

**East West Railway Company**

**Consultation November 2024 – January 2025**

**Response from Bedford Borough Council**

**1 Describe your interest in the project**

We are responding as a local authority

**2 Contact details**

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**3 Organisation**

Bedford Borough Council

**4 Age**

Not relevant

**5-6 Oxford to Bletchley**

No responses

## **7 Please tell us which of the options for the Marston Vale Line stations you prefer:**

We agree with EWRCo's conclusion that Concept 2 appears to be the best performing in operational terms. This is because it provides modern stations which are better located to serve the future distribution of housing and businesses across the area, and therefore will better cater for demand.

Concept 2 provides a consistent level of service at all stations and provides enhanced station facilities.

In addition, our economic analysis shows that Concept 2 offers a 5% premium over Concept 1 in terms of Gross Value Added to the Borough's economy – showing benefits of £13.72M p.a. rather than £13.05M.

The council supports the creation of a new, consolidated station in the Stewartby / Kempston Hardwick area that would be capable of serving both settlements.

The loss of the current 'halt' at Kempston Hardwick is acceptable due to its very low levels of usage – a total of just 34 entries and exits per day in the pre-Covid peak year of 2019/20.

The least ecologically damaging option would be keeping the existing stations and there being no consolidation. However, given the potential impact of the proposed Universal Theme Park, consolidation of the two stations would not significantly increase the ecological impact.

In landscape terms, Concept 2 is supported, as it will result in planned stations relating to and connecting communities rather than the existing stations which are remote from settlements and villages.

Concept 2 performs better from a climate resilience perspective as new stations would be designed to modern standards of climate resilience, but what is not clear at this stage is the degree of difference between the options presented for consultation and the assumptions underpinning the assessments. For example, whether the assessment includes assumptions around carbon emissions associated with vehicle trips for both options. This information will be required to inform the final decision-making around options.

To further mitigate any impacts on carbon and embodied carbon, we would recommend an approach to station design like that being implemented for the new Cambridge South station. This includes achievement of a BREEAM excellent rating and the use of engineered timber to reduce the embodied carbon of the station. The provision of new stations in Concept 2 also offers greater potential for renewable energy generation.

**The Council prefers the Consolidated Stations option (Concept 2).**

**8. Ridgmont Station**

No response

**9. Please tell us your preference for the proposed location of Stewartby station:**

The council has granted planning permission for 1,000 dwellings on the former Stewartby Brickworks site (Local Plan 2030 Policy 25). It has also allocated land at the former Kempston Hardwick Brickworks site for 4,000 dwellings as part of its Local Plan 2040 (Policy HOU14).

A new station on the Option 2 site would be ideally placed to serve both of these sites, lying immediately between them.

A station at the Option 1 site would be well-placed to serve the Stewartby Brickworks site but would sterilise around a quarter of the allocated land, thus reducing the amount of housing that can be delivered. In addition, it would be poorly located to serve the Kempston Hardwick Brickworks site.

Given Option 1 would be built on pre-developed land, it is likely that it would have the least ecological impact, but the development of either a Theme Park or housing on the HOU14 land means that Option 2 is preferred in landscape / sustainability terms because the station would be located centrally and would be easy to access by residents or visitors to the theme park.

In supporting Option 2, the council recognises that this will increase walking distances from the station to Kimberley College and we must insist on particular attention being paid to developing a first mile / last mile solution, funded by EWRCo, that ensures there are effective sustainable travel options in place for students and teachers.

Sustainable travel arrangements will also need to be provided to enable safe walking and cycling access from Stewartby village as well as the new developments on the former brickworks' sites.

**The Council supports Option 2: moving the station to the north of Broadmead Road.**

**10. Please provide any comments you have on our proposals for level crossings along the Marston Vale Line, including proposed diversion routes.**

In general, the Council believes that level crossings should be closed and replaced by bridges to improve safety and accessibility, and to reduce congestion.

In respect of the crossings within the Bedford Borough area, the decision to retain crossings appears to be a retrograde step from the previous proposals. The retention of the crossings will lead to increased inconvenience for crossing users and could result in increased levels of crossing misuse.

The Technical Report (TR) states that assessments using Network Rail's All Level Crossing Risk Model have been undertaken for the crossing sites, but the full results of these assessments are not reported.

The TR goes on to state that the calculations use road traffic data gathered during 2021. Given that 2021 was severely impacted by the Covid pandemic and that traffic levels are known to have increased since then, it is likely that the traffic volumes used will be lower than actual volumes in 2024 or forecast for 2030.

Traffic volumes are also likely to further increase in the period between now and completion of the EWR scheme due to on-going development on the Stewartby and Kempston Hardwick Brickworks' sites.

Although the TR states that increases in crossing use arising from the EWR scheme have been considered, it is not apparent whether growth from the abnormally low 2021 levels has been appropriately considered.

Green Lane – proposed to be retained as a CCTV crossing.

Although it is not stated which Concept this applies to, the TR states that barrier down time at this crossing will increase to 28 minutes per hour.

The use of Green Lane level crossing will be impacted by the future development of the Stewartby Brickworks site.

**The Council requires a bridge to be introduced to accommodate the impact of development in the area and the consequent increased movement of traffic.**

Stewartby Brickworks – proposed to be closed with no replacement.

The Council notes that the closure of this crossing was authorised by the TWAO made in 2020, and that the planning permission granted for this site includes the provision of a new bridge as part of the site's redevelopment.

**On this basis, the closure of the level crossing is acceptable.**

Broadmead Road – proposed to be retained as a CCTV crossing.

The TR states that barrier down times for the crossing will be 34 minutes in each hour with Stewartby station Option 1 or 27 minutes in each hour with station Option 2.

The use of Broadmead Road level crossing will be impacted by the future development of both the Stewartby and Kempston Hardwick Brickworks' sites.

**The Council requires a bridge to be introduced to accommodate the impact of development in the area and the consequent increased movement of traffic.**

Wootton Village – proposed to close and divert to Kempston Hardwick crossing.

EWRCO proposes to close this crossing on the basis of very low recorded use.

A diversion of the affected public footpath is proposed. This involves creating new sections of public footpath on each side of the railway to connect with Manor Road.

**Given the low use of this crossing and the leisure nature of the journeys likely to be being undertaken, this diversion would be acceptable to the Council.**

However, part of the diversion route is along Manor Road, which currently has no footway and a 40mph speed limit. If this closure is pursued, EWRCO must provide a safe route along the relevant section of Manor Road.

Kempston Hardwick (Manor Road)

Consent has previously been obtained by Network Rail (NR) for the closure of this crossing and its replacement by a bridge carrying Manor Road over the railway.

The consultation materials state that if NR does not implement the consented crossing closure, EWRCO now only proposes to upgrade Manor Road to a full barrier crossing with obstacle detectors rather than replace it.

No barrier down time is quoted in the TR. However, it can be assumed that the times would be broadly similar to those quoted for the Broadmead Rd crossing, i.e. 34 minutes per hour. Given the higher volumes of road traffic on Manor Road, this will cause a greater level of inconvenience to road users.

Given the higher frequency of train services now intended and the increase in maximum speed from 60mph to 75mph, the proposal to retain the crossing is surprising and at odds with NR's previous decision to close the crossing.

**The Council requires the introduction of the previously permitted bridge.**

### Woburn Road

NR has previously obtained consent to close this crossing and provide a footbridge over which the public right of way would be diverted. The TR states that if NR does not proceed with the closure of the crossing, EWRCo would seek to retain the crossing and upgrade it by the adding miniature stop lights.

As with the similar situation at Manor Road crossing, the decision to retain the crossing is surprising and at odds with NR's decision to pursue closure.

