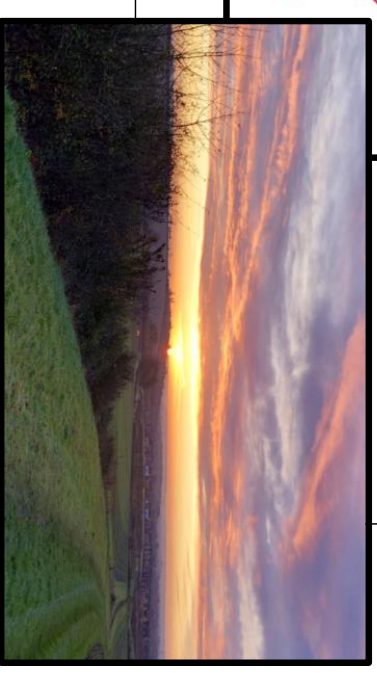
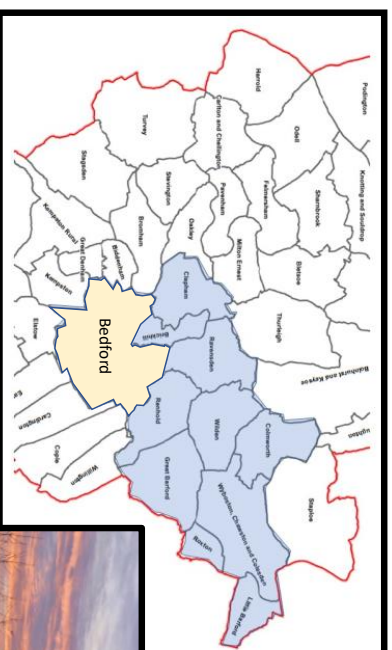


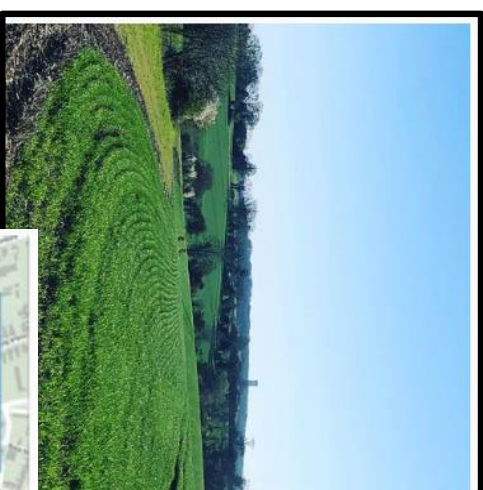
East West Rail – 2021 Consultation Response by BFARe

June 2021



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**EWR non-
statutory
consultation**



Why BFARe?

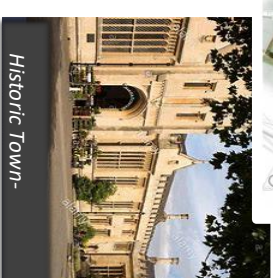
- ❑ *BFARe* is a voluntary campaign fighting for Bedford's future as part of the Oxford to Cambridge East-West rail route. Whilst generally supporting the principle of a railway between Oxford and Cambridge *BFARe* considers the option E route selected by EWRC^o and the current alignment selection is based on a critically flawed 2019 public consultation, a situation further aggravated by a lack of transparency from EWRC^o in providing key information.
- ❑ *BFARe* brings together 9 parishes through which East West Rail potentially passes in Bedfordshire plus CPRE Bedfordshire. By contrast EWRC^o's flawed route selection consultation failed to communicate with many affected people, missed key Parishes from the Prescribed Consultee List and distorted the reporting of public response to suit an agenda agreed with selected pressure groups and local authorities with questionable public mandate.
- ❑ Responding to a significant groundswell of concern across the Bedford Borough, *BFARe* aims to coordinate local opinion, challenge the preferred route between Bedford and the East-Coast Main Line, and propose a realistic alternative which fully meets the key objectives of all stakeholders.
- ❑ *BFARe* seeks DfT and EWRC^o support for reconsideration of current plans, and requests immediate fresh consultations aimed at back-checking past assumptions and identifying an optimum route across Bedfordshire that will enhance the whole EWR Central Section; will offer the maximum economic and social benefit; and fully support Government aspirations for a low carbon economy, and the required regeneration and economic growth across the Oxford-Cambridge Arc.

What's Best for Bedford?

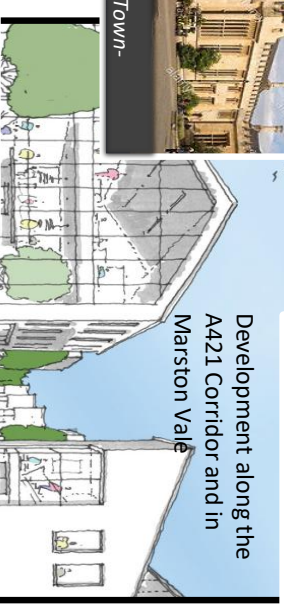
- ❑ A key centre in the Oxford-Cambridge Arc.
- ❑ Potential to take full advantage of :
 - Historic Town Centre.
 - Convenient connections to London and across the Arc.
 - Strategic Communications infrastructure.
 - Unique transport location benefitting from EWR.
 - Attractive countryside and rural landscapes.
 - Good value housing plus readily available development land South of Bedford.

