



Mr S Blanchflower
Chief Executive
East West Rail Company
FREEPOST

Mike Barlow
BFARe
Bedford For a
Re-consultation

7th June 2021

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Dear Mr Blanchflower,

BFARe'S FORMAL RESPONSE TO THE EWRCo 2021 CONSULTATION

BFARe is a community-based voluntary organisation comprising a group of nine Parish Councils¹ along the Route E corridor between Bedford and the East Coast Mainline (ECML), together with Ward members from Bedford Borough Council; CPRE Bedfordshire; and many concerned residents. The group was formed in early 2021, following an upsurge in public concern. It had become increasingly apparent that neither EWRCo nor Bedford BC were responding positively to legitimate questions and concerns from individual parishes or residents about the railway proposals. There is still, regrettably, an absence of meaningful dialogue, or any basis of trust in EWRCo or Bedford Borough Council.

BFARe members have devoted considerable time and energy into investigating EWRCo's proposals, based on their own local knowledge, experience and technical and professional expertise. To date, over 2000 members of the public have subscribed to BFARe social media, and over 3750 people have signed our petition demanding a re-consultation into the decision to select Route E for the Bedfordshire section of the railway.

BFARe fervently believes there is a much better solution for an East West Rail route in Bedfordshire than Route E, which uniquely chooses a route through a congested urban centre and then across very challenging terrain. Our solution better meets the requirements of all stakeholders including EWRCo and Bedford Borough Council, and also the Government's wider growth agenda for the Oxford-Cambridge Arc. Individual parish councils belonging to BFARe will also be giving their own responses to EWRCo in this consultation, both into the principle of a rail route through north Bedfordshire and the specific alignments being consulted upon. Each parish council has endorsed the BFARe submission.

The current consultation into alignments through Bedford and north Bedfordshire is an extremely unfortunate and unnecessary consequence - indeed for many lives and livelihoods already a disastrous outcome in terms of blight, worry and uncertainty - of the 2019 Route corridor

¹ Brickhill PC, Clapham PC, Colmworth PC, Great Barford PC, Ravensden PC, Renhold PC, Roxton PC, Wilden PC, and Wyboston, Colesden and Chawston PC. BFARe is also supported by other parish councils and Bedford Borough Council ward members across north Bedfordshire not directly affected by the route proposals crossing their parishes but nevertheless concerned at the wider implications for their own areas.



consultation and the 2020 preferred route announcement. Communities and residents in Bedford and north Bedfordshire feel under intense threat and also ignored, hence their anger and frustration. There is universal rejection of Route E.

You will already be aware that BFARe and many residents consider the consultation process prior to this current round of consultation to have been seriously flawed for many reasons, including:

- Inadequate communication with impacted residents across the Route E corridor in Bedfordshire²;
- Unexplained and uncommunicated cost changes between 2019 and 2020 consultations, with Route E, previously by far the most expensive, becoming the second cheapest, even though EWRCo had assured consultees in 2019 they could have confidence in the relative order of costs;
- Hidden and vague information regarding aspirations for freight, with possible compromise on freight capability, because of the gradients within the chosen corridor.

We do not amplify these well-founded objections further here. You will already be very familiar with all of them.

There is massive local concern that EWRCo has chosen not to listen, understand and respond positively to the concerns of local residents in this current consultation. Admittedly not helped by the restrictions imposed by the pandemic, EWRCo's overall approach, and specifically its failure or reluctance to fully answer well-formulated, specific and considered questions from members of the public, has created a widespread impression of evasiveness, lack of transparency and "public relations speak".

This lack of transparency has been further aggravated by the failure of our local authority, Bedford Borough Council, to adequately represent the interests of all its residents, especially those in the affected area. Instead it has chosen to pursue unrealistic and politically driven ambitions to create a national rail hub, whilst compromising the experience of passengers – especially commuters – through the utter inadequacy of supporting town centre infrastructure, or scope to improve it to a material extent. Their support for Route E is simply because the line goes through Bedford, irrespective of all the damaging consequences that will inevitably ensue.

Their failure to listen to constituents, or to act with democratic mandate, and their contemptuous rejection of alternative approaches, has further aggravated the breakdown of public trust.

The actions of both EWRCo and Bedford BC to date augur very badly for subsequent stages of this process.

There has to be a better way.