**The Council requires the introduction of the previously permitted bridge.**

### Non-Motorised Users

Provision must be made for all types of non-motorised users at all crossing points and on all off-road routes. Such users include equestrians in the rural areas of the Borough, as well as pedestrians, cyclists and those using prams, pushchairs and wheelchairs.

**11. Please provide any comments you have about our proposals in the Fenny Stratford to Kempston route section.**

Passing loops between Ridgmont and Stewartby

Although the TR states that the proposed loop locations are based on timetable evaluation, no timetables are presented in the consultation materials to allow verification of the validity of the chosen locations.

Given that the difference in average speed between freight and passenger services will now be minimal as a result of the reduced maximum speed and revised stopping patterns for passenger trains, the need for loops to allow them to overtake freight trains is likely to be low.

However, the loops may still be useful to allow freight services to be held clear of passenger services while they await an available path on the Midland Main Line (MML) through Bedford, for example.

Of the six loop locations proposed, only three are within the Bedford Borough area, those being the Stewartby locations

- a) east of the railway, south of Broadmead Road,
- b) east of the railway, north of Broadmead Road, and
- c) west of the railway, north of Broadmead Road.

Loops (b) and (c) conflict with Stewartby station relocation Option 2 and are therefore not supported by the Council.

Loop (a) appears to be clear of all Stewartby station options, although its western end would be very close to Stewartby station Option 1.

All three options appear to require the acquisition of land beyond the current railway boundary. Whilst the amount of land required specifically for the loop is low, in all three cases, the land required is within sites proposed for development.

**The Council would therefore support the loops, if necessary, being located at one of the suggested sites outside of Bedford Borough.**

Community benefits and impacts – Noise

The drawings provided by EWRCo indicate locations where noise mitigation might be provided, but no locations within Bedford Borough are currently identified on this section of the route.

This is despite the extant planning permission on the Stewartby Brickworks site and the allocation of the Kempston Hardwick Brickworks site.

**The provision of noise mitigation measures will be necessary in proximity to both of these sites.**

#### Land and property requirements

Land within the former Stewartby Brickworks site is shown as being required for a construction compound.

**This would impact on the delivery of new housing on this site and an alternative site should be found for this facility.**

#### Environmental and sustainability

The general approach to considering the railway's impacts on climate change, notably related to carbon emissions as part of the Environmental Statement (ES) is noted. However, given the high-level nature of the information provided as part of this consultation, we request early sight of the detailed assessment of carbon and the mitigation measures to be associated with construction of the railway.

The route passes through the Forest of Marston Vale and so design and mitigation must follow design guidance for the Forest and Local Plan Policies 36S Forest of Marston Vale and 37 Landscape Character and the adopted SPD.

#### Construction and logistics

There is little specific information provided about construction methods and logistics.

It is notable that there appears to have been a move away from previous proposals to undertake works on the Marston Vale Line (MVL) during an extended closure or "blockade" of the line.

An extended closure would allow works to be completed more quickly, reducing the overall period of disruption for local communities and reducing the need for nighttime and weekend working.

**The Council requires construction to be undertaken more quickly through the use of a blockade.**

#### Door to Door Connectivity and Active Travel

No specific proposals have been presented at this time, and we note that detailed proposals will need to be prepared – particularly in respect of access to the relocated station at Stewartby.

Connectivity between stations and existing or new communities is critical and should be supported through safe routes for cycling and walking, and by the provision of both secure (for regular users with access cards) and freely available (for ad hoc users) bike storage at the stations.

The current access route to the Option 2 station site at Stewartby is not conducive to active travel modes and specific proposals are required in respect of this and for connectivity between the relocated station and Kimberly College.

### Traffic and transport

Our own traffic forecasts from the Bedford Borough Traffic Model (BBTM) show severe congestion on the A421 near Bedford, by 2030, specifically at the two junctions with the A6.

The EWRCO forecasts show some congestion in these areas; however, no congestion is forecast at the eastern A6 junction on the A421, and the severity of the forecast congestion at these locations is not presented in the TUR.

**The Council believes that future congestion levels on the A421 are not currently being accurately modelled or effectively mitigated by EWRCO.**

With the relocation of stations along this section of the route and an increase in service provision, it is expected that there would be increases in traffic on routes from the A421 to these stations. As no information is provided on the derivation of the changes in traffic with the opening of the scheme, or the forecast change in traffic flows, it is not currently possible to review whether the forecast impacts on congestion on these routes are realistic.

**12. Please provide any comments you have about our proposals in the Bedford route section.**

**Bedford St Johns Station**

Double-Tracking

Building a new two-track railway to the north of Sandhurst Road to replace the existing single-track section of the Marston Vale Line into Bedford would facilitate the operation of more frequent and more reliable train services.

The reconstruction of two tracks will impact on trees which have grown up since the previous reconfiguration of tracks in this area, and these will need to be replaced elsewhere. The Council has a policy of planting two new trees for every one that has to be removed.

**The Council supports the double-tracking of the railway.**

St Johns Station Relocation

The consultation sets out proposals to realign the railway in the vicinity of St Johns station to allow an increase in the maximum speed of trains, and the enlargement of St Johns station which is currently located on a very short section of straight track between two tight curves. The relocation also moves the station closer to Bedford Hospital.

**The Council supports the relocation of St Johns station.**

Access to St Johns Station

The relocated station is proposed to have buildings and facilities on the opposite side of the railway to the hospital and no indication is given on what provision would be made for pedestrian access from the station to the hospital.

The proposal to site station facilities remotely to the hospital is surprising given that the consultation specifically mentions the benefits of the station improving access to the hospital. Patients and visitors would clearly benefit from the station building being placed on the same side of the line as the hospital.

The TR states that vehicular access to the station would be taken from Melbourne Street, through what is an allocated housing development site in Local Plan 2030 (Policy 14 – South of the River). The Council is concerned at the possible loss of this allocated housing land.

There are no detailed plans showing how this access would be arranged and how much allocated development land would be sterilised. There is also no detail on how interchange with bus services would be achieved.

If the station buildings and facilities were instead to be located on the western side of the tracks, in close proximity to the hospital, this would have the benefit of allowing housing to be introduced to the east, and for buses to use the existing or

expanded bus stop and layby facilities on Britannia Road to the west without altering and extending their routes.

The relocation of the St Johns station offers the opportunity for delivery of a highly sustainable station building. We would recommend an approach that achieves a BREEAM excellent rating and incorporates renewable energy provision to help minimise the operational carbon of the station buildings.

Early consideration should be given to the design of the station and platform access to take into account the large numbers of people who may look to bring bikes with them on their train journeys.

**The Council wants to see the St Johns station buildings on the west side of the station and served from Britannia Road.**

#### Car Parking at St Johns Station

The realignment of the railway requires the permanent acquisition of the majority of the current Britannia Road car park, which caters for hospital staff and visitors.

To compensate for the lost parking, a new multi-storey car park is proposed, which would serve both hospital and railway users. It will be important that the car park is constructed to the highest possible design and sustainability standards. We would recommend an approach that achieves a BREEAM excellent rating as a minimum and incorporates renewable energy provision to help minimise the operational carbon of the station buildings.

The consolidation of surface level parking into a multi storey car park is a more efficient use of space and will free up land for other uses, creating an opportunity to improve the wider area around the station.

The use of this car park will need to be carefully managed to ensure that sufficient space is available for both groups of users and charges will need to be set that are appropriate to both types of use.

The construction of new car park and the realigned railway will need to be phased so that sufficient spaces remain available for hospital users at all stages of work. In particular, any spaces removed to allow construction of the new car park to take place must be re-provided on accessible alternative sites within acceptable walking distances of the hospital prior to work commencing.

We would also require the integration of cycle parking into the proposed multi-storey car park to enhance sustainable transport options for those using EWR and working at or visiting Bedford Hospital.