BFARe considers that *East West Rail C^o* selected Route E from 5 routes after a consultation in 2019 that was flawed and needs to be re-run to

achieve the best outcome for Bedford and EWR



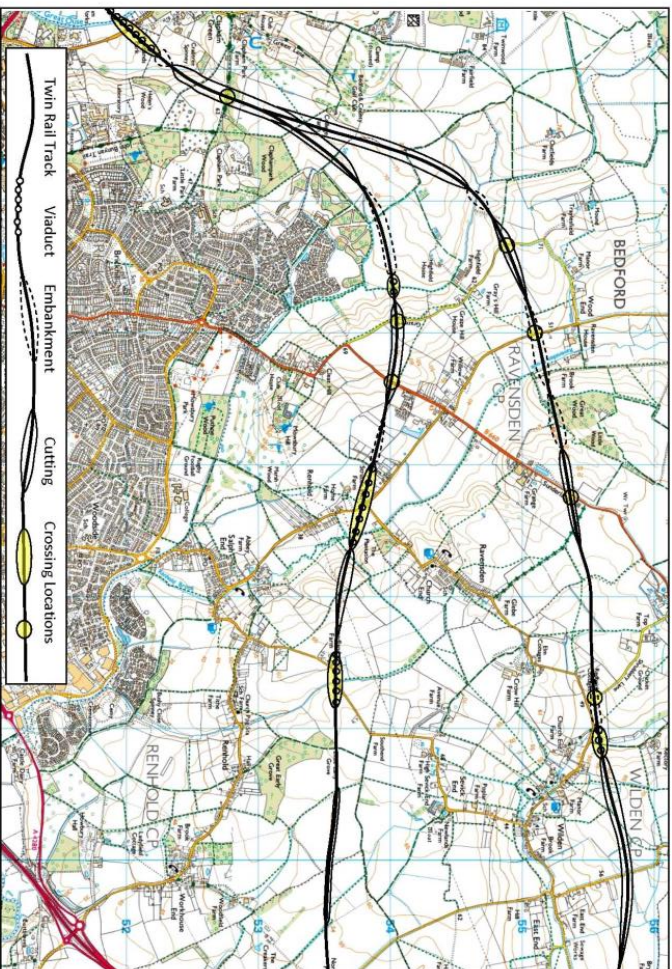
Historic Town-



Development along the A421 Corridor and in Marston Vale



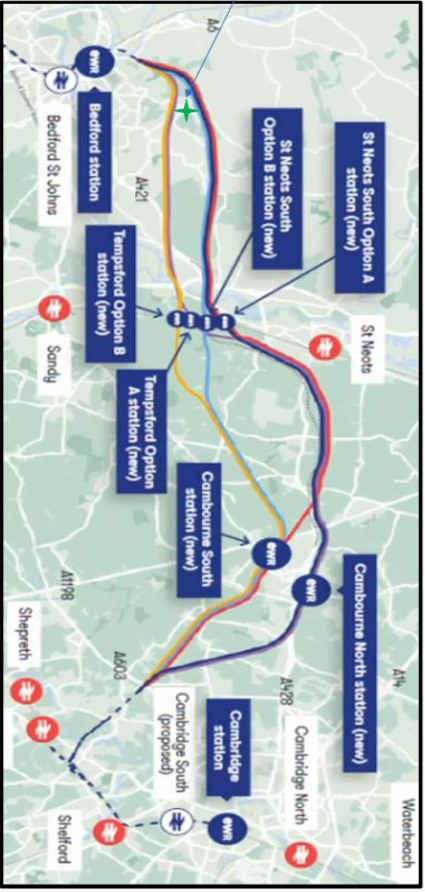
Option E - Route Alignments



Results in -

- ❑ Devastation of rural landscape & quality agricultural land.
- ❑ Longer route, with steep gradients, tight curves and greater journey times.
- ❑ No supporting study on environment, climate change, air quality and pollution.

