

East West Railway Company

Spring Consultation April – June 2026

Response from Bedford Borough Council

**Q1. Please tell us which of the following describes your interest in the project:
(Please tick all that apply)**

Local authority

Bedford Borough Council demands a business case is presented and consulted upon with affected local authorities, parliamentarians and residents.

Q2. If you have received a letter identifying you as having an interest in land, please add your Party ID letter reference number in the box below:

EWB-PGM-ARD-LP-XX-AT-G-3489

Q3. Please provide your contact details:

Paul Pace

paul.pace@bedford.gov.uk

Q4. If you are responding on behalf of an organisation, group or affected landowner, please provide further details below:

Bedford Borough Council
Borough Hall
Cauldwell Street
Bedford
MK42 9AP

Your role in organisation, group or representing landowner:

Interim Strategic Director for Environment

Q5. Please provide your age range:

No response.

Q6 – Q8 Oxford to Bletchley

No response.

Q9. Please use the box below to provide any feedback you have about our connectivity proposals to the new stations [Fenny Stratford to Kempston] including walking, wheeling, cycling and equestrian routes.

- i. Overall, we support the consolidated stations option for the Marston Vale Line providing there is good connectivity between the new stations and nearby communities: some local residents will face a longer journey to a station than they did before, albeit the station will provide a much improved service when they get there. This journey must therefore be as easy and convenient as

possible, and we note East West Rail's proposals to design its new stations as mobility hubs, with high quality provision for access by active travel and integrated bus services.

- ii. To ensure this approach is delivered effectively, active travel routes must be well planned, with input from existing communities about their needs and preferences, and extend far enough from the station to ensure that end-to-end journeys are viable, not merely the final few hundred metres nearest the station. Bus services must be both regular and reliable, with ticketing and payment options that are seamlessly integrated with ticketing and payment on the railway. The recently published National Strategy for Integrated Transport commits to making tools available for major city regions to roll out integrated contactless ticketing from 2030: these tools should be adopted and incorporated into East West Rail's offer for integrated travel.
- iii. We have a significant outstanding concern in relation to sustainable travel arrangements for Kimberley College. The new station at Stewartby will be a significant walk away from the college, which will make commuting by train significantly less attractive to students. This is likely to lead to parents dropping students off in larger numbers, and therefore an increase in car traffic. In our previous consultation response, we wrote:

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.

- iv. EWR's proposal is for an active travel route, which relies on the Brickworks development to deliver part of its length including, crucially, the bridge over the railway. If this is not delivered, students will face an even longer walk via a less direct route, and having to cross the railway at Green Lane: we require the provision of a road bridge to replace the level crossing (see our comments under Question 17 below), but if the level crossing is retained it will introduce heightened safety risks for students in addition to the inconvenience of the less direct route and waiting time for barriers to lift. The footbridge and active travel route must be delivered, and delivery phased so that they are in place for when trains begin serving the new station.
- v. Our previous response specified that we required a first mile / last mile solution to provide effective sustainable travel options: we did not specify an active travel route on its own, and we do not view this as an adequate solution. We can see no evidence that consideration has been given to other options, such as a dedicated shuttle bus or a bike / e-bike hire scheme that would be free for students and staff. Given that the station is to be built as a mobility hub, incorporating options of this sort should be feasible. We require further

consideration of such options, and the provision of a solution over and above the active travel route alone.

Q10. Please use the boxes below to provide any feedback you have on our proposals for these level crossings.

Level crossing name	Our consultation proposal	Your consultation feedback
Wootton Broadmead (Broadmead Road)	Close and provide a road bridge at the crossing.	We support this proposal, which adopts our previous recommendation.

Please see our comments in response to Question 17 regarding the level crossings not specified in this question.

Q11. Please use the box below to provide any feedback you have about our revised proposals for south Bedford and Bedford St Johns station.

Station design

- i. We continue to support the relocation of Bedford St Johns station to the new site near the hospital, and the substantial expansion that is proposed for its passenger facilities, in addition to the greatly enhanced train service compared to what is available at the current station.
- ii. In the current proposals, we particularly welcome the proposal to site the station concourse above the platforms, and the provision of a pedestrian route across the railway that will be accessible to the general public, with lifts to provide step-free access. We are also pleased to see that this is proposed as part of an active travel route from the hospital side of the station through to Cauldwell Street where it will connect with existing access to the river.
- iii. We previously called for the proposals to provide vehicular access to the station from the Cauldwell Place side of the station to be re-thought, and are pleased that this proposal has been dropped, as has the proposal to close access to Cauldwell Place from Cauldwell Street. We would welcome greater clarity on the structures still apparently proposed on the eastern side of the railway: lift towers and similar would be acceptable, but we would not wish to see any more substantial structures there.

Travel connectivity at Bedford St Johns station

- i. In our previous consultation response, we wrote:

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.

- ii. In respect of Bedford St Johns station, while the proposed active travel routes are positive, they do not go far enough – literally – to achieve this aim. Other than where they connect with Cauldwell Street / Kempston Road, they do not link in with existing routes, or bridge gaps that currently prevent active travel being an attractive option for reaching this area.
- iii. We particularly require improved connections to Ampthill Road, Elstow Road, Cardington Road and London Road. There is also a considerable opportunity to connect with the active travel infrastructure around the river, east of the St Johns Retail Park and Cardington Road. High quality active travel routes would open up access to the station by walking, wheeling and cycling for large residential areas of the town, both north and south of the river. The relatively high frequency of trains at Bedford St Johns would make it a meaningful alternative gateway to the rail network, as a short trip for interchange at Bedford station would often be feasible. The current proposals fall short of this, and gaps in the proposals to the east of the station are particularly notable.

Car parking at St Johns station

- i. In our previous response, we supported the consolidation of surface level parking into a multi storey car park, as a more efficient use of space. However, we wish to raise concerns regarding the current specific proposals for the construction of the multi-storey car park adjacent to Cauldwell Street and Britannia Road.
- ii. While the proposal seeks to maintain parking capacity for Bedford Hospital, the Council objects on several grounds. Firstly, the acquisition and loss of eight residential properties (1–8 Crown Place) and the inclusion of the Crown Care Home raise significant social and community impacts. The displacement of residents and potential disruption to vulnerable care home occupants is not adequately justified, nor is it clear that all reasonable alternative sites—particularly those with less residential impact—have been fully explored.
- iii. Secondly, the proposed access via a new traffic light-controlled junction on Britannia Road is likely to exacerbate congestion in an already heavily trafficked area. The junction sits close to existing busy intersections, and the cumulative traffic impact, particularly during peak hospital visiting hours, has not been sufficiently demonstrated to be manageable without adverse effects on local air quality, road safety, and journey times.
- iv. Furthermore, the Council is concerned about the broader urban design implications. The introduction of a large nine-storey structure in close proximity to established residential streets risks being out of scale and character with the surrounding area, potentially resulting in visual intrusion, overshadowing, and loss of amenity for nearby properties.

- v. The car park design should include a minimum of 2 lifts, ideally more, and should include a fire suppression system. Drop off and pick up points should be included in addition to the car park. These should be sufficient to avoid additional congestion on neighbouring roads. Car parking for people with restricted mobility should be provided. There should be an assessment of need to ensure that this provision is sufficient.
- vi. Finally, while the proposal states that parking provision will be maintained during construction, there is insufficient detail on how disruption will be minimised over the construction period, which could have knock-on effects for hospital operations, patients, staff, and surrounding neighbourhoods.
- vii. For these reasons, Bedford Borough Council considers that the proposal, in its current form, fails to adequately balance infrastructure needs with community impact, and therefore objects pending further evidence, mitigation measures, and exploration of less harmful alternatives.

Curve south of Bedford St Johns station

- i. Overall we accept the broad approach outlined in respect of the curve south of Bedford St Johns station, subject to the following.
- ii. Engagement with the groups and facilities affected by the proposals, such as the Raleigh Centre and Men in Sheds, must continue and be stepped up. We have concerns that engagement with these groups has not been sufficient to date. Crucially, East West Rail must engage with Bedford Borough Council as the landlord, as well as with our tenants.
- iii. The full effects of construction must be thoroughly mitigated. EWR's proposals for this are so far not fully developed. For example, the Raleigh Centre site currently has a deficit of parking, which is already resulting in elderly users not accessing services on the site, to which they have been referred by the NHS. We have been investigating options for remedying this parking deficit. EWR's proposals appear to result in a further net reduction in parking capacity. These facilities seem less amenable to public and active travel solutions as a substitute for parking compared to, say, railway stations, although we are open to suggestions for proposals of this sort that could meet user needs. East West Rail's proposals must result in a net uplift in parking, or equivalent measures, to improve access to the facilities.
- iv. Additionally, current plans will remove part of the Youth Offending Service's garden land, which they currently use for court mandated reparations. The council has just completed a project to refurbish this building; taking this land would significantly impact the YOS' ability to deliver statutory services on this site. As a result, the plans risk placing the capital already invested and service delivery at risk. We will require full compensation for this if the proposals are taken forward in their current form.

- v. We note the intention to deploy noise mitigation, likely a noise barrier, and also to continue with approaches that appear to be largely successful in managing curve squeal and flange squeal on the existing curve. We require sight of full details of these measures as soon as possible.

Environment

- i. The current consultation does not present significant new material on environmental considerations at Bedford St Johns station. We therefore re-state our position from our previous consultation response, as follows.

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.

Q12. Please use the box below to provide any feedback you have about our proposals to redevelop Bedford station.

Ashburnham Road

- i. In its 2025 'You Said We Did' report, East West Rail published a significant change to its proposals for Bedford station. This entails the demolition of a substantial number of buildings on Ashburnham Road that EWR had previously ruled out of its land take requirements. Full Council considered these proposals on 26 November 2025 and passed the below motion in response, which we reproduce here in full, and which remains a current statement of the Council's position.

MOTION – 26 November 2025

This Council notes:

East West Rail's sudden and recent decision to propose the demolition of homes on Ashburnham Road.

Residents and businesses have been shocked and upset by this decision.

EWR failed to communicate these plans with local Councillors who would have advised a different approach

This Council believes:

Demolition of those properties is not required for a final design of a new station for Bedford, even if it includes space for East West Rail trains, as shown by EWR's previous consultation documents, based on station designs they considered workable. Neither is demolition necessary for the process of building the new station.

That faster construction is not sufficient justification for the demolition of people's homes, whether on Ashburnham Road or in the Poets estate.

That outright opposition to building of East West Rail is not likely to convince the Department of Transport to take any course of action that will avoid demolitions of homes in Ashburnham Road and the Poets estate.

This Council resolves:

To do all it can to support residents whose homes are proposed to be demolished.

To investigate designs for Bedford station that will provide the most convincing case that even if East West Rail is built going through Bedford station, there is no need to demolish homes on Ashburnham Road.

To also investigate options for the railway and construction that will similarly obviate the need to demolish homes in the Poets estate, even if East West Rail is built going north out of Bedford Station before heading east.

To publish the results of such investigations before 30 January 2026.

