

Ravensden PC's Response to the East West Rail Consultation
4th June 2021
By Email and Registered Post.

Dear Sir / Madam

Ravensden Parish Council (PC) Response to EWR Company (EWRCO) Consultation 2021

This letter forms the official response from Ravensden Parish Council, on behalf of our residents, to the East West Rail (EWR) 2021 consultation, covering the sections from Bedford to the East Coast Mainline (project section C and parts of section D by the EWR definitions).

- **Choice of Route Corridor E:**

Ravensden PC wish to make clear, on behalf of our residents, our **absolute objection to the choice of the Route Corridor E and the way it was selected in 2020**. This decision was made on the basis of a fundamentally flawed consultation in 2019 and we fully support the BFARe campaign for this consultation to be re-run looking fairly and objectively, including all the new information now available, at the choice between Route E and a corridor to the south of Bedford (such as the previous route B).

The 2019 consultation was fundamentally flawed in a number of ways all of which are now a matter of public record, and we publicly call on EWRCO and the Government to be fair to local people and re-run a consultation for the overall route corridor chosen.

Flaws in the 2019 consultation included:

- Very inadequate communication and consultation processes which excluded large numbers of local residents from obtaining detailed information on the consultation and attending meetings to discuss the consultation;
- The use of significantly misleading cost information, and its relativities between routes, that changed during the process without notifying the public. The cost of Route E went from being the most expensive to the second cheapest, which would have very directly influenced the level and nature of responses of residents to the 2019 consultation;
- The distortion and misrepresentation of residents' responses by grouping together all the results relating to Route E regardless of origin, and the subsequent failure by EWRCO to publish more disaggregated postcode data;
- The discussion and explicit notification of possible freight use of EWR was almost entirely absent from the details of the 2019 consultation, despite the accommodation of freight being one of Government's main objectives for the line;
- The 2019 consultation did not explicitly flag the significant destruction of homes in the Poets area of Bedford, despite EWR already being fully aware from

recently disclosed work by Network Rail in 2018 that this was a clear possibility in the requirements to manage trains through the area north of Bedford station.

- **An Alternative that meets all stakeholders objectives:**

Ravensden PC, as part of the BFARE campaign (www.bfare.org.uk) support an alternative 'Third Way' route option which would continue to meet EWRCo's, the Government's and Bedford Borough Council's (BBC) objectives.

This option is **detailed in Appendix 1** [as an attached pdf file to the electronic submission – "BFARe EWR 2021 Consultation Resonse.pdf"]

In brief this alternative route would:

- allow some trains to run direct between Oxford and Cambridge;
- enable at least 2 trains per hour to call at Bedford Midland for those wanting to interchange to Midland Mainline/Thameslink and/or commute to/from central Bedford, thus bringing economic benefits to the town and enabling urban residents easy use of EWR;
- support BBC's objectives for town centre and edge of centre regeneration;- a southern parkway station on EWR outside Bedford (as advocated by BBC and completely separate from the Wixams station development) would more effectively serve commuters from outside Bedford town and from new housing developments and thus significantly reduce congestion and pollution in the town;
- additional journey time above the current Route E option would only affect passengers choosing to remain on EWR trains through Bedford Midland. It would directly reduce the journey time for all other trains on EWR;
- allow EWR freight traffic to bypass Bedford town centre completely, with an option for joining MML to the north without a reversing movement;
- be a shorter, flatter and quicker route for EWRCo to build and run, saving the Treasury significant investment and better meeting Government carbon reduction commitments;
- be less environmentally and visually damaging than the alternative Route E corridor by running largely alongside a major development corridor and involving significantly fewer cuttings (or tunnels), viaducts or embankments.

- **Ravensden PC position on Route Alignments offered within Corridor E:**

Ravensden Parish is almost uniquely blighted by the proposed EWR route alignments, being straddled by the two alignment choices from Bedford. Our residents simply have been given a choice in this consultation of how they would prefer our tranquil and rolling rural environment to be destroyed by EWRCo and the Government, aided and abetted by our own Mayor and Bedford Borough Council.

Ravensden PC have tried to manage this wholly invidious position by undertaking a survey of all our residents to assess views on the route alignments being put forward by EWRCo.

60% of residents who responded specifically rejected the selection of the Route E corridor.

However, of those who then went on to express a “preference” between the hard choices offered, 73% stated that they would prefer Alignment 1.

On that basis, Ravensden PC are expressing a preference for alignment 1 between the choices offered in this consultation exercise. This in no way diminishes our outrage and opposition to the way in which Route E was initially selected by EWRCo.

- **Concerns Relating to ALL alignments passing through Ravensden Parish:**
Whichever route alignment is eventually chosen by EWRCo, supported by Bedford Borough Council, we have a considerable number of fundamental concerns which are important to state at this stage of the consultation so that EWRCo (and BBC) can be seen to listen and explicitly take them into account in the next stages of this project:

Environmental Concerns:

For the detail of our response on general environmental concerns, including footpaths and bridleways and overall mitigation issues, please also see Appendix 2.

Ravensden Parish Council are preparing a Neighbourhood Plan for the parish, which includes a Green Infrastructure Survey and Local Green Space assessment.

