

BEDFORD BOROUGH COUNCIL

RESPONSE TO THE EAST WEST RAILWAY COMPANY CONSULTATION

JUNE 2021

Objectives

Bedford Borough Council (BBC) has been a long-standing supporter of delivering East West Rail connectivity. BBC appreciates the scale of the benefits which will accrue to the town of Bedford, to Bedford Borough as a whole, and to the wider area with a regular, fast, efficient, reliable, cost-effective and sustainable rail service connecting Bedford to Oxford, Cambridge and beyond.

Furthermore, BBC believes that an integrated vision and collaborative approach between EWR and the Council will be the best approach to crystallising the transformational benefits which will accrue from redeveloping Bedford St Johns station and, especially, Bedford Midland station.

To fully capitalise upon these opportunities, though, the railway project needs to provide the right customer benefits in the right place and to minimise community dis-benefits in construction and operation. The challenge for the East West Rail Company (EWR) is to treat all residents in the vicinity of the proposed railway line as important stakeholders and to engage with them and address their concerns throughout all subsequent stages.

The purpose of BBC's response to the 31 March – 9 June 2021 consultation is to:

- act as a voice for the residents of the Borough;
- consider the consultation options from a perspective of maximising the benefits and minimising the impacts for the Borough;
- highlight opportunities that you may not have identified;
- challenge EWR, where appropriate;
- share our knowledge of Bedford Borough to help you to deliver the best outcomes for all

Our approach is to make a number of broad strategic points, before answering the specific questions in your consultation document.

Strategic Outline

It is clear that there are substantial potential economic and transformational benefits from a north, south, east and west passenger railway interchange at Bedford. At the previous consultation stage, BBC argued strongly in favour of the EWR route through Bedford Midland.

BBC is looking forward to working closely with the EWR team as the project develops.

Strategic Outputs

The Council seeks an outcome that will capitalise upon the opportunities presented by EWR, whilst minimising potential environmental and community disruption and dis-benefits. Fundamentally, BBC seeks the best possible economic outcomes for the Borough. These benefits will include the stimulus of redevelopment at and around Bedford Midland and St Johns stations, and maximising the opportunity to create more affordable and sustainable housing in new and sustainable settlements based around a new station in the Tempsford / St Neots South area.

Our research shows that over 450 jobs will be created in Bedford as a result of EWR being routed through Bedford Midland station. This will benefit the local economy by over £20 million per annum. In addition, growth and development around other stations on EWR will add to the Borough's growth and prosperity.

In respect to the railway, BBC wants a reliable and frequent train service to places that Borough residents want to go, and for those who need to access Bedford. A competitive journey time is important in order to attract users out of cars, but also in order to encourage economic benefits and sustainable development. This approach will strengthen the economic ties between Bedford and the thriving economies of Oxford and Cambridge.

The draft Local Plan for Bedford Borough, covering the period up to 2040, is due to go to consultation this summer. EWR station locations are likely to be a key focus for growth.

It is important to the Council that careful consideration is given to the minimization of disruption during construction. BBC believes that EWR should develop two-way partnerships with the local communities involved. Those communities should then have the opportunity to comment upon proposals and have points of contact within EWR who have the authority to deal with any issues that arise in real time, 24-hours a day.

Engineering overview

Bedford Midland Station to Fairhill

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.

Research carried out for BBC

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.

This study shows that the Slow Lines north of Bedford station are only used on a regular basis by freight trains, of which there are typically one or two per hour each way. Southbound East Midlands Railway trains calling at Bedford also use part of the slow line from Bedford North Junction to Bedford. This happens twice an hour. The simplified track diagram below shows that conflicts between eastbound EWR trains and southbound trains on the Midland Main Line could occur at points A, B and C.

¹ Network Rail document *East West Rail Central Section 2f Report (Draft)*, 29 March 2019, p.42.

² Network Rail document *East West Rail Central Section 2f Report (Draft)*, 29 March 2019, p.56.