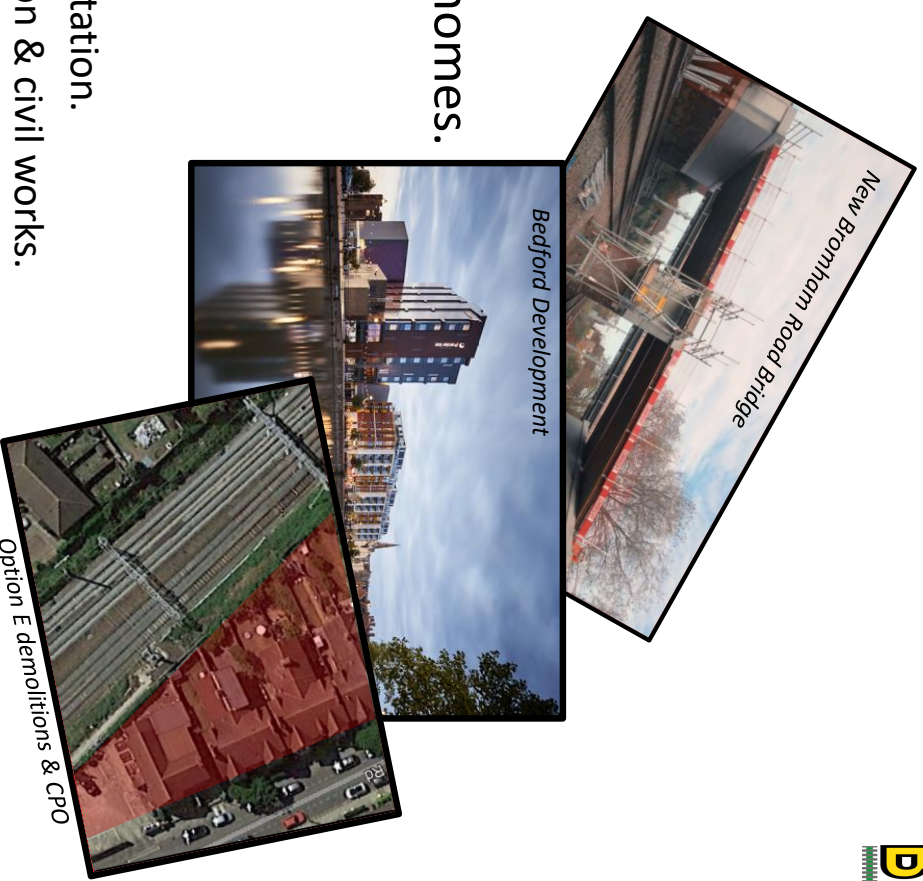
Alignment	EWB Alignment (Shortlisted)	ECML Station	Cambridge Station	Notes
(North)	1	St Neots (Opt. A)	N	Better environment & support to housing growth than 2. £340m cheaper than 3. Viaduct A1 at Black Cat & Gt Ouse.
(North)	2	St Neots (Opt. A)	S	Crosses A1 at Boxton, with viaduct from Black Cat over A1 and Gt Ouse. Follows A428.
(North)	6	St Neots (Opt. B)	S	Crosses near Black Cat. Better environmental. £270m cheaper than 3.
(South)	8	Tempstford (Opt. B)	S	Does not follow A428. Shortest Route. Most expensive £23.25 bn. Requires viaduct over A1 & Gt Ouse with Road A428 bridge. £120m cheaper than 3. Best route for Temp & Cam N Viaduct over A421/A1/Gt Ouse and bridge under A428.
(South)	9	Tempstford (Opt. A)	N	



- ❑ Significant difficulties in Clapham area with highways, Gt Ouse river/flood plain, links from MML, and difficult terrain.
- ❑ Complex civil engineering.

Impact of Option E on Urban Bedford

- ❑ EWRC's 6-track MML proposal causes devastation of tightly-knit communities.
- ❑ Compulsory purchase involving up to 100 homes.
- ❑ Disruption of existing MML including:
 - Flyover from existing MML over the A6 highway.
 - Additional tracks added to existing MML.
 - Lengthy viaduct in the Clapham area.
 - Replacement and extension of existing bridges.
 - Remodelling/replacement of Bedford Midland Station.
 - Great Ouse flood plain compromises construction & civil works.
- ❑ Hugely expensive relocation of Thameslink carriage sidings to an unknown location.
- ❑ Further overloading of access roads & parking at Bedford Midland deters passengers.
- ❑ Major track upgrade & station rebuild in St John's area of Bedford.
- ❑ All trains (including Freight) routed through urban Bedford – noise, pollution, vibration & AQMA concerns especially in absence of electrification.