- ii. Bedford Borough Council therefore objects to the proposed new eastern station entrance and civic plaza on the grounds that insufficient information has been provided to demonstrate how this element of the scheme delivers meaningful wider regeneration benefits or a clear, tangible offer back to the local community. While the principle of improved access, public realm and connectivity is acknowledged, the proposals lack detail on how the space would be activated, managed, and integrated with surrounding neighbourhoods, particularly Ashburnham Road and Queens Park.
- iii. The Council is concerned that the revised designs rely heavily on the acquisition of additional land and properties on Ashburnham Road, yet do not adequately set out how the resulting impacts on residents are offset by long-term social, economic, or environmental benefits. There is limited clarity on how the civic plaza and new entrance will support local businesses, community use, inclusive placemaking, or wider area regeneration beyond the immediate function of the station itself.

- iv. The final entrance designs should take full regard of personal safety, including lighting, staffing, CCTV and clear sightlines.
- v. Furthermore, the information presented to date does not provide sufficient certainty on delivery, phasing, or the relationship between the station works and broader regeneration objectives for this part of Bedford. In the absence of a clearly defined regeneration strategy, secured community benefits, and meaningful engagement outcomes, the Council considers that this element of the proposal fails to adequately justify its impacts and therefore raises an objection.
- vi. Bedford Borough Council is opposed to the demolition of homes on Ashburnham Road. The Council does not consider the loss of people's homes to be an acceptable price for the current scheme, whether for permanent infrastructure, construction compounds or associated works. East West Rail must redesign its proposals to avoid the demolition of homes and protect established residential communities.
- vii. The Council is concerned that the demolition would adversely affect a well-established residential community, leading to the permanent displacement of residents and the erosion of the street's residential function. Insufficient justification has been provided to demonstrate that demolition is unavoidable or that reasonable alternative solutions have been fully explored which would avoid or reduce the need for property loss.
- viii. We expressed concern in our previous response about the effect of a large multi-storey car park on the conservation area whose boundary is defined by the eastern side of Ashburnham Road. Given that any tall building on the western side of the road would be out of scale with the mostly four-storey buildings on the eastern side, we would have similar concerns about any tall residential block on former station car park land. That said, we recognise the direction in national planning policy towards denser residential development around railway stations.
- ix. Furthermore, the proposed demolitions would introduce prolonged disturbance to neighbouring occupiers through construction activity, noise, dust, and increased traffic, compounding the harm already associated with the wider construction proposals. Bedford Borough Council does not support the demolition of homes on Ashburnham Road under any circumstances and calls on East West Rail to redesign the scheme to avoid this loss.

Construction

- i. Bedford Borough Council objects to the proposed construction arrangements associated with the Bedford station works, specifically the establishment of a main construction compound adjacent to Ashburnham Road within the existing station car park. The scale, intensity, and duration of the proposed construction

activities would give rise to unacceptable impacts on the surrounding residential area and local highway network.

- ii. The Council is concerned that accessing the principal construction compound from Ashburnham Road would introduce significant construction traffic, including HGVs and workforce movements, onto a predominantly residential street. This would adversely affect highway safety, residential amenity, and the quality of life of nearby residents through increased noise, disturbance, congestion, and reduced pedestrian safety.
- iii. While the applicant states that alternative options have been explored, insufficient evidence has been provided to demonstrate that the proposed approach represents the least harmful solution in planning terms. In the absence of adequate mitigation and a clear demonstration that construction impacts can be acceptably managed, the Council considers that the proposed construction arrangements would result in undue harm and therefore maintains an objection to this element of the scheme.

Community facilities on Ashburnham Road

- i. The loss of the GP surgery on Ashburnham Road would create a significant impact on local primary care access as the practice has a patient list of 4,500 people. It will be a challenge to find new GP places for this number of residents in an already stretched primary care sector with no additional capital funding. This is especially pertinent as this practice is in an area of the Borough with high levels of deprivation where there are typically poorer health outcomes.
- ii. We understand that East West Rail is working with the Central East Integrated Care Board to ensure continued healthcare provision for patients at this practice. This continued provision is a separate issue from any matter of compensation relating to the existing building and, in the event that the current proposals are taken forward despite our objections, it is essential that East West Rail ensures there is no disruption to patient care.
- iii. The proposed demolition of the Polish Club also causes significant concern. The building has longstanding cultural and historical value in Bedford and is the principal Polish community venue in the town. It supports community groups and businesses, including organisations serving minority ethnic communities through affordable space arrangements. It also functions as a polling station for residents in the region who are eligible to vote in Polish national elections.
- iv. We therefore require East West Rail to recognise fully the cultural significance of the site and, accordingly, to undertake a full equalities and community impact assessment, engage directly with club representatives, users and relevant stakeholders and, in the event that the current proposals are taken forward despite our objections, provide like-for-like replacement accommodation before the existing site is closed. This must include accommodation for at least the

same number of businesses and community functions, with town centre parking.

- v. Delivery of these new healthcare and community facilities will be a clear and critical test of East West Rail's effectiveness and bona fides in delivering their scheme.

Housing impacts

- i. Approximately 60 households (including those properties split into separate flats/units) face the loss of their home in delivery of this scheme between Ashburnham Road and the Poets area. The consequences for the households affected will be significant, and likely to interrupt communities, family networks, and ease of access to education and employment.
- ii. It will prove a significant challenge in the current housing market for such households to source alternative affordable like-for-like accommodation. Tenants in leased properties, particularly those who have had protected rents for a number of years, may struggle to find alternative accommodation that is affordable or suitable in the vicinity. The East West Rail scheme risks increasing numbers of homeless households in Bedford Borough. These impacts must be managed by East West Rail, at its own cost.
- iii. Bedford Borough Council has a duty to prevent and relieve homelessness under the Homelessness Reduction Act 2017, and to take all reasonable steps to help applicants keep their current home or find alternative accommodation.
- iv. The Council faces unprecedented financial pressure, with temporary accommodation provision a particular high-risk pressure. Since 2020 household numbers in temporary accommodation have risen from 260 to 920, with costs in the millions. Furthermore, a key accommodation setting (Charis House) owned by the Council on Ashburnham Road currently provides ten safe and supported homes for former rough sleepers and vulnerable adults, which under the EWR scheme faces closure and demolition. The loss of this setting will create adverse outcomes for those individuals and significant financial loss to the Council. Grant funding to the Council from Homes England is tied to the property and will likely have to be returned. We therefore require a commitment from East West Rail to reimburse the Council for any extra costs incurred in the event that our statutory duty is engaged as a result of the scheme, and for any financial losses in respect of Charis House.
- v. Further care or support settings for homeless people or vulnerable adults also face closure and demolition under the EWR scheme. These include the Crown Care Home near Bedford St Johns Station (see our comments on the proposed new car park at Bedford St Johns station in response to Question 11, above), and the South Lodge facility on Sidney Road in the Poets area (see our

comments on the proposed demolitions in that area in the section below).

- vi. The EWR proposals are already having material impacts on affected residents. Owner occupiers are concerned about the decline of their home value which would lead to a poor return through a compulsory purchase scheme. Property values may have been affected during the period before safeguarding was introduced, but while the development of the scheme was well known: we have heard concerns from residents about whether EWR is correctly calculating the unblighted value of properties by failing to take this into account. Affected owners could face negative equity, financial hardship or forced downsizing to move elsewhere. Unblighted values should be calculated with reference to prices prior to the selection of the northern route ('Route E') in 2020, adjusted for general movements in local property prices since then.
- vii. In our engagement work in the affected communities we have spoken to residents who were unaware of the available support such as the Need to Sell scheme and provisions relating to statutory blight, and we recommend that EWR redoubles its efforts to provide information to residents about how they can be compensated. As outlined in our previous response, we believe that the existing 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 East West Rail.
- viii. Where properties have been purchased, they should be quickly made available to the rental market, to avoid vacant houses potentially attracting anti-social behaviour.
- ix. Much greater efforts should also be made to produce clear, accessible and well-publicised information about compensation that will be available due to devaluation of property near to the works and/or the operational railway, whether under the Compulsory Purchase Act 1965, Land Compensation Act 1973, other existing provisions, or any new schemes introduced by East West Rail. The consultation paper notes that compensation is a complex area of law and surveying practice: East West Rail should be doing more to guide affected residents and property owners through it in an accessible, easily navigable manner.
- x. In the event that a four track solution is adopted in the Poets area, and/or EWR's station proposals revert to something more like the earlier and less destructive approach proposed for Ashburnham Road, compensation payments to residents and property owners would be appropriate for years of blight, uncertainty and distress, as would a formal apology from East West Rail.

Car parking at Bedford station

- i. In its 2025 'You Said We Did' report, East West Rail announced a proposal to use the railway land off Ford End Road as the permanent location for car parking at Bedford station (having previously proposed to use it for a temporary car park during construction). Full Council considered these proposals on 4 February 2026 and passed the below motion in response, which we reproduce here in full, and which remains a current statement of the Council's position.

This Council notes:

Growing concern among residents of Queens Park regarding East West Rail's revised plans for a multi-storey car park on the western side of the railway station.

That improved pedestrian access to the station, including a potential Western Entrance, is welcomed as it would better serve the existing community and future developments in Policy 12 of Local Plan 2030.

That Policy 12 of Local Plan 2030 notes land at Ford End Road will be developed for residential, local retail, education, and open space uses, which will further increase traffic in the area.

That the Non-Statutory Consultation was conducted on a different version of the proposals, meaning local residents and Councillors were not fully consulted on the current multi-storey car park relocation plan.

That Queen's Park Councillors were not notified prior to publication of the 'You Said, We Did' report, despite the Western Entrance and car park proposals directly affecting their Ward.

That information has been provided in a piecemeal, drip-feed manner, making it difficult for the Council and residents to provide meaningful feedback.

That it is unclear where the idea to move the car park originated, whether suggested by the Council or solely by EWRCo, and this needs clarification.

That residents fear the development would significantly increase traffic congestion, particularly on Ford End Road, Hurst Grove, Ashburnham Road and surrounding streets, with negative impacts on road safety, air quality, and quality of life.

That the current proposals, as shared publicly by East West Rail, have raised questions about whether adequate mitigation, local benefits, and infrastructure investment have been fully considered.

This Council believes:

Any major transport-related development in Queens Park must prioritise the needs, safety, and wellbeing of existing residents.

Development that increases traffic should only proceed where there are clear, enforceable, and well-resourced measures to mitigate congestion and environmental harm.

Queens Park should see tangible benefits from any such development, rather than bearing disproportionate negative impacts.

This Council resolves:

To call on the Executive to oppose the construction of any multi-storey car park in Queens Park unless there are:

Fully funded traffic mitigation measures, agreed in consultation with the Council and local residents;

Clear infrastructure benefits for Queens Park;

Significant investment in traffic management and transport infrastructure within Queens Park and the surrounding area, including Ashburnham Road.

To write to David Hughes of EWR requesting traffic modelling and the rationale for relocating the multi-storey car park, and to formally register the Council's objection to the proposed site under the terms of point 1.

To ask EWR whether smaller car parks with fewer floors, or multiple car parks on either side of the station, were considered as alternatives to mitigate visual and traffic impact.

To seek confirmation of the origin of the relocation idea, including whether it was suggested by the Council.

