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CPRE Bedfordshire Guide to East West Rail Route Alignment Consultation (31st March to 9th June 2021)

<u>Introduction</u>

CPRE Bedfordshire believes that this consultation is fundamentally flawed because it is entirely focused on the EWR Company (EWR Co) preferred corridor (Route E), which passes north through the urban area of Bedford before turning east, through tranquil open countryside and rural villages, causing huge environmental damage.

CPRE Bedfordshire has been working with BEFARe (Bedford For a Re Consultation), a coalition of Parish Councils and residents in north Bedfordshire, to put pressure on EWR and Bedford Borough Council, demanding that the current consultation arrangements are abandoned to allow for reconsideration of the choice of the EWR Cos preferred Route E.

CPRE Bedfordshire and BEFARe say that a better alternative could be developed, based on Route B from the previous consultation, which minimises environmental damage by utilising the A421 travel corridor south of Bedford. (See maps of Route B and Route E on page 7).

The options for railway alignments within Route E proposed in this consultation are therefore completely unacceptable.

What is East West Rail (EWR)?

EWR is a major rail project to improve transport connections between Oxford and Cambridge. In Bedfordshire, EWR involves an upgrade to the existing Marston Vale line, and the creation of an entirely new railway route from Bedford to the border with Cambridgeshire.

CPRE Bedfordshire supports the concept of East West Rail as a scheme that can bring benefits by reducing car journeys and heavy goods vehicles on our roads.

What is this consultation about?

The consultation puts forward options for station locations and routes (alignments) for EWR between Bletchley and Cambridge.

The full Consultation Document can be found at; https://eastwestrail-production.s3.eu-west-2.amazonaws.com/public/Consultation-Document.pdf

What are the implications for Bedfordshire?

The options under consideration in Bedfordshire are concerned with;

- The number and location of stations between Bletchley and Bedford on the existing Marston Vale line (Section B of the Consultation Document).
- The alignments for the railway on a new line between Bedford and the boundary with Cambridgeshire, where an interchange station with the East Midlands Mainline is to be located somewhere between St Neots and north of Sandy (Sections C and D of the Consultation Document).

Why does CPRE Bedfordshire say Route E is unacceptable?

CPRE accepts that some environmental harm will be inevitable in the construction of a major new railway line, but we recognise the benefits of better east/west rail connections which will provide important opportunities to reduce reliance on roads for cars and heavy goods vehicles.

However, we believe that EWR Co have got their priorities totally wrong in their choice of Route E;

- CPRE Bedfordshire believe it is essential that the railway is developed in a way that
 makes minimising environmental harms to both urban and rural areas, a primary
 priority.
- By their own admission EWR Co state in the Consultation Document that the key project priorities are to develop the railway in a way which best supports economic growth and new large scale housing growth.
- Although EWR Co state that environmental considerations are taken into account, these are largely absent from the Consultation Document as far as the Bedford Borough area is concerned.

CPRE Bedfordshire believe the case against Route E can be demonstrated as follows;

- 1. Environmental Impact a detailed Environmental Impact Assessment of the choice of Route E, both on the urban areas of Bedford and the rural areas of the north Bedfordshire countryside, has not been undertaken.
 - Implications for the urban areas of Bedford not considered;
 - Impact on properties in the Ampthill Road/Kempston Road areas of Bedford
 - Impact on the surrounding areas of increased use of St Johns Station, potentially as the principal EWR station in Bedford
 - No impact assessment of Route E on the Poets area of Bedford town, and no clear estimate of the cost implications
 - EWR proposals involve increased train speeds in urban areas from 25mph to 50/60 mph
 - Freight trains will operate 24/7.

- Implications for the rural areas of the Borough not considered;
 - o Impact of the massive viaduct over the A6 on the River Great Ouse Valley area
 - Impact on north Bedfordshire countryside across the length of Route E
 - o Impact on rural communities from Route E
 - Potential environmental impact of New Towns associated with Route E e.g.,
 Twinwoods/Clapham/Milton Ernest/Bletsoe and Sharnbrook/Colworth
 - Impact on biodiversity EWR Co say they are committed to achieving biodiversity net gain across the programme, yet there is no detail of the steps that will be taken to achieve it, by what date, how and what level of biodiversity net gain is expected.
- 2. Freight on East West Rail in its communications with the public EWR Co has continually played down the potential for the line to develop as a strategically important route for freight.