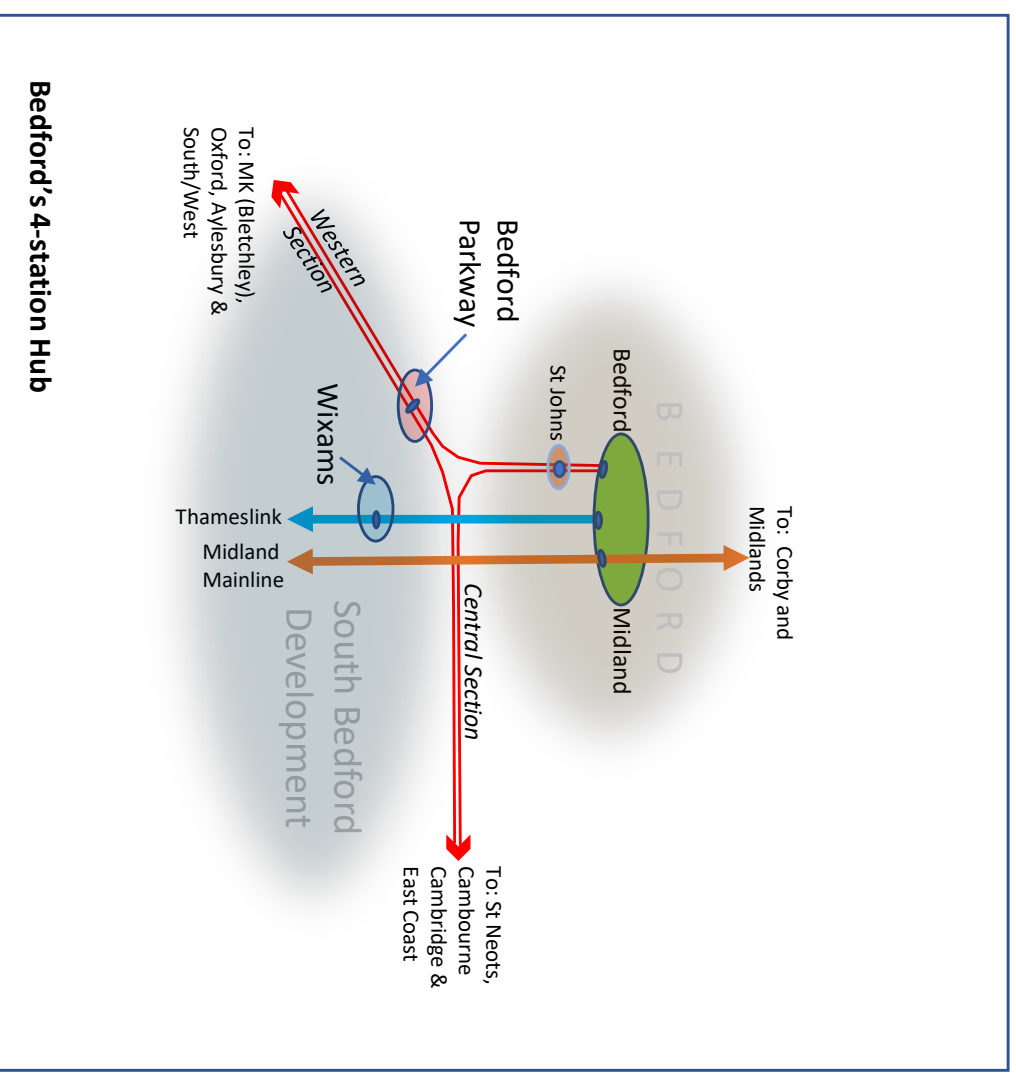
Impact of Option E on Rural Areas



- ❑ Devastation to rural countryside and high-grade agricultural land being sacrificed for investment in urban development and a small GVA uplift.
- ❑ Difficult topography in North Bedfordshire requires significant civil engineering including long viaducts, deep cuttings and high embankments.
- ❑ Low priority given to key Government policy on 'Climate Change' and 'Carbon Zero' targets.
- ❑ Absence of an outline construction management plan for each alignment; many local access roads unsuitable and already congested.
- ❑ Option E plans are costly, disruptive, and scar heritage landscapes contrary to stated Bedford Borough Council, EWRC, and Government environmental, sustainability, decarbonization and biodiversity policies.
- ❑ Noise, vibration and pollution issues associated with construction and future operation (particularly in absence of electrification).
- ❑ Track gradient issues relating to Freight operations with concerns about compliance with best practice; uncertain provision of suitable freight train 'waiting/passing' zones and future opportunities for inter-modal transfer sites.
- ❑ No environmental/sustainability studies undertaken and concerns on protection of heritage sites and ancient woodland; stopping-up or diversion of numerous well-used, historic, public rights-of-way.
- ❑ Location of East West Rail / East Coast Mainline interchange station between Sandy and St Neots is likely to dictate alignment within declared Option E corridor, with indeterminate impact on local communities and landscape in North Bedfordshire.
- ❑ EWR Corridor issues prejudicing outcome of future discussions on development options under Local Plan.

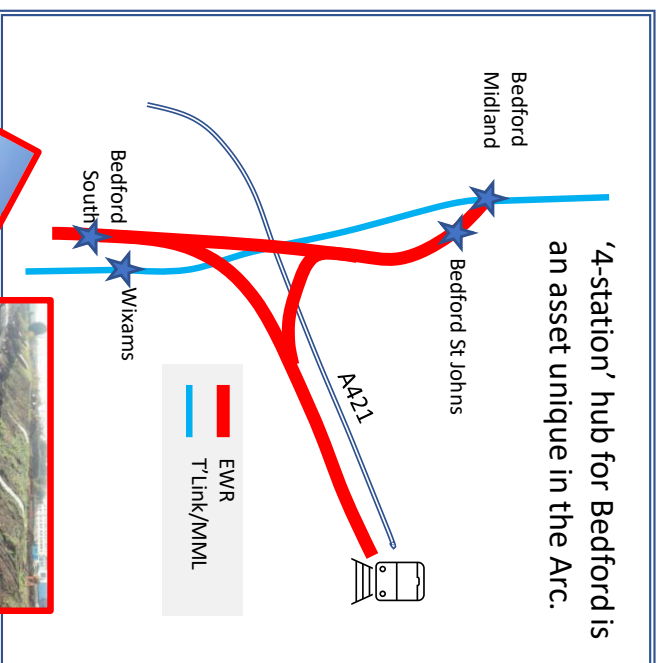
An Alternative Option for Bedford

- ❑ BFARe investigation of alternative route which avoids severe problems of 'Option E' in Bedford and across north Bedfordshire, and satisfies many local objections.
- ❑ **Alternative route matches up to all proposed routes through St Neots or Tempsford station and onward to Cambourne & Cambridge (example is EWR 'Option B'). Westward line is Bedford/Bletchley EWR upgrade.**
- ❑ Gives EWR access to Bedford Midland town-centre station, and for MML and Thameslink interchanges from east and west.
- ❑ Gives option for flexible scheduling to fully meet passenger demand, with some fast EWR services to call at Bedford Parkway as alternative to Bedford Midland.
- ❑ Builds on early work by Network Rail⁶.
- ❑ Direct E-W route for freight avoiding urban centre with option to divert to MML for northern destinations.



