



Critique of Reports commissioned by Bedford Borough Council into Alternative Alignments for an EWR Railway in Bedford Borough

Summary

The Mayor of Bedford Borough, Tom Wootton, convened a Council meeting on 6th February 2024 to present the findings of three consultant reports which compare alternatives to the EWRCO preferred route through Bedford and out across north Bedfordshire countryside. These reports were from Systra, SLC Rail and JBA.

In his summary report, Jon Shortland, the Council's Head of Planning and Infrastructure concluded there was no clear winner between any of the options, with the southern options, including BFARe's proposed hybrid route, performing almost as well as the northern options.

BFARe considers that if the consultants had undertaken more rigorous and in-depth analyses, the BFARe alternative would have come out as the clear winner. Our note explains our position in more detail, but in summary, the main issues are:

- The Systra report, looking at the economic implications, concludes there is little to choose in terms of GVA benefit to the Borough between north and south options. However, their analysis contains some misunderstandings and some significant modelling flaws, which unfairly penalises the BFARe option against the others. It is clear it would deliver the most GVA benefit of any of the options, including EWRCO's preferred route.
- The SLC Rail Report wrongly states EWRCO's decision-making process had been sound, which is a highly contentious conclusion. For example, decisions have been based on false, incomplete, misleading and withheld information and distorted feedback from the 2019 consultation. There were unexplained variations in construction cost estimates between 2019 and 2020 which misled affected residents. The need for homes in the Poets area to be demolished was known to EWRCO as early as 2018 – and to the previous Bedford Borough Council administration in 2019 - but was not disclosed publicly until 2021.
- BFARe disagrees fundamentally with SLC Rail when they estimate our alternative will require the demolition of 10-20 homes, when it is highly likely none will be lost. (This compares with 66 being required in the Poets area under EWRCO's proposals.)
- SLC Rail also fail to consider impact on landscape character and visual amenity. Sections of countryside north of Bedford (and around Roxton when considered alongside the A428 improvements) are highly vulnerable to change. Some of the most significant additional impacts of the EWR Co route are due to the hilly topography it would cross, such as construction costs and impacts, carbon impact, operational costs and freight suitability. However, SLC Rail either say it is not possible to assess at this stage, or the impacts are the same for all options. We disagree.
- On the JBA report (flooding) no conclusions were drawn on the merits of each route, due to the lack of data from EWRCO.
- SLC Rail also question the need for 6 tracks north of Bedford, whereas we know EWRCO have consistently rejected the notion of 4 shared tracks. The BFARe hybrid option avoids the need for demolitions in the Poets area completely, whilst continuing to deliver town centre connectivity and regeneration prospects.



Background

In Autumn 2023, the Mayor of Bedford Borough, Tom Wootton, commissioned three consultant firms to compare the merits of EWRCo's Preferred Route alignment (RA1 with Tempsford variant) in Bedford Borough against alternative proposals including those put forward by BFARe and ERTA, together with four other options generated by EWRCo (RA1, RA9, Varsity, and Varsity Hybrid). At a special Council meeting on 6th February 2024, Jon Shortland, the Head of Planning and Infrastructure, presented the results of those consultant reports, together with his own overview.

The reports were from JBA (flooding issues) Systra (economic issues) and SLC Rail (differentiating criteria). The JBA report was inconclusive owing to a lack of suitable data from EWRCo, so we do not consider it in this response.

BFARe welcomes the open and transparent way in which the alternatives have been considered and reported to the public by the Council, but we are not satisfied the BFARe option has been properly assessed or accurately reported.

Mr Shortland's report concluded there was "*no clear winner*" amongst the routes considered – "*the southern options are almost as good as the northern*" – but further work on each option could change these findings.

BFARe firmly believes a more rigorous analysis of alternatives to EWRCo's Route E would clearly point to the BFARe hybrid option delivering the best solution to serve Bedford and the Borough as a whole – "*the clear winner*" in Mr Shortland's words.