**Subject to the acceptance by EWR of our qualifying comments above, the Council supports the provision of a new multi-storey car park. This new car park must be constructed by EWRCo and must be in place prior to the existing car parking being removed.**

### Work to Bridges

In connection with proposals to electrify the railway, the consultation materials state that the existing bridges at Ampthill Road and Cauldwell Street might have to be reconstructed to provide additional clearance for overhead line electrification (OLE) equipment. The consultation also proposes the lowering of the railway by up to 1m beneath the two bridges.

Neither of these proposals is confirmed to be required and both measures are subject to more detailed assessment, including which sections of the railway might benefit from discontinuous electrification (potentially removing the need for OLE at these sites).

The lowering of the railway, if carried out, would increase its vulnerability to flooding given its proximity to the River Great Ouse and the fact that lowering would make the resulting shallow cutting a low point in the locality. If this proposal were to be taken forward, it will be essential for suitable flood prevention and mitigation measures to be incorporated into the design.

The reconstruction of the two bridges will also have the potential to cause significant traffic disruption and the works, if undertaken, would need careful phasing to ensure these impacts are minimised as far as possible.

The Council requires early sight of the proposed timeline for these works so that it can ensure that disruption is minimised within EWRCo's plans.

The proposals include a temporary diversion of Prebend Street through land currently used as car parking for Borough Hall but allocated for housing development in Policy 13 of Local Plan 2030.

The works would also result in the permanent closure of the junction of Cauldwell Street and Cauldwell Close. As Cauldwell Close is a cul-de-sac that provides the sole means of vehicular access to two businesses – a garage and a plant hire firm – the proposals include the formation of a new access to Cauldwell Close from Holme Street. This is a relatively narrow residential street which is not well suited to the type and volume of traffic that would potentially use it.

**The Council supports the use of discontinuous electrification in this area to minimise the long-term disruption caused by any necessary engineering work to the Ampthill Road and Cauldwell Street bridges.**

**Access from Kempston to the hospital for non-motorised users must be maintained across the railway at all times. If necessary, this may have to be by means of a temporary bridge capable of safely and comfortably accommodating concurrent two-way operation for wheelchairs, pushchairs and other wider forms of sustainable transport.**

### Traffic and transport

There are several roads within Bedford town which EWRCO forecast to become congested in the construction scenario. The TUR details that there are expected to be two construction compounds within Bedford town, located adjacent to St Johns Station and within the industrial estate at Cauldwell Walk.

Roads surrounding the compound at St Johns station and the hospital appear will be affected particularly adversely by the forecast construction traffic, although the scale of the congestion at these locations due to the scheme is not detailed within the TUR.

It is not clear whether consideration has been given to the possibility of making use of the rail network for delivery of materials, either from source or from a railhead located outside of Bedford, for example, on the MVL. While such an approach would not eliminate the need for construction traffic to use the highway network, it could reduce the volume of construction traffic on town centre roads.

**The Council would wish to see material deliveries occurring by rail wherever possible.**

**The Council is particularly concerned about the potential impact of works on hospital patients', staff and visitors' journeys. Congestion in this area cannot be allowed to increase such as to put the care and treatment of patients at risk.**

### Environment and Sustainability

The proposed developments of St Johns station, the multi-storey car park and the relocation of sidings to Caudwell Walk all represent the re-use of brownfield sites and would have minimum impact on natural or semi-natural habitats.

There will be intrinsic ecological values to the physical infrastructure (bridges and buildings); however, suitable mitigation should be able to remove any residual risk of harm.

Relocation and expansion of St Johns station creates an opportunity to provide a more accessible, visible and improved station. The station's design must consider access routes for all users prioritising people on foot, wheelchair or cycle.

There is an opportunity to improve the wider area around the station through a co-ordinated design strategy and masterplan. Green infrastructure should form part of the proposals, integrated with access routes, and connecting to the existing network, and the opportunity to achieve additional Biodiversity Net Gain (BNG) must be seized.

## **St Johns Station to Midland Station**

### **The relocation of Jowett Sidings to Cauldwell Walk**

The provision of a two-track approach to the proposed new EWR platforms at Bedford Midland station necessitates the removal of the five “Jowett Sidings” that are used to stable those Thameslink trains that are not required for service outside of peak periods.

EWRCo is proposing to provide replacement sidings next to Thameslink’s existing maintenance depot located adjacent to the MML, near Cauldwell Walk. The sidings would be constructed in the area between the MML and the Thameslink depot that is currently occupied by commercial premises including the EMR Scrap Metal facility and other businesses.

The proposed location for the replacement sidings avoids the use of a green field site and siting them next to the existing facility concentrates activity onto one site. Relocation of the scrap metal facility will also reduce overall noise levels in this area.

The Council is willing to assist business owners with advice and information to facilitate their relocation to alternative sites.

### **The Council supports the relocation of the Jowett Sidings to Cauldwell Walk.**

EWRCo also suggests that the remnants of the Jowett Sidings could be used to stable shorter formation EWR trains. The Council does not support this idea as the land concerned would provide an excellent site for town centre development in accordance with Policy 10 of Local Plan 2030, and policy EMP1 of Local Plan 2040.

## **Bedford Midland Station**

### **Platform Arrangements**

The consultation materials set out revised proposals for the redevelopment of Bedford Midland station, with only two new EWR platforms and the extension of platform 1A to provide an additional platform for Thameslink services.

The reduction in the number of platforms proposed at Bedford Midland is attributed to the decision to extend to Stewartby the two trains per hour from Cambridge that were previously proposed to terminate at Bedford. The extension of Platform 1a to create an additional Thameslink platform is described as being necessary to improve the performance of Thameslink services.

### **The Council supports the proposed platform arrangements for EWR and Thameslink.**

The Council notes that the EWRCo proposals do not have regard for the views of NR as set out in their Bedford Area Strategic Advice of 2022.

Recommendation 3 of this advice stated:

“It is recommended that East West Rail explore further the opportunities afforded by the provision of a new Up Fast platform and subsequent removal of fast trains from the slow lines at Bedford”

The provision of an Up Fast platform to facilitate East Midlands Railway services to London is a key objective of the Council’s adopted Rail Strategy, as well as for NR. Not to include construction of such a facility as part of these proposals would be a lost opportunity.

### **The Council supports proposals to bring forward construction of an Up Fast platform. This must be constructed as part of the final EWR proposals.**

### **The Relocation of Bedford Midland Station.**

To create adequate space for the new platforms and associated tracks, the existing station building, forecourt and much of the at-grade station parking together with the Council’s Ashburnham Road car park would be removed.

The proposed redevelopment would be within the bounds of the current station and its associated car parks. Therefore, the only likely impacts to habitats would be to trees and shrubs found within the redline boundary.

The building structure and associated infrastructure will have an intrinsic ecological value; however, with suitable mitigation impacts, they could be removed and the opportunity to achieve additional BNG seized.

The relocation of the station buildings southwards to a site immediately accessible from Midland Road is a long-standing aspiration of the Council.

A “station plaza” is also shown at the southern end of the site. This is described as providing for pedestrians, cyclists, buses and taxis. Provision of such a facility in this location will provide a more logical transition between the town centre and the station.

The creation of such a plaza and the associated public realm improvements formed part of the Council’s original Town Deal programme. Regrettably, the delays to the EWR project have meant that this part of the programme has had to be deferred as the available funding was time limited. However, such works remain an aspiration of the Council.

**The Council supports the relocation of the station buildings.**

Car Parking

With much of the at-grade station parking needing to be replaced, additional parking is proposed to be provided in a new multi-storey car park located between the railway and Ashburnham Road, although part of the existing at-grade parking at the northern end of the site would be retained.

A multi-storey car park could have an adverse visual impact on Ashburnham Road and the setting of the adjacent Conservation Area and could be seen as an overly dominant feature in a street that is otherwise mostly fronted by residential properties.