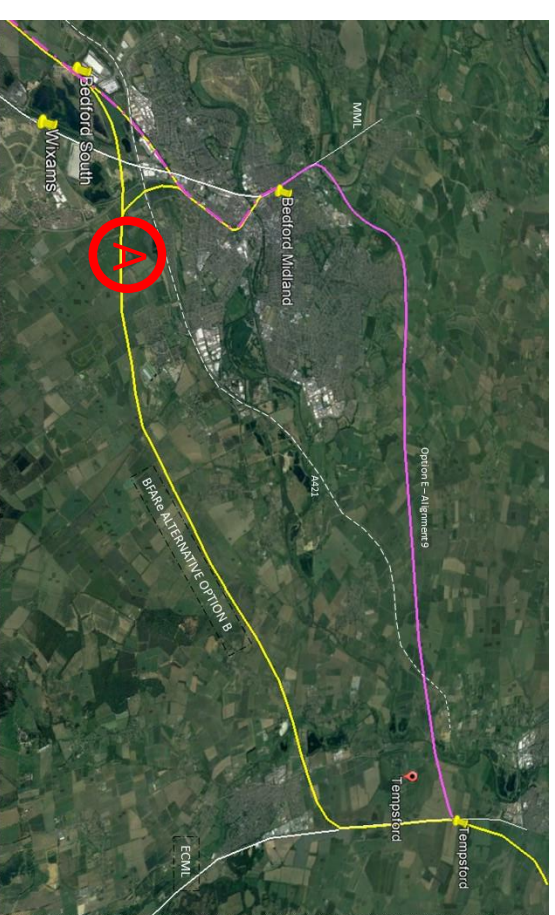
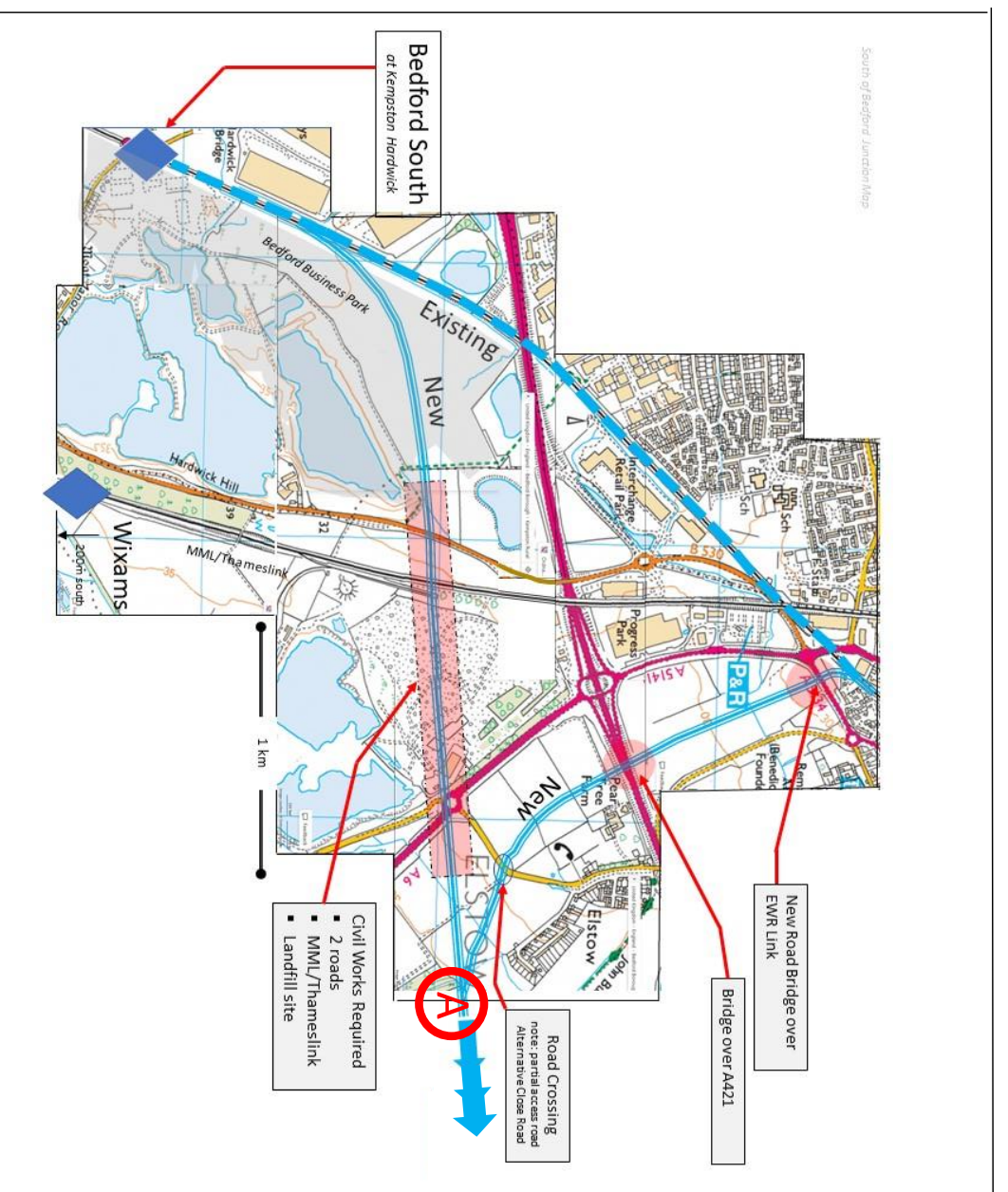
⁶ Concept study by Network Rail; East-West-Rail Central Section – Phase 2e Report – 30 Sept 2018

