



The countryside charity
Bedfordshire

CPRE Response to East West Rail Consultation January 2025

Introduction

1. As stated in CPRE Bedfordshire's response to previous consultations, CPRE has supported East West Rail (EWR) in principle believing that it would close a significant gap in the rail network and provide new non-road based journey options, reducing air pollution, carbon footprint, road congestion and dependence on the private car. An essential outcome of the project should be to encourage a modal shift from road/private car to rail.
2. CPRE does not believe that the purpose of EWR should be to open up greenfield areas for housing or commercial development, or to contribute to an arc of urban development from Oxford to Cambridge.
3. EWR should be focussed on delivering improvements to connectivity, serving existing communities and those already planned. Local service provision should be a major factor in route choice, route design and technology and should not be sacrificed to speed, which has low economic and environmental value.
4. CPRE is very concerned that these principles seem to have been almost completely ignored in the current proposals regarding the chosen route from Bedford to Tempsford.
5. The issues commented on in this submission are concerned with issues which, for the most part, are broader than the questions put forward by EWR Co in the Feedback Form published with the consultation report. CPRE Bedfordshire's response to the questions on the Feedback Form in the areas of the project that interest us, are attached in the appendix to this submission.

Earlier Consultation and process for choosing the preferred route

6. In 2019 CPRE expressed the view that there was a complete failure on the part of EWR Co to effectively engage the participation of residents in the 2019 Route Option consultation and a consequent lack of evidence to justify the assertion by EWR Co that the preferred route 'E' enjoyed popular support. Glaring examples of failures to notify significant interested parties include some parish councils with boundaries crossed by the proposed alignments.

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7. The way that the Route Option consultation responses from members of the public were collected did not allow for recognition, e.g., by post code, of local views. It has become apparent that almost half of the 7,000 responses from members of the public were prompted by encouragement by the Woodland Trust to make a general plea to protect ancient woodlands. These responses appear not to have included specific comments on individual routes.
8. CPRE Bedfordshire believes all consultations undertaken following the Route Consultation of 2019 have been fundamentally flawed because they have been entirely focused on the EWR Co preferred corridor (Route E).

Alternatives to the Preferred Route

9. There is a complete lack of evidence to support the assertion made by EWR Co that Route E outperforms Route B against the criteria adopted to assess the route options put forward in January 2019.
10. **CPRE Bedfordshire's preference is for a route between Bedford and Tempsford based on Route B from the original Route Option Consultation report of January 2019.**
11. We still believe that Route B or a variation based on 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 agricultural land for development, speed of delivery, clear alternative to the now cancelled Ox-Cam expressway.
12. We stated that within Bedfordshire, the interchange with Thameslink/Midland Mainline south of Bedford, as proposed by EWR Co in the Route Option consultation, remains a viable alternative and is capable of providing an effective solution for the railway whilst continuing to serve communities in the southern areas of Bedford.
13. CPRE Bedfordshire has been working with the campaign group Bedford For a Re Consultation, (BEFARe), a coalition of Parish Councils and residents in north Bedfordshire, to put pressure on EWR Co 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.
14. **CPRE Bedfordshire and BEFARe say that a better alternative could be developed passing to the south of Bedford, based on a remodelling of Route B from the previous consultation, which minimises environmental damage.**
15. **An alternative based on Route B or a variation of Route B has the advantage of not adding to road congestion in Bedford town or parking problems at the existing Bedford station. The demolition or blighting of around 70 homes in the "Poets" area of Bedford would be avoided.**

- 16. The options for developing the railway in Bedfordshire based on Route E are therefore completely unacceptable.**

Environmental Assessment

17. CPRE Bedfordshire stated previously that a full Environmental Impact Assessment (EIA) should have been undertaken before the preferred route was selected. This would have allowed for comparative environmental assessment of Route E against Route B, the option which CPRE have always advocated for in Bedfordshire.
18. As things stand, the current Consultation document, 'Connecting people, building communities' promises that an EIA will be carried out and included in the Environmental Statement submitted within the Development Consent Order application. The consultation document also explains that further studies of environmental impacts will be undertaken as project proposals are further developed, including consideration of; landscape and visual impacts, biodiversity and nature conservation, water resources and historic environment.
19. The only consultation which asked for views on alternatives to Route E took place in 2019. Reference to environmental matters was limited to highlighting sites with statutory designations. Since then, further consultations have been focussed entirely on Route E as EWR Cos preferred route. The lack of earlier environmental assessment means that the choice of the preferred route was made in the absence of any thorough analysis of environmental impacts between the different routes originally considered.
20. EWR Co published a statement setting out 'Our approach to the Environment' which claimed that 'Caring for the environment is at the centre of everything that we do.' However, this claim has not extended to using in depth environmental impact assessment to guide the way that the preferred route was selected and will not be published until the statutory consultation commences.
21. CPRE Bedfordshire asked EWR Co to identify the quantity of agricultural land between Bedford and Tempsford to be lost through the development of the railway, and to date they have been unable to provide that information. This appears to have been an impact that EWR Co have not taken into account.
22. 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, no safety or health risk assessment
 - Freight trains will operate 24/7, no noise or vibration risk assessment.
23. Implications for the rural areas of the Borough not considered;
- Impact of the massive viaduct over the A6 on the River Great Ouse Valley area

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- Impact on north Bedfordshire countryside across the length of Route E, including significant loss of high quality agricultural land
- 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.