- ii. Bedford Borough Council objects to the proposed relocation and development of the multi-storey car park to land south of Ford End Road on the west side of Bedford station. The Council considers the location and traffic impact of the proposal to be unacceptable, regardless of any further mitigation offered. The proposal would place a disproportionate burden on Queens Park, surrounding residential streets and residents west of Bedford. East West Rail should bring forward alternative parking solutions away from this location.
- iii. The Council is particularly concerned about the six-storey height and massing of the car park, which would represent an incongruous and visually dominant form of development in close proximity to established residential neighbourhoods, including Queens Park. The proposal risks causing harm to the character and setting of the area, with insufficient evidence provided to demonstrate that visual and townscape impacts would be adequately mitigated.
- iv. In addition, the Council has ongoing concerns regarding the traffic and highway impacts associated with accessing the car park from Ford End Road. Existing congestion in the area is acknowledged by the applicant and is expected to worsen over time. The potential for increased traffic, including rat-running through the Queens Park area, has not been satisfactorily resolved, and reliance on further traffic modelling and future mitigation fails to provide certainty that the impacts would be acceptable.

- v. Irrespective of any future parking solution for the station, the creation of a western entrance will inevitably invite some users of the station to attempt to park in the residential streets nearby. This will be to the significant detriment of residents, for whom car parking is already highly constrained. For this reason, East West Rail must fund the creation of a controlled parking zone in the Queens Park area, whatever settlement is finally reached for parking at the station itself.
- vi. Overall, the Council considers that the proposed car park would result in unacceptable harm to the residential area and traffic conditions. Bedford Borough Council therefore objects to the proposed multi-storey car park in this location and calls on East West Rail to identify alternative parking solutions which do not place unacceptable pressure on Queens Park, surrounding residential streets and residents west of Bedford.
- vii. Based on media comments issued by East West Rail since the launch of the consultation, there appears to have been a recognition that the proposals for car parking require further attention. We will work with EWR to find a more appropriate solution or set of solutions for car parking at Bedford station. We are open to considering solutions that could involve more than one car park, at more than one location, but at a smaller scale than the large car park currently proposed. Whatever its nature, any new and/or temporary parking provision must be in place before existing provision is closed. Multi-storey car parks should include a fire suppression system.

Travel connectivity at Bedford station

- i. We welcome East West Rail's ambition to make the station accessible by sustainable means, which will reduce congestion impacts from the scheme. We would like to see more detail about EWR's proposals for this as soon as possible.
- ii. Bus connectivity at Bedford station is currently poor, with relatively few services routed along Ashburnham Road and restrictions on the size of bus that can use it. Feedback from the initial public consultation on our new Local Transport Plan (LTP) indicated that many residents are keenly aware of the lack of integration between trains and buses in Bedford and the LTP will seek to address this, in line with new national guidance. We anticipate that this should be achieved both by improving the walking and wheeling routes to the bus station, and by improving the bus service at the railway station.
- iii. This is an area where we are keen to work with East West Rail and other rail partners, and would welcome further detail on EWR's proposals for bus stop provision at the rebuilt Bedford station (subject to our comments above). The indicative plans shared in this consultation appear to show quite modest bus stop provision on Ashburnham Road, some distance away from the main station entrance; this seems likely to be inadequate both for any future

improved bus service in Bedford and for rail replacement buses, and we would expect to see more substantial provision in practice.

- iv. Similar considerations apply to active travel, and we welcome the proposal for a dedicated active travel hub at the station. Bedford station currently benefits from substantial provision of high quality cycle storage, including covered, two-tier cycle racks. New provision here, and at other stations, must be to at least as high a standard, and in sufficient quantities to meet demand.
- v. The current proposals show two important active travel routes to the station from the town centre as being planned 'by others': along Midland Road to Greyfriars / River Street, and via Woburn Road and Alexandra Place. Both of these would be upgrades of existing routes, and while the Council has ambitions for these to be delivered, neither is a committed scheme, although an upgrade of Midland Road has been delivered between Greyfriars / River Street and the junction with Prebend Street. We believe East West Rail should approach these routes as an integral part of its delivery of a high quality, well functioning new station, and provide them as part of its works. The full upgraded Midland Road route would connect with EWR's proposed route at River Street and connecting with the route along the river towards Embankment, which we welcome.
- vi. We note that EWR's plans do not appear to preclude the Council's aspiration for a Prebend Street relief road, which is welcome.
- vii. We welcome the aspiration to improve Ashburnham Road for walking, wheeling and cycling, although we note that it is relatively narrow in places (particularly at its southern end) and that this will need to be balanced carefully with any potential increase in bus frequencies: managing the road space to meet the needs of all users will need to be done carefully, and is a matter on which EWR could usefully integrate its work with our emerging Local Transport Plan.
- viii. Also on Ashburnham Road, we note the proposal that a taxi rank, pick-up and drop-off parking and some car parking for people with restricted mobility should be retained on this side of the station, which we support. There should be an assessment of need to ensure that this provision is sufficient. Pick-up and drop-off facilities must be maintained at the station throughout construction.
- ix. On the western side of the station, the proposals are for an active travel route along Crowe Road and Henley Road, with traffic calming applied to Hurst Grove to avoid it becoming an attractive 'rat run' route to the station for motorised traffic. The proposed active travel route is somewhat less direct than Hurst Grove, but on balance we agree that routing active travel along Hurst Grove alongside motorised traffic would not make for a safe, comfortable or attractive route (and that re-routing motorised traffic via the less direct Crowe Road or Henley Road would clearly be neither feasible nor desirable). Care

must be taken in the design of the active travel infrastructure to make the route as useable and therefore attractive as possible, and there must also be thorough engagement with residents on those roads to ensure the increase in active travel does not cause problems for them.

- x. More generally, we would like to see East West Rail produce wider route maps to show how their proposals fit into current and proposed networks. Assessing proposed new or upgraded routes in isolation is inherently difficult, and presenting them without full context makes it hard for residents to understand likely benefits or drawbacks.

Bedford station – other

- i. Some aspects of the latest proposals for Bedford station are very welcome: the dedicated platform for southbound express trains and the entrance on the western side of the station are both long-standing demands by the Council, and we are pleased to see them included in the proposals at last (subject to comments above regarding traffic in Queens Park and below regarding track layout more broadly).
- ii. We support the relocation of the Jowett Sidings to land near Cauldwell Walk, currently used for a scrap metal facility and other businesses. This avoids using a green field site, and the relocation of the scrap metal facility will also reduce overall noise levels in this area.
- iii. As in the previous consultation, plans include a proposal for the remnants of the Jowett Sidings to be used to stable 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. We note that an alternative site for stabling trains is being considered in the Stewartby area, and our preference is for this to be used instead, provided it will not impinge heavily on development there.
- iv. It is proposed to relocate some car parking spaces and a play area at Kempster Close on the western side. We understand that this is to comply with requirements for anti-terrorist hostile vehicle mitigation (HVM) measures which will come into force once Bedford station is enlarged, as the affected area will be within the perimeter around the entrance that must be protected from hostile vehicles. We support the deployment of appropriate HVM measures, provided in this case that the parking spaces and play area are re-provided like-for-like in their new locations.
- v. We have no objection to the small construction compound proposed for the undeveloped land on Kempster Close, provided that noise and vibration are kept to a minimum for adjoining properties, and that it is not used for evening or weekend work unless absolutely necessary.

Proposed additional tracks north of Bedford station

Overview

- i. Although the consultation document presents Bedford station and the area north of it as separate matters, we are addressing them both in response to Question 12 because the viability of different options for tracks north of Bedford depends on the track layout within Bedford station, and potentially also in the area between the Ford End Road bridge and the River Great Ouse.
- ii. East West Rail first proposed to build additional tracks north of Bedford station in its 2021 non-statutory consultation. Bedford Borough Council has consistently supported the East West Rail scheme with majority support, and welcomed the economic and social benefits it will bring. However, Bedford Borough Council cannot support the current East West Rail proposals where they would require the demolition of homes, unacceptable impacts on local communities and environment, significant disruption, or the loss of land needed for economic development. However, we have never accepted that these additional tracks are necessary: we stated our objection to the proposal in our consultation responses in 2021 and 2025. We have consistently argued that arrangements using the existing tracks of the Midland Main Line could be made to work, and that East West Rail should investigate these further.
- iii. Acquiring the necessary land for their extra tracks will require East West Rail to demolish 37 houses and take land from the gardens or parking areas of 37 more. This would be a draconian measure, and require a robust justification in the public interest, as it would be a considerable interference with Article 1 of the First Protocol (enjoyment of property) and Article 8 (respect for private and family life) rights. As far as we are aware, Bedford is subject to by far the most extensive intrusions on human rights proposed for any part of the East West Rail route.
- iv. East West Rail has argued to us that it has an appropriate justification for this intrusion. It argues that without its extra tracks, the new railway effectively will not work: it will not be able to deliver an adequate level of performance to generate the economic and social benefits of the scheme, and therefore to justify the significant investment of public funds.
- v. For this to be true, EWR will have to be able to show that it has fully considered all reasonable alternatives, and that none can deliver adequate performance. We do not believe that EWR can demonstrate this, on either count. We have repeatedly advised them to undertake further work to examine more options, and have advised them of the sort of options we expect could be viable. The onus to do this work is on EWR: it is their scheme, and they have the necessary resource to develop and evaluate alternative approaches. EWR has, as far as we are aware, declined to undertake work to consider these further options.

- vi. Five years have passed since EWR first proposed its extra tracks, and the company is now approaching its planned development consent order (DCO) application. The time that has been lost without further options being evaluated is greatly to be regretted. EWR now appears to be approaching its DCO application without adequate evidence that it has considered reasonable alternatives to its most destructive and intrusive proposals. This surely poses a high level of risk to the scheme: it is hard to see how a DCO on this basis can be justified in law, and therefore how the Secretary of State can reasonably grant one. We do not welcome the prospect of a lengthy delay to the scheme, which is what would be required for EWR to evaluate alternative options appropriately, and if necessary to re-start large portions of its design work. This would not have been necessary if EWR had taken greater heed of our advice at earlier stages.
- vii. In the following section, we set out these issues in more detail.

The Midland Main Line in Bedford

- i. It is important to understand the full context of railway operations at Bedford station (sometimes referred to as Bedford Midland, to avoid confusion with Bedford St Johns station).
- ii. The Midland Main Line (MML) is a four-track railway that runs roughly north-south through Bedford. It is organised in two pairs of tracks: down (northbound) and up (southbound) fast lines on the western side; and down (northbound) and up (southbound) slow lines on the eastern side. The fast lines carry nearly all of the passenger traffic that passes through Bedford, which is a mix of intercity services between London and the East Midlands and Sheffield, and semi-fast 'Connect' services between London and Corby (both currently operated by East Midlands Railway). Thameslink services from London terminate in Bedford, and travel here on combinations of the slow and fast lines, not passing further north than the station area.
- iii. Until 2021, all passenger services that travelled through Bedford to or from the East Midlands were intercity services, many of which stopped here. Since then, only the 'Connect' semi-fasts routinely stop at Bedford, which has left the town without direct rail services to the East Midlands for the first time since the railway was built in the 1850s. When travelling southbound, any East Midlands service stopping here has to leave the fast lines north of Bedford station and use the slow lines briefly, due to the lack of a platform on the up fast line. They rejoin the fast lines south of Bedford.
- iv. The only other trains that use the slow lines to pass through Bedford are freight services. Typically there is around one per hour in each direction, although the number of paths available is two or three times this (as, unlike passenger services, freight services only operate when there is cargo to carry, and are not guaranteed to run every day). Most commonly these are aggregates trains that

travel between the Peak District and the various rail freight interchanges south of Bedford along the MML, but some services move to or from the Marston Vale Line, which will become part of EWR.