However, consolidation of the surface level parking into a multi-storey car park is positive in landscape terms and gives an opportunity to transform the area around the station.

Pick up and drop off facilities for taxis and buses must be maintained throughout the reconstruction of the station.

**The Council supports the provision of replacement car parking provision but would be willing to work with EWRCo to find better locations for the proposed multi-storey car park if these are available.**

During construction, a temporary car park is proposed on the west side of the railway, accessed via Ford End Road. This proposal will place additional pressure on the junction of Ford End Road, Midland Road and Prebend Street, which would exacerbate existing congestion.

The temporary facility must be in place prior to the loss of any of the current parking spaces.

The walking distance from the temporary car park site to the existing station building is around 650m, around double the maximum walking distance from the extremities of the existing station car park. Consideration will need to be given to the impacts on those with mobility difficulties, heavy luggage or young children.

One potential solution would be to provide an additional entrance to the station from the west side of the railway, aligning with the proposed southern footbridge. This would reduce the walking distance to under 200m.

**The Council wants to see the creation of such an additional access.**

#### Station Infrastructure

The proposals include three station footbridges – one main bridge and two emergency egress bridges.

The bridge located at the southern end of the station is well located to facilitate the provision of a new access to the station from the west side of the railway.

The Council is pleased that, whilst such an access is not included in the current proposals, it has been assured that at least “passive provision” for a western access is included in the EWRCO proposals.

Such an access from Queens Park to serve the existing community and the new development set out in Policy 12 of Local Plan 2030 is a key objective of the Council.

**The Council supports the provision of new footbridges on the station, and notes that all such bridges along the route must include lifts as well as stairs.**

It will be important that the redeveloped station is constructed to the highest possible design and sustainability standards. We would recommend an approach that achieves a BREEAM excellent rating as a minimum and incorporates renewable energy provision to help minimise embodied carbon in the station buildings, as well as measures to protect and enhance the habitat for fauna such as birds, and the opportunity to achieve additional BNG.

The location of the station building within this important area for regeneration may also offer the potential for the use of emerging standards, such as the UK Net Zero Carbon Buildings Standard.

Noting the consideration being given to provision of secure cycle storage and sustainable transport connections to the station, early consideration should also be given to the design of the station and platform access to consider the large numbers of people who may look to bring bikes with them on their train journeys.

#### Work to Bridges

In connection with proposals to electrify the railway, the consultation materials highlight the potential need for the partial reconstruction of Ford End Road bridge to provide clearances for OLE on the new EWR tracks.

This proposal is not confirmed to be required and is to be subject to more detailed assessment, including which sections of the railway might benefit from discontinuous electrification (thus removing the need for OLE at these sites).

The reconstruction of the bridge would have the potential to cause significant traffic disruption and the works, if undertaken, and would restrict vehicular access to the proposed temporary car park site. The necessary works to and around the station would therefore need to be carefully co-ordinated to ensure that the station is able to continue to operate throughout the construction period.

The Council requires early sight of the proposed timeline for these works so that it can ensure that disruption is minimised within EWRCo's plans.

**The Council supports the use of discontinuous electrification in this area to minimise the disruption caused by any necessary engineering work to the Ford End Road bridge.**

#### Bromham Road Bridge

The Council believes that only four tracks are necessary north of Bedford Midland station, and that the current Bromham Road bridge is therefore adequate to span the railway.

However, if the bridge were to be extended to accommodate additional tracks, there is a requirement for the current pinch-point to be made safer for cyclists. This could be achieved either through widening the bridge or by providing a parallel bridge on the southern side.

**If EWRCo undertakes work to the Bromham Road bridge, the Council will insist that adequate provision is made within the scheme for safe cycle routes during and after the works.**

#### Air Quality

The Council undertakes air quality monitoring for Nitrogen Dioxide (NO<sub>2</sub>) at one automatic site and 56 passive diffusion tube sites.

The 2023 monitoring results showed that there is one exceedance of the annual mean NO<sub>2</sub> objective of 40 µg/m<sup>3</sup> within the Borough. This is at the monitoring location on Prebend Street that has been above that limit for a number of years.

There is only one other location within 10% of the objective level (i.e. above 36 µg/m<sup>3</sup>). The other values were all below 36 µg/m<sup>3</sup>.

A new site has also been installed on Henley Road in Queens Park, close to the MML on the west side of the line. During 2023 the annual average for NO<sub>2</sub> at this location was 7.41 µg/m<sup>3</sup>.

## **North of Bedford**

### **Poets Area**

Proposals for the section of railway north of Bedford Midland station along the MML corridor remain largely unchanged from those previously published, with two additional tracks for the use of EWR services proposed on the east side of the existing lines.

The provision of these additional tracks would require the demolition of residential properties adjoining the railway. The number of properties to be demolished remains unchanged from the previous figure (37), but further development of the proposals has resulted in an increase in the number from which land would need to be acquired from 28 to 37.

In January 2024, SLC Rail produced a report for the Council which included a review of the justification for the provision of two additional tracks in this corridor.

The TR acknowledges the SLC Rail report but restates EWRCo's alleged need for additional tracks without addressing any of the points raised within it. This lack of engagement and response is incredibly disappointing.

The two additional tracks proposed by EWRCo would provide additional capacity and flexibility in constructing future EWR timetables. They would also reduce conflicts between EWR and other services through Bedford and could therefore contribute to delivering higher levels of operational performance (reducing the opportunities for delays spreading between the MML and EWR routes).

However, the magnitude of such performance benefits (which have not yet been quantified by EWRCo) needs to be weighed against the substantial negative impacts caused by the construction of the additional tracks.

Having reviewed the latest consultation material, SLC Rail has confirmed that there is nothing presented within them that would change the conclusions of their previous report.

**The Council does not believe that six tracks are necessary for the railway's operation.**

**The Council does not support the demolition of any homes and objects to this proposal on this basis.**

### **Bedford Midland Station Platform Configuration**

The January 2024 SLC Rail report discussed how the highly constrained pathing of freight services south of Bedford is a key issue and how this would impact the interaction of freight services and EWR passenger services on a four-track layout north of Bedford station.

The report discusses how the provision of the proposed Up Fast platform and the extension of platform 1a would potentially allow the current line through platform 3 to be used to hold freight trains clear of both Thameslink services and EWR services. This would create the necessary “firebreak” that would improve timetable flexibility and reduce performance impacts arising from the interaction of freight and EWR services. The provision of the Up Fast platform is also recommended in NR’s “Bedford Area Strategic Advice”.

Even if it were to be shown that such a solution did not provide the required capacity, alternative reconfigurations of the track layout through the station area might also be possible.

The latest EWR proposals see a reduction in the number of platforms required for EWR services. This means that, within the footprint of Bedford Midland station as envisaged in the 2021 consultation documents, there is now additional space available that could be used for reconfiguring the layout of the non-EWR part of the station, such as by providing another additional platform to the east of the extended platform 1a.

A more detailed engineering and timetabling study is required to determine whether, within the space available, it is possible to reconfigure the platform and track layout to provide the necessary additional capacity.

If EWR services could be operated on the existing MML ‘slow line’ tracks north of Midland station, not only would the impacts on residential properties be avoided but it is likely that the need to alter the Bromham Road bridge could also be removed. This would avoid any disruption to the area resulting from the necessary temporary closure of the bridge.

**The Council supports the reconfiguration of platforms within Bedford Midland Station to create additional capacity.**

#### Air Quality

In relation to the Poets area there are two established diffusion tube monitoring locations, one close to the junction of Shakespeare Rd / Bromham Rd, and the other near to the Shakespeare Rd / Clapham Rd junction. During 2023 the annual averages for NO<sub>2</sub> at these locations were 22.7 µg/m<sup>3</sup> and 30.4 µg/m<sup>3</sup> respectively, below the objective level.