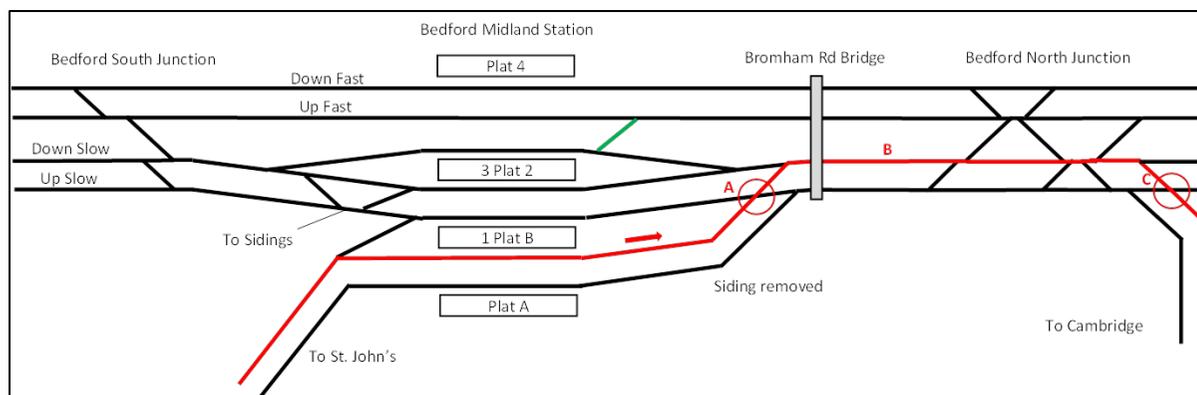


Figure 1: The four-track option at Bedford.

As suggested in paragraph 8.5.15 of the EWR Consultation Technical Report, the installation of a new crossover between the 'up fast' line and Platform 3, south of Bedford North Junction (shown green on the diagram above), would remove conflicts between the other passenger services and EWR services (removing opposite direction conflicts across track shown at position B).

We calculate that such an intervention would mean that, assuming two freight trains per hour each way using the slow lines on the Midland Main Line, line availability for eastbound EWR trains would be 40 minutes per hour. This should be more than sufficient to cater for the proposed EWR services.

The Consultation Technical Report also notes (paragraph 8.5.65) that the installation of this crossover would necessitate a reduction in line speed on the 'up fast' from 125 mph to 110 mph through this point (presumably because of track geometry). This speed reduction is a small price to pay, perhaps costing half a minute in the journey time of non-stop southbound trains, for the sake of the demolition of houses in the Poets Area, with all the associated disruption and misery caused to the residents affected.

The introduction of this crossover introduces positive benefits whereby southbound passenger trains can call at the station more easily (this applies to both expresses from the East Midlands and the Corby electric services to London). In such cases the crossover would reduce the time penalty associated with calling at Bedford. According to East Midlands Railway, the time penalty of up to 7 minutes is one of the reasons why they are currently reluctant for trains to / from Nottingham to call at the station.

The provision of a platform on the 'up fast' line as part of the station reconstruction would also remove conflicts with EWR services, and reduce the time penalty from calling at the station.

Fairhill to Clapham Green

From our observations and local community feedback, we are concerned about the proposal from the point of departure from the Midland Main Line over the River Great Ouse and beyond Clapham.

It is our view that the existing proposal is unnecessarily visually intrusive and costly to construct. We believe that a possibly cheaper and less impactful solution could be enabled by aligning the track slightly further to the south.

We have carried out a desktop study and would like to suggest an alternative course between the Midland Main Line and Carriage Drive. Figure 2 shows the proposed EWR route in Blue, and a BBC alternative in Green. The BBC alternative route keeps to the south bank of the River Great Ouse. It is:

- Less visually-intrusive
- Less expensive (see Graphs 3 and 4 below)
- Less risky (no power line diversions)
- Slower (c. 400m radius and c. 50mph)



Figure 2: Proposed and alternative route from Midland Main Line to Carriage Green.

This proposed route has the benefit of utilising space within the southernmost span of the existing road bridge on Paula Radcliffe Way. There is approximately 16m between the bearing columns of the bridge. If necessary, the span could be extended. The banked abutment would need to be replaced by a retaining wall.