- v. The Council believes Bedford should not become a location where rail infrastructure is expanded, or land is taken, primarily to accommodate wider freight movements without a clear and direct local benefit. Any freight-related infrastructure must be economically justified, must not require the demolition of existing homes or businesses, and must not use land needed for housing, regeneration or economic development.
- vi. North of Bedford we understand that the slow lines are therefore lightly used, and do not face any significant capacity constraints, albeit they are formally within scope of the congested infrastructure designation (see below). Their slow linespeed makes them suitable only for freight: trains are limited to 50mph much of the way to Wellingborough, and consistently high speeds (90mph or more) are only available on both lines some way north of Wellingborough station. There is therefore no prospect of these lines being used for faster traffic, such as any additional stopping or semi-fast passenger service: the linespeed is just too slow.
- vii. It would therefore seem sensible for East West Rail's services to run north of Bedford station for a short distance on these lightly used lines, before the EWR route diverges to the east to head towards Cambridge. Instead, EWR proposes to build an additional pair of tracks over this stretch of its route, bringing the total in the rail corridor at this point to six. It is these tracks for which East West Rail states it needs to demolish 37 houses in the 'Poets' area of Bedford, and take land from 37 more. Bedford Borough Council is opposed to the demolition of homes in the Poets area and does not consider the loss of people's homes to be an acceptable consequence of the current scheme. East West Rail must redesign its proposals to avoid the demolition of homes and unnecessary land take from existing residents.

Bedford Borough Council's previous representations

- i. Our responses to EWR's non-statutory consultations in 2021 and 2024-5 considered these issues and stated our position. For reference, extracts from these responses are reproduced below.
- ii. 2021 response:

BBC believes that the four-track option between Bedford Midland Station and where the EWR line diverges from the Midland Main Line will provide the necessary railway infrastructure for EWR, without requiring the compulsory purchase of numerous houses alongside the route.

The Network Rail document, East West Rail Central Section 2f Report (Draft) of 29 March 2019, is unequivocal in concluding that, based upon the May

2018 timetable and up to six trains per hour between Bedford and Cambridge that “there is available capacity on the slow lines for the proposed service specification”.¹ This option is workable with the minimum of disruption to existing East Midlands Railway or freight services. Network Rail concluded that six tracks north of Bedford is unviable.²

As a result, we believe that with engineering enhancements to the existing infrastructure it is possible to introduce EWR train services and run the current East Midlands Railway and freight services without operational or performance detriment.

To inform our response to this consultation, BBC commissioned SLC Rail to consider the issues around EWR operating solely within the existing infrastructure (four tracks). A copy of the subsequent SLC report is attached to this submission.

iii. 2024-5 response:

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.

- iv. As will be seen below, the issues raised in our previous responses remain material to EWR's proposals and our objections to them.

EWR's case for additional tracks

- i. East West Rail has presented analysis in which it claims that the apparent abundance of spare capacity on the MML slow lines north of Bedford cannot in

fact be utilised, and it needs to build its own dedicated tracks instead. This argument was first presented in its 2021 consultation, and expanded on in a report published alongside its 2023 'Route Update Announcement'.

- ii. The MML north and south of Bedford is formally designated as 'congested infrastructure': principally, this is because the intensive pattern of Thameslink and East Midlands passenger services, plus freight, results in a tightly packed timetable that has little slack to accommodate delays, and little or no additional capacity available.
- iii. The Thameslink timetable does not extend to the slow lines north of Bedford, but EWR argues that for operational purposes they are similarly constrained. Specifically, this is to do with freight services that run from north of Bedford into the stretch of the MML used by Thameslink: these need to be fitted in between Thameslink services on the slow lines very precisely. Late running freight services can easily and quickly cause knock-on delays for trains entering and leaving the complex Thameslink core through central London, and also delays for northbound services on the Midland Main Line, due to crossing manoeuvres performed by Thameslink trains between the slow and fast lines near London.
- iv. This is significant for the slow lines at Bedford because freight services have to move between Bedford North and Bedford South junctions in one movement, which takes them over the portion of the slow lines that might potentially be shared with East West Rail, as well as onto tracks shared with Thameslink. The timing of these freight services is therefore dictated by the needs of the Thameslink timetable south of Bedford. If EWR were also using these tracks, they argue, the need to accommodate those same freight services would mean that the timing of their trains would have to be similarly dictated by Thameslink. In the event of delays they fear that MML services would be prioritised over theirs, to minimise the considerable prospect of knock-on delays outlined above.
- v. To demonstrate this, in 2023 EWR published a summary of modelling undertaken by its then technical partner Arup. This modelled a four track and a six track scenario at Bedford, and found that with just the four tracks it was not possible to create the intended EWR timetable through Bedford without generating conflicting moves; even to the extent that a timetable could be created, it would be highly fragile and vulnerable to delay in practice. We will return to this modelling below.
- vi. EWR argues that it must therefore have its own, segregated tracks through Bedford.
- vii. EWR also argues that there are other benefits from creating segregated tracks. For example, when either the MML or EWR need to be closed overnight for maintenance, this could be achieved without having to close the other line as

well, whereas that would have to be done if both were using the same slow lines. East West Rail have not shared details of their option selection process with us, and so have not confirmed to us that the issue of the freight services was decisive in their adoption of their six track proposal. However, it appears to us that relatively modest and marginal benefits such as ease of maintenance cannot possibly justify the enormous costs and impacts of building the two additional lines, so this response will proceed on the basis that the freight movements and their knock-on consequences are the decisive issue.

East West Rail's modelling of different options

- i. Arup's report, published in 2023, remains the most recently presented evidence of EWR's consideration of different options for the track layout in, and north of, Bedford station. We do not consider that it, or any of the documents published with EWR's 2021 non-statutory consultation, demonstrate adequate consideration of reasonable alternatives.
- ii. Two principal scenarios are modelled: a four track option and a six track option. The four track option models a minimally adjusted track layout at Bedford station: other than the three new platforms that EWR was proposing at the time to build, the only significant change is the addition of an up fast platform (which EWR were not proposing to build at the time but now are, albeit in a different form). Arup concludes that this enables the removal of southbound East Midlands services from the slow lines at Bedford, but that this is not adequate on its own to provide enough capacity to operate EWR services on the proposed pattern or with sufficient reliability.
- iii. It finds that the addition of two dedicated EWR tracks overcomes this problem. This is unsurprising: the addition of such a significant amount of extra capacity is bound to result in a smooth-running service. This is very much a 'Rolls Royce' option or, in more common engineering jargon, a 'gold-plated' one.
- iv. We have reservations about the usefulness and validity of this modelling on several counts. The first is that neither modelled scenario includes any attempt to address directly the core underlying problem previously identified, namely the freight services on the MML. The four track option models them running as now, without any attempt to regulate them. The six track option simply by-passes the problem by adding new, segregated capacity. At no point has EWR developed, modelled or otherwise tested a solution that directly addresses the core underlying problem by regulating those freight services in such a way as to enable EWR services to run reliably over the slow lines north of Bedford. On its own, we believe this represents a clear failure to consider all reasonable alternatives. We discuss below what sort of options might be available that would directly address the core problem.
- v. However, we also question the accuracy of both the modelling work conducted by Arup, and some of the conclusions drawn in their report. Firstly, we are not

sure that Arup has accurately modelled the extent of the capacity released by removing southbound East Midlands services from the slow lines and from platforms 1-3 in Bedford station. There would be considerable capacity for freight trains to be held in platform 3 before continuing south on the reversibly signalled down slow line to Bedford South junction, and therefore considerable flexibility for fitting these trains in among Thameslink services. Arup's report at best downplays this, and at worst underestimates it.

- vi. What's more, Arup attached significant weight to the prospect of freight trains missing their path between southbound Thameslink services, and argued that the prospect of this would cause signallers to prioritise those freight services over EWR services when deciding the sequence of trains passing over the slow lines north of the station. This seems questionable: as we understand it, it is already reasonably common for freight services to be slotted into the next available gap between Thameslinks, which may or may not be their booked path. Given that the freights only have to reach Sundon freight loop before there is another opportunity to move them off the slow line and out of the way of any service catching from behind, this already provides a considerable measure of operational flexibility on the MML. The threat of signallers rigidly prioritising MML freight over EWR services at Bedford seems considerably overstated.
- vii. It may therefore be that further technical review of EWR's minimally adjusted layout will find that it is in fact a workable alternative that can deliver sufficient performance to operate its intended services. In this scenario, EWR's non-consideration of reasonable alternatives would not be an outright omission, but a technical failure.
- viii. We would see no value in any repeated use of this model, for example to consider the five trains per hour proposed in the current consultation, unless and until these technical uncertainties have been reviewed and addressed. If the model itself is technically flawed, the same flaws will be present in any new running of it. Such an exercise would also miss the opportunity to model other potential solutions (see below). And in any case, other aspects of EWR's plans have changed since the model was created, including the number of platforms it intends to build at Bedford and the configuration of its new up fast platform. We find it hard to see how any repeat use of this old model, without modification, can now be useful: we would not expect to see any such further 'evidence' presented by EWR, or for any weight to be placed on it.

Further alternatives that merit consideration

- i. It remains our view that East West Rail should have undertaken substantial further work to develop, model and test alternative options for the Bedford station area. They are the party promoting the scheme, and they have the necessary resources to engage appropriate technical specialists to undertake the work. They have been in receipt of advice for the last five years that such

work should be undertaken.

- ii. However, for the avoidance of doubt or ambiguity, we wish to outline the sort of options we had expected EWR to consider more seriously, and which we referred to in our earlier submissions. It may be that their previously modelled four track solution has been inadequately assessed and would, on its own, be an adequate solution. But if it is not, further adjustments to the track layout at Bedford could potentially be capable of yielding a sufficiently resilient service and obviating any need for additional tracks to the north of the station.
- iii. The chief concept that appears to us to merit further exploration would be a thorough operational firebreak between the congested infrastructure south of Bedford and the slow lines north of the station that might be used by EWR services. This would be achieved by constructing at least one, or maybe two, freight loops in which freight services could be held between Bedford North and Bedford South junctions. In practice this would mean between the Bromham Road bridge and the River Great Ouse, largely within the footprint of Bedford station.
- iv. In this way, the movement of the freight services in between EWR services could be timed independently of their movement in between Thameslink services: after navigating the stretch of track shared with one, the freight could be held until there is an appropriate gap for it to pass into the stretch of track shared with the other. The need to co-ordinate movements on both stretches of track simultaneously would be eliminated.
- v. The Council is clear that this solution involving the ability to hold freight trains is for the purpose of securing a four track solution to avoid any demolitions.
- vi. In the four track model developed by Arup, platform 3 could be used for this purpose to at least some extent. However, under EWR's current proposals platform 3 will not be available: instead, it will be built out to meet the southbound fast line and create the up fast platform. Identifying alternative arrangements is an engineering design exercise that should be undertaken as a priority.
- vii. One option could be to use the line that currently serves platform 1 as a loop, and move the rebuilt platforms 1 and 1A to the east, and likewise the proposed EWR platforms. A variation on this could involve exploring whether the widened structure of platforms 2 and 3 could be cut back on its eastern edge, creating a new line for platform 2 and using the existing platform 2 line as the loop, or even as a second loop. A further option could be to build a loop in between the line serving the rebuilt platform 1A and the new EWR platforms. There may well be other options.