As context to the Borough Council's comparative appraisal, it is relevant to consider how EWRCo have themselves evaluated and compared routes through Bedford Midland with routes to the south of the town.

Previous consultations by EWRCo and relevance to decision-making

In 2019, EWRCo put forward 5 Route Options (A-E) for connecting Bedford and Cambridge. Routes B and E were similar between the ECML and Cambridge and only differed between Bedford and the ECML. In summary, Route B went south of Bedford (with an interchange with the MML in the vicinity of Wixams) and Route E went through Bedford Midland and then across the north Bedfordshire countryside. Whilst Route E was seen as delivering opportunities for connectivity with Bedford town centre, challenges were envisaged with it potentially having complex linkages with the MML. Route B could support new homes south of Bedford whilst Route E could support new homes "through densification of Bedford town centre". Slightly longer Oxford-Cambridge journey times would result from routing through Bedford Midland (Route E) compared with Route B. The indicative upfront construction costs in 2015 prices were c£2.6bn for Route B and c£3.4bn for Route E (the latter being by far the most expensive of the 5 options).

In the Preferred Route Option report (2020) EWRCo set out their reasons for identifying Route E as the preferred option.

Taking into account their main route selection criteria, EWRCo asserted:

- Route E would provide the greatest transport benefits for users serving the most households in the catchment surrounding Bedford Midland, and better connectivity than a new station south of Bedford (para 1.21);
- The GVA (productivity) benefits of routes via Bedford Midland and routes via a new station to the south of Bedford would be very similar (para 1.28);
- Several large housing sites south of Bedford had already been allocated and an EWR service south of the town was not seen as adding to that position, whereas EWRCo referred to the Borough Council's argument that a Bedford Midland option could support new housing as part of the regeneration of the town centre and potentially new opportunities north of the town (para 1.36);
- Route E costs had now fallen in relative terms to being the second cheapest £3.7bn (2019 prices) versus £3.9bn for Route B (para 1.37) but the reasons for that change were not explained;
- Routes via Cambourne (both Route B and Route E) had the fewest environmental impacts. EWRCo said that the specific route alignment that was chosen would ultimately determine impact on environmental features, but singled out that careful consideration would be given to potential noise, vibration and air quality impacts in the Bedford urban area (paras 1.39 and 1.40). Bedford town centre was considered a high risk hotspot (Route E) but no high risk hotspots were identified for Route B south of Bedford (Table 15.8);
- All options were expected to be able to satisfy existing and potential freight demand;
- All options could provide an acceptable level of operational performance, particularly if the EWR tracks through Bedford were fully segregated from existing infrastructure;
- Safety risk was not considered to be a differentiating factor (para 1.42).

Reflecting the issues identified and the comparisons made between Routes B and E in the 2019 and 2020 reports, BFARe's 2021 Consultation response put forward a hybrid between Routes B and E, picking up on the advantages of each route proposal whilst avoiding many of the downsides of Route E. In particular,

- Even wider Bedford related catchments would be served, with services calling at town centre stations (both Bedford Midland and St Johns), and at a new South Bedford Parkway station at Kempston Hardwick which could also accept fast through services not requiring a stop at Bedford Midland (a situation similar to the station arrangement at Bletchley and Central Milton Keynes);
- GVA benefits would be augmented by providing several station locations, allowing both town centre connectivity and out of town accessibility;
- Bedford BC aspirations for town centre regeneration and housing could still be achievable, whilst there would be additional transport support for south of Bedford sites, increasing their viability and attractiveness for development;
- Town centre environmental impact, including from additional traffic congestion and parking pressure, would be reduced, and EWR freight movements to/from the south and west could be routed away from the town centre;
- EWR and Thameslink/MML tracks would remain segregated, but the threat of acquisition and demolition of homes in the Poets area would be totally removed;



- Broad consideration of the topography north and south of Bedford (for the BFARe and the EWRCo options respectively) suggests significant advantage to the BFARe route in terms of engineering complexity, cost, environmental impact, and reduced risk.