This design is similar to that developed for other riverside routes and could be constructed to take account of flooding risks from the River Great Ouse and the necessary mitigation measures.

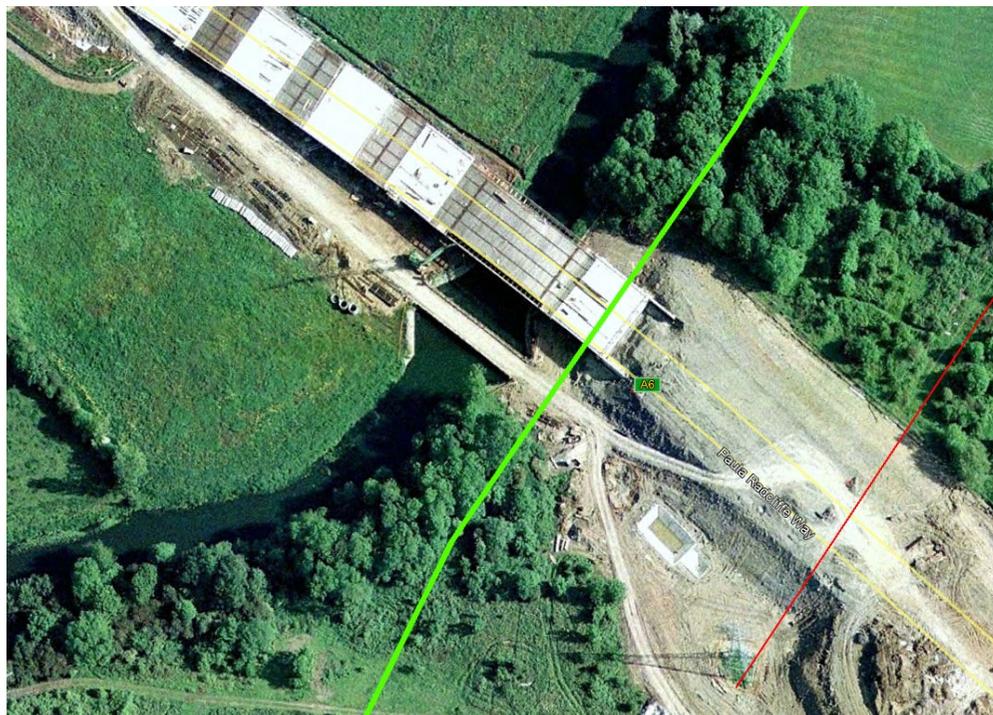
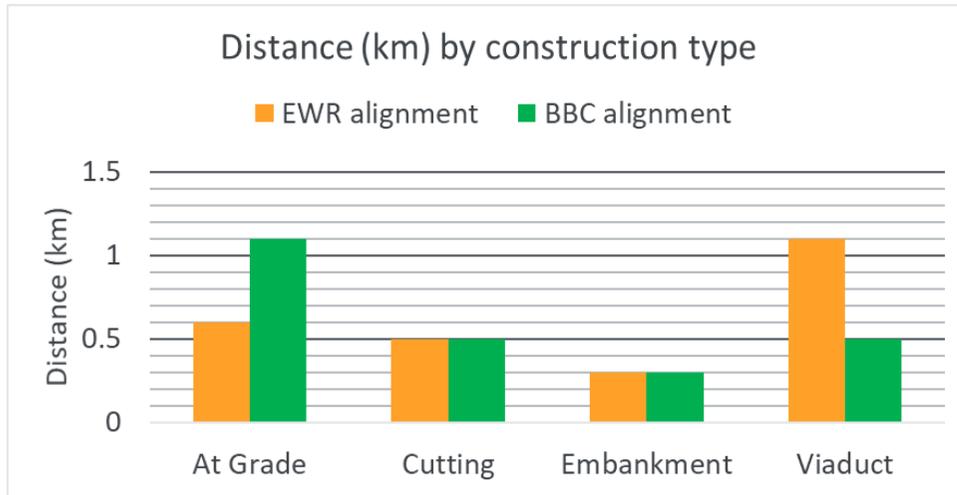
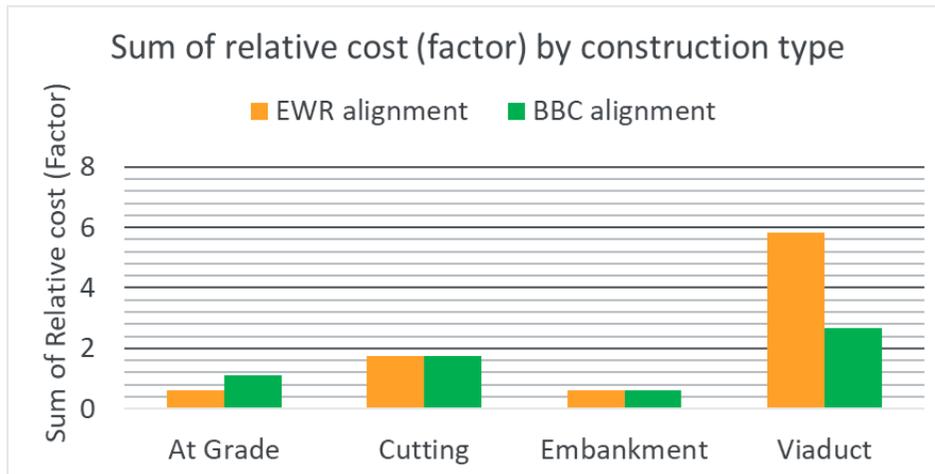