- viii. It seems highly likely that any freight loops of this sort would need to extend under the Ford End Road bridge and rejoin the MML in the area between the bridge and the River Great Ouse. Depending on the layout selected, this may require the use of the land where the Thameslink carriage wash is currently located, and possibly the rearrangement of track that gives access to the Thameslink sidings. Based on EWR's current proposals, which include passive provision for additional tracks at their new Cauldwell depot, we think it is likely that any facilities lost in this area could be relocated there.
- ix. If an arrangement can be found that would operationally separate the slow lines north of Bedford from the congested infrastructure to the south, it would transform the considerations around this section of the East West Rail route utterly. Rather than EWR using tracks that are operationally tied to another busy main line, EWR would left as an essentially self-contained main line with, in effect, a pair of diverging freight lines to the north (the MML slow lines) plus one or two sidings that freight can be moved in and out of at any convenient time (the loop/s). Such a junction cannot be regarded as unusually complex or challenging to operate at a frequency of five passenger trains per hour, and it would be operationally insulated from the congested area south of Bedford.
- x. We acknowledge that such a solution could have some modest knock-on effects, such as requiring slower approach speeds for Thameslink services into Bedford (either because the Thameslink platforms would be bays, or because of the need to protect the junction just beyond them if they are through platforms), or slightly slower speeds for EWR services passing under the Bromham Road bridge, as the tracks between there and the EWR platforms would be more heavily slewed than in a six track solution. None of these consequences would remotely justify reverting to a six track solution, with the enormous disruption to property and private life rights that it would require.

Next steps for East West Rail

- i. Whether, and if so how, a four track solution north of Bedford can be made to work remains ultimately unknown. We have good reason to believe that it may very well be possible, but EWR's work to date has not been adequate to settle the question one way or the other. Certainly EWR has not done enough to demonstrate that it has meaningfully considered all reasonable alternatives to its six track proposal.
- ii. Work to consider alternative options will need to involve consideration of both timetabling and track geometry, as well as interrogating further the accuracy of the previous modelling and the conclusions drawn from it. This work on its own will take months as a minimum. In the event that one or more viable four track options is identified, EWR will have to re-start its design work on Bedford station and the north of Bedford area from scratch, as well as its constructability studies. It may also need to revisit design work for its new Cauldwell depot and

the area south of Bedford station.

- iii. We recognise that this will be an unwelcome prospect for EWR: it will delay the Bedford portion of its scheme by years. This is greatly to be regretted, but could have been avoided with more thorough assessment work over the last five years. Responsibility for the failure to carry out that work rests with East West Rail.

Q13 – Q16 Cambourne to Cambridge

No response.

Q17. Please use the box below to provide any further feedback you have about the project and our proposals for East West Rail. Please include relevant location information to help us understand your feedback.

Route-wide or project-level issues

Comment on the East West Rail project

- i. These 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. They will redress the current relative lack of travel opportunities to and from Bedford Borough (other than to and from London) for people who do not use a car, whether because they are disabled and cannot drive, because of affordability issues, or for other reasons.
- ii. 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 station and of the reconstruction of the station.
- iii. 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.

About this consultation response

- i. This consultation response represents Bedford Borough Council's up-to-date position on the matters raised in East West Rail's consultation materials and other information currently in the public domain.
- ii. However, we lack sight of detailed information relating to many aspects of the project, both for the purposes of this response and for the purposes of our extensive ongoing engagement with EWR. We mostly do not have access to baseline data, information on option selection exercises, or data that has been used to justify design decisions. Indeed, it is a regular experience for us to request information and either be told it cannot be shared, or be promised it but

not receive it. It is also a regular experience for us to be asked at short notice for views on information that is too high-level and insufficiently detailed for us to be able to offer a meaningfully useful comment.

- iii. This makes it difficult for us to offer an informed view not only on individual aspects of the scheme, but on the scheme as a whole. While we endeavour to provide useful comment on individual aspects as best we can on the information available, this information does not always add up to a full picture of the overall effects and impacts across a route section or the route overall.
- iv. All comments in this response are therefore presented with the caveat that, while they are based firmly on the information we have available, that information may well be incomplete. We reserve the right to revise our views in the event of more evidence being presented.
- v. We require EWRCo to provide written answers to questions raised and every element of this consultation response.

Impact on Bedford Borough Council land

- i. East West Rail plans to acquire substantial Council-owned land and property for the rail route and station expansion in Bedford, resulting in the loss of residential homes, commercial space, and potential impacts on green space. The proposals are also fettering the Council's ability to dispose of assets and generate capital receipts. The project therefore presents severe financial risks to the Council, as the Council faces losing assets to facilitate a faster, cheaper construction route.
- ii. The Council further objects to the loss of land with economic, regeneration, housing, commercial development or capital receipt value. East West Rail should not be allowed to weaken Bedford Borough's economic development opportunities or financial position where less harmful alternatives exist. East West Rail must demonstrate that any such land-take is genuinely necessary and does not undermine the Council's ability to deliver planned development or secure capital receipts for the benefit of local residents.
- iii. Specific concerns exist regarding the acquisition of land at Fairhill, which could affect planned commercial developments (see comments under 'North of Bedford', below). These impacts in particular are significant in respect of the phasing of capital receipts.
- iv. There is currently no official figure for the loss to Bedford Borough Council from EWR taking over council land. However, over 100 Council assets have been requested for access, with multiple council-owned buildings affected.

Oxford-Bedford services

- i. The consultation paper offers an outline of the sequence in which different parts of the new rail service between Bletchley and Cambridge, through Bedford, will be constructed and begin operating. An omission from this is the direct service between Bedford and Oxford that was due to begin operating at a frequency of one train per hour by 2030, ahead of the full upgrade of the Marston Vale Line. Work to enable this service to begin was due to be delivered under an existing Transport and Works Act order, by the East West Rail Alliance (made up of Network Rail, Atkins, Laing O'Rourke and VolkerRail, as distinct from the East West Railway Company). The service was expected to run using a two coach train, as the length of platform 1A at Bedford station would remain a limiting factor prior to the station's full upgrade.
- ii. Media statements by EWR around the launch of this consultation indicated that the planned Oxford to Bedford service will now not be operated. We understand that the rationale for this relates primarily to safety: there are, we infer, concerns that the service would be used by people seeking to access the new Universal theme park, and that an hourly train of only two coaches would be inadequate for this traffic, and become overcrowded to the point of being unsafe.
- iii. This is bitterly disappointing news for residents and businesses in Bedford. The rail connection between Oxford and Bletchley, and therefore onward to Bedford, was restored in 2024. It was disappointing enough for Bedford to have to wait over five years for a direct service to Oxford to be reinstated, but it is doubly so to discover that we must now wait ten years, until the mid-2030s. The lack of official communication of this decision to Bedford Borough Council, such that we had to piece the news together from media reports, truly adds insult to injury.
- iv. We would like to understand the option selection process that was used to make this decision. We recognise that demand for travel to Universal could have the effect of drawing people to this service, although given that the existing stations on the Marston Vale Line are still scheduled to be open in 2030 and do not directly serve Universal, and therefore that this would not be one of the advertised and promoted routes for reaching the resort, it is not self-evident to us (without sight of an option selection report) that this would definitely be a problem in practice. Alternatively, was the option of running the trains non-stop through both Stewartby and Kempston Hardwick stations considered and evaluated? That could potentially have prevented the problem from arising, while still restoring a direct Oxford-Bedford train service.
- v. We would also like to receive a public assurance that the existing stopping service between Bletchley and Bedford will not be withdrawn early on similar grounds.

Construction period and train services in Bedford

- i. The outline of EWR's construction phases in the consultation paper can be summarised as follows.
 - Early 2030s: Marston Vale Line upgraded and electrified; service commences of 4 trains per hour (tph) between Oxford and Stewartby ('trains per hour' figures apply in both directions unless stated)
 - Mid-2030s: Reconstruction of Bedford station complete, with 4tph between Bedford and destinations to the west
 - Mid-to-late 2030s: Bedford to Cambridge section opens and full service begins.
- ii. The consultation paper observes that some aspects of the project are being accelerated, which we infer means those parts that enables trains to serve the Universal theme park via the new station at Stewartby. However, this timeline represents a further delay to the completion of the railway as a whole: the previous non-statutory consultation put the commencement of services to Cambridge in the 'mid-2030s', not 'mid-to-late 2030s' as now stated.
- iii. We would like much greater clarity about what the proposed timeline would mean for railway services in Bedford Borough. We recognise that they will be disrupted during the construction process to some extent, and while we accept that some form of disruption is inevitable we would like to understand what to expect. What level of service can we expect to be maintained at Bedford station (across all services – Thameslink, East Midlands intercity and semi-fasts, and the Marston Vale Line), and over what period? At what point will the current Marston Vale Line service be withdrawn, and will that be all in one go, or at different times on different sections of the line? We note the commitment that, "the existing single platform at Bedford St Johns station would remain open for as long as possible during the works," which is welcome, but can more be said about what type of service would be operating from it? How will this disruption be managed to minimise the impact on passengers?
- iv. Given that this is the final non-statutory consultation before East West Rail submits its DCO application, we would expect it to be possible to provide at least indicative information on this matter now, or very soon.

Service patterns – passenger services

- i. In our previous response, we expressed our support for the proposal to run services from Cambridge through to the station at Stewartby, and this remains the case. We also welcome, subject to comments below and elsewhere, the proposals to expand EWR's services to accommodate demand from the new Universal theme park, including the decision to increase train lengths from four to five coaches. Maximising the accessibility of Universal by rail will be vital to minimising pressure on the road network.
- ii. In that context, we have some further comments on the proposals outlined in the current consultation for service patterns on EWR. Under the latest

proposals, when the new railway is built in full EWR proposes to operate the following services through Bedford, with all services stopping at all three EWR stations within the Borough:

- 2tph trains per hour Oxford-Cambridge
- 2tph Bletchley-Cambridge
- 1tph Stewartby to Cambridge 'and potentially beyond'.

- iii. We would like greater clarity on the proposed fifth train per hour. What destination or destinations beyond Cambridge does EWR envisage this train would serve? If no onward destination is confirmed, would the train still run to Cambridge, or would it not be operated at all? Would that train have to run through to Cambridge, or could it move from EWR to the Midland Main Line at Bedford and serve a destination in the East Midlands, subject to capacity on the MML? It is stated that a fifth train may operate only at busy times, but would that have to be the train to further destinations, or could it be one of the services to Cambridge, leaving the 'further destination' train to run throughout the day?
- iv. The prospect of new rail services to more wide-ranging destinations is not of itself unwelcome, but we would appreciate much greater clarity over what, if anything, people in Bedford are being offered.
- v. In addition to this fifth eastbound service per hour from Stewartby, which would pass through Bedford Borough, an equivalent westbound service would start from Stewartby and leave Bedford Borough for Oxford 'and potentially beyond'. The same range of questions applies to that service. Additionally, we would like to know whether consideration is being given to running this or another westbound service into Milton Keynes, once capacity is available on the West Coast Main Line following the opening of HS2. Our economic analysis shows that the Gross Value Added benefits of the railway to the economy of Bedford would increase by a further £0.5M to £14.2M p.a. if services are extended to Milton Keynes, and in our previous response we made clear that we favour the construction of a north-facing cord at Bletchley to facilitate this. Alternatively, we would support reversing services at Bletchley to create a direct service to Milton Keynes Central.

