quotes:-

“Bedford Midland Options....come at the cost of increased construction costs, increased disruption, longer journey times and increased operational costs, as well as increased congestion and other highway costs.”

“In short neither Route D nor E [the northern routes] have much to recommend them to EWR... However, there is an alternative approach that should be explored with EWR...”

It goes on to recommend an alternative option which they surveyed and stated that there were “no insurmountable physical obstructions...” It follows the old Varsity line. They identified some specific features that would require design solutions “none of which seems to be insurmountable”

It goes on to say: “The route is almost straight from Bedford to Sandy and on to Cambridge, minimising distance, route costs, and journey time while maximising value of time benefits.”

What did BBC do to address this with EWR? Cllr Headley retorts by saying there have been “loads of studies” into the old Varsity route. But has so far failed to produce one of these reports (myth? Fantasy? He appears to be the authority on that). Surely a balanced response from BBC would have been to respond to EWR stating that BBC’s rail experts had recommended EWR undertake a feasibility study into this alternative route. If not, then maybe spend taxpayer’s money on one themselves – instead they instructed Kilborn to re-examine their report and come up with the answer they wanted – a Northern Route. Kilborn produced this in March 2019. ([Appendix E](#)). Read the language of the report – it is *very* different to the first report which is positioned as a third-party analysis. Instead it positions much of the content as being driven by “BBC” rather than an independent third party. The Mayor didn’t like the first report we paid for, giving the same answer as EWR - that a southern route was shorter, cheaper, less disruptive etc, so he had us pay again for one that said what he and Cllr Headley wanted to hear, that the route through Bedford was best. Neither of these reports were proactively made available, and only became released as the result of Freedom Of Information requests.

4.0 Dubious Economic calculations and Assertions

Bedford Borough's report to EWR states that the incremental economic benefit of a route through Bedford Midland is 12% higher than Southern routes. £6.23 million incremental GVA per annum. The total GVA of Bedford Borough in 2018 according to figures calculated from the ONS was £4.8bn.

So, £4.8 BILLION GVA in total and the benefit is just £6 million. This supposed economic benefit represents a derisory 0.13% of GVA. So small as to not be statistically significant due to the confidence levels in rounding errors.

According to the Council's own figures, the vast majority of that £6.23m (£5.2m) is apparently made up of "interchange" benefit. Money spent by passengers whilst changing trains. So, money into the pockets of Starbucks, not into the local Bedford economy.

The economic benefit was also calculated without taking into account:-

- The potential property acquisitions and demolition of 97 houses in Bedford and more in Borough villages
- The disruption to the economy of 5-10 years of 'remodelling' the area – people staying out of Bedford to avoid the noise, dust and congestion and therefore not spending in Starbucks
- The disruption of demolishing the two existing stations and building the two new ones
- The remodelling, knocking down and re-building, and widening of bridges including Bromham Road bridge (again!)
- The remodelling, digging up and re-laying new roads, of the road and traffic network
- The resulting congestion and decrease in air quality and the subsequent health issues of Bedford residents and commuters
- The collective negative impact on property values of properties not destroyed but negatively impacted. Homes people have worked all of their lives to buy often made unsellable at previous market rate.
- The building of new multi-storey car-parks for the extra commuters and the car parking lost to the new station with all of the attendant noise, dust and traffic mayhem.

The full cost benefit outcome needs recalculating in a responsible, professional, even handed manner, taking into account all of the disruptive elements listed above.

The report also highlighted a marvellously specific number of 468 jobs that will be created as a result of the Central section of EWR. It fails to mention how many of these would be incremental by the route coming through Bedford. It also fails to mention (although the Mayor did mention it on the public event on May 13th 2021) that most significant industrial sized investors in 2020 want to locate their businesses in out of town or edge of town premises.

This is precisely because they are better serviced by the transport network in those locations. He also mentioned that investors – want to get to London – which they can with the existing railway. And his latest mantra is that they want connectivity – which we acknowledge is true – however, business people can only travel to or from one place at once. If they are coming to Bedford, or going from Bedford and they can travel North, South, East or West from Bedford – then whether that connection is in town or out of town is irrelevant for the purposes of "connectivity" – the connections do not need to be in the same place.