Figure 3: BBC route proposal under Paula Radcliffe Way (the photograph shows the bridge under construction in 2002).

The benefit of the alternative approach can be seen in Graphs 4 and 5. The BBC approach reduces the length of viaduct required by more than 50%. The increase in construction type is for cheaper 'at grade' construction. The real benefits are shown in Graph 4 which demonstrates that for a very modest increase in 'at grade' construction costs there is a sizeable reduction in viaduct costs, which has the potential to generate a total saving in this section of 30% or more.



Graph 4: Comparison of distance by construction type EWR alignment versus BBC proposal



Graph 5: Comparison of relative cost by construction type EWR alignment versus BBC proposal

Irrespective of the route, though, we remain especially concerned about the visual impact of a cutting to the east of Clapham around Carriage Drive and wish to see the proposed cutting replaced by a tunnel. If a viaduct across the River Great Ouse at Clapham is required, this should be as low as possible and that visual intrusion should be minimised by close attention to architectural design.

We are also concerned about the impact of cuttings, viaducts and embankments along the proposed routes. Before EWR makes a decision on a precise route alignment, we would like to see a detailed engineering topographical study of the impact of the potential solutions and be able to make further comments on that basis.

We would also like assurances that, in order to minimise wheel noise from trains, the maximum use is made of continuously-welded rail construction and, where this is not possible, that noise damping methods are employed.

Stations

It is the location and design of the stations along the EWR route that provides the connection between the railway system and the communities and people that the railway serves. The stations and their hinterlands are integral to providing the catalyst not only to growth in rail passenger numbers, but also in local economic growth and transformation.

Existing and new railway stations will become hubs which support the economic prosperity of the area. It is important, then, that station design integrates fully with local authority master-planning of the wider environment. It is only by a collaborative and integrated approach that the full benefits of EWR will be crystallised.

Bedford Midland Station

The station redevelopment presents a once in a century opportunity to regenerate and repurpose a significant part of Bedford town centre. We believe that a multi-agency approach can drive broader benefits without introducing delay to the EWR delivery plan.

It is important that EWR considers not only the operational railway benefits in terms of Bedford Midland Station design, but also the wider transformational benefits which are congruent with the delivery of the broader benefits of the Oxford-Cambridge Arc. We would like to work together with EWR to jointly deliver an ambitious station redevelopment plan.

