



Response to the East West Rail Non-Statutory Consultation November 2024- January 2025

Introduction

BFARe (Bedford for a Re-Consultation) 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 about EWRCo's proposals and the flawed non-statutory consultation (NSC) which had taken place in 2019. Cost information and feedback responses from the 2019 Consultation had clearly been manipulated to favour that part of Route E of concern to BFARe. Everything that EWRCo has proposed since 2019 has therefore been based on a false prospectus.

BFARe members continue to devote considerable time and energy into investigating and challenging EWRCo's proposals, using their own local knowledge, experience and technical and professional expertise. Our responses to the May 2021 Alignment NSC, the 2023 Route Update Announcement and to Technical Papers released by EWRCo subsequently (which have continued to misrepresent BFARe's better and entirely feasible alternative to the flawed Route E proposals) reflect hard work by BFARe's supporters, which continues to this day.

It is worth re-emphasising the obvious facts.

BFARe's indicative proposals show that, if there is to be a railway link between Bedford and Cambridge, there is a much better option than Route E. Uniquely along the whole of the Oxford-Cambridge corridor, EWRCo has chosen to force a new railway right through Bedford Town, a highly congested urban area, inflict a decade of untold congestion and disruption on daily lives and the economic welfare of the town during the construction period, demolish people's homes, adversely affect essential local services such as hospital car parking, destroy the notably peaceful and rolling rural countryside in North Bedfordshire, and compromise operational performance (because of steep gradients) - all for little or no economic or transport advantage (even using EWRCo's own figures).

EWRCo's proposals in Bedford and North Bedfordshire are highly risky in terms of delivery, timescales, cost, and inflation, and offer no "growth" advantage over the BFARe alternative. Attempting to engineer a railway line through uniquely unsuited and difficult terrain adds to this risk and creates many compromises during construction and rail operations that future generations will find difficult to understand, particularly when a better alternative existed.

EWRCo's proposals represent a classic example of the "sunk-cost fallacy"².

The BFARe proposals can be delivered with less risk and at lower cost, up to £1billion cheaper than the Route E proposals.

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.

² A reluctance to abandon a strategy or course of action because there has already been heavy investment in it, even where it is clear that abandonment would be more beneficial.



Scope

The scope of BFARe's representations relates to the sections of the route between Bedford and Tempsford (Questions 12-15 of the Non-Statutory Consultation Feedback Form) and to Route-wide Matters (Question 22).

The 2024 Non-Statutory Consultation materials provide some high-level qualitative information (e.g. the Transport Update Report) but defer providing more essential information until at least the Statutory Consultation phase (anticipated in late 2025) or even the Development Consent Order application after that. Whilst BFARe understands that the design of an infrastructure project is an evolutionary process, we are very concerned that, after more than seven years of EWRCo's existence, some necessary strategic assessments essential for informing this or even previous stages of the consultation process, remain conspicuous by their very absence. For example, there is huge frustration that only an "early version" of a business case will be published by EWRCo with the Development Consent Order, and a full version only afterwards. This is unacceptable, and points to a vulnerability which, for many, calls into doubt their earlier support for the whole EWR project.

The most significant information provided in the consultation materials is the Construction Impact/Route Section Maps. Although previous versions of these maps were reluctantly disclosed by EWRCo within the last 6 months following a tortuous Freedom of Information process and appeal, this is the first time that EWRCo has voluntarily published such maps for public information and feedback. The details they contain illustrate starkly how much unnecessary damage the choice of Route E in Bedfordshire will inflict on local communities and the environment – as BFARe has always maintained.

Local communities know more about their own areas than EWRCo or any of their hired experts do. For this reason, each parish council and community organisation will provide their own assessment of the Construction Maps and submit their representations separately. BFARe endorses the representations of each of them.

BFARe also understands from feedback obtained during the present Non-Statutory Consultation (NSC) public information events that EWRCo are working on revisions to track gradients along CS3 to reduce the maximum gradient from 1 in 80 to 1 in 100, or shallower, with any such changes anticipated to be disclosed in the Statutory Consultation, possibly late 2025. Given that over 20% of the alignment between Bedford and the ECML is presently shown at c1:80 gradient, such revisions will have potentially significant impacts for the depth and length of cuttings, the height and length of embankments and viaducts, volumes of excavated material, haul movements, and land-take. BFARe is highly critical of the fact that the implications of any such significant design revisions have not been disclosed in the 2024 NSC materials – nor has even a "health warning" to this effect been given – so the public is potentially being misled as to the true impacts of this project, being consulted on potentially out of date material. This is not the first time that the public has not been alerted by EWRCo to potential changes during a consultation (e.g. the dramatic revisions to capital cost estimates during the course of the 2019 Consultation). Overall this reduces public confidence and erodes support on which ultimately a major project such as this depends.