To argue that having the connectivity in the same place would discourage a large corporation from investing in Bedford is naïve in terms of how businesses make investment decisions. The question would be:

- Can my employees get to London and go North from Bedford?
- Can my employees get to Oxford and Cambridge from Bedford?
- Can my employees get to Luton Airport or East Midlands Airport?
- Can my employees get to MK?
- Can my customers and employees get to Bedford from those and other places?

If the answer to all those is “yes”. Obviously, it most definitely is, regardless of whether it is Bedford Midland or Bedford Parkway South station, then that box is ticked too.

They are likely to be asking more questions:

- Is the M1 easily accessible?
- Is the A1 easily accessible?
- Can I easily drive to Luton Airport?
- Can I easily drive to MK?

Which means a location South of Bedford is more likely to attract investment – and a Parkway station near there more appropriate.

At this point you may be saying “where is the evidence for this, that sounds anecdotal”. You would be right - we don’t have any evidence, other than experience with institutional investors making decisions like this.

But then neither does the Mayor present any evidence to forward his own argument. Neither are we making unilateral decisions for the Borough without consulting residents. The Mayor has not presented anything other than his own anecdotal, back-of -a -fag-packet calculation, evidence – and that is not good enough to make a decision that will cause the carnage that Route E will. The devastation to homes, roads, bridges, the lives of residents and to the environment will all be created because of the decisions taken by the Mayor.

Such an important decision needs to be handled even-handedly, in a proper democratic process, with open and transparent consultation, presenting all the facts and evidence with proper feasibility studies. Not sold on the confirmation bias fed by Mayoral anecdotal musings.

EWK have also failed to clarify the detailed cost calculations that meant Route E went from being the most expensive route, as communicated to the public in the 2019 consultation, to becoming the 2nd cheapest as was only communicated after the decision was announced in January 2020. They have given summary figures but these are impenetrable to any level of analysis. They refuse to produce the figures clearly showing how the costs swung around by such an astonishing amount.

In the 2021 consultation they have still not released the cost information for the Bedford section. It is surprising, given their interest in the 2019 costs for that section, that Bedford Borough Council are not scrutinising these to the same degree.

Could it be that they are concerned at the flimsy business case not only because of reduced travel demand post Covid, but also because of the massive costs associated with the relocation of Midland and St Johns stations, demolitions and compulsory acquisitions, road remodelling, bridge rebuilding (over the river and at Bromham Road), relocation of carriage sidings, moving strategic energy infrastructure at Fairhill, the extremely complex turnout at Clapham, onto the floodplain, the elevation of the A6, the huge viaducts and the cuttings would mean that Route E once again becomes the most expensive?

Why are BBC not pushing EWR to expose like for like costs to ensure that the motto of getting the “best value for every pound spent” is still true. To ensure that the Business Case still justifies destroying those people’s homes and lives and a massive swathe of unspoilt countryside?

5.0 Lack of Rigorous Supporting Environmental Investigations

There have been some spurious claims by EWR and BBC that Route E is the least impactful route on the Environment. Yet when questioned EWR state that no detailed comparative environmental study across the routes took place. That legally they don’t *have* to produce an Environmental Statement or Environmental Impact Assessment until statutory consultation and DCO stages. But what about ethically and morally? EWR are making decisions that will have a massive environmental impact yet point-blank refuse to carry out environmental studies that could show that the other routes are less damaging, as is clearly obvious to anyone from simply looking at the countryside involved within each route.

The response from The Wildlife Trust ([Appendix K](#)) to the 2019 consultation identifies precisely this issue stating the a Strategic Environment Assessment (SEA) should be brought forward within the process of considering alternative routes. The effect of not performing an SEA is that no full public consultation allowing comment on the relative environmental impacts of routes. It states that Environmental Impact Assessments at Alignment stage are too late in the process to assess and avoid significant environmental impacts.

