



The countryside charity
Bedfordshire

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Beth West
Chief Executive Officer
East West Rail
FREEPOST East West Rail

24/07/2022

Dear Beth West,

It was good to meet you as a member of the BFARe Core Group at the meeting of 31st May that took place at Wyboston Lakes Conference Centre.

I am writing this open letter to you in advance of the Bedford Local Representatives Group meeting scheduled for this week, to bring to your attention the views of CPRE Bedfordshire on EWR (see our response to the EWR Consultation of 2021 attached). I believe that the topic for this meeting is the Environment.

CPRE Bedfordshire support the proposal to develop the EWR railway and recognise the many environmental benefits, especially the potential relieve pressures on the local road network, that it would bring.

'Protecting the Environment is at the heart of everything we do' is said by EWR Co to be one of the core principles which underpins the approach to developing the new railway. CPRE Bedfordshire's basic objection to the choice of Route E as the preferred route is that there has been a complete absence of recognition by EWR Co of the negative environmental impact that Route E would have across an area of quiet countryside and rural villages in the northern part of Bedford Borough.

We believe that the choice of Route E is a very poor choice and our views have not changed despite the extensive information published by EWR Co explaining the factors which led to its selection as the preferred route.

The published EWR Co route assessment reports show that a high level approach to environmental matters was adopted, whereby consideration was only given to locations with formal designations such as Green Belt, AONB, SSSIs and heritage assets. As a result, no significant environmental impacts are recognised as applying to the section of the route that goes across open countryside north of Bedford.

Valued Landscape threatened

CPRE Bedfordshire believe that this a wholly inadequate approach indicative of the fact that no in-depth Environmental Impact Assessment was undertaken to support and inform the consideration of the preferred route at the earlier stage. We also maintain that there are areas of countryside along the preferred route that meet the criteria for 'Valued Landscape' as set out in the NPPF paragraph 174. This states that 'Planning policies and decisions should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan).

The proposal to route EWR across north Bedford, in our view, is in conflict with paragraph 174 and is indefensible when a more environmentally friendly alternative route is available. There is scope for an alternative route, based on a variation of Route B, which could take advantage of the opportunity to route create a multi modal transport corridor aligned as closely as possible with the A421 dual carriageway. In our view Route B, or a variation of Route B, is the optimum route corridor for several reasons including, ability to serve the maximum number of existing communities, construction cost, operating revenue, least disruption to the countryside and to agriculture, least opening up of scarce high quality agricultural land for development, speed of delivery, clear alternative to the now cancelled Ox-Cam expressway.

EWR Co has recognised the advantages of aligning the route in Cambridgeshire as far as possible with the new A428 dual carriageway section. We cannot understand why EWR Co does not recognise that similar benefits can be achieved by following the same approach in Bedford Borough by aligning the route as far as possible with the A421.

The agenda for the meeting of the Bedfordshire Local Representatives Group to be held on 27th July, includes an item on ' Environmental Impact Assessment and how this relates to the DCO process.' CPRE Bedfordshire's concern is that any EIA for the purposes of the DCO process will be entirely on focussed the chosen preferred route and will not be assessing the relative merits of a northern route compared to a southern route. That being the case then we regard EWR Cos approach, regardless of whether it is compliant with legal requirements, to be deeply flawed. Please correct us if this is wrong.

Proposed New Station at Wixams would compromise alternative route options

The opportunity to reconsider the route choice and to switch attention from the currently proposed northern route in Bedford to a southern route is currently threatened by progress on the development of a new station at Wixams.

As far as we understand the location of this station has been identified with other priorities in mind and would be unable to operate as an EWR station interchange with Midland Mainline and Thames Link.

CPRE Bedfordshire urges EWR Co to intervene in this development and ask for the project to be paused so that alternatives could be considered which would serve the needs of EWR as well as residents of Wixams.

As stated earlier CPRE Bedfordshire support EWR in principle and would like to see the new railway being progressed and delivered, but only if these major concerns are addressed and EWR Co changes course to focus on a more environmentally alternative route.

Best regards,

Paul Jenkins
Vice Chair, CPRE Bedfordshire