Service patterns – freight services

- i. The consultation paper also gives information about anticipated provision for freight services:
 - One freight train every other hour (0.5ftph) on the existing Marston Vale Line, Bletchley to Bedford
 - Two freight trains per day (2ftpd) on the new line between Bedford and Cambridge.

Overall, this appears to offer a level of freight provision on the Marston Vale Line essentially unchanged from its current freight capacity.

ii. The only section of EWR offering somewhat substantial capacity for freight (1ftph) would be the Oxford to Bletchley section that was opened in 2024.

iii. In respect of the Bedford to Cambridge section, the factsheet published alongside the consultation says:

We have also made provision for additional freight services from the Felixstowe area to use the route in the future, allowing for up to one freight train per hour in each direction. However, this would only be possible with additional investment elsewhere on the national rail network.

iv. We infer that this is a reference to the line through Newmarket to Cambridge, which is currently single track and not gauge cleared for intermodal freight. We are unaware of any meaningful proposals to upgrade this line, so if this is the intended meaning then in practice these additional services would not run for many years, if ever. Given that container traffic from Felixstowe is overwhelmingly transported into the 'golden triangle' of logistics centres in the Midlands, the lack of a north-facing junction on EWR as currently planned, at either Bedford or Bletchley, makes its usefulness for this traffic extremely limited even if the trains were able to access the line.

v. The consultation paper contains similar text, but referring just to the 2ftpd: "We anticipate that freight service levels would follow the pattern described below, but only if no additional limitations arise elsewhere on the rail network. If wider network constraints are not addressed by other projects, they could restrict the level of freight services that could realistically be delivered[.]"

vi. We would like greater clarity on what the 2ftpd proposed for the new Bedford to Cambridge line are expected to be. If they will not be traffic from Felixstowe, what will they be? And if there is provision for 1ftph to and from Felixstowe depending on upgrades beyond EWR, what would stop any other freight flow (not involving Felixstowe) from utilising that EWR capacity, if such a flow were to be developed?

vii. A public statement offering greater clarity on this matter would be very welcome.

Motive power for trains

i. In our previous consultation response we supported the use of discontinuous electrification for trains on EWR, so that passengers and residents could benefit from cleaner, quieter electric trains, while works needed to modify bridges could be minimised and the railway could in places be less visually intrusive in the landscape.

ii. The current consultation confirms the proposal for discontinuous electrification over EWR as a whole, although one of the electrified stretches of the railway will in fact run all the way through Bedford Borough, with gaps in the

electrification only occurring in areas to the east and west, outside our boundaries.

- iii. Overall this is welcome: although the long term value of discontinuous electrification seems to us to be open to question, as future work to fill the gaps will be much more expensive than if continuous electrification had been installed during initial construction, we recognise that under current proposals this consideration does not apply within Bedford Borough. Whatever the final configuration, it will be important to factor electricity infrastructure requirements, including grid connections and sub-station upgrades into EWR's infrastructure planning.
- iv. Current plans therefore raise the prospect of completely eliminating the use of diesel traction on railways through Bedford Borough. Thameslink's services have used electric trains since they commenced; East Midlands Railway's 'Connect' services now use electric trains; and EMR's remaining diesel intercity trains are in the process of being replaced by bi-mode units that run on electric power through Bedford Borough. Once EWR services commence at their full extent there will be no diesel passenger trains in Bedford Borough at all.
- v. We would therefore encourage the use on freight services on both EWR and the MML of the new classes of bi- and tri-mode freight locomotives that are currently being introduced on the railway network, which would be able to operate on electric power when travelling through Bedford. This would eliminate diesel traction from the Borough entirely, except possibly for shunting moves within rail freight interchanges that are not electrified.
- vi. However, we would also like to see more detailed information on why this decision was taken. It will mean that in some places the railway's visual impact on the landscape is greater than it might have been without masts and wires for overhead electricity supply, and we note that stretches of the line west of Bletchley and east of Tempsford will not be electrified. We would like to understand the option selection process that led to this decision, and to satisfy ourselves that it was reasonable.
- vii. Furthermore, since the publication of the consultation there has been clarification in media articles of this paragraph in the consultation paper:

Some diesel passenger services would operate on some sections of the route between Oxford, Bletchley and Bedford during earlier years. This is until overhead line installation across the project is complete, enabling us to operate battery electric trains.
- viii. The factsheet on motive power contains similar wording. This might have been taken to refer to the diesel trains that we already know will operate the Oxford to Milton Keynes services when they commence this year (hopefully), and those used on the existing Bletchley to Bedford services. In fact, EWR

representatives quoted in media reports have clarified that the new fleet of battery-electric multiple units (BEMUs) will only be available around the time that services start on the new line between Bedford and Cambridge – that is, according to the consultation paper, the ‘mid-to-late 2030s’.

- ix. In the meantime, services on the upgraded Marston Vale Line, including for the new station serving Universal at Stewartby, and into the newly rebuilt Bedford station, will be made up of older diesel multiple units (DMUs), cascaded from other parts of the railway network as other new fleets are introduced. Judging from current and expected procurement exercises to replace existing DMU fleets, most or all of these trains will be approaching 30 years old, or older, when they enter into service with EWR.
- x. We require further information from EWR about the nature of the rolling stock they will be using when services commence into stations in Bedford Borough. Older DMUs will not be able to match the acceleration of modern electric trains, so will EWR’s early-2030s timetables feature slower journey times than those previously mooted? Will the cascaded trains be refurbished internally, or used in the condition in which they were withdrawn by their previous operators? How will EWR factor in the likely reliability problems arising from using well proven but ageing trains? Has EWR accounted for this period of diesel operations in its assessment of its carbon impacts?
- xi. If information about EWR’s rolling stock plans exists to be provided to the railway trade press, it can and should also be made clearly available to residents along the route. We recognise that lead times on designing and building a new class of train may well make this timescale unavoidable. In those circumstances, an interim solution of this sort could be perfectly reasonable. But EWR have again fallen short on transparency, in a way that can only ultimately be to their own disadvantage: when services start with a rag-bag of ageing diesel trains, instead of the brand new electric trains that EWR has promoted, many of EWR’s new passengers will inevitably feel that it has over-promised and under-delivered.

Station facilities and accessibility

- i. Bedford Borough will contain three East West Rail stations, of varying sizes. Bedford station will be the largest overall, although EWR trains will serve only two of its platforms; the new station at Stewartby will have four platforms, all served by EWR trains, some of them starting or terminating there; and Bedford St Johns will have two platforms, both served by EWR through trains.
- ii. We would like greater clarity on the proposals for staffing and facilities at stations. The consultation paper states:

All stations would include toilets. Some stations would have staff on site, with accommodation sized to meet day-to-day needs.

- iii. Given that EWR is making a point of building substantial stations throughout its route, and closing existing smaller branch line stations, it is our view that all stations should be staffed during hours when trains are running.
- iv. Similarly, given the number of new stations being built and the commissioning of a new fleet of trains specifically for EWR, the platform-train interface should in all cases support level boarding, to enable independent access for disabled people and people with luggage, push chairs and so on.
- v. Plans shared so far by EWR include lifts for access to all platforms, but the extent of redundancy that will be built in has not been made clear. All platforms should be accessible by more than one independently operated lift, so that platforms remain fully accessible when a lift breaks down or requires maintenance. At many existing stations, including Bedford, the failure of a single lift can render the station inaccessible for many people: this should not be a feature of newly built stations.
- vi. All stations should have substantial and high quality cycle storage provision, and East West Rail's policy on supporting cycling should be thought out across both its infrastructure and its trains: Oxford and Cambridge, at either end of the line, have strong cycling cultures, so we would expect a high standard of provision for passengers who will be taking their bikes with them, from which Bedford residents can also benefit.
- vii. More generally, the design of stations must meet the requirements of local planning policies as set out in Local Plans and other relevant documents.

EWR and the wider rail context

- i. The arrival of East West Rail at Bedford will transform its rail connectivity. This transformation requires a serious discussion between EWR, Network Rail / Great British Railways, local government and others about the services that will be provided.
- ii. The Midland Main Line offers services both between London and the East Midlands and Sheffield, and through London to Brighton on the south coast. East West Rail will be the only significant east-west rail link anywhere in southern England between London and the Midlands. Bedford station will be the only point of interchange between these strategically important east-west and north-south passenger flows. We therefore believe that it is essential for intercity services to call at Bedford station regularly, as they did until timetable changes only a few years ago. The planned up fast platform will make this possible with far less of a time penalty for southbound services than the current track layout at Bedford allows.
- iii. Other variables include the semi-fast East Midlands Railway 'Connect' services between London and Corby, and the new station at Wixams which will be an

important way for people to travel to the new Universal theme park.

- iv. In total, Bedford Borough will contain four railway stations in relatively close proximity (Bedford, Bedford St Johns, Wixams, and the new EWR station at Stewartby), which is an unusually heavy concentration of rail facilities for a settlement of Bedford's size, even allowing for its expected growth. With the high frequency of services on both Thameslink and EWR, this raises the possibility of a highly useful spine of rail connectivity within the urban part of the Borough, around which many other transport services could and should be integrated. This opportunity must be maximised.
- v. We are therefore ready to start a discussion with rail partners that should cover not just calling patterns but ticketing and pricing. Bedford and Bedford St Johns station are already an official station group on the rail network, meaning that one ticket can be valid to both. We would like to explore options for a station group covering all four future stations in Bedford Borough, to maximise possibilities for seamless, integrated travel around the area. Alternatively, two station groups – the existing one, plus a south-of-Bedford one covering Wixams and the station at Stewartby – could be workable. Ticketing and payment options worth exploring could also include a travelcard zone-type arrangement, such that a train ticket to the station group/s could automatically include bus travel within the area at no, or only a small, extra cost. The creation of this highly useful, integrated travel corridor would contribute greatly to reducing demand on Bedford's road network.

Construction impacts

- i. We note EWR's proposal for a Code of Construction Practice and other management plans to avoid or manage impacts on communities, businesses and the environment from the construction of the new railway. As this is the final non-statutory consultation before the DCO application is made, we would greatly have preferred to have the opportunity to comment on a draft of these documents at this stage, as a minimum.
- ii. The Council is concerned about the impact of construction traffic, HGV movements, temporary road closures and diversions on urban and rural communities across North Bedfordshire, including Bedford, Clapham, Wyboston and surrounding villages. Many rural and local roads are narrow and not designed to accommodate construction traffic over a prolonged period of time. East West Rail must provide a clear traffic management plan which identifies all proposed routes, diversion arrangements, HGV volumes, mitigation measures and impacts on village connectivity before any works are approved.
- iii. 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.