No such undertaking has been made by EWR at route selection stage. The Environmental information is sketchy at best, and a decision made subjectively, not based on a balanced objective assessment.

On page 3, referring to the Bedfordshire aspects, it goes on to say: “We have undertaken an analysis of the potential ecological impacts of each of the 5 route options A to E.... In summary route options A,C,D, & E through Bedfordshire would be likely to result in direct damage to nature conservation sites supporting priority habitats, including ancient woodlands, which are irreplaceable. These routes will also result in fragmentation of local ecological networks. As such the Wildlife Trust objects to all of the options A,C,D & E. Route B is least damaging....”

Why has the Council ignored this from an expert organisation?

Route B, for example, is 7km shorter and is straighter and much flatter. In version 2E of Network Rail’s 2018 assessment it stated that 1.48km of viaduct construction would be needed. Whereas, due to the undulating nature of the countryside the Route E alignments will need between 4.2km and 7.2km of viaduct. That is a lot of extra embodied carbon and concrete to offset. A lot more materials and energy to build and a longer route meaning extra Diesel fuel to run for every trip, every day of the hundred year lifetime of the line. Even if electrified it will use extra energy for a century.

Route E Being a longer route means the railway is carving up much more of the Bedfordshire countryside. That fact is indisputable. Embankments up to 11m high and 60m wide; cuttings up to 18m deep and up to 150m surface width; and viaducts up to 18m high.

Bedford Borough declared a Climate Emergency in March 2019. How do the Borough reconcile supporting all of the incremental negative environmental impact with that declaration? Also, why hasn’t BBC pressured EWR to perform a full comparative environmental study at the Route selection

stage? Leaving this to later stages means that BBC and EWR miss the opportunity to make genuinely impactful environmentally sound decisions.

What has Bedford Borough done about investigating the environmental and health impacts of more Diesel trains through Bedford town and more traffic, congestion, air pollution and noise pollution? What about the associated health impacts and the resulting additional strain on the Borough's health and social care budget?

Our understanding is *nothing* has been done. There is a Systra report commissioned by Bedford Borough ([Appendix H](#)). We understand that Jon Shortland told a councillor of Ravensden PC that no traffic study had taken place. Interestingly, BBC make no reference to this report in their response to EWR either, although it claims to show the traffic impact not to be too bad for Bedford Midland options. Could this be that traffic reports are notoriously unreliable? Or could it be that it does not play well to the predetermined decision to go through Bedford Midland? In the summary Systra state:

“...shows that from a highway network perspective disbenefits are introduced by both scenarios, and comparatively the level of disbenefits are expected to be three times more in the Bedford Midland scenario than in the Bedford South scenario based on the assumptions which have been modelled here.”

Three times the Traffic “disbenefits” for using a Bedford Midland option versus a Southern option!

Furthermore, Bedford town already frequently breaches the Air Quality standards set by government. Yet no study has been released to look into the impact on Air Quality of having the railway running through Bedford Midland. EWR are saying that the line will be Diesel from day one. How will that impact Air Quality and Bedford Borough's health outcomes associated with that? Clearly it can only make them worse for the people of Bedford.

We already know that the traffic and parking problems around Bedford Midland from all directions are horrific. What impact will there be on congestion and therefore pollution and AQ will the massive new construction projects required to run six lines through Bedford town have? Why has there been no study into this? Is it because the answer won't play to the predetermined Mayoral choice of Route E?

Jon Shortland, the Mayor and Cllr Headley have pointed out there are Environmental disadvantages for all routes. Which is *exactly* why a formal comparative assessment was so important at the point of Route selection. This has not happened.

6.0 Denial of the Role of Freight

In the full Borough Council meeting of 24th February 2021, Cllr Vann, in an astonishingly childish tantrum of party-political showboating, surprisingly made a really valid point. He roared that he was “flabbergasted” that certain councillors were surprised that Freight runs on railways.