The impact of freight has been ignored by EWR Co in this consultation. The true extent of EWR Cos ambitions for freight can be found in the East West Rail Consortium's Terms of Reference, which state their intention to seek out opportunities to use EWR to;

 'Develop freight services as part of the UK rail network, recognising the opportunity EWR brings in terms of better connectivity to eastern ports, and as an alternative to routing traffic around London.'

CPRE Bedfordshire recognises the extremely important part that EWR can play in reducing road freight and the associated carbon footprint. However;

- Taking large freight trains through the urban areas of Bedford is not a good idea.
 Residents whose homes are already close to the rail network e.g., the Ampthill
 Road area, will be subjected to additional noise, vibration and air pollution.
- Route B, utilising an existing transport corridor, is a much more environmentally suitable route for the new railway for both passenger and freight traffic.
- Bedford Borough Council appears not to have thought this through in their enthusiastic support for Route E.
- 3. Project Costs the Costs of Route E should be subject to independent review and comparison, between Route E and the principal alternative, Route B.

CPRE Bedfordshire believe that EWR Company's assertion that Route E is the most costeffective route is simply not credible.

The following facts give cause for concern;

- The cost comparison figures put forward by the EWR Co in the Route Option Consultation of January 2019, where the upfront capital costs for Route B were presented as being significantly less than those for Route E, have been substantially revised without explanation, to show the preferred Route E as cheaper in terms of upfront costs compared to all other route options.
- The EWR Co have acknowledged that many substantial costs, for example those
 due to the proposed demolition of properties in the Poets area of Bedford, were
 not taken into account when the Route E cost calculations used for this
 Consultation were published.

- There are very obvious technical challenges for Route E associated with the steep gradient in Bedford from the A6 to Clapham that will clearly carry heavy cost implications.
- For Section D in Cambridgeshire, East West Rail Co have said that they wish to
 "take advantage of the already established A 428 transport corridor" created by
 Highways England from the Black Cat roundabout on the A1 to Cambridge,
 recognising the substantial cost and environmental benefits of doing so.
- Why doesn't EWR Co recognise the same benefits can be achieved in Bedfordshire by using the A421 transport corridor from Bedford to the Black Cat roundabout via Route B?

EWR Company have been persistently asked by CPRE Bedfordshire and BFARe for more information about how the cost estimates were created and revised, but their promises to share more financial information have not been kept. This is despite the fact that they made more detailed financial information available to the consultants engaged by Bedford Borough Council to review the route options in 2019.

- 4. Economic Growth the case made by Bedford Borough Council that Route E can deliver greater economic benefits than Route B is unreliable, and inconsistent with the analysis put forward by EWR Co;
 - Bedford Borough Council's response to the Route Option Consultation of March 2019 suggested that economic benefits of a Bedford Midland route are 12% higher than a route south of Bedford.
 - EWR Cos Technical report published in January 2019 indicated that route options serving Bedford Midland would generate slightly smaller increases in jobs and productivity than routes serving a new station to the south of Bedford, due to faster journey times across the Oxford-Cambridge Arc.
 - The EWR Co Preferred Route Option report of January 2020 stated that further economic modelling they commissioned suggests the likely Gross Value Added (GVA) productivity benefits of routes via Bedford Midland and routes via a new station to the south of Bedford, would be very similar.

CPRE Bedfordshire believes that this is the wrong priority for the EWR project and that these unreliable and inconsistent estimates of potential economic benefits, represent a very unconvincing case to justify the extensive damage to the countryside and rural communities that will follow if Route E is pursued.

5. Housing Growth Opportunities - this is another area where EWR Cos position has shifted, presumably due to pressure or persuasion by Bedford Borough Council.

EWR Cos Technical report of January 2019 stated that;

 "although Route E could support additional housing through the densification of Bedford town centre, this is likely to offer significantly less potential than to the south of Bedford where Route B could support significant additional housing (aligned with the recent strategic allocation of land at Wixams). Bedford Borough Council, in their response to the Route Option Consultation, say there is little or no scope to include development south of Bedford as a benefit of a southerly route for EWR.