The “3-Ways” Option for Bedford – Strategic Benefits



- ❑ 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 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 EWRC'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.

The “3-Ways” Option for Bedford - Engineering Outline



Representative route from Bedford towards A428

“3-Ways” junction south of Bedford links to route from Oxford, and eastward to Tempsford/St. Neots and onwards to Cambourne and Cambridge.

Option B shown but exact alignment to be agreed with all stakeholders.

BFARe route  approximately 5km shorter than Option E 

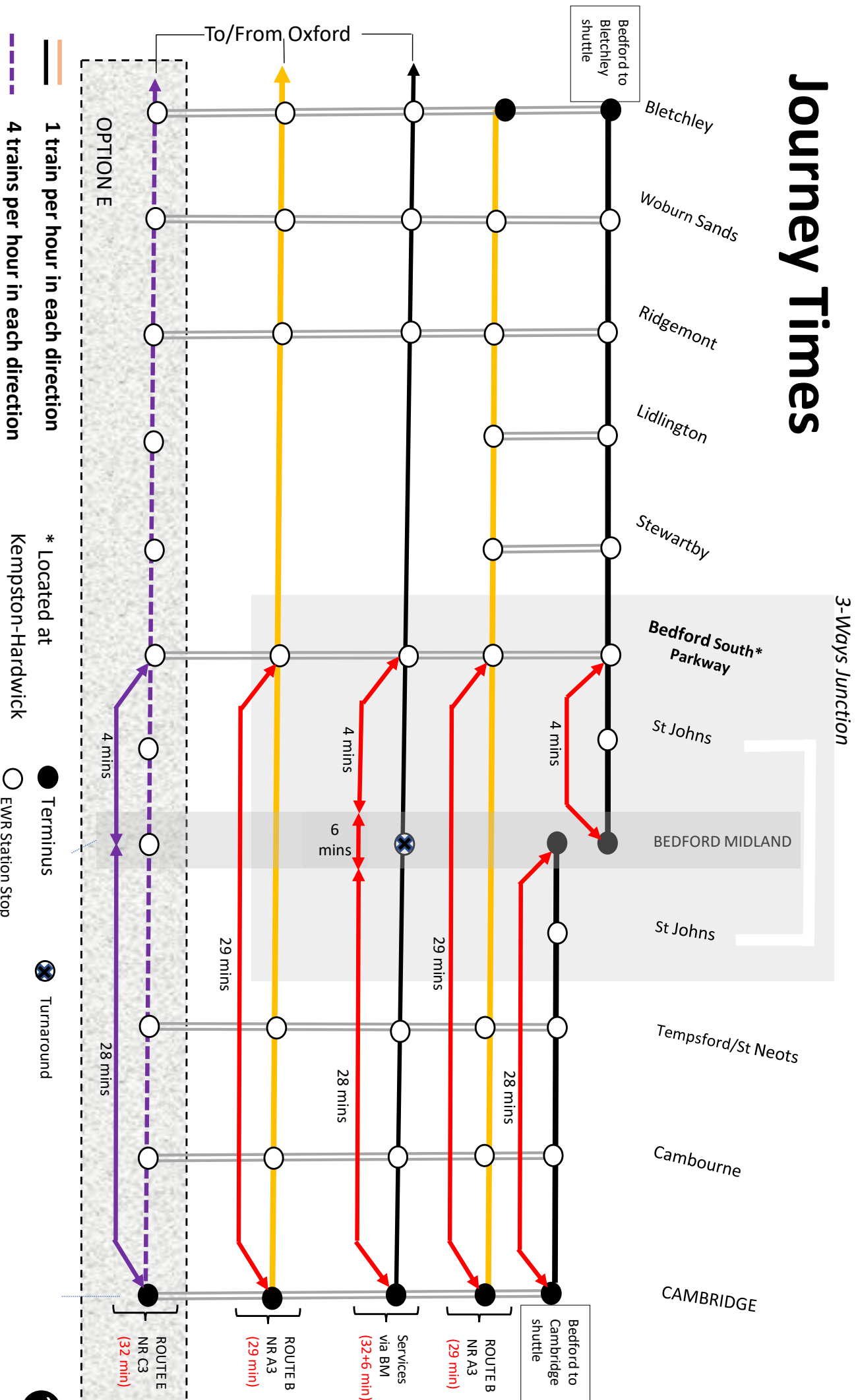
The “3-Ways” Option for Bedford

- Stations and Linkages



Option E compared to BFAR Alternative Option

Schedules & Journey Times



Comparing BFARe Solution with Option E (Primary Criteria)