And that is exactly the point. We as constituents are also flabbergasted that EWR and Cllr Headley continue to play down the role of freight. It was barely mentioned in the 2019 consultation. That is what was so surprising and frustrating. Even in the face of overwhelming evidence that freight **MUST** play a part in EWR:-

- Pressure from SEMLEP for EWR to carry freight (the Mayor sits on SEMLEP board)

- Pressure from England Economic Heartland for to carry Freight (The Mayor is chair of EEH Strategic Transport Forum) whose recent report stated the railway should be built to W12 gauge (the maximum in the UK) and should accommodate capacity of “up to more than 20” trains per day in each direction.
- Pressure from Covanta / Veolia to transport up to 180,000 tonnes waste annually by rail from Norfolk to their Energy Waste Recovery Facility at Rookery South at Stewartby.
- Pressure from EWR Consortium (Cllr Headley is on the board) who in their December 2020 minutes discuss meeting with Port of Felixstowe to sell EWR freight capability from there to Cardiff.
- Will Gallagher stated on the EWR webinar in February that they are aiming at an average of 1 freight train path per hour in each direction.
- A freight depot to service EWR under DCO application at MOD Bicester (Nilesh Sachdev – the new Non-Exec Chair of EWR is also the Non-Exec Chair of Defence Infrastructure Organisation that owns this site)
- Network Rail’s 2017 Freight report states 3% growth per annum in freight traffic – therefore a 30.4% increase in requirements between now and 9 years-time by 2030 when EWR is scheduled to open.

On the May 12th and 13th calls, Cllr Headley accused some concerned people of Bedford Borough of “myth” and “fantasy” and “not living in the real world” for suggesting there will be freight on the line.

He suggests that there will only be limited freight because of peripheral connectivity – but that is the situation now. EWR are building a railway for the next 100 years! Jon Shortland’s slide, also shared in those meetings, clearly showed future rail routes extending to Norfolk and the huge freight destination of Felixstowe.

The only conclusion that can be reached from all of that evidence is that the line must carry freight, lots of it. In the light of our Covid experience it has now become clear that homeworking is here to stay and mass commuting will be a thing of the past. Freight will become intrinsic to the business case and passenger numbers will drop.

Our point is, that EWR have not consulted adequately on freight at the Route selection phase. In 2019 the mention of freight was reduced to a few words. If this enormously significant national infrastructure project with huge public investment is to go forwards – it should be designed with the right requirements in mind – including the correct route selection for freight.

To say that there has been “no decision on freight” and still go ahead and design a railway that “might” carry freight seems irresponsible in the extreme with public money. Especially in times of austerity.

If EWR should carry Freight – and it should as it is more environmentally friendly than road freight, then the environmental benefits should be maximised by having the railway designed to cope with it. Bedford Borough Council’s response to EWR in 2019 ([Appendix E](#)) contradicts this approach by encouraging EWR to take a route that requires compromises on gradient through the hilly North Bedfordshire countryside. This means a lower grade of Freight can be used on EWR.

It rules out aggregates freight used in construction – which makes no sense whatsoever when this railway is supposed to support the construction of 1 million homes in the Ox-Cam Arc and the associated development. That means shifting a lot of aggregates that will have to travel by road as Route E cannot carry it– again negatively impacting upon the environment.

If the environmental benefits of moving as much freight as possible by rail on EWR are to be realised then the route needs to be designed as such. This would mean:-

- Not pushing Diesel freight through the urban centre of Bedford.
- Adopting a flatter shorter route, meaning the gradient and length compromises of a North Bedford route are avoided to enable maximum freight capacity.
- Avoiding the choke point through Bedford on four tracks or the need for six tracks destroying homes and buildings.

A south of Bedford route avoids both scenarios.

7.0 Overstated Benefits, Understated Challenges

The Bedford Mayor and Cllr Headley's approach has been an overt sales pitch with little done to even pay lip service to an even-handed approach.

The incremental economic benefits of a route through Bedford have already been covered as being embarrassingly coffee-cup small at best, to spurious, anecdotal and virtually nothing at worst. Certainly, the economic case for a Southern route is barely any different in benefit to that of a route through town, and it supports encouraging direct external investment too.