We have raised particular concerns with the Chief Executive of EWRCo that the BFARe 2021 consultation response was not seriously assessed in the 2023 Route Update Announcement documents and have still not received a satisfactory response. This disregard for local opinion and elected officials is typical of the EWRCo approach, and the matter is now the subject of Freedom of Information Requests.

Systra Report: East West Rail Routing Options and Station Choice (January 2024)

This report looked at the economic implications of three route options (EWRCo RA1 with Tempsford variant of Route E; BFARe; and ERTA) and found there was relatively little to choose between them in terms of the GVA addition to Bedford Borough (max 4% difference). The BFARe option was ranked marginally lowest of three options. However, we consider there are fundamental weaknesses in Systra's analysis which mean the GVA benefits of the BFARe option have been underrated.

BFARe's hybrid option involves through passenger (and freight) services bypassing Bedford Midland in favour of a Parkway Station at Kempston Hardwick. This would allow for a wider and growing catchment in the south of the town and beyond, to be served for journeys both west towards Bletchley and Oxford and also east to Cambridge, with more direct passenger services.

Systra looked at the effect on transport benefits from the anticipated rail service patterns of each of the alternative route proposals.

The first issue is they assert (para 2.1.3 and para 7.1.5) that, under the BFARe proposals, Bedford Midland (and St Johns) would lose direct services to Oxford. This is incorrect and does not reflect the BFARe service pattern, which allows for 1 direct tph from Bedford to Oxford in addition to the Bedford-Bletchley and Bedford-Cambridge services. BFARe's service pattern is, however, correctly acknowledged in the SLC Rail report (section 6.3). Systra's error will have negatively affected their calculation of the economic benefit of the BFARe option.

There is also an apparent misunderstanding in Systra's comment at para 2.1.1 of their report that all services running between Cambridge and Oxford which call at Bedford are required to reverse at Bedford Midland Station. Whilst this manoeuvre would apply to the ERTA option, it does not apply to the BFARe option. The Bedford-Oxford, the Bedford-Bletchley, and the Bedford-Cambridge services under the BFARe option would operate as separate shuttle services from Bedford Midland and would therefore not require a reverse manoeuvre as part of the same journey. Although Systra do recognise there is now an opportunity for services to run direct from Oxford to Cambridge without calling at Bedford Midland or St Johns, they say it would mean the service specification at Bedford would be susceptible to being reduced. However, any such outcome is conjecture depending on how demand for each service emerges and develops, and the actual frequency of service adopted by the operator.

Then there are major flaws in how Systra have calculated station catchments (Section 3) for the BFARe option. In effect, this process allocates areas where people live to an individual station for modelling particular journeys on the new network. Generally, it should be the case that passengers would tend to go to their nearest or most accessible station. BFARe has proposed there should be a



Bedford South Parkway station at Kempston Hardwick to serve a south Bedford Borough catchment, but this has been overlooked by Systra. Instead Stewartby, further to the south, has been used in their analysis as the sole station to serve this area. This error penalises the BFARe option, because it assumes residents will go out of their way to access the same rail service rather than going to their nearest station. Indeed, in their conclusions (para 7.1.5) Systra go so far as to say that Stewartby has a very strong role in supporting EWR in the Bedford area, “providing considerable mitigation in Option 2 (the BFARe option) when Bedford Midland loses direct services to Oxford.” So a double error here – no loss of services to Oxford and no recognition of the wider role of a Bedford South Parkway station.