FACTOR 5	OPTION E	“3-Ways”	Comment
Transport User Benefits	★★★★☆	★★★★★	Includes passenger satisfaction with end-to-end journey experience and benefit of fastest journey times. Congested routes & Car-Parks important in addition to station quality & on-time, frequent and comfortable trains. Station convenient for workplace or to have good ‘first-mile-last mile’ transport links. Train scheduling matched to passenger need.
Supporting the Delivery of New Homes	★★★★☆	★★★★★	Assessment of land & potential for homes to be served by EWR. South Bedford has more potential than town centre or rural areas north of Bedford which lack road infrastructure. Convenient access required to station – by car, cycle, walking or bus/tram
Support Economic Growth	★★★★☆	★★★★★	BFARe solution supports BBC and Arc economic objectives. Option E assumes growth in unscheduled areas. South of Bedford has significant business development opportunities. Willingness to commute will be important to support productivity increases. Only marginal option differences in what is very low GVA benefit.
Capital & Operating Costs and Overall	★★★☆☆	★★★★★	Option E involves expensive engineering to modify Bedford Midland station area and MML, and to traverse difficult countryside. On route to ECML “3-Ways” route has easier terrain south of A421 and less demanding engineering challenges.
Affordability Environmental Impacts and Opportunities	★★☆☆☆	★★★★★	“3-Ways” option is less complex, lower risk and potentially lower cost. Track is approx. 5 km shorter than Option E (from Bedford S) Costs not updated from 2019 despite significant changes – need urgent clarification. S of Bedford Route has less environmental impact than Option E through town centre and across N Beds rural countryside, and avoids multiple CPO and urban demolitions, with lower pollution and noise levels than for Option E.
Assessment Score	11/25	18/25	

Comparing BFARe Solution with Option E (Secondary Criteria)

FACTOR ⁶	Option E	"3-Ways"	Comments
Short-distance passenger services and connectivity to support commuting into key employment hubs (current & Future)	★★★★☆	★★★★★	S of Bedford stations easily accessible with short journey time. Bedford Midland access and car park congested.
Rail passenger connectivity to existing mainlines	★★★★★☆☆	★★★★★☆☆	Both options give access to MML. "3-Ways" gives faster access to ECML and WCML
Long Distance Passenger Services	★★★★★☆☆	★★★★★☆☆	Bedford Midland remains an important interchange for both options.
Satisfying existing & future freight demand (as anticipated by freight industry) where affordable	★★☆☆☆☆	★★★★★☆☆	Problems with freight through town centre. "3-Ways" option gives access from East Coast ports and fast services. E & W access to MML
Railway performance and alignment with wider rail strategy and infrastructure.	★★★★★☆☆	★★★★★☆☆	Assessed against EWRC criteria and "The Rail Sustainable Development Principles" ⁷
Safety risk (construction & operation)	★★★★★☆☆	★★★★★☆☆	Additional track and civil works north of Bedford Midland. Gradient risks for freight in Option E.
Consistency with plans for location of settlements	★★★☆☆	★★★★★	Housing & business development in S Bedford close to EWR. N Beds housing development is speculative, difficult to access stations and lacks suitable roads for construction and operations.
Assessment Score	20/35	30/35	

6. From "East West Rail Bedford to Cambridge – Preferred Route Option Report Chapter 5 – Approach to Evaluating Route Options within the Preferred Route Corridor

7 DfT /RSSB advisory

[2016-05-rail-sustainable-development-principles.pdf \(dft.gov.uk\)](https://www.dft.gov.uk/rail-sustainable-development-principles.pdf)

Headline Challenges

- ❑ *Route E selected is longer, has more steep gradients, has tighter curves and longer journey times and will cost more to construct with much greater harm to the environment and to local communities. This is all contrary to the assurances provided by EWRC² and conflicts with policy set by the Government for EWR and more generally for development of the Oxford-Cambridge Arc.*
- ❑ *Contrary to public expectation, EWRC² failed to communicate the earlier studies¹ recommending a south of Bedford option via Sandy, and then manipulated cost information to favour routes supported by selected pressure groups & local authorities who had very narrow agendas. EWRC² failed to share this critical data in 2019 and only did so at the start of the 2021 consultation when a route option had already been selected; they have failed to justify how Option E was elevated to being the Preferred Option.*
- ❑ *Key issues were also ignored. Routes were evaluated with insufficient consideration (or public consultation) on issues such as freight operations, sustainability, environmental damage, or on Government priorities for decarbonization and climate change. Significant engineering issues were underrated with a potentially serious impact on local communities and on construction costs, with a heightened risk of significant cost escalation and future project delays.*
- ❑ *BFARe considers that knowledge of these shortcomings and the resulting major impact on local communities was concealed in a cynical attempt to frustrate formal challenge.*

¹ Network Rail – March 2017 – www.network.co.uk/wp-content/uploads/2017/03/East-West-Central-central-section.pdf

Challenge to EWRC² ①

ECWR¹

“It delivers the best value for the taxpayer, returning the most benefit for every pound spent”²