BFARe's supporters have worked hard to produce an alternative, better and entirely feasible solution, which now forms the basis of its consultation response. BFARe's solution better meets all EWRCo and Bedford BC objectives and avoids many of the critical issues thrown up by EWRCo's own proposals. It is attached to this letter. **We urge you to take it fully and seriously into account.** It

² For example, preliminary analysis of the postcode information only recently released by EWRCo reveals only 20% of households in one affected parish in the consultation zone were included in the EWRCo 2019 distribution list. Overall the response rate from households in the consultation zone was 2%, from the resident population less than 1%.

presents a compelling argument for re-opening the consultation in Bedfordshire. Failure to do so would leave EWRCo open to accusations of renegeing on its public commitment to “back-check” previous decisions when fundamentally new information and evidence comes to light. Such back-checking must also be done publicly by way of a re-consultation.

BFARe’s 3 way solution combines the best elements of proposals previously worked on by both EWRCo and Network Rail, and scores better than Route E on all EWRCo’s primary and secondary assessment criteria. It still readily meets Bedford BC’s objectives for connectivity to and interchange with MML and Thameslink services at Bedford Midland, without any added journey-time penalty for passengers joining or alighting from EWR services there. It satisfies Bedford BC’s aspirations for regeneration in Bedford town centre, around Bedford Midland Station, and south of the river. It removes the threat of large scale house demolitions in the Poets area of Bedford. It avoids the destruction of huge swathes of north Bedfordshire countryside and the engineering and environmental challenges arising from a decision to force a railway across its varied topography³⁴. Basing these innovative proposals on the firm foundations of previous options, including EWRCo’s Route B and work by Network Rail, gives high confidence in the advantages offered.

It must be emphasised that BFARe’s proposals reflect what we believe is common ground with EWRCo and Bedford BC for a southern parkway station serving EWR. It would be entirely separate from and in no way would prejudice the achievement of a new station for Thameslink services at Wixams. It does not require the acquisition or demolition of any homes in the Wixams new village. Any claims to the contrary by Bedford BC in its own consultation response are entirely and knowingly false and have raised wholly unnecessary fears.

BFARe’s solution holds the following clear benefits over Route E:

- Greater transport user benefits
- More closely aligned with the delivery of new homes⁵
- More support for economic growth and regeneration in Bedford
- Lower capital and operating costs and lifetime carbon costs
- More affordable and far less risk of cost escalation and overrun
- Fewer environmental impacts and greater environmental opportunities
- Better for short distance passenger services and connectivity into key employment hubs
- Maintains rail passenger connectivity to existing mainlines
- Long distance passenger services supported
- Satisfies existing and future all-freight demand and avoids extra noise, vibration, pollution, and risk to health/wellbeing in urban Bedford
 - Avoids construction safety risks alongside operational MML north of Bedford; and gradient/curvature operational risks associated with Route E

³ In version 2E of Network Rail’s 2018 assessment it stated that 1.48km of viaduct construction would be needed for Route B. Whereas, due to the undulating nature of the countryside the Route E alignments will need between 4.2km and 7.2km of viaduct.

⁴ EWRCo’s vertical route alignment information shows alignments in Route E would entail 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.

⁵ The draft Bedford Local Plan Review 2040, about to undergo public consultation, proposes options for the bulk of new housing and employment in the Borough to be located mainly south of the town or along the A421 corridor towards St Neots. See <https://councillorsupport.bedford.gov.uk/documents/s55106/Item%2008%20Local%20Plan%202040.pdf>

BFARe is demanding that the Route selection consultation for the section between Bedford and the ECML is re-run using all of the new additional information – including the BFARe 3 way solution - which has come available during the consultation process, including that released following Freedom of Information requests. The currently held information only goes to highlight our concerns that the choice of Route E was based on a flawed consultation process, misleading information as to relative capital and operating costs, inadequate and/or concealed information (e.g. on property acquisitions and demolitions; on freight), and failure to follow best practice relating to environmental and sustainability appraisal.

The re-consultation should be open and transparent and compare Route E with other alternatives including BFARe’s solution.