Further, when looking at the detailed allocation of residential areas to particular stations, more anomalies are evident in the way they’ve assessed the BFARe option (Option 2). For example, looking at Table 1, Brickhill and also Putnoe (in the northern parts of Bedford) are allocated to Stewartby Station for journeys to Cambridge, not Bedford Midland or St Johns. Conversely, Wootton and Stewartby are allocated to Bedford Midland, not Stewartby Station, so presupposing that residents from these settlements would go to Bedford Midland to catch a train to Cambridge, rather than to their local station. In the same vein, Wilstead and Shortstown are allocated to Bedford St Johns rather than a more local station. Wyboston, Great Barford and Cople are allocated to Bedford St Johns, not Bedford Midland – or even Tempsford. However, the detailed allocations for Options 1 and 3 for journeys to Cambridge appear to have been treated more sensibly, thus exposing a bias or lack of understanding in Systra’s approach.

The result of these flaws is that the economic benefits of the BFARe option must have been downplayed relative to the other options (£257.57m versus £268.72m over 60 years for the EWRCO RA1 Tempsford variant – see Table 10).

The other factor which has not been taken into account in the Systra analysis is the impact of the proposed Universal development centred on Stewartby and Kempston Hardwick. This major national leisure attraction could represent a significant boost to the Borough economy, far outweighing any benefits from a new railway. The BFARe option is uniquely placed to serve this major attraction. Our proposals would allow faster, more direct rail services to the Parkway Station nearby and enable the potential for additional direct rail connections from the East Coast Mainline near Tempsford, e.g. from Peterborough and the north. EWRCO’s own proposals, on the other hand, are for tracks to be grade separated at the ECML so it would not offer this benefit, and passengers would have to change trains (and levels).

Finally, Systra claim that hybrid working (working from home, etc) will increase the benefits that East West Rail can bring “through a combination of improved connectivity and increased commuting catchments” (para 7.1.2). That statement is completely counterintuitive. It ignores the fact that hybrid working has reduced demand for commuter journeys across the network and it is the actual number of people travelling on the network which creates the economic benefit, not the fact that passengers may be prepared to travel further because they travel less frequently.

The SLC Rail Report: East West Rail – Route Update Review v1.2 January 2024

The purpose of this review was to determine whether the arguments advanced by EWRCO in favour of their preferred route between Bedford and Cambridge appear valid; and to understand how well the various alternatives perform in respect of certain criteria when compared with EWRCO’s



preferred route option. The report is divided into two main sections – Part A – Review of Route Update Report, and Part B – Rationale for 6 tracks north of Bedford.

In Section 3 of their report, SLC Rail provide an overview of the scheme development process and timeline, and in their words *“have found no fault with the decision making that has led to the current preferred route alignment”*.

BFARe fundamentally disagrees with this statement, on three grounds.

First, it is well documented that the 2019 Consultation exercise from EWRCo into the five route corridors (A-E) was fundamentally flawed. EWRCo failed to notify many residents who were most closely affected in the Route E corridor north of Bedford, and held a publicity event in an obscure public hall in the south of the town. EWRCo admitted that half of the claimed 7000 responses to the consultation originated from a mass response from members of an environmental organisation anxious to avoid tree loss under any route or circumstances, yet perpetuated the claim the consultation drew 7000 responses from a postcard campaign. Many of the returns identified with supporting Route E apparently came from areas well away from the communities affected by the route choice around Bedford. EWRCo have never revealed a breakdown of consultation responses for or against Route E within Bedford Borough.

Second, the construction costs for Route E were presented in 2019 as considerably the highest of the five options, thus misleading the public into thinking that this option would be too costly to be proceeded with, and dis-incentivising many residents in the corridor from participating in the consultation exercise. To compound this, it subsequently came to light that, whilst the 2019 consultation was underway, EWRCo had received revised construction cost estimates in which Route E had become the second cheapest of five route options, not the most expensive – but this was only disclosed in 2020 when the preference for Route E was announced. The change in relative cost ranking has never been explained publicly or satisfactorily.

Third, the need for homes to be acquired and demolished in the Poets area if Route E was chosen was known to EWRCo (and Network Rail before them) as early as 2018, and to Bedford Borough Council in July 2019 but was not disclosed publicly until the day before the March 2021 Alignment Consultation. Residents of the Poets area were kept in the dark until too late in the process (thus precluding the opportunity for legal challenge, being “out of time”).