A further monitoring location within the Poets area has now been established to capture baseline data in closer proximity to the existing rail line. This is located at Chesterton Mews, approximately 30-35m from the existing rail line. During 2023 the annual average for NO<sub>2</sub> at this location was 14.2µg/m<sup>3</sup>.

#### West of the MML

Land known as the former St. Bede’s School playing field forms part of an allocation for housing development and education use under Policy 21 – Land

North of Beverly Crescent of the Local Plan 2030. The land is also now being considered by the Department for Education for educational use.

This land is identified by EWRCo for use as a compound to support the delivery of environmental mitigation. Such a use does not seem as if it necessarily needs to be undertaken at this location.

**The Council insists that the proposed compound is relocated to a site that is not allocated for housing, education or other uses.**

Construction of a new viaduct over the River Great Ouse and Paula Radcliffe Way. To connect the MML and the onward EWR route towards Cambridge, a 1.1km long viaduct is proposed. The viaduct and its approaches cross the A6 (twice), the River Great Ouse (twice), the River Great Ouse flood plain and Clapham Road.

A single viaduct is proposed instead of a series of discrete bridges connected by embankment so as to reduce the impact on the flood plain, and this appears to be a sensible choice given the nature of the obstacles that need to be crossed.

The creation of an 18m high viaduct, with the potential for 5m tall electrification gantries on top of it, will have a significant ecological impact in both its construction and operational periods. During construction, the TR states that there will be extended hours working on both the bridges and the realignment of the A6. Working at night under floodlighting poses a significant risk to any commuting or foraging bats around the River Great Ouse.

This will be a very significant structure which will become a local landmark and will need to be designed sensitively in relation to its location in the river valley and the surrounding landscape context.

A full Flooding Assessment of the works' impacts must be undertaken by EWRCo and made available for independent review by the Council's consultants before designs are finalised.

**The Council insists that the viaduct's design should be bespoke and both respect and enhance the local landscape.**

#### Diverting Utilities

Construction of the viaduct will necessitate the diversion of utilities in the vicinity of the new structure. Such diversions are commonplace in large infrastructure projects and the relevant utility companies will insist on appropriate provisions to ensure that supply to their customers is not impacted.

The impacts of diverting utilities above and below ground must be assessed as part of the ES and through a Landscape and Visual Impact Assessment.

### Work to Bridges

The construction of the viaduct and its approaches will affect Great Ouse Way, Paula Radcliffe Way and Clapham Road. Any temporary closures of these routes will need to be carefully co-ordinated to manage their impact on the road network in this part of Bedford, and on affected businesses.

On Great Ouse Way, EWRCO propose the construction of a new bridge to carry the road over the railway. This new bridge must be constructed prior to closure of the existing bridge so as to minimise and manage disruption by allowing existing traffic flows to be switched from one bridge to the other without a hiatus.

In addition, the new bridge must be constructed to accommodate a dual carriageway road in accordance with the Council's existing plans to dual the whole of its existing northern and western bypasses.

**The Council supports construction by EWRCO of a new dual carriageway bridge to carry Great Ouse Way over the Midland Main Line on this basis.**

## **Other works in Bedford**

### Highway Network

The nature of the proposed works in the Bedford area will have a significant impact on the local highway network during the construction phase.

Numerous roads could be subject to extended period of closure to facilitate bridge reconstruction works. Some of the affected roads already operate at, or close to, capacity during peak periods, and the diversion of traffic onto adjacent routes will increase congestion on those routes, cause delays and inconvenience road users.

The resulting disruption will negatively impact the local economy as a result of people choosing to not to visit Bedford for the duration of the works.

The Council requires early sight of the proposed timeline for these works so that it can ensure that disruption is minimised within EWRCo's plans.

The works to Ampthill Road, Cauldwell Street and Ford End Road are associated with the possible provision of OLE on the Bedford – Bletchley section of the railway. The consultation materials note that a decision has not yet been taken as to which parts of the railway will be equipped with continuous electrification and, if this section the route is so equipped, whether the reconstruction of the bridges carrying these three roads over the railway is required.

Given the scale of disruption that these reconstructions could potentially cause and the limited options available to mitigate this disruption, EWRCo should pursue solutions that avoid the need for the bridge reconstructions.

Such solutions are likely to include not fitting this section of the railway with overhead electrification and using technical solutions that reduce the amount of clearance beneath the bridges.

**The Council supports discontinuous electrification throughout those areas where bridge works might otherwise be necessary.**

### Environmental and sustainability

The general approach to considering the impacts of the railway on climate change, notably in relation to carbon emissions as part of the ES is noted.

The impact of construction, especially to the River Great Ouse and its associated habitats and species, will be significant if suitable mitigation is not put in place.

EWRCo should be aware of the difficulties of linear projects cutting through significant bat commuting routes and should conduct the relevant surveys to understand the impacts.

### Door to Door Connectivity and Active Travel

The consultation materials contain no detailed proposals in respect of door-to-door connectivity or active travel. Measures must be introduced that reduce the need for rail users to drive to Bedford Midland and Bedford St Johns stations. This would reduce road traffic in the town and lead to a lower increase in the amount of parking required at the two stations.

The opening of Wixams station on the MML and the proposed relocation of Stewartby station provide opportunities to undertake a wider review of the provision of access to the rail network in Bedford and the area to its south, thereby reducing congestion on routes into central Bedford.

### Community benefits and impacts

The proposals will deliver significant improvements to connectivity for Bedford residents and businesses, opening up new journey opportunities and delivering an annual boost to the Borough's Gross Value Added of over £13M.

However, these benefits need to be considered against the negative impacts of the proposed works, particularly the impact on residential properties of any additional tracks north of Bedford Midland station.

The Council is also extremely concerned about the potential adverse effects on trade in the town centre of congestion caused by construction works at stations and bridges deterring customers from accessing shops and other commercial premises.

### Noise

Although much of this route section is in existing railway corridors, the additional EWR services will result in noise impacts. Visually acceptable acoustic fencing (or other suitable forms of mitigation) should be introduced to reduce the impacts on residential properties and other sensitive receptors.

Detailed noise modelling will need to be undertaken as details of the proposed railway are finalised to determine where mitigation would be required, including in rural areas where background noise levels, especially at night, are currently very low.

The local community will be negatively impacted by noise, dust and vibration from construction activities, particularly if these involve the demolition of any bridges.

The Council expects to see an assessment of the impact of both the construction and implementation phases of the project.

Construction activities should be programmed to avoid nighttime and weekend working except where absolutely necessary and, where this is necessary, measures to reduce noise, dust and vibration should be implemented.

Timely advance notice of working periods and their associated impacts is essential for both residents and the Council.

If there is any out of hours working, then this may well need to come forward through s61 applications under the Control of Pollution Act.

#### Geology

The Council has made EWRCo aware of a recent fatal incident in Cleat Hill, Ravensden, caused by work to introduce a ground source heat pump hitting a pocket of natural gas and causing an explosion.

A survey of the local area is currently being arranged through the British Geological Survey, and the railway's plans will need to be fully informed by its findings.

**13. Please provide any comments you have about our proposals in the Clapham Green to Colesden route section.**

Diversions of roads, tracks and paths that cross the new railway

The consultation materials do not include details of current usage for any of the affected Rights of Way, making it difficult to determine the scale of impact resulting from specific proposals. If some of the affected Rights of Way are heavily used, it might be necessary to consider revising the proposals to reduce impacts on those routes, e.g., Green Lane, Ravensden.