In a survey of residents in March 2020, the majority of respondents reported high levels of satisfaction with many aspects of the local environment, and the availability of green spaces and footpaths. The proposed East-West rail route was widely opposed and thought to be inconsistent with the Parish character.

One of the main objectives of the Green Infrastructure Survey is to identify the key existing natural, historic, cultural and landscape assets, accessible greenspace and rights of way and to plan new features that will provide a connected network of green infrastructure for the benefit of present and future generations.

The Green Infrastructure Survey notes the varied topography of the parish with elevation differences up to 35m over relatively short distances, across which both alignments would cut, leading to massive embankments and deep cuttings. Embankments in the parish would be up to 12m high and up to 35m wide, creating wall like features across local valleys. Cuttings would be up to 15.5m deep and up to 75m wide creating huge scars on the local landscape. At one point, a viaduct up to 16m high is proposed, totally alien to the local landscape and environment.

The Green Infrastructure Survey also catalogues key environmental features which could be directly or indirectly affected by either alignment. These include biodiversity features (incl. neutral grassland, a roadside nature reserve, veteran trees, ancient woodland, county wildlife sites); historic features (incl. Iron Age/Romano British Enclosures and sites of occupation, a Scheduled Monument

(Mowsbury Hillfort and Moat), a possible Roman Road (Green Lane), the setting of several listed buildings including the Grade I listed All Saints Church), and other buildings of local interest); public rights of way (incl. c13 separate but interconnected footpaths, 2 bridleways and 1 bridleway open to all traffic); and potential Local Greenspace areas including Mowsbury Hill fort and Green Lane.

Local residents have indicated very clearly in this survey that they wish to protect key views over the parish, such as those from the top of Cleat Hill, Graze Hill Lane, Mowsbury Hillfort, All Saints Church and the Water Tower; and improve key footpaths in the wider rights of way network, including Ravensden Brook and Green Lane.

Both alignments would inflict untold damage on the local environment of Ravensden and overturn the recently expressed aspirations of our local residents, whether through adverse impact on biodiversity; the setting and significance of nationally and locally important heritage features; the severance/rerouting of well-used and historic rights of way; or the destruction of key and well-loved views.

Most of the agricultural land in Ravensden is high quality Grade 2 and Grade 3a, with a presumption against its loss to development. Government policy is to consider lower grade agricultural or brownfield land before higher grade land is taken. This additionally points to a route south of Bedford being considered, although we are not aware that EWRCO has undertaken any assessment of agricultural land loss or indeed the severance of farm holdings.

Noise:

Although relatively close to Bedford, much of the Parish is noted for its low noise environment, especially during the evenings and at night. The Parish Council considers it entirely remiss of EWRCO not to have carried out background noise assessments in nearby residential areas (or published the same) to inform the public as they are asked to choose between the two alignments which cross the parish. This is of critical importance given the height and length of embankments and viaducts proposed in the parish, from which effective noise mitigation will be impossible and which could give rise to unacceptable noise emissions throughout the day and especially at night, with a high risk of localised sleep disturbance. This objection also applies to the construction period.

Visual Impact:

The PC does not believe that the visual impact of the proposals has been properly evaluated. The baseline condition needs to be fully assessed before decisions of such consequence can be made. Highly valued views would be transformed by the proposals and for the residents most adversely affected, the visual impact will be extremely damaging to their home environment. The PC is highly critical of the design approach which has failed to take landscape and visual impacts into sufficient consideration and has therefore failed to develop a mitigation strategy as an integral part of the scheme.

Freight:

We note the verbal indications EWRCo have recently given publicly that the railway will operate an 18 hour day and therefore NO freight will use the line overnight. We expect this assurance to be confirmed in writing by EWRCo during or soon after this consultation

Construction Management

- Shrubbery Lane on Route alignment 1 should be bridged so that the road can remain open once the railway is built. This is an important route to feed traffic away from both Ravensden Church End and Wilden village and so avoids all traffic flowing through either village centre.
- during (and after) construction we would expect weight restrictions to be imposed on Church End Ravensden and Oldways Road to avoid its use by construction or maintenance traffic at any time

In summary Ravensden PC, on behalf of our residents reject the choice of the Route E corridor based on a fundamentally flawed ongoing consultation process. The support of this route by our own Mayor and Borough Council is a source of extreme disappointment to all our residents. On the route alignments offered Ravensden PC is expressing a preference, guided by our residents, for alignment 1.

Yours Sincerely,

B. Russell

Bernadette Russell

Chair

Ravensden Parish Council

bern russell@yahoo.co.uk

Copied:

Richard Fuller MP

Mayor Dave Hodgson, Bedford Borough Council

Jon Shortland, Chief Planning Officer, Bedford Borough Council

Councillor Stephen Moon, Borough Councillor Great Barford, Wilden and Ravensden

Councillor Phillippa Martin-Moran-Bryant, Borough Councillor Great Barford, Wilden and Ravensden.

Appendix 1 – A Viable Alternative Route Meeting Stakeholders’ needs

BFAR EWR 2021 Consultation Response. Attachment 2

Appendix 2 – Ravensden Parish Council’s Environmental Concerns. Attachment 3