Key Issues

Alternatives

BFARe does not intend to rehearse its arguments for a better alternative to Route E in these representations. These arguments should be well known to EWRCo but continue to be disregarded by them. But as we have noted already, the BFARe option is a superior technical solution, carries less risk and can be delivered at lower cost than Route E (up to £1bn saving), whilst fully meeting EWRCo's strategic objectives.

Appendix A of the Environmental Update Report is entitled "Alternatives" and purports to consider alternatives up to the route update announcement (para A.1.4). However, it conspicuously fails to consider alternatives put forward by third parties (let alone portraying those options accurately, especially the BFARe alternative). Instead, this section is no more than a flimsy justification for a narrowing down process from route options to a preferred alignment.

Because a core part of the environmental assessment process involves a proper consideration of alternatives and full reasons for choosing a particular option, BFARe is disappointed at the approach taken in this NSC. We will be expecting better from EWRCo at the Statutory Consultation Stage.

Bedford

The impact of EWRCo's proposals in Bedford is of huge concern not only to Bedford communities but also to rural communities in North Bedfordshire which rely on the town for essential services and facilities.

BFARe objects to the demolition of 37 homes and the loss of gardens or amenity areas from a further 38 properties in the Poets area of Bedford. EWRCo has long maintained that 6 tracks are necessary north of Bedford Station for reasons of operational performance and long term resilience, thereby necessitating such devastating losses for local communities. On this basis BFARe unequivocally objects to the whole of the CS3 proposals through Bedfordshire.

BFARe objects to the proposals affecting car parking at Bedford South Wing Hospital which, during the construction period and particularly while any replacement provision is made, will adversely affect the delivery of essential health facilities in the town and its rural catchment. BFARe also understands that the Bedfordshire Hospitals NHS Trust will lose some of its land which is required for essential improvements to vital medical facilities needed for the serve the rapidly growing local population.

The whole rationale for a dedicated station at St John's to serve Bedford Hospital is poorly argued since there is negligible use of the existing station; Bedford Hospital is linked in a health partnership with Luton & Dunstable and Milton Keynes, neither of which are served by dedicated stations or would be by EWR. The value of rail links to Cambridge biomedical campus is claimed as a concept but not proven, and the disruption for staff, patients and visitors will be significant (particularly during the construction period). The costs to the wider area are poorly defined and yet could be significant and may be unaffordable if transferred to hard-pressed local authority budgets or other public sector budgets, such as health. Overall there is poor indication as to whether costs essential



to the completion of EWR will be transferred to Council taxpayers or will require as yet unconfirmed private investment.

BFARe objects to the reconstruction proposals for highway bridges in Bedford. Whilst some may see the vague promise of discontinuous electrification for EWR services as a panacea to avoid the requirement for damaging disruption to the local highway network during what could be a ten year construction period, long distance freight services originating from beyond EWR will not have the option of this mostly untested form of traction and will be reliant on overhead electrification once diesel traction is discontinued. Whether or not discontinuous electrification is introduced on EWR services, each of the bridges directly affected (Amphill Road, Cauldwell Street, Ford End Road) will have to be rebuilt to higher clearances to assure passive provision for full electrification – which is a fundamental project requirement not obviated by the suggested use of discontinuous electrification. (The BFARe option avoids this problem as freight services using EWR would bypass the town). Bromham Road and the Great Ouse Way bridges will need to be extended or rebuilt in any case for Route E. All such works will give rise to years of highway congestion and economic impact in the town.

BFARe is also concerned by the inclusion on the Route Section Drawings of an intention to lower the track beds along the section containing Amphill Road and Cauldwell Street bridges and through the new St Johns / Hospital station in between. This is unacceptable as it would lower the running height below the highest recorded level of the nearby Great Ouse River in flood (26.02m AOD in 1998). This unwise intention was first documented in the Feb 2022 series of ARUP Plan Profile Drawings and has been repeated in the equivalent current Route Section Drawings dated 4 Nov 2024.

BFARe is concerned about proposals for multi storey parking (MSCP) at Bedford Midland and the relocated St Johns Stations, which could cause extensive queueing back on to an already congested highway network. At Bedford Midland, we are also concerned about the townscape impacts on the Conservation Area and on local residential amenity from the massing of the proposed MSCP.