The re-consultation should be performed even-handedly, focussing equally on all existing relevant assessment factors, but also include:

- A full comparative environmental⁶ and sustainability impact assessment for the investment, including the embedded and lifetime carbon costs of each alternative
- Full comparative traffic impact, noise and air quality assessments
- Transparency on freight usage, freight industry demand projections and full freight capability
- Full comparative cost-benefit studies including the economic impact of the 5-10 years of disruption during the construction period
- Full transparency on property acquisitions, demolitions, bridge rebuilding, road remodelling, and relocations, and an outline construction methodology for each route
- Full transparency on comparative cost information at all stages of the consultation

A re-consultation should also clarify two specific matters relating to Route E and the alignments, which have been the subject of intense lobbying by Bedford BC, namely:

1. The 6 track versus the 4 track option to the north of Bedford. We now know that Bedford BC were aware of the 6 track solution at least in June 2019 if not earlier, but did not let local residents know until March 2021. They commissioned consultants in 2019 (SLC Rail) and sent their report to EWRCo supporting a 4 track solution in August 2019, although likewise the existence of this report was withheld by Bedford BC from affected residents. However, by indicating in the 2021 consultation that a segregated railway involving two additional dedicated EWR tracks is your preferred solution (bearing in mind existing capacity constraints on MML north of Bedford, the desire for a “clock face” service and the need to allow for future traffic growth), you have obviously rejected the Bedford BC solution. The May 2021 report from SLC Rail (which forms part of Bedford BC’s response to this consultation) adds nothing new to that debate, but the matter urgently needs to be cleared up for the benefit of local residents. They deserve to know whether a 4 track solution is acceptable to EWRCo or not, right now - not to have to hope in vain for many months.

⁶ The response from The Wildlife Trust to the 2019 consultation identifies that 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 there is 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.

2. Bedford BC's proposal in this consultation that the route should be taken *under* the A6 Paula Radcliffe Way rather than by way of a viaduct *over*. Again this was a previous suggestion made by Bedford BC in the March 2019 consultation (Kilborn Consulting) which EWRCo have apparently rejected⁷ by maintaining the need for a viaduct in this location, despite obvious visual and environmental objections.

Full clarification of these two issues should be placed in the balance when weighing the merits of Route E and the alignments against the alternative that BFARe is now putting forward.

The BFARe response to the current consultation also challenges the assertions that Route E was the most favoured in the 2019 consultation.

We dispute that Route E:

- delivers the best value for the taxpayer, returning the most benefit for every pound spent⁸
- was the most popular option with people who responded to our consultation
- would deliver the best opportunities for the environment

We do not rehearse these important criticisms here. Please refer to the BFARe consultation response as attached for a summary and you will of course be familiar with many of our serious misgivings, concerns and criticisms from previous meetings and engagement. Please ensure all these matters are fully taken into account.

In conclusion, what upsets and angers local residents most is the lack of fairness in the approach EWRCo and Bedford Borough have taken. For Bedford BC elected representatives and officials to have so vehemently promoted Option E in both written response and their many ad-hoc meetings with EWRCo (which FOI requests have revealed), both before and after the route announcement in January 2020 – has been to ignore the many people that are impacted so negatively. Despite claiming in their consultation response that they are acting as a voice for local people, Bedford BC have not told you of the strength of opposition which clearly came through in the meetings they've held with parishes and local residents.

Credible alternatives have been proposed by Bedford BC's own consultants (Kilborn Consulting in February 2019), by Network Rail up to 2018, and in recent public debate, which avoid the most devastating aspects of Route E in town and country. Rather than pause and back-check decisions, alternatives have been dismissed without proper consideration.

BFARe simply want a consultation run with adequate communication, all the information available and the routes to be treated equitably.

BFARe urges EWRCo to launch a democratically sound and fully transparent comparative reconsultation into Route selection in Bedfordshire and into feasible alternatives, that is fair to all.

In order to secure the best solution for the Bedford-ECML section and address valid and well-argued concerns, BFARe stands ready to respond positively to any invitation from EWRCo to work with them

⁷ There is an obvious inconsistency in Bedford BC's position. Arguing against Route B because of floodplain issues does not sit well with its argument that the line could proceed under the A6 at this point, which is within the Great Ouse floodplain.

⁸ Officials will no doubt need to substantiate the veracity of this claim in front of the Public Accounts Committee in due course



in the re-consultation. Such a gesture may go some way to restoring a level of public trust and confidence in East West Rail Co and the project as a whole.

Yours faithfully,

Mike Barlow
Chair - BFARe

Attachment: East-West Rail 2021 Consultation – Response by BFARe

cc: Richard Fuller MP (NE Bedfordshire)

Mohammed Yasin MP (Bedford)

Grant Schapps MP (Secretary of State for Transport)

Chris Heaton-Harris MP (Rail Minister)