- iv. Planned and expected disruption during construction must be communicated as fully as possible, in a timely manner, and to the highest standard. This must include updates by letter to the residents most heavily affected, and to councillors.
- v. 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.
- vi. Learning from experience in Buckinghamshire, it will be important that access routes to EWR compounds are resurfaced at EWR'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.
- vii. The Code of Construction Practice must consider safety implications for more vulnerable road users, including equestrians, sharing roads with HGV traffic
- viii. We have previously recommended that construction materials be brought in by rail to the greatest extent possible, to minimise the number of lorry movements on local roads. We accept that this may require a trade-off with the extent to which passenger operations can be maintained on the railway during the construction period; overall, we feel that a proportionate amount of disruption to rail services would be an acceptable trade-off in this instance.
- ix. Similarly we want EWR Co to use haul roads within the rail corridor to keep lorries off the public highway, with the obvious exception of the proposed haul road in the area north of Bedford station, where we do not believe new tracks should be constructed. We oppose the current proposed heavy vehicle routes around the Borough and the reliance on the existing road network many of which have schools on the road and/or are narrow roads. The Council seeks reassurance that East West Rail (EWR) will engage with the Council at the earliest possible stage regarding preventing the use and volume of lorries on the highway network arising from the EWR construction project. This is particularly important where more than ten lorries per day are expected to use certain routes, given the potential impacts on current traffic volumes, environmental concerns, noise and nuisance, and the safety risks associated with these extra heavy vehicle movements past sensitive locations such as schools etc.
- x. The Council considers that some rural and urban communities are likely to experience a disproportionate impact from construction disruption. Temporary closures, diversions and construction-related congestion can have a significant knock-on impact on day-to-day journeys. East West Rail must demonstrate how it will minimise disruption to communities, villages and rural parishes and must not rely on unsuitable rural roads for regular HGV or construction traffic.

- xi. The Council requires East West Rail to assess the cumulative impact of its construction activity alongside other major infrastructure projects affecting the borough and neighbouring areas, including the A428 Black Cat to Caxton Gibbet scheme. Construction traffic, road closures, and diversions must not be considered in isolation where residents and businesses may face overlapping disruption from multiple major schemes.

Environmental considerations in construction

- i. As per our previous response, we recommend that new buildings constructed as part of East West Rail achieve a BREEAM excellent rating and incorporate renewable energy provision wherever feasible, to help minimise operational carbon emissions.
- ii. 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.
- iii. We also support the use of materials that can be recycled when structures reach the end of their lifespan, for example by making greater use of steel and less use of concrete where possible.
- iv. Also as per our previous response, we request 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.
- v. In addition to the consideration of carbon, it will be important to understand how the wider climate impacts will be considered. This should include consideration of the wider climate impacts and resilience measures, for example the impacts of heat both during the construction phase and on the operation of the railway. We note the proposed Environmental Sustainability Strategy and the Environmental Impact Assessment scoping report, and will comment in detail on the Environmental Impact Assessment when it is available.
- vi. It remains our position that a full Flooding Assessment of the works' impacts must be undertaken and made available for independent review by the Council's consultants before designs are finalised. We have not had sight of such an assessment, and infer that it will not be presented until the examination stage, when EWR will be presenting what it regards as effectively final designs. This is greatly to be regretted: we wish to see this assessment as a matter of urgency, as it is imperative that the scheme should not increase the flood risk to homes or businesses in Bedford Borough.
- vii. Across the route, mitigation must extend beyond the boundaries and edges of the rail corridor so that the railway is integrated with the wider landscape

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

- viii. The Council is concerned about the impact of the scheme on the character and the rural setting of villages across North Bedfordshire. East West Rail must provide detailed mitigation proposals for affected rural areas, with particular attention to protecting village character, views, tranquillity and the wider setting of open countryside.
- ix. In our previous response we observed that linear projects such as new railways can cut through significant bat commuting routes; EWR should conduct the relevant surveys to understand the impacts. Work at night under floodlighting also poses a significant risk to any commuting or foraging bats, which should be mitigated.
- x. We also made clear that the Council's policy is to plant two new trees for every one tree removed in a construction project. We require an equivalent commitment from East West Rail, which we could not identify in the current consultation materials.

Geology

- i. EWR's plans must take full account of the British Geographical Survey's report on the Cleat Hill area, following the fatal incident in which work to introduce a ground source heat pump hit a pocket of natural gas and caused an explosion.

Noise from railway operations

- i. 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.
- ii. The Council is concerned about noise impacts in quieter rural areas, where existing background noise levels are low and where both construction and operational noise may be more intrusive. Noise modelling must specifically assess impacts on rural villages, isolated homes, farms, schools, community facilities and must include robust mitigation where appropriate.
- iii. Visually acceptable acoustic fencing (or other suitable forms of mitigation) should be introduced to reduce the impacts on residential properties and other sensitive receptors.
- iv. We note EWR's general approach to reducing noise and vibration as outlined in the consultation paper, and that a noise assessment will be developed in accordance with the Noise Policy Statement for England 2010. As this is the final non-statutory consultation before the DCO application is made, we would

greatly have preferred to have the opportunity to comment on a draft of the assessment at this stage, as a minimum.

Highway impacts from railway operations

- i. Discussions are ongoing between East West Rail and Bedford Borough Council about EWR's approach to traffic modelling. We have not yet had sight of sufficient detail to enable us to provide meaningful comment on this. In its absence, we repeat here points we made in response to the previous consultation and its Technical Update Report (TUR), with the earlier phase of traffic modelling that it detailed, which remain relevant to the current proposals.

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 EWR 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 EWR.

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.

[...]

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.

[...]

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 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.

Further comment on route sections

New station at Stewartby

- i. The new station that will serve the Universal theme park and Stewartby village is referred to simply as 'Stewartby' in the consultation document, although its location is part-way between the current Stewartby and Kempston Hardwick stations.
- ii. We understand that the 'Stewartby' name is being used as something of a placeholder, that the final name of the station may be a matter for future discussion, and that options that reflect its position relative to Universal could be considered. There is precedent for railway stations to be named after organisations or institutions that they serve, such as IBM, Blackpool Pleasure Beach and Manchester United Football Ground stations.
- iii. As the local authority, we believe we should have a say in any potential future name change, and we believe it is important that, as well as reflecting local identity, the name should be as clear and instructive to visitors as possible. This should include reflecting travel and ticketing arrangements, for instance if the station is part of an expanded Bedford station group or new south-of-Bedford group as discussed above. We would be happy to see formulations such as 'Stewartby Universal' or 'Bedford Universal' considered for the station's name.

Marston Vale Line

- i. We have several further comments on the updated proposals for the Marston Vale Line.
- ii. In our previous response we expressed a preference for proposed passing loops at Stewartby to be relocated elsewhere, to avoid land take from development sites. We note that the proposal remains to locate the loops between Green Lane and the site of the new station. We require clarity about the extent of the land take that will be required and its implications for the development site.

- iii. As noted above with reference to Bedford station, our preference is for the Stewartby site to be considered further for train stabling, rather than the remainder of the Jowett Sidings. However, we again require further detail about what land take might be required.
- iv. We note that EWR is working to integrate its environmental mitigation measures in this area with those of Universal, which we welcome.
- v. In our previous response we requested that the construction compound on the brickworks site be relocated elsewhere. We welcome the revised proposal to move the main construction compound off the Brickworks site, leaving only a much smaller compound in that area, on a strip of land alongside the railway corridor.
- vi. As we observed in our previous response, 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.

Railway crossings on the Marston Vale Line

- i. Question 10 above asks for comments on selected level crossings in this route section. Of those, only the Wootton Broadmead (Broadmead Road) crossing is within the Borough.
- ii. In our previous response we observed that we generally supported the closure of level crossings and their replacement with bridges, and that non-motorised users including equestrians must be fully catered for.
- iii. Overall, we expressed surprise at the proposals to keep a significant number of level crossings open. We welcome the general change of approach shown in the current proposals, with the exception of the retention of the Green Lane crossing, to which we object. In line with our position on the Brickworks site development, we require a road bridge to replace the Green Lane crossing.
- iv. We note that under current proposals several of the bridges to replace closed level crossings will be built by others: the bridge to replace the Stewartby level crossing (an essential element of the active travel route to Kimberley College, but note our comments under Question 9, above) will be built by the developer of the Brickworks site, while Universal will make provision in respect of the Wootton Village and Manor Road crossings. These crossings must be re-provided, and not lost in any future change of plans by others.

North of Bedford

- i. The consultation paper presents new proposals for road layouts in the Poets area where EWR proposes to demolish homes to make way for its new tracks. We understand that EWR is, or will be, consulting residents in the area on their preference for the new road layout. We do not believe that demolitions in this

area or necessary, or therefore that new road layouts should be required, but if EWR persists with its proposals our recommendation is to follow the preference of local residents. We note that the current proposals make no direct provision for cyclists, which should be incorporated.

- ii. A haul road is proposed within the expanded railway boundary between Bromham Road and Fairhill Switching Station. We do not believe that demolitions for new tracks in this area are necessary, so in the event that a four track option is adopted EWR will have to revise its proposals for construction traffic in this area. We understand that the haul road would principally be for the construction of the proposed extra tracks, so the need for it could be entirely obviated if they are not built. Clearly a haul road on its own, if required for other elements of the construction process, would not provide adequate justification for the loss of properties proposed in the Poets area.
- iii. Another implication of EWR's proposal for extra tracks is the need to extend the Bromham Road bridge to provide an extra portal for the tracks to pass through. If EWR were to go ahead with these works, the Council would insist that adequate provision is made within the scheme for safe cycle routes during and after the works, to alleviate the dangerous pinch-point created by the current design. This could be achieved either through widening the bridge or by providing a parallel bridge for active travel.
- iv. The consultation paper notes that the construction of the extra tracks will also require acquisition of land from the Alexander Sports Centre, and "likely" require their pavilion to be relocated. This will not be necessary if a four track solution is adopted.
- v. We are very concerned about the impact of the proposed relocation of Fairhill Switching Station. We have yet to have sight of definitive plans, but we understand that this work will sterilise a significant amount of prime development land, with significant negative implications for the Council's capital receipts. In the event that a four track solution is adopted, relocating the switching station will not be necessary, as the railway could diverge from the Midland Main Line slow tracks just north of its current site; this would be a further significant benefit of not proceeding with the unnecessary extra tracks. In the event that EWR persists with its proposals, it must find an alternative site for the rebuilt switching station.
- vi. In our previous response we made clear that the proposed construction compound on the former St Bede's School field development site (north of Beverley Crescent) would be unacceptable. We welcome its removal in the current plans.

Clapham area

- i. In our previous response we indicated support for EWR’s proposal to build a new bridge to carry the Great Ouse Way over the new railway, but this support was offered expressly on the basis that the bridge would be able to accommodate a dual carriageway in future, in support of the Council’s ambitions to enhance the northern and western bypasses.
- ii. The current proposals do not satisfy this, and instead offer only a single carriageway bridge. Any future dualling of the carriageway would therefore require the construction of a new bridge, from the foundations up, over a live railway: the cost and associated burdens of these works could well be so great as to preclude them entirely. It is not acceptable for the EWR project to preclude enhancements of our bypass in this way: provision must be made, at a minimum, for a new bridge that could accommodate the addition of a second deck by the Council in the future. In its absence, the Council objects to the proposal.
- iii. Addressing the proposed viaduct over the River Great Ouse and Paula Radcliffe Way, we stated in our previous response:

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. [...]