BFAR^e

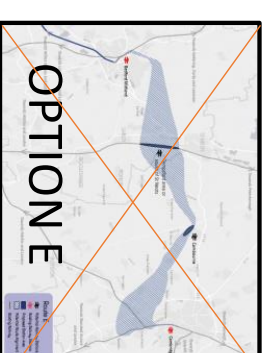
- ❑ EWRC² assurances regarding **economic benefit** and the headline preference for Option E are unconvincing.
Published analysis has shown the most favourable GVA uplift³ in Bedford Borough from EWR is < 1.5% and within that figure the advantage of a town centre station over one in South Bedford, is marginal.
- ❑ At a late stage of the 2019 non-statutory consultation Bedford Borough Council (BBC) commissioned a report to demonstrate the economic advantage of Option E over alternative routes and to provide support to the option through Bedford Midland Station which they championed to meet local politically-driven aspirations. This was submitted after the closing deadline for the consultation. No account was taken of economic or social costs to rural and urban communities.
- ❑ The reports from EWRC² prepared for the March – June 2021 consultation show that the measures (and therefore the cost savings) proposed in the BBC submission have largely been ignored. Furthermore, many *significant and potentially expensive measures have been added* including track and bridge modifications; challenging new viaducts; compulsory purchases involving up to 100 homes; plus, very complex and environmentally and socially unacceptable civil engineering across north Bedfordshire. EWRC² and BBC have also failed to perform traffic congestion, air quality, or noise pollution studies for the town centre; this risks future costs to ensure regulatory compliance and to safeguard the door-to-door passenger journey experience.
- ❑ **Despite requests to EWRC², no updated cost estimates have been provided for the whole of the Bedford-Cambridge corridor and therefore there is a high risk of future cost escalation.**

² Announcement by Secretary of State for Transport and East West Rail Company – 30 January 2020

³ BBC report uplift in Gross Value Added (GVA) from EWR is £57m per annum in total Borough GVA of £3900m (2017 Data)

Challenge to EWRC^o ②

EWRC ^o .	<i>“It was the most popular option with people who responded to our consultation”²</i>
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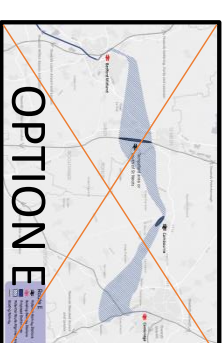


BFARe	☐ EWRC^o statement regarding the popularity of Option E being routed through the centre of Bedford is dubious. The data applies to <i>all</i> responses received on <i>all</i> aspects of Option E from across the entire region - and nationally. ☐ EWRC^o have been unable to say how many responses came from the Bedford area and their published data has been distorted by grouping together all the results despite the issues and motivations being local and understandably, quite different. BFARe have requested that responses to the current consultation be identified by locality post-codes. ☐ Published results were also distorted by block submissions from well-organised single-issue environmental groups. These distortions further reduced local confidence in EWRC^o analysis and recommendations. It cannot be accepted as a fair statement, as the upsurge of protest by local residents and organisations has demonstrated. ☐ Key communities around Bedford were not included on the Prescribed Consultee list.
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² Announcement by Secretary of State for Transport and East West Rail Company – 30 January 2020

Challenge to EWRC² ③

“It would deliver the best opportunities for the environment”²



EWRC²

BFARe

- ❑ The headline EWRC² statement on **overall environmental benefit** of the Preferred Option lacks any supporting data or any adequate local environmental study.
- ❑ Intuitively, the devastation of large areas of rural countryside and high-grade agricultural land across north Bedfordshire; the recently announced extent of demolitions of people’s homes necessary; and the very extensive civil engineering work required for Option E, compares unfavourably with route options south of the town in the A421 route-corridor which is already a favoured location for redevelopment.
- ❑ Concerns also exist on the impact of increased pollution in an area which already has marginal air quality (AQM-5 Bedford), particularly if freight operations are sanctioned without electrification of the line; future concerns on climate change and carbon emissions.
- ❑ BFARe also supports proper attention being given to submissions from respected amenity societies such as CPRE who have argued strongly against Option E on sustainability and environmental grounds.

Summary

- ❑ “3-Ways” Option is the BFARe preferred route solution for Bedford
- ❑ “3-Ways” Option:
 - Avoids devastation of rural communities & CPO /demolitions in Bedford.
 - Supports planned housing & business growth and economic development of Arc.
 - Alternative EWR stations help avoid congestion at Bedford Midland station.
 - Provides full access to Bedford Midland for town centre and MML interchange.
 - Meets all stakeholders’ primary objectives.
 - Excellent access east & west on EWR with junction into Bedford Midland.
 - E-W freight operation avoids town centre but can take mainline route north if required.
 - Provides low carbon, sustainable solution with low journey times, low risk at lowest cost.
 - Gives shortest journey times on direct route.
 - New “3-Ways” junction links through A421 corridor (Route B) to ECML interchange.
- ❑ ‘4-station hub’ gives Bedford unique access to EWR and communication across Arc.
- ❑ “3-Ways” Option gives the best outcome against EWR/C² route evaluation criteria, and DfT/RSSB ‘Rail Sustainable Development Principles’.