It should therefore be obvious that the choice of the current EWRCo preferred route alignment was predicated on false, incomplete, misleading and withheld information and distorted feedback stemming from the 2019 public consultation exercise. There is no justification for SLC Rail to conclude the decision making process has been sound, as all decision making has been based on a completely unreliable starting point and continuing obfuscation since.

We now turn to look at the way SLC Rail have considered the alternative options, including the BFARe alternative in comparison with EWRCo’s preferred alignment.

We note the overall conclusion from SLC Rail that the choice between options is finely balanced (Executive Summary, Comparison of Route Alignments, last paragraph) and depends on the relative weight given to the factors affecting route choice which they have examined. They have not weighed those factors against each other, so on their own terms they should be unable to rank the alternatives one against each other.



BFARe also notes their statement (also from the Executive Summary) that *“we believe a southern route option, such as the one promoted by BFARe could be feasible if further development work were undertaken to resolve some of the current deficiencies”*.

To compare alternatives, SLC Rail has used the EWRCo preferred alignment (RA1 Tempsford variant) as a reference case and compared the other options with this. Whilst we understand this approach, it could suggest that this reference case carries acceptability, which we strongly dispute. What should have been provided by SLC Rail is an overall conclusion from their criteria based assessment, with performance of each option against the chosen criteria weighed in the round to come up with a firm recommendation on route preference for the Borough Council to consider. BFARe suggests this is a key, but missing link in their work.

SLC Rail present their summary of the performance of each option against chosen criteria and a table of differences with the reference case, at para 7.15. We draw different conclusions.

Residential properties (Section 7.2)

SLC Rail estimate that the BFARe option will require the demolition of between 10 and 20 properties at West End Elstow. BFARe has been careful to avoid the need for any demolitions when drafting our alignment. Having rechecked that work and taken into account an easing of the track radius of the new chord leading to the Marston Vale Line as SLC Rail recommend, BFARe confirms there will be no need for the demolition of residential properties here. Elsewhere along the BFARe route, SLC Rail accept that minor realignments will avoid the need for any other demolitions. The headline statement referring to demolitions is misleading and without foundation.

The BFARe option therefore performs considerably better than the EWRCo option which requires the acquisition/demolition of 37 residential properties in the Poets area, and the loss of gardens or parking areas from a further 28 properties (Economic and Technical Report May 2023, Table 32). The need for further house acquisitions in the Ashburnham Road area has never been quantified.

Environmental Features (Section 7.3)

A major omission in the SLC Report is any consideration of landscape impact, contrary to well established practice (the Guidelines for Landscape and Visual Impact Assessment version 3, produced by the Landscape Institute) and without regard to Bedford BC’s own Landscape Character Assessment study.

The GLVIA suggest a baseline study is undertaken (para 3.15) to provide an understanding of the landscape in the area which may be affected, which, when reviewed alongside the description of the proposed development, will form the basis for the identification and description of the changes that will result in the landscape and visual effects of a proposal. A preliminary desk-based assessment may be appropriate at initial stages which should also be tested in the field. Although it is not an absolute requirement for alternatives to be identified and considered, it is recommended they should be, as a means of achieving more sustainable development.

The Bedford BC Landscape Character Assessment has not been consulted by SLC Rail. The LCA identifies aspects of the landscape which would be sensitive to proposed development. Much of Route E crosses the defined Renhold Clay Farmland, key aspects and sensitivities of which include the steep ascent out of Bedford with steep hills marking the southern edge of this area; a rural, peaceful area; the edge of Bedford being generally well screened by topography; a pattern of

dispersed settlement; a network of small rural lanes; generally distant views; high levels of recreational access; the tranquil and rural nature of the landscape which is vulnerable to urban influence; and the sense of openness and wide views.