In their consultation response the Borough Council highlights;

- "four new settlement proposals, at Colworth, Twinwoods, Thurleigh and Wyboston. Whilst none of these has yet been allocated, they are likely to be considered for allocation in future plans."
- "Each site is to the north of Bedford and would be better served by a northern route for EWR through Bedford Midland..."

CPRE Bedfordshire maintain that through their support for Route E, the Borough Council are positioning EWR as a means to unlock north Bedford for the development of major new settlements which, with associated road infrastructure, would overwhelm and urbanise the character of this area of precious countryside.

The position that the Borough Council has taken on housing growth in north Bedford is one that CPRE Bedfordshire will be challenging in the upcoming Local Plan Review Consultation. We will be encouraging our members and local people to vigorously oppose any steps towards planning large New Towns in the north Bedfordshire countryside.

What are the proposals for the Marston Vale line?

Section B of the Consultation Document looks at the options for operating EWR between Bletchley and Bedford using the existing Marston Vale line. EWR Co proposals are focused on the frequency of services, how vehicles and pedestrians cross the railway, and the number and location of stations.

EWR Co has developed two alternative concepts for the train services and stations on the Marston Vale Line;

- Concept 1 retains the existing hourly service that stops at all current intermediate stations and introduces a fast limited-stop Oxford – Cambridge services alongside it.
- Concept 2 merges a number of the existing intermediate stations together to provide five new stations on the Marston Vale Line with improved facilities and more frequent and faster trains.

CPRE Bedfordshire favours Concept 1 because it:

- Retains all existing stations, providing easier access for local people to rail services for local travel. A 'greener' and more sustainable option.
- Avoids the extensive development and relocation of some stations involved in Concept 2, which involves building new stations in open countryside.

CPRE Bedfordshire believes that it is essential that the views of Parish Councils and local people are fully considered, and that resident's current travel patterns are fully understood, before making decisions about which option will be chosen.

HOW TO MAKE YOUR VIEWS KNOWN TO EWR Co

The EWR Co feedback form is inevitably structured in a way which seeks views on the options they have put forward for delivering Route E. As a result, it does not cater well for responders like us, who are totally opposed to Route E.

If you are in agreement with CPRE Bedfordshire's view that Route E is totally unacceptable, we advise that you take the alternative, offered by EWR Co, to send your views by emailing EWR Co at; consultation@eastwestrail.co.uk or writing to Freepost EAST WEST RAIL.

We recommend you state in your response that you are responding the EWR public consultation dated April - June 2021, wish your email/letter to be considered as your formal response and request confirmation of receipt.

We suggest that you make a clear statement that Route E is unacceptable and that the project programme and consultations should be revised to allow for an objective detailed re-examination of the relative benefits of Routes B and E.

Also, add your reasons for supporting the case against Route E and for favouring a southern route for EWR in Bedford Borough, using the information provided here that you find most closely reflects your concerns and objections.

The consultation closes on 9th June 2021

References and further reading

EAST WEST RAIL - Consultation March 2019: CPRE Bedfordshire's Preferred Route - Route B https://www.cprebeds.org.uk/resources/ewr-briefing-march-2019/

EWR Route Option Consultation January 2019

https://eastwestrail-production.s3.eu-west-

 $\underline{2.amazonaws.com/public/MediaObjectFiles/fe0f74c338/EWR-Consultation-Document.pdf}$

Bedford Borough Council Response to EWR Consultation March 2019

https://bbcdevwebfiles.blob.core.windows.net/webfiles/Parking%20Roads%20and%20Travel/Strategies%20and%20projects/Bedford%20EWR%20Response%20Final%2011-3-19%20%20BCC%20(4).pdf

BFARe

https://bfare.org.uk/provide-comparative-costings-for-all-routes/

https://bfare.org.uk/the-new-31-03-2021-consultation-is-based-upon-a-flawed-2019-route-

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CPRE Bedfordshire campaigns for a thriving countryside that benefits everyone.

We'll keep standing up for the Bedfordshire countryside. Want to stand with us? Sign up now for monthly news on our work, make a donation or join as a member from just £3 a month.

EWR Maps showing Route B and Route E corridor options (Jan 2019)

ROUTE B



ROUTE E