Housing Growth Opportunities

24. This is another area where the position of EWR Co has shifted, presumably due to pressure or persuasion by Bedford Borough Council. The EWR Co 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).”

25. Bedford Borough Council, in their response to the Route Option Consultation in March 2019, said that there was 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...”

26. CPRE Bedfordshire maintain that through their support for Route E, the Borough Council are positioning EWR as a means to unlock the largely rural area north of 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.

27. The position that the Borough Council has taken on housing growth in north Bedford is one that CPRE Bedfordshire has challenged in the Local Plan 2040 Examination.

28. We have been encouraging our members and local people to vigorously oppose any steps towards planning large New Towns in the north Bedfordshire countryside.

Freight on East West Rail

29. 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.

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30. 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.'
31. 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 is a much more environmentally suitable route for the new railway for both passenger and freight traffic.
32. CPRE considers it important that an integrated approach to providing capacity for freight by rail should have been more fully taken into account insofar as it affects route options and the commercial viability of EWR.
33. One implication of this is that this study should include provision of viable through freight routes from Felixstowe and Harwich to the rest of the country avoiding London. This is a major opportunity to shift goods from road to rail and increase the return from the new railway line.
34. Such a comprehensive study appears not to have been done.
35. EWR has no clear freight strategy or clear estimates of the volumes of freight traffic likely to use its tracks. Neither has Network Rail built use of EWR into any of its detailed plans.
36. There has been no attempt whatsoever to assess the likely health effects arising from noise, vibration, air pollution, water pollution or accident risk on those living close to the line or on the surrounding countryside arising from the use of the line by freight trains or even by passenger trains.
37. CPRE considers that EWR in its current form and with its current economic case being based upon the returns from development, is acting irresponsibly and making a bad situation far worse.
38. Therefore, if it is to continue, EWR must make an economic case which is based upon transport delivery and not on housing growth delivery.

Project Costs

39. The Costs of Route E should be subject to independent review and comparison, between Route E and the principal alternative, Route B.

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40. CPRE Bedfordshire believe that EWR Company's assertion that Route E is the most cost-effective 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.
- 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 and cost implications for Route E associated with the railway would rising on a viaduct to cross twice over the River Great Ouse and its floodplain, as well as the A6 Paula Radcliffe Way. The proposed viaduct would be 1.1km (0.68 miles) long. The steep gradient from the A6 to Clapham will also carry heavy cost implications.
- **CPRE Bedfordshire believes that a route based on Route B, such as the BFARe alternative, could save the taxpayer between £500m and £1billion.**

Economic Growth

41. 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.
- 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.

42. 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.

Conclusions

43. CPRE Bedfordshire are deeply concerned about the current route proposal through Bedford town and an area of small rural villages and quiet countryside.

- The EWR Co case for passenger traffic revenue with the railway in the form proposed is clearly unviable.
- The very high costs and construction chaos, combined with unacceptable levels of home demolitions and the blighting of neighbourhoods, caused by a route going north through Bedford town cannot be justified.
- The EWR Co case rests heavily on returns from housing growth in an area where all farmland must be protected in the medium term national interest due to climate change.

44. CPRE Bedfordshire are calling for;

i. A full and detailed independent cost comparison between:

- The currently proposed route E going North through the centre of Bedford and then east across open countryside to Tempsford and,
- The alternative of route B with a Bedford South Parkway Station and a route south of Bedford to Tempsford.

EWR should return to the drawing board and examine how it can deliver an economic case and a return on investment based upon transport need, preferably by serving local markets with an integrated transport solution.

Unless this is done voluntarily, HM Treasury should intervene and halt the project in its current form

ii. A full and detailed independent Environmental Impact Assessment (EIA) comparing the Northern Route E and the Southern Route B from Bedford to Tempsford. This should consider both the urban and rural areas through which the railway will run.

As far as we are aware, no such comparative Environmental Impact Assessment has ever been undertaken.