Sections of the countryside along the EWRCo preferred route are highly vulnerable to change, such as within the landscape to the west and north of Bedford (Clapham, Brickhill, Ravensden and Wilden particularly). Conserving an attractive countryside setting is important for the character and economic well-being of Bedford as a popular place to live and visit. The countryside around Roxton is also highly vulnerable to change: the cumulative impact of EWR with the A428 highway improvement scheme requires particular evaluation.

The lack of an appropriate landscape input is a serious weakness of the SLC Report, undermining the value of the comparisons currently being made. The failure to incorporate the most basic landscape analysis means that one of the most significant impacts of the EWRCo proposal have not been given any attention. Until visual material is provided, the visual implications of the proposal cannot be fully assessed. A landscape assessment should be used to first inform the design of the scheme and then help determine the mitigation strategy. Without an understanding of landscape, the essential mitigation will not have been adequately considered or costed, a factor which has major implications for land purchase and the overall budget.

There is also a similar concern that assessment of biodiversity has been limited to the impact on known sites and for some protected species, but the impact of fragmentation of the countryside has not been considered. The impact of disturbance on the River Great Ouse, the loss of hedgerow connectivity and the severance of woodlands are all factors which need to be assessed as part of the route comparison analysis.

In relation to other environmental features, the SLC Rail report notes that the BFARe alignment could be adjusted to reduce interactions with Flood Zone 3 and the setting of listed buildings; and would take less prime agricultural land than the alternatives. SLC Rail do not take into account the loss of open space at the Alexander Sports Centre, Sidney Road if the 6 track option proceeds in Bedford. The BFARe option takes no defined open space.

Taking the above into account, BFARe consider that in terms of impact on environmental features, especially impact on landscape, the BFARe option should have been scored much higher than the EWRCo preferred option.

Carbon Impacts (Section 7.4)

SLC Rail state that it is not possible to compare the alternatives at this stage. We are not suggesting that there should be a full carbon assessment of each option. However, it would not take much to rank each of the route options in order of likely carbon impact. The key element underlying a preliminary carbon assessment would be local topography for each route. EWRCo's preferred route would clearly score much worse than BFARe's because of all the engineering work it would need in terms of cuttings, embankments, and viaducts (carbon embedded in concrete production). Compared with the base case (EWRCo's preferred option), the BFARe option would score much better.

Construction cost (section 7.5)



SLC have concluded that it is not possible to produce a detailed comparison of construction costs. However, they outline the likely scale of the engineering challenge associated with EWRCo's preferred scheme and indicate that the BFARe option is likely to involve least cost, insofar as structures costs, and open space and scheduled monument mitigations are concerned. The flat terrain south of Bedford is already characterised by recent linear infrastructure improvement (the A421 Bedford southern bypass). There is less data and much more construction cost risk for the EWR route which cuts through and across the undulating landscape north of the town, because this is an area where there is no history of major infrastructure projects, unlike south of the town.

We have already pointed out that there will no cost associated with the BFARe option in respect of property acquisition/demolitions. In relation to landfill site remediation, our route alignment can be adjusted northwards to skirt the edge of the Elstow landfill site, and any costs will be substantially reduced.

As noted above, BFARe considers the lack of any commentary on the changing cost estimates from EWRCo is a huge omission – there should at least have been a critique of EWRCo's approach to costings and the wide difference in relative costs between 2019 and 2020.

Operational Costs (section 7.6)

SLC Rail state they will be similar for all options but taking into account carbon impact during the operational life of the project, we draw the conclusion that gradient factors associated with Route E (the limit of acceptability for freight operations 1:80) will in fact give rise to higher operational costs for the EWRCo option compared with the BFARe option.