The plans for the railway's route east of Bedford do not currently appear to address the following national and local policies:

- NPPF para 100; Planning policies and decisions should protect and enhance public rights of way and access.
- NPPF para 104; Planning policies and decisions should protect and enhance public rights of way and access.
- Bedford Local Plan 2030 Policy 91 – Access to the countryside.
- Bedford Rights of Way Improvement Plan 2025-2030 Aim 1.5 – Improve the contribution the network makes to enhancing non-motorised travel.
- Bedford Rights of Way Improvement Plan 2025-2030 Aim 3.2 – Develop a better connected and safer network.

The Council wishes to see much fuller detail on the railway's impacts on the Right of Way network north and east of Bedford, and mitigation proposed that addresses the requirements of these specific policies.

The Council is aware that the Local Access Forum is reviewing the EWR route at its meeting in March to determine where it considers improvements can be made to the Public Right of Way network.

Installation of Passing Loops near Colesden.

Passing loops are proposed to allow passenger trains to overtake freight services.

The TR notes that loop locations have been selected from analysis of the timetable, but no timetable details are provided within the consultation materials, meaning it is not possible to determine whether the loops are necessary at all or whether their proposed locations are operationally appropriate.

Given that the difference in average speed between freight and passenger services will now be minimal as a result of the reduced maximum speed and revised stopping patterns for passenger trains, the need for loops to allow them to overtake freight trains is likely to be low.

However, the loops may still be useful to allow freight services to be held clear of passenger services while they await an available path on the MML through Bedford, for example.

#### Community benefits and impacts.

Community impacts will be most directly felt through the construction period, during which time there will be localised increases in HGV traffic, noise, vibration and potentially dust.

Construction activities will also have short-term visual impacts and result in delays and congestion, as well as the severance of communities and potential impacts on land drainage, flood risk, and the loss of habitat, hedgerows, trees, and agricultural land.

**Mitigation measures will be necessary to lessen the impact of these activities, including temporary noise barriers, dust suppression measures and the considerate use and positioning of temporary lighting to limit light pollution.**

Once the railway is in operation, there will be on-going noise, vibration and visual impacts.

**Mitigation measures such as noise barriers close to sensitive receptors, and planting or landscaping alongside the railway corridor will be necessary to reduce these impacts.**

#### Land and property requirements

The land and property requirements indicated on the draft plans show multiple large construction and logistics sites. The amount of land required seems higher than might be expected for a scheme of this nature.

The Council wishes to see the scheme's design and construction methodology develop further, such that there will be scope to reduce the amount of land required for this temporary purpose.

#### Environmental and sustainability

Carriage Drive is currently an unlit private road with wooded boundaries and mature trees. The roadway is ecologically linked with Clapham Park Wood to the northeast and Park Wood to the southeast. Surrounding habitats include parkland woodland, grasslands, and agricultural fields.

The cutting, temporary realignment of Carriage Drive, and new overbridge will cause a significant ecological impact; therefore, surveys and analysis must be completed to best practice standards to provide a robust mitigation strategy. Any new lighting in this area must be minimal and in-line with the results of nocturnal surveys and remove any impacts to commuting and foraging bats.

The new cutting and over bridge at Graze Hill will cause an ecological impact to habitats and species. Graze Hill is currently unlit and may provide a commuting and foraging path for bats and other nocturnal species.

The impact of drainage proposals in these areas on existing eco-systems, especially ancient woodlands such as Great Wood and Clapham Park Wood

nature reserve must be carefully assessed to ensure that there are no adverse impacts.

This section of the route is in the Renhold Clay Farmland landscape character area 1E, as defined in the Landscape Character Assessment. This is an open, gently undulating landscape, dominated by arable farmland with scattered woodland and fields defined by hedgerows and hedgerow trees. The landscape includes historic elements such as field boundaries, settlements and earthworks. Introduction of the rail corridor disrupts the existing pattern of landscape.

**Mitigation must extend beyond the boundaries and edges of the rail corridor so that the railway is integrated with the wider landscape character.**

**Detailed landscape and drainage assessments, together with mitigation proposals, must be discussed with local groups and communities prior to work commencing.**

Early sight of a detailed assessment of carbon and the mitigation measures proposed to reduce the impacts associated with construction of the railway and associated structures is especially important on this section of the route given the nature of some of the infrastructure, for example viaducts, which will inherently have high embodied-carbon impacts.

The Council is also concerned about the potential severance of areas of habitat affecting local populations of badgers, deer and other ground-dwelling species.

The red line area for construction of the railway around Ravensden includes a recycling facility known as Growing Beds. Whilst no details of the likely impacts or possible mitigations is given in the consultation documents, the Council is concerned that this facility, which receives all of the Borough's kerbside-collected green waste, remains usable at all times.

#### Tunnel at Clapham

We remain concerned about the visual impact of the railway to the east of Clapham around Carriage Drive.

**The Council wishes to see the proposed cutting replaced by a tunnel.**

#### Woodlands Country Park

The route of the railway passes north of the existing Woodlands Park on the northern edge of Bedford. The Council would like EWRCo to take the opportunity to dedicate land within their red line for an extension of the park once construction in the area has been completed.

#### Construction and logistics

As noted above, the quantity of land shown as required for construction and logistics sites appears higher than expected.

Haul roads within the Order Limits are proposed on this section of route. These are welcome as they will reduce the volume of construction traffic using local roads. However, the main compound sites will need to be accessed from the public highway network, and construction traffic routes have yet to be confirmed.

#### Traffic and transport

The TUR states that there are four main construction compounds within this section of the route. However, as no details of the assumed construction traffic or the routes they will take are included in the TUR, it is not possible to conclude whether their forecast of limited impact during construction is plausible.

No additional routes are forecast to move above the 85% volume-capacity level with the opening of the EWR route. As there are no stations proposed for this section of the route, the Council agrees that it is reasonable to assume that changes in traffic volumes will be limited.

Learning from experience in Buckinghamshire, it will be important that access routes to EWR compounds are resurfaced at EWRCo's expense before and, if necessary, after works take place. This will ensure that normal vehicular traffic does not suffer from poor road conditions during or after construction.

#### Door to Door Connectivity and Active Travel

In common with other route sections, few details are provided on door-to-door connectivity and active travel proposals. The rural nature of this route section means that public and active travel options for travel from villages to the stations at Bedford and Tempsford are currently extremely limited.

Consideration should be given to measures that could improve this situation, including the construction of a lineside cycle route laid out between the tracks and screening vegetation.

**The Council supports the construction of an active travel route alongside the new railway line from Tempsford towards Bedford. This route must rejoin the existing highway network prior to reaching Fairhill.**

#### Air Quality

In 2023 the Council undertook air quality monitoring for Nitrogen Dioxide (NO<sub>2</sub>) at one automatic site and 56 passive diffusion tube sites.

A number of additional monitoring locations have now been placed in rural areas along the EWR route to obtain baseline NO<sub>2</sub> data. These have not been in place for a full year yet, but the data available at the time of writing shows:

| <u>Ref</u> | <u>Location</u>                    | <u>Forecast Annual Average NO<sub>2</sub></u> |
|------------|------------------------------------|-----------------------------------------------|
| 93         | Bell Farm, Colesden Rd, Colesden   | 13.90 µg/m <sup>3</sup>                       |
| 94         | Chequers Hill – (opp No 25) Wilden | 6.79 µg/m <sup>3</sup>                        |
| 95         | Chequers Hill – Wilden             | 8.22 µg/m <sup>3</sup>                        |
| 96         | Entrance to Rectory Farm – Wilden  | 8.13 µg/m <sup>3</sup>                        |

The Environmental Update Report confirms that Construction Management Plans will be produced to manage and mitigate identified impacts, with further work to be completed to better understand potential impacts from both the construction and operational phases of the project.

It is also expected that detailed air quality assessments will be produced providing greater clarity on the expected impacts from construction, rail operations and changes to road transport related emissions within the Borough, with these to be considered against relevant objectives and target levels from government.