Construction Impact Maps

As noted above, each parish council/community group will be commenting on the construction impact maps affecting their local areas. However, some general points can be made.

BFARe is critical of some of the quality of the published materials, especially the construction impact maps where it is very difficult to ascertain the base mapped context and thus to orientate oneself to familiar places on the ground and then to the actual construction proposals. Also the heavy reliance on digital formats prejudices the visually or digitally disadvantaged. The necessary level of detail to understand the impacts can easily be lost on the computer screen or if printed out at A4.

There appears to be a lack of background analysis or information to inform key aspects of the route construction maps.

A major omission is any consideration of landscape impact, contrary to well established practice³, or reference to Bedford BC's Landscape Character Assessment.

³ Guidelines for Landscape and Visual Impact Assessment version 3 (GLVIA), produced by the Landscape Institute.

The GLVIA suggest a baseline study is undertaken 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.

The Bedford BC Landscape Character Assessment 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 (e.g. Clapham, Brickhill, Ravensden and Wilden), where the alignment cuts across the “grain” of local topography. The sensitive gap between Bedford and Clapham would be bisected by the railway. 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, Chawston and Wyboston 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 Route Construction Maps. A landscape and visual impact assessment should be used to inform the design of the scheme and then help determine the mitigation strategy. Without such an understanding, essential mitigation will not have been adequately considered or costed. So the landscape “mitigation” shown on the Maps in many instances bears little relation to the qualities of local landscapes and what is really needed to assimilate the scheme into the countryside or mitigate harm on sensitive receptors such as users of public rights of way or occupiers of nearby residential properties.

EWRCo should also consider opportunities for area-wide enhancements such as woodland corridors, and recreational route or local green space improvements.

There is also concern that there has been no assessment of biodiversity. So the impact of fragmentation of the countryside has not been considered. For example, the impact of disturbance on the River Great Ouse, the loss of hedgerow connectivity and the severance of and/or proximity of works to sensitive woodlands are all factors which need to be assessed.

Despite EWRCo having undertaken some surveys of public rights of way (PROW) usage, no results have been published to inform which PROWs are locally popular and should be retained and enhanced. For example, in Ravensden, the well-used Green Lane Byway (BOAT61) is shown as being severed, whereas an unused footpath which serves no practical purpose (FP35) is enhanced with a connection to a footbridge over the railway.

No hydrological assessment has been produced. So there is no way of assessing whether the location or capacity of proposed balancing ponds bears any relation to what is required to ensure run-off from the proposed works will be properly handled without giving rise to surface water flooding. In relation to fluvial flooding, Clapham in particular currently suffers from regular flooding of the High Street. There is no confidence that this won't worsen by the construction of a viaduct within the



Great River Ouse floodplain. Current flood mitigation proposals do not appear sufficiently robust. Throughout the area many existing farmland drainage ditches will be altered, also giving rise to surface water flooding problems.

There is great concern at the size and location of many of the proposed construction compounds, which will give rise to immense landscape, visual and residential amenity impacts (e.g. traffic, noise, disturbance, vibration, dust, lighting, security fencing, spoil heaps, the setting of listed buildings, loss of trees, hedgerows and agricultural land). Some seem totally unsuited for this purpose because of undulating landform. Local access roads are in many instances totally unsuitable for the weight, type and volume of construction traffic which will be introduced across the area. It is wholly unacceptable that no justification has been provided in this NSC to support the scale, location and impacts of each of the construction compounds, or to defer the publication of construction and traffic management plans (e.g. how construction traffic will gain local access from the strategic road network) to a future consultation. A draft Code of Construction Practice will not be produced until the DCO stage, which is far too late.

Red line Safeguarding Area

A number of assurances are required from EWRCo:

1. The safeguarded area marks the absolute maximum extent of land which is needed to build and operate the railway and will be minimised wherever possible. For example the intended usage and the extent of each of the proposed construction compounds must be individually justified.
2. EWRCo will commit to funding all works within the red line area.
3. EWRCo will commit to paying in full for any mitigations and improvements required beyond the red line area which are directly or indirectly related to the scheme. For example, the cost of first-last mile connectivity improvements should not fall on local Council taxpayers.
4. All construction compounds will be restored to their previous use and condition.
5. All offsite highway repairs necessitated as a result of construction traffic usage will be funded and implemented entirely by EWRCo at their expense within a fixed timescale.

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