The challenges of building this railway through the urban environment of Bedford Town centre and then through the hilly North Bedfordshire countryside have been massively downplayed:-

- Destruction of property was hardly mentioned (especially by Bedford Borough)
- The implications of 5-10 years of road development, demolition, construction, dust, noise and traffic issues not mentioned
- The remodelling of bridges including Bromham Road bridge (again) not mentioned
- The dust, noise, air quality issues – not mentioned
- The challenges around noise prevention on viaducts and embankments – not mentioned

The Mayor and Cllr Headley refer airily to the need for the demolition of 150 potential homes in Wixams if the line doesn't go through Bedford – this comes from Network Rail's 2f report. However, there are 3 other options in the reports from Phase 2e which BBC don't seem to have taken into account. The way the documents work is that the later the letter after 2, the more recent a Phase. *However*, this does not invalidate earlier documents. In fact, many details are referred to in later phases, even going back to phases 2b/c/d.

In the 2e document B11 there are other options for Wixams namely A1, A2 and A3. The number of buildings impacted are significantly less - 5/3/4 homes respectively. To pretend these were not just as possible or likely as 150 demolitions is to be wilfully misinformed.

Again, this is reflective of the confirmation biased approach adopted by Cllr Headley and the Mayor, selecting and sharing only the information that supports their predetermined case, and not being open and transparent. They attempt to use shock 'facts' and anecdotal evidence to ward off true facts and figures.

8.0 The Democratic Deficit

It is clear that EWR need BBC's cooperation for political expediency. It is much easier to get through their DCO Planning Application for the railway with the support of the local authority.

The question is – has the local authority operated within its mandate by supporting one route over another for a project with such significant impact on its constituents without consulting those most impacted?

We cannot help but feel that the Mayor, by pursuing a decision made in 1995, when the world and economy were both very different, is behaving in a dictatorial manner:

- There was virtually no public engagement, information, attempt to engage in 2019.
- There was no debate at full council until 2021 after the Route selection
- There was no vote until 2021
- Vital information has been actively hidden from residents that could lose their homes.
 - o Six-track demolition of homes and businesses
 - o Remodelling of roads and bridges, traffic and congestion
 - o Implications of freight
 - o Pollution, Noise, Dust,
- Unsubstantiated penny-ante benefits have been oversold.
- Negative consequences on the health and well-being of thousands have been downplayed.
- Unilateral decisions have been made without recourse to asking those that will be so badly affected what they thought.

This is a once in a generation investment opportunity, yes, we keep getting told that over and over again.

It is an investment for the next 100 years, that too is told and re-told.

Surely it deserves more governance and consideration than “Mayor Dave thinks it’s great”.

Add to this BBC's direct influence on other EWR stakeholder organisations by the Mayor and Cllr Headley on:

- SEMLEP
- England Economic Heartland – and specifically the Strategic Transport Forum
- EWR Consortium

The Mayor and Cllr Headley clearly have an excessively loud voice in EWR's ear.

This is undemocratic and it must not stand.

9.0 BFARe's Alternative Route

BFARe is demanding that the Route selection consultation is re-run using the new information available.

The consultation should be open and transparent.

The studies should be performed even-handedly focussing equally on all the deciding factors – both positive and negative:

- A full comparative Environmental and sustainability Impact assessment for the lifetime of the investment
- Full comparative traffic, congestion and Air Quality studies
- Transparency on Freight usage and ambition from stakeholder organisations

- Full comparative economic impact studies including the impact of the 5-10 years of disruption during construction
- Full transparency on demolitions, bridge rebuilding, road remodelling and relocations for each route.
- Full Transparency on comparative cost information at all stages of the consultation

BFARe have worked to produce an alternative route. It meets all EWR and BBC objectives and avoids many of the critical issues we have highlighted. It is attached as [Appendix I](#).