#### Noise

Noise monitoring needs to commence as early as possible in order to obtain accurate background levels which can be taken into account within the railway's design.

#### Additional Stations

There are persistent rumours that proposals will be brought forward for the construction of an additional station between Bedford and Tempsford to act as a focus of growth.

The Council has no such plans of its own in either its current Local Plan which runs until 2030, or in its Local Plan 2040 which is currently the subject of independent examination.

We note that EWRCo has put forward no proposals for such a station either.

**The Council confirms that it has no plans for an additional station, and would welcome EWRCo's similar confirmation.**

**14     Please tell us your preference for the Tempsford alignment:**

Both alignments pose significant potential ecological risks to both protected and priority species, and habitats, include major viaduct structures, and pass through open areas in Landscape Character Area 4A (Great Ouse Clay Valley).

It is noted that the consideration of the assessment factors for the Tempsford alignment shows a minor improvement in environmental impacts and opportunities for Option 1C.

The lower embankment and viaduct heights achievable in Option 1C will reduce the visual and acoustic impact of the route.

The Council has allocated land at Little Barford for 4,000 dwellings under policy HOU19 of the Local Plan 2040. Whilst this Plan is still at Examination, the Inspector has not found any issue with this allocation.

Locating the new station to the north of the new A421 through Option 1C allows for better proximity to, and access from, the allocated site, which will enhance the potential for attractive sustainable travel links to the station for new residents.

**The Council supports Option 1C.**

**15. Please provide any comments you have about our proposals in the Roxton to east of St Neots route section.**

Logistics Hub

Provision of a rail logistics hub has the potential to reduce the volume of construction-related road traffic associated with delivery of the scheme.

Option B allows tracklaying works to proceed eastwards from the hub ahead of completion of the Tempsford viaduct structures, whilst Option F is located between two new viaduct structures and, as such, is dependent on the completion of the viaducts before tracklaying in either direction can commence.

The consultation materials state that the hub is only intended to be used towards the end of the construction programme, in connection with rail systems work such as track laying. The Council believes that EWRCo should make greater use of the hub during earlier stages of the works.

Both hub options have the potential to have a significant impact on ecology through the construction and operational phases, especially if there is to be additional lighting. However, Option B is more contained than Option F, and so is likely to have less landscape and visual impact.

The Council has allocated land at Little Barford for 4,000 dwellings under policy HOU19 of the Local Plan 2040. The site promoters have confirmed that Option F would have an unacceptable negative impact on the number of houses that can be delivered on the site by 2040, whereas Option B can be accommodated.

**The Council supports the creation of Logistics Hub Option B, but not Option F.**

Land and property requirements

The Council has allocated land at College Farm, off the Black Cat Roundabout for employment use in the Local Plan 2040. The site has been assessed to have potential for a service area.

Alignment Option 1B threatens this allocation's delivery.

Environmental and sustainability

The Tempsford station platforms are elevated above the surrounding landscape and so potentially impact on the surrounding landscape. A bespoke station design is required to address its location and the surrounding landscape context.

We would recommend an approach to the new stations along the route that follows a similar approach to that being implemented for the new Cambridge South station. This includes achievement of a BREEAM excellent rating and the use of engineered timber to reduce the embodied carbon of the station. Green roofs are also utilised to help reduce the visual impact of the station. The renewable energy generation potential of stations should be maximised to help reduce operational carbon emissions.

A full Flooding Assessment of the works' impacts must be undertaken by EWRCO and made available for independent review by the Council's consultants before designs are finalised.

#### Traffic and transport

In the EWRCO traffic model, there are several links that are forecast to be operating above 85% of capacity because of construction traffic in 2032. These include routes around the upgraded Black Cat junction, including the road through Roxton and the existing A428 to the south of St Neots.

The EWRCO model forecasts that there are no additional roads with operating at over 85% capacity after opening of the railway.

Given that the proposed scheme includes a new interchange station between the EWR route and the East Coast Main Line (ECML), significant changes in traffic flows around the proposed new interchange station would be expected, and this latter statement will need to be retested.

#### Door to Door Connectivity and Active Travel

In common with the proposals for other route sections, no specific proposals are presented.

Connectivity between the new Tempsford station and existing and new communities is critical and should be supported through safe routes for cycling and walking, including the creation of an active travel corridor alongside the railway to link the station to nearby areas of development, and bike storage at the station capable of serving cyclists from the new settlement at Little Barford and any future developments in the area.

### **16-21 St Neots to Cambridge**

No responses

## **22. Please provide any comments you have in relation to these route-wide matters.**

### **Traffic and Transport Modelling**

#### General

In terms of the transport model used to produce the analysis detailed in the TUR, (the East-West Rail Strategic Highway Model – EWRSHM) the report contains limited detail on the structure, development, performance, and forecasting assumptions used in the model.

It is noted that this model will be replaced with a new strategic modelling tool for the assessment of scheme impacts as part of the Transport Assessment to be included in the Development Consent Order.

The TUR contains limited detail on the transport model forecasts to compare against existing forecasts available from the Council's own work. For example, the presented congestion forecasts only highlight links which are forecast to have a volume-capacity ratio above 85% and do not provide detail on the scale of these exceedances.

A comparison of the forecast congestion locations has been undertaken against the forecasts available from the modelling undertaken in the Bedford Borough Traffic Model (BBTM). At a high-level, there is reasonable consistency between the two sets of forecasts, with forecast congestion identified in similar locations.

There are, however, some key locations of known congestion which are highlighted in the BBTM forecasts but are not shown in the forecasts presented in the TUR. These include:

- the section of the Bedford Bypass between Biddenham and Bromham and
- the eastern A6 junction with the A421 south of Bedford.
- the area around the Black Cat roundabout and Tempsford station.

In terms of the forecast impacts of construction modelled in 2032, in general, the forecast impacts presented in the TUR align with the proposed locations of construction compounds; however, limited forecast impacts are shown for the section between Clapham Green and Colesden despite four construction compounds being located within this section.

As no details of the assumed construction traffic are included in the TUR, it has not been possible to independently review the likely impacts of construction.

In terms of the forecast impacts of the EWR scheme on highway congestion in general, increases in forecast congestion are identified around proposed stations with the additional forecast traffic accessing these locations.

Limited forecast impacts are presented near stations to the south-west of Bedford and at the new interchange station at Tempsford; however, as with construction impacts, no detail on the assumed changes in traffic flows with the

implementation of the scheme has been included in the TUR and it has therefore not been possible to independently assess these forecasts.

The potential impacts of the scheme identified in the TUR are generic in nature (such as additional delays due to roadworks and construction traffic) and no specific mitigation measures are identified or tested within the Report.

The TUR does detail a framework for the identification of locations where mitigation measures are to be assessed, which appears robust.

Specific mitigation measures will be identified and assessed as part of the development of the Transport Assessment using an update strategic model.

**The Council expects to be closely involved in the refinement of the EWRSHM ahead of statutory consultation taking place.**

#### Car Parking

Learning from the recent experience of a vehicle fire in a MSCP at Luton Airport, the Council believes there should be a requirement for all car parks to have sprinklers included in their construction specification, and that the Bedfordshire Fire & Rescue Authority will be fully consulted in the design and build of car parks to ensure the best possible fire risk mitigation.

## **Operating the railway**

### **Train services**

The proposal to introduce Cambridge to Stewartby services is sensible for two reasons. Firstly, it reduces the need for additional platforms at Bedford Midland station, offering more space for other uses; and secondly to better serve the Universal Theme Park if that goes ahead.

### **The Council supports the proposals for a Cambridge to Stewartby service.**

The proposed new passenger services set out in the consultation materials will provide new journey opportunities and improve the connectivity of Bedford and the surrounding areas. However, the services proposed do not include direct services to Milton Keynes Central. Such a service would link Bedford and the surrounding areas more easily to the employment, education and leisure opportunities in the city as well as providing a direct interchange with the intercity services operating on the West Coast Main Line (WCML) which do not call at Bletchley.