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.

The Council insists that the viaduct’s design should be bespoke and both respect and enhance the local landscape.
- iv. The current consultation paper states: “The viaduct would be designed to draw on Britain’s proud railway heritage and the tradition of viaduct structures that have shaped our railway network for generations.” This is a vague statement and we request greater clarity on it as a matter of urgency. Taken at face value, it appears to refer to the widely recognised style of Victorian railway viaducts such as the Ribbleshead or Glenfinnan viaducts. These may be well known and well regarded structures, but they are very large (substantially taller than needed in this location), span much more dramatic geographic features, and have a heavy outline in the landscape. As per our previous response, we require a structure whose design responds sensitively to the area it is being built in; we cannot see how a design that references unrelated structures in markedly different geographies could possibly achieve this.
- v. We note the proposals for landscaping around the area of the viaduct, but need to see considerably more detail before we can offer meaningful comment. We would not wish to see any good work in this respect be undone by the construction of an unsuitable viaduct structure.

- vi. The consultation paper observes that electricity transmission lines will have to be re-routed to accommodate the viaduct, but it does not offer the assessment of the impact of this relocation that we asked for in our previous response. Again, we await further detail.
- vii. Construction in this area will require some temporary closures of both Paula Radcliffe Way and the Great Ouse Way. As we observed in our previous response, these must be carefully co-ordinated to minimise their impact.
- viii. In our previous response we observed that the amount of land required for construction in this area appeared high. We welcome that this has now been somewhat reduced.

Clapham to Tempsford

- i. Unlike sections to the west, this part of the East West Rail route will be a brand new railway through open countryside that does not currently contain any comparable transport infrastructure. It is therefore in this section that the environmental impacts stand to be greatest, particularly in terms of noise, and changes to the landscape and character of the area. Disruption and traffic during construction are also likely to affect this area in a distinct way compared to impacts in the urban area, for instance with diversions likely to require much greater additional distance to be travelled.
- ii. In this environmentally sensitive section of the route, mitigation of impacts will be especially important during both the construction and operation of the railway. In our previous response we emphasised the need for mitigation of construction impacts through the use of temporary noise barriers, dust suppression measures and the considerate use and positioning of temporary lighting to limit light pollution; we also emphasised the need to mitigate operational impacts through measures such as noise barriers close to sensitive receptors, and planting or landscaping alongside the railway corridor to reduce operational impacts. We also advised that noise monitoring needs to commence as early as possible, to obtain a baseline against which to assess the impact of the railway. In the absence of any further detail on mitigation measures of this sort, we re-state all of these recommendations.
- iii. The Council considers that the impacts on North Bedfordshire's rural communities require much greater recognition. The new railway through open countryside, together with associated construction, traffic routes, diversions, noise, visual impact and land take, has the potential to alter the character and daily life of rural villages. East West Rail must provide a clearer assessment of these impacts and set out how harm to rural communities will be mitigated.
- iv. The Council requires more meaningful engagement and information sharing with Parish Councils and rural communities. Engagement must take place early enough for local concerns to influence decisions, not simply after proposals

have already been developed.

- v. In our previous response we observed that EWR's proposals do not currently appear to address several national and local policies. In the absence of any acknowledgement of this, it appears still to be the case, and we remind EWR of the following Bedford Borough policies:
 - 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.
- vi. In our previous consultation responses, we recommended that a tunnel be used to take the railway under Carriage Drive, instead of the proposed cutting. In 2021, this was as part of a suggested alternative alignment that would have kept the railway at a lower level from Fairhill to Clapham, and therefore approaching the hillside at a considerably lower point. We recognise that the cutting is now proposed to be significantly shallower than in previous proposals, and that a tunnel is therefore a less obviously viable alternative. We would like to see the relevant option selection documentation, to understand how this solution was arrived at rather than our earlier suggestion.
- vii. Also as per our previous response, we would like EWR to allocate the land within their red line boundary adjacent to North Brickhill Country Park for an extension of the park once construction is complete.
- viii. At Thurleigh Road, the revised proposals now involve a viaduct rather than a long embankment with two smaller bridges. We acknowledge that the new proposal will not block views in the way that a solid embankment would have done, and is therefore less visually intrusive, although any new railway infrastructure in a rural location will inevitably be highly intrusive. Nonetheless, the reduction in disruption to the highway network required to implement this solution is welcome.
- ix. We would like to see option selection material for the new proposal not to construct a bridge Graze Hill. While the severance caused by the railway may affect a relatively small number of residents who will face longer route options for certain journeys – effectively having to go around three sides of a rectangle rather than in a direct line – we wish to understand how EWR reached this decision. Given the severity of the severance for those affected, we require sight of detail about the decision-making process to understand whether the impact is reasonable and proportionate.
- x. In our previous response we made clear that the Growing Beds facility, which receives all the Borough's kerbside-collected green waste, must remain usable at all times during construction. We cannot identify any specific reason in the

current proposals why this should not be the case, but a good deal of work will be undertaken in proximity to the facility, and we therefore require a clarification that it will indeed be able to remain open and in use throughout.

- xi. It is apparent that the Temporary Drawings (Route Section 4, Sheets 02 & 03) for Sunderland Hill make no provision for, and the Consultation Brochure no mention of, a localised temporary diversion of the B660 to permit continued use of this moderately loaded road between Bedford and Kimbolton. EWR have confirmed at the recent drop-in sessions their intention to close the B660 from its junction with Thurleigh Road to the top of Sunderland Hill for a period of up to 12 months and maybe more. The unstated alternative is for all north- and south-bound B660 traffic, including Growing Beds HGV traffic from the south, to find its way via the villages of Wilden and Ravensden or Thurleigh – which the Council would not accept. EWR are requested to invest in a local diversion of the B660 in the immediate vicinity of the proposed rail underbridge in the same fashion as is already proposed for Carriage Drive, or explain why they choose not to provide this level of mitigation.
- xii. In respect of the proposed passing loops at Colesden, we previously observed that an absence of timetable information makes it impossible to judge whether passing loops are needed or if this is the appropriate location. In principle we recognise that passing loops here could potentially be useful for regulating services over the approach to Bedford station; but East West Rail has not demonstrated the need for them.
- xiii. In our previous response, we stated clearly that we have no plans for an additional station between Bedford and Tempsford to facilitate growth, and invited EWR to issue an equivalent clarification. From the current proposals, we can see no indication at all of any preparation or planning for a new station between Bedford and Tempsford, but we would still welcome a formal public clarification of this from East West Rail.
- xiv. In the Tempsford area, we supported the northerly alignment for the route of the railway, and 'option B' for the site of the logistics hub. We welcome the selection of both of these options, and reiterate our recommendation that the logistics hub should be brought into use as early as possible to maximise the quantity of construction materials that can be brought in by rail.

Active travel route between Tempsford and Bedford

- i. The current proposals are grossly inadequate in respect of active travel connections from the new Tempsford station into Bedford Borough. In our previous response we recommended a lineside cycle route laid between the railway tracks and the proposed screening vegetation, between Tempsford and Bedford, to rejoin the existing highway network before reaching Fairhill. We had expected this to be seriously considered, but instead it is entirely absent from

the proposals, with no word of explanation.

- ii. As an absolute minimum, there must be high quality access by active travel between the new Tempsford station and communities in the north-eastern part of Bedford Borough, including the new Little Barford settlement. This requires the water crossing to the west of Tempsford station to include capacity for the active travel route: given that a new structure is being built from scratch, there is no reason not to incorporate active modes within it. Tempsford station should be the natural gateway to the rail network for communities in the north-eastern part of Bedford Borough, particularly those within ready cycling distance: at best, the current proposals will encourage car travel to reach the station; at worst, they will fail to attract passengers to the station at all. Given the significance of the planned new town development, failure to incorporate active modes into the new water crossing would be extremely short sighted, and we require that this omission be rectified.

Rights of way proposals, Clapham to Tempsford

- i. There follow comments on rights of way proposals from Clapham eastwards.
- ii. Clapham FP24 temporary diversion and reinstatement: the timescale for this work and route for the temporary diversion are not stated in the consultation paper. We take it this is the same as the works to modify Carriage Drive. Proposals for Carriage Drive have been modified to raise the road surface by a metre where it crosses the railway, and to reduce the cutting's width and depth: this will move the western edge of the cutting where it intersects Carriage Drive, and the alignment of the tracks, eastwards, but leave the eastern edge of the cutting, near the lodge, crossing Carriage Drive at the same point as previously planned. The consultation paper argues that this will reduce the impact on both the road and the setting of the Grade II listed lodge, but introducing a hump to a currently relatively flat road seems to us to be making a different trade-off rather than reducing overall impact. In respect of the setting of the lodge, the cutting would be in the same place as before but with a more pronounced gradient on the road over it than either its current setting or the previous proposals; it is not clear to us how this reduces impact on its setting. Also in relation to Carriage Drive, we reiterate the comments in our previous response:

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.

- iii. Clapham FP5 and FP6 diversion, and BW53 part closure: the proposed new green bridge is stated in the consultation materials as 2.6m wide, but as well as carrying FP5 and FP6, the bridge will also need to accommodate BW53. For a bridleway, a minimum width of 3m, with high parapets, is required. The proposed arrangements also threaten an anomaly where the northern end of the bridleway does not connect with a highway of bridleway status; an upgrade of the relevant part of FP6 is therefore required, which can form a junction with BW2 at College Farm. We also require further information on the vegetation proposed for the green bridge: how and where will it be planted, and how will it be maintained?
- iv. Brickhill BW55 diversion, BW54 realignment: to accommodate the bridleways, the proposed bridge must be at least 3m wide, with high parapets.
- v. Ravensden FP29: we require clarity over the height of the proposed viaduct at this point, whether closure of the footpath will be necessary during construction, and if so whether a temporary diversion is possible.
- vi. Ravensden BOAT61 and FP35: diverting the northern section of the BOAT to the footbridge connection with Footpath 35 will leave an anomaly, as the BOAT will be connecting to a path of lower status. The authority requires the northern section of the BOAT to be downgraded to a bridleway and the bridge being shared with Footpath 35 upgraded to a bridleway bridge, which will then allow users to connect to the diverted part of BOAT 61. This will also allow for a connection for users using Ravensden Bridleway 41 on the north side of Sunderland Hill.
- vii. Wilden FP16: a footway is required along the whole length of Shrubbery Lane that will be used for this diversion, to connect with the existing footway on High Street.
- viii. Wilden BW33: we require greater clarity on whether there will be full closure or a temporary diversion during construction.
- ix. Wilden FP27: there is a discrepancy between the Highways Plans and the consultation brochure showing the route of this diversion. The route of the diversion requires clarification. A footway is required from this footpath to Shrubbery Lane.
- x. Wilden FP24 diversion: an additional footway is required from the diverted part of FP24 that connects onto Chequers Hill up to Footpath 34.
- xi. Wilden BW1, Wyboston BW16 and Wyboston FP15: a minimum width of 3m is required for the new bridge, and high parapets; we also require greater clarity on whether there will be segregated sections for different user groups where

these bridleways converge with the footpath.

- xii. Wyboston Chawston and Colesden FP7, FP8 and FP10: we require greater clarity on whether there will be full closure or temporary diversion of these footpaths during construction.

Q18 – 19 About the consultation

No response.