CPRE Bedfordshire responses to questions on the EWR Co Consultation Feedback Form

Fenny Stratford to Kempston (the Marston Vale Line) Section

Question 7a: Which of the options for the Marston Vale Line stations do you prefer

- CPRE response: prefer Existing Stations Option (Concept 1a)

Question 7b: Explain your answer to question 7a

- Overall CPRE Bedfordshire favours Concept 1a in principle: retaining, upgrading and relocating existing stations. Option 1a retains all existing stations, providing easier access for local residents utilise rail services for local travel which is a 'greener' and more sustainable option.
 - Option 1a avoids the extensive development and relocation of some stations involved in Concept 2, which involves building new stations in open countryside.
 - EWR Co recognises that the population in this sector is going to grow driven by Central Bedfordshire's adopted Local Plan 2016-2035. The Local Plan Policy SA2: Marston Vale New Villages is to deliver 5,000 dwellings and approximately 30 hectares of employment land. The footprint of this proposed development extends from Ridgemont easterly to Marston Moretaine encompassing and extending the village of Lidlington.
 - This factor reinforces CPRE Bedfordshire's view to support the Concept 1a in principle but with modifications as detailed below.
 - 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. Therefore, we wish to take this opportunity to propose modifications for the Ridgemont sector (see response to question 8) and Lidlington station (see response to question 11) which are detailed below.

Question 8a: Tell us your preference for the proposed location of Ridgmont station

- CPRE propose an 'Other' option with modifications as set out below

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Question 8b: Explain your answer to question 8a.

- CPRE proposed Ridgemont Sector Modification
 - following consultation with local community organisations CPRE Bedfordshire propose a hybrid solution which retains Ridgemont Station along with the existing Heritage Centre which is a Grade II Listed Building and develop a new Interchange Station in Husband Crawley as defined in Option 1.
 - By retaining Ridgemont Station, there will be no impact on the adjacent businesses which it currently serves, and the valued Heritage Listed Building remains untouched.

Question 11: Further comments about proposals in the Fenny Stratford to Kempston route section

- CPRE proposed Lidlington Sector Modifications
 - CPRE Bedfordshire favours relocating the station to the east in a greenfield site on the northern edge of the village as detailed in Concept 2 which would include the construction of a new station car park which would be required when the Strategic Development SA2 is delivered. The existing level crossing adjacent to the existing station should be retained as closure would split the village in half and residents would be required to take an arduous car journey to reach either side of the settlement.
 - CPRE Bedfordshire are opposed to the closure of Forty Steps level crossing as the crossing is an integral part of the Greensand Ridge which is an important amenity for the wider Bedfordshire Community and should be protected for future generations.

Bedford Section

Question 12: Comments about proposals in the Bedford route section

- Refer to our main consultation response statement where we set out many compelling reasons for our assertion that the chosen route for EWR in Bedfordshire, going through Bedford and crossing an area of rural villages and quiet countryside north of Bedford town, is ill conceived and deeply flawed.
- In paragraph 22 of the CPRE consultation response we list a number of the key negative impacts for the urban areas of Bedford that seem to have not been considered as follows;
 - Impact on properties in the Ampthill Road/Kempston Road areas of Bedford

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- 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 Co proposals involve increased train speeds in urban areas from 25mph to 50/60 mph, no safety or health risk assessment
- Freight trains will operate 24/7, no noise or vibration risk assessment.

Clapham Green to Colesdon Section

Question 13: Comments on proposals in the Clapham Green to Colesdon route section

- Refer to our main consultation response statement where we set out many compelling reasons for our assertion that the chosen route for EWR in Bedfordshire, going through Bedford and crossing an area of rural villages and quiet countryside north of Bedford town, is ill conceived and deeply flawed.
- Refer to our para 23 of the CPRE consultation response where we list a number of the key negative impacts for the rural areas of Bedford that seem to have not been considered as follows;
 - 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, including significant loss of high quality agricultural land
 - 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

Roxton to east of St Neots Section 13

Question 14a: Preference for the Tempsford alignment

- CPRE Bedfordshire favours the northern Alignment Option 1c with the proposed ECLM Rail Logistics Hub Option B which is detailed directly adjacent to the proposed new Tempsford 1c Station and interchange with the East Coast Main Line.

Question 14b: Explain your answer to question 14a

- This route option is less invasive on the surrounding countryside and further north of the current Tempsford Settlement resulting in less disturbance to local communities from air and noise pollution and amenity impacts, as well as avoiding potential impacts on the setting of designated the heritage assets in the area.
 - Alignment 1b requires the construction of a much higher and longer viaduct than Alignment 1c which we noted at the Consultation event in Tempsford. Alignment 1c would be circa 24m (78 feet) high to cross over

the new A421 dual carriageway and approximately 50% longer in the length of viaduct structures which would significantly harm the landscape and visual impact.

- Alignment 1c scheme runs the track to the north of Black Cat roundabout and does not cross the existing or new A421 dual carriageway, therefore the railway and station would be significantly lower than Alignment 1b and therefore less of an impact on the countryside setting.
- We also believe that alignment 1c is the most cost effective option

Route-wide matters Section

Question 22: Provide any comments you have in relation to the route-wide matters referred to regarding the operation and delivery of the railway.

- Refer to our main consultation response statement where we set out many compelling reasons for our assertion that the chosen route for EWR in Bedfordshire, going through Bedford and crossing an area of rural villages and quiet countryside north of Bedford town, is ill conceived and deeply flawed.