The provision of such a direct service would require either an “east – north chord” to allow trains to proceed directly from the MVL onto the WCML towards Milton Keynes; or would require trains to reverse at Bletchley station. This service could be created as an extension of the hourly Cambridge – Bletchley service proposed as part of service Concept 2.

Our economic analysis shows that the Gross Value Added benefits of the railway to the economy of Bedford increase by a further £0.5M to £14.2M p.a. when services are extended to Milton Keynes.

The WCML is currently heavily utilised and opportunities to path this service between Bletchley and Milton Keynes Central are likely to be limited. However, the opening of HS2 will result in significant changes to the structure of the timetable on the WCML and thus provide additional opportunities.

### **The Council would support the introduction of Cambridge to Milton Keynes services, and the creation of an “east – north chord” from the Marston Vale Line to the WCML at Bletchley.**

### **Powering our Trains**

The consultation proposes either the full electrification of the railway between Oxford and Cambridge or the use of discontinuous electrification in combination with hybrid battery-electric trains.

The latter option will reduce the need for existing bridge structures over the railway to be reconstructed to provide clearance for OLE. This is particularly relevant in Bedford where several structures have been identified as potentially requiring reconstruction to facilitate electrification.

Consideration of discontinuous electrification must focus on removing the need for these bridges to be reconstructed as this will avoid significant disruption during the construction phase and could shorten the programme for delivery of the railway through Bedford.

The rail corridor, particularly if it includes overhead gantries and power equipment will impact on views and landscape.

**The Council welcomes the decision to operate passenger trains using electric traction.**

**The Council particularly welcomes the use of discontinuous electric power, noting the contribution this would make to reducing the need to reconstruct bridges within the urban area of Bedford.**

**The Council also supports discontinuous electrification in areas where Overhead Line Electrification would be visually intrusive in the landscape.**

#### Supplying Power to EWR

It is noted that the development of the EWR project will require works to make grid connections to supply power to the railway as well as realigning and diverting existing utilities supplies. This includes sub-station upgrades across the route.

As part of this work, it will be important to ensure that electricity infrastructure requirements are factored into infrastructure planning. This should include the work on Regional Energy Strategic Plans being developed by the National Energy Systems Operator.

#### Stabling Trains and Maintaining the Railway

Detailed proposals for new rolling stock stabling and maintenance facilities have not been presented as part of this consultation. However, the TR includes an indication of locations that are being considered for such facilities.

The provision of these facilities can bring new employment opportunities for the area where they are located. However, these facilities need to operate round the clock and can be a source of disturbance to local residents, especially during the night. The development of proposals for new facilities should therefore focus on locations that are less likely to impact local residents and suitable mitigation measures should be incorporated within the proposed facilities.

#### Approach to Freight

We wish to see an assessment of the potential for growth from the current capacity of one freight train path per hour in each direction.

We need to understand whether this level of provision would remain static at this point due to capacity on the network, or if there is the potential for this level to increase. If there is such potential, we need to know the time frame over which this may extend.

Information on the potential motive power for freight trains would be welcome in order to allow clarity over the anticipated impacts of this on local air quality.

### **Delivering the railway**

#### **Environment and sustainability**

We support the use of materials with low embodied carbon wherever possible and recommend that where new or replacement habitats are proposed, consideration be given to how the carbon sequestration potential of these habitats can be maximised.

In addition to the consideration of carbon, it will be important to understand how the wider climate impacts will be considered as part of the ES. This should include consideration of the wider climate impacts and resilience measures, for example the impacts of heat during the construction phase and on the operation of the railway.

It is noted that the consultation references a modular design approach to new stations, but it will be important that station designs meet the requirements of local planning policies as set out in Local Plans. It will also be important to ensure that the design of stations and platform access takes into account the large numbers of people who may look to bring bikes with them on their train journeys.

#### **Homes, Land and Property**

The construction of a new railway and its associated facilities cannot be undertaken without impacts on land and property. The specific requirements of gradient and curvature can restrict the ability of a new railway to avoid impacting specific properties, but regard should be paid to the specific impacts arising from the need to acquire residential properties.

Because of the impacts such acquisitions can have on individuals, families and the wider community, additional effort must be devoted to finding solutions that remove the need to acquire people's homes or gardens.

This is particularly relevant to the Bedford area where a significant number of properties are currently proposed to be acquired and demolished. As highlighted in preceding sections of our response, the options for avoiding these demolitions have not been fully explored. We believe that our proposals to provide additional track capacity to hold freight services in the Bedford Midland station area are (a) feasible and (b) provide adequate timetable flexibility and performance robustness to remove the need for additional tracks north of the station.

#### **Construction – Marston Vale Line**

The opportunity of utilising an extended closure of the route should be considered as it would potentially reduce the programme duration for the MVL works and reduce the impacts of nighttime and weekend working on local residents.

Works in the Bedford area will be disruptive and, in the absence of an extended closure, would require numerous separate possessions and potentially additional nighttime and weekend working. The services introduced at Connection Stage 2, together with the existing services on the MVL would be disrupted by these works.

Consideration should also be given to accelerating the MVL works through the use of alternative consenting mechanisms for the works on this section of the route.

This would de-link these works from the construction activity to the east of Bedford and allow the earlier introduction of services between Bedford and Oxford.

#### Construction – Traffic

We note that the recently completed works on Connection Stage 1 of the EWR project and the ongoing works on HS2 have resulted in significant construction traffic impacts within Buckinghamshire. A range of lessons have been learned from the experiences of Buckinghamshire Council in dealing with these impacts and must be put into practice in Bedford Borough.

**EWRCo and Bedford Borough Council should jointly engage with Buckinghamshire Council and take account of the lessons learned when planning construction logistics for future stages of the EWR scheme.**

#### Utilities

Water scarcity is also a considerable issue facing the East of England so, as part of the consideration of the impacts of the proposed development on water resources, it will be important to consider whether construction and operational impacts on potable water supplies in terms of creating additional demands on water resources, and to develop mitigation measures to minimise any requirements.

#### Communications

Learning from the experience of Buckinghamshire, EWRCo must employ a first-rate communications strategy to ensure that local residents are clearly informed of all works being undertaken in a timely manner.

**The Council requires EWRCo to fund the employment of resources within the Council to deal with incoming queries and Street Works issues on a 24 / 7 basis.**

#### Need to Sell Scheme

The Council continues to believe that the Need to Sell scheme, even as enhanced as part of the current consultation announcement, is inadequate and unfair.

The scheme should be adapted to enable any property owners who wish to sell to do so quickly and easily, at a price that includes a premium above market rates to compensate for the blight they have suffered since Route E was selected.

In addition, those properties which are purchased by EWRCo should be quickly made available to the rental market to ensure that the local community is kept buoyant and vital rather than the neighbourhood slipping into decline with vacant houses potentially attracting anti-social behaviour.

#### Statutory Blight

The Council notes that statutory blight provisions are now available to affected owner-occupiers in safeguarded areas, whereby they may be eligible to serve a blight notice on EWRCo asking them to buy the property before it is needed to build the railway.

Whilst recognising that the statutory blight compensation process is set out in legislation and in the light of case law, the Council is concerned that those affected may not have a thorough understanding of their position.

The Council believes that the statutory requirements ought to be enhanced to encompass the provision of independent legal advice for each owner-occupier with property in a safeguarded area, with the relevant fees being rechargeable to EWRCo.

Consideration must also be given to extending the scope of the property purchase scheme to include those that are outside the current red line boundary but are unable to be sold due to the continuing uncertainty over the scheme's proposals.