Economic Rationale (Section 7.7)

SLC Rail estimate that serving central Bedford with all services would deliver marginally greater benefit than that resulting from some longer-distance journeys (via the BFARe proposed southern link) being slightly faster. BFARe considers this is an incomplete assessment since it does not take into account the easy accessibility of a Parkway station to southern Bedford and the surrounding area, compared with the significant congestion and parking challenges for passengers attempting to access Bedford Midland. In 2020, EWRCo confirmed that the GVA benefits of a Bedford Midland versus a south Bedford option were very similar. However, neither EWRCo or SLC Rail have considered the GVA benefits of BFARe's hybrid option which would deliver GVA benefits across both town centre and out of centre stations. As such, the economic rationale for the BFARe option should be better than the EWRCo preferred option, not worse as shown in the table at para 7.15 of their report.

Predicted Benefits (Section 7.8)

SLC Rail do not feel able to draw any firm conclusions, pending service levels being clarified. However, we note they say each route alignment will be capable of supporting alternative levels of service with consequent impacts on some scheme benefits (note to table on page 58). We should point out from this table that SLC Rail have said there are only 2 services per hour from Bedford compared with the alternatives, whereas if Bedford South Parkway services are taken into account, it will be apparent that the BFARe option maintains 4 services per hour between Bedford and Cambridge, some being faster than others, thereby adding to local transport choice and benefits. In the table, the BFARe option should have been scored no lower than the EWRCo preferred alternative.



Construction Impacts (Section 7.9)

The report avoids looking at quite a number of construction impacts arising from the EWRCo option such as earthworks, haulage routes, work in a tightly built up urban area, noise, vibration and disturbance/severance, which will have a major impact on daily life and economic activity. As an example, there will be enormous traffic impacts resulting from the need to re-route the Great Ouse Way (A6) near Aldi and Brewpoint to accommodate the new railway under the road. This disruption will be compounded by construction traffic needed to thread the rail line through from Bedford Midland, build an extensive viaduct over the River Ouse floodplain and Clapham Road, and the work needed to create a deep cutting into the Clapham escarpment. Again some basic work would have shown how much better the BFARe alternative is compared with EWRCo's preferred option. Our option would remove this issue completely. Although SLC Rail have assessed the BFARe option as giving rise to fewer construction impacts than any of the other options, we consider the differences with the EWRCo proposal are so stark that a far greater differentiation should have been identified.

Car parking (Section 7.10)

Here the SLC report looks at the loss of car parking in both the construction and operational phases. The BFARe option performs marginally better than the EWR Route E because less of the Midland Station car parking would be lost to the railway. However, SLC Rail have not looked at overall parking gain, in which there is scope for a southern parkway station in the BFARe option to provide plentiful surface level parking at a very accessible location. If this had been considered then the BFARe option should have been scored even better on this factor than the EWRCo option.

Air quality impacts (construction and operation) (Sections 7.11 and 7.12)

SLC Rail say the impacts will be similar for all options. We do not agree. As the Route E option will pass close to retained properties in the Poets area, the EWRCo option must perform worse in air quality terms than alternatives which do not require a northern rail access out of Bedford Midland. We would rate the BFARe option higher than the EWRCo option.

Local traffic impacts at proposed station locations (Section 7.12)

SLC Rail assess that all route alignments will perform equally in respect of this issue. The biggest increases in traffic will be seen at Bedford Midland station where there is the potential for existing congestion to be exacerbated, however they consider this will be offset by a reduction of car trips due to the opening of Wixams station. BFARe contend that the opening of a Bedford South Parkway station would likewise mitigate potential town centre congestion and should be a factor in favour of the BFARe option. The ease of access from existing highways south of the town provides an attractive option (especially for commuters) from a wide range of housing areas, without adding unacceptably to traffic impact on the road network.