It holds the following benefits over Route E, and we would like to see it considered as part of an even handed, level playing field consultation process: -

- Offers fastest, lowest cost, low risk route option for Bedford.
- Ensures EWR access from east and west to Bedford Midland as destination & interchange.
- Avoids adding to existing congestion in town.
- Fully meets adopted Local Plan objectives, including planned houses & jobs growth south of Bedford.
- Avoids 100 property CPO/demolitions in town and country and devastation of rural communities.
- Protects planned development of Wixams community and station.
- Avoids major construction and environmental problems north of Midland station and across rural north Bedfordshire.
- Supports Bedford Town Centre regeneration.
- Readily connects into EWRCo 's Option B route in A421 corridor.
- The best approach for a low carbon, sustainable Bedford with least damage to the environment.
- Diverts anticipated EWR freight away from Bedford avoiding extra noise, pollution, and risk to health/wellbeing.

Summary

What upsets Borough constituents most is the lack of fairness in the approach Bedford Borough has taken. For BBC officials to have so vehemently promoted Options E in both written response and the many ad-hoc meetings with EWR before and after the decision in January 2020 – has been to ignore the many people that it impacts so negatively. Not to mention spending public money to provide confirmation biased affirmation.

Credible alternatives have been proposed (by BBC's own consultants, by Network Rail, and in recent public debate) which avoid the most devastating aspects of Option E. Rather than pause and back-check decisions, alternatives are dismissed without proper consideration. The Mayor and Cllr Headley seem to prefer spending taxpayers money arguing technical details with EWR.

EWR seem to have lost faith in the advice being offered from Bedford as they ignored the 2019 SLC report and are likely to do the same with the almost identical re-release in 2021. The final decision rests with EWRC and Ministers, but BBC have shown its advocacy can influence matters heavily. It is hypocritical to celebrate "great lobbying" in January 2020, but for the Mayor to hold up his hands saying "Not my fault" in 2021 when the consequences are revealed.

BFARe just want a consultation run with adequate communication, all the information available and the routes to be treated on a level playing field basis. BBC is complicit, and responsible, for



promoting a predetermined decision and facilitating EWR's reverse engineering to make that fit, come what may.

That is not democracy. That is not acceptable. That is dictatorship.

Will you stand up for what is right and fair and honest? Will you stick up for the people of Bedford Borough by voting for Bedford Borough to support a re-consultation on Route E?
Or will you jump headlong into the hole that the *present* Mayor of Bedford, Dave Hodgson, has dug for the people of our fair town and countryside?

In the end only you can decide whether to do what is right and decent or to toe the Mayoral line and allow our people to suffer the consequences for generations.

BFARe asks that Bedford Borough Council to urge EWR to launch a democratically sound and fully transparent comparative reconsultation into Route E in Bedfordshire and into feasible alternatives, that is fair to all.

Yours faithfully,

Mike Barlow
Chair - BFARe

List of Members and Parishes:

Bletsoe PC	Chawston & Colesden PC
Clapham PC	Colmworth PC
Great Barford PC	Knotting & Souldrop PC
Ravensden PC	Renhold PC
Roxton PC	Wilden PC
Woodlands Park Ward of Brickhill PC	Wyboston PC
CPRE Bedfordshire	

List of Appendices:

[Appendix A – Headley Letter to EWR Co 30082019.pdf](#)
[Appendix B - SLC 2019 - Implications of EWR Services Using Slow Lines North of Bedford \(1\).pdf](#)
[Appendix C - SLC 2021 - implications-of-ewr-services-using-slow-lines-north-of-bedford.pdf](#)
[Appendix D – BBC Kilborn 1st Report Feb 2019.pdf](#)
[Appendix E - BBC Kilborn 2nd Report March 2019.pdf](#)
[Appendix F – BBC EWR Response March 2019.pdf](#)
[Appendix G – NR Six Track Option Oct 2018.jpg](#)
[Appendix H - BBC Systra Highway-Assessment-for-BBC-Area.pdf](#)
[Appendix I – BFARe's Preferred Route](#)
[Appendix J - BBC Consultancy POs.xlsx](#)
[Appendix K – The Wildlife Trust response to 2019 consultation](#)