Freight suitability and impacts (Section 7.13)

SLC Rail note that the EWRCo preferred route would be at the limits of acceptability for rail freight (1:80) and would be limited to container rather than bulk freight. They estimate that the BFARe option might require gradients of 1:100 to 1:150 at its western end to provide adequate clearance over the MML, B530 and A6. BFARe has recently used LIDAR height information to assess the potential gradients around the 3 legs of the proposed triangular junction and can now confirm that none exceed 1 in 200, which would permit any freight configuration, unlike EWRCo's preferred



option. Moreover SLC Rail note that routes from Cambridge which approach Bedford from the south (including BFARe's proposal) would be better suited to meeting the needs of freight traffic than the northerly route alignments. On this basis, although better than EWRCo's preferred option, the BFARe option should have been scored as favourably as the other southerly options whereas it has been downgraded compared with them.

On freight impacts, SLC Rail argue that the EWRCo route will perform marginally better than the southern options, including the BFARe option because mitigation to reduce noise, vibration and air quality impacts alongside the new tracks would also serve to mitigate existing noise on the MML. BFARe notes that the 4 or 6 track option north of Bromham Road would be approximately 900m in length, over which attenuation for residential properties could be expected to be provided. However, a southern approach to Bedford Midland would be about 3kms through residential areas already affected by freight traffic and very high flows of passenger trains on the GTR service. Attenuation along this route would afford protection to many more residential properties. In these circumstances, BFARe considers their option would score better, not worse than EWRCo's preferred option in terms of freight impacts.

Impact on Local Plan 2040 housing and employment sites (Section 7.14)

SLC Rail note the BFARe alignment crosses 4 sites allocated in the draft 2040 Local Plan, so they conclude it performs worse than the reference case (but which itself would involve the loss of an employment site at Roxton). The sites they refer to are Abbey Fields Elstow, Kempston Hardwick New Settlement, College Farm Shortstown (all housing), and Peartree Farm Elstow (employment).

SLC Rail recognise that route alignments can be refined. Our preliminary analysis is that the BFARe alignment can be adjusted to avoid the College Farm site and only to clip the northern part of the Kempston Hardwick site (also noting that the whole of the proposed Kempston Hardwick site has been purchased by Universal Studios for a major national leisure attraction which calls into question the new settlement allocation here). The Local Plan Inspector has informed the Borough Council he is unlikely to endorse the allocation of the Abbey Fields site. Any effect on the Peartree Farm Elstow employment allocation could be mitigated through layout and design to accommodate rail infrastructure and employment uses alongside each other. In general terms, employment uses and railway infrastructure can much more readily coexist than residential for example. Under the BFARe proposals the tracks would likely be elevated on viaducts, thereby minimising severance and loss of developable area. The site could well remain viable.

Many of the Local Plan 2040 proposed site allocations have been thrown into doubt by the absence of spare capacity on the A421 to take additional traffic and at the moment there is no commitment from National Highways to programme or fund the necessary widening and junction improvements. Until the Borough Council revises the Local Plan to take into account the Local Plan Inspector's concerns on this issue, little can be concluded on the effect of the BFARe alignment on Local Plan 2040 allocations. So at present there seems little to choose between the EWRCo preferred alignment and the BFARe alignment in terms of effect on Local Plan 2040 sites.

Rationale for 6 tracks north of Bedford (Part B Sections 8-11)

The issue as to whether there should be two additional segregated tracks for EWR services north of Bedford, which will involve the demolition of homes in the Poets area, simply does not arise with the BFARe proposal. This is a clear advantage of our proposals which should carry significant weight.



SLC Rail have recommended to Bedford BC that they question the need for 6 tracks, arguing that whilst track separation may be desirable on operational grounds, it does not appear necessary.

BFARe would point out that EWRCO have publicly rejected the notion of 4 tracks north of Bedford, presented by Bedford BC (with SLC Rail technical support) in August 2019, and again in May 2021 (when SLC Rail updated their technical note). EWRCO have never accepted the risk of externally induced service delays inherent in sharing slow lines with MML traffic (see Economic and Technical Report May 2023, Appendix 12, and Factsheet 21 (September 2023) “Why two additional tracks are needed north of Bedford Station”).

29th February 2024