EWR's technical document establishes two options for Bedford Midland redevelopment: the North and South Concepts; the demarcation between the options being Ford End Road Bridge which splits the site area. EWR indicates a growing preference for the North Concept. BBC believes, though, that the optimal development of the site for regeneration and railway operations may not be as clear cut as a north or south option. We believe that more work is required to develop a deeper, wider proposal.

A carefully crafted Bedford Midland Station design offers, for example, the potential to:

- integrate the existing north-south services with the new, by the careful design of a holistic railway approach to customer delivery, making connectivity at Bedford simple and easy;
- create an iconic architectural statement in station and hinterland design which describes the future ambition of both the railway companies and the town;
- provide a plaza or entrance to the town, integrating with redevelopment opportunities for Bedford;
- serve the station and the town better by upgrading the Ford End Road bridge for stronger east-west connectivity to meet the needs and demand generated by the station;
- repurpose land and making more effective use of real estate to create a centrepiece for urban regeneration – establishing a new Quarter for the town

We want to see a comprehensive redevelopment of Bedford Midland station, which does not focus just on EWR's requirements. For example, we believe that it is critical that an "up fast" platform is part of the overall solution. This would enhance interchange options at the station via direct, express trains to London St Pancras, Leicester, Nottingham and Sheffield.

In order to exploit the full potential of the Bedford Midland Station Quarter, it is likely that the Jowett and Thameslink sidings must be relocated. The Council would like to engage with EWR to develop concepts and locations for relocating the sidings.

Bedford St Johns Station

Bedford Borough Council has adopted a master plan for the area known as "South of the River", which includes the area around St Johns station.

The illustrative masterplan for the area identifies a number of potential opportunities which could account for a significant development capacity. This is estimated as:

- 1,100 homes
- 450m2 retail space
- 1 new primary school
- 1 new community building
- 1 re-modelled civic building
- No net loss of public car parking

These plans would be enhanced by the proposal to move the existing station closer to the hospital and are currently being updated to that effect.

Other Stations

In terms of local stations such as Stewartby Hardwick, whilst the scale may be smaller than that of Bedford Midland, the ambition should not be. These stations could form the civic centre-piece of new and sustainable developments, being carefully crafted to smoothly transition customers through the station to / from their sustainable first / last mile transportation.

There should be lasting and innovative design, incorporating sufficient passive provision and space to exploit emerging accessibility opportunities and new ideas in respect to integrated transportation and community benefit.

At Stewartby Hardwick there is a particular need to provide safe, sustainable, well lit routes for students at Kimberley College to use to / from the station.

Environmental impact

It is important to BBC that the environmental impacts of the new line within the Borough are mitigated, and environmental net gain is achieved. BBC recognises that there is a delicate relationship between the benefits and costs associated with the new railway. Nevertheless, we strongly believe that the utmost care should be taken to preserve the amenity of the area. We want to see as little impact on heritage and conservation assets as possible and, as great an increase in biodiversity as can be achieved. We believe that viaducts aid permeability for wildlife, and for this reason we would wish to see viaducts considered in place of embankments at locations where environmental permeability could be significant.

BBC has declared a climate emergency and consequently we are very interested to understand EWR's plans to ensure that this 21st Century state-of-the-art railway is designed and implemented with 'net zero' carbon impact as a baseline position.

We believe that the advent of EWR also has a role to play in improving the environment along the line of route. We would like EWR to consider its broader role in creating a lasting legacy from the new railway line. We think that it may be feasible, for example, at marginal or no additional cost, to create a cycleway along the line of route, and lay fibre optic broadband, so as to bring real, long-term benefits to current and future residents of the area.

Furthermore, we are aware of the Community and Environment Fund (CEF) that has been created to add benefit to communities along the route of HS2 that are demonstrably disrupted by its construction. We wish to see a similar fund created for EWR to allow Parish Councils and communities to bid for funding for appropriate mitigation schemes such as:

- Improved pedestrian, equestrian, or cycle access not provided under statutory services;
- Landscape and nature conservation enhancement projects which increase biodiversity (including pop up interventions such as skip gardens);
- Enhancement or replacement of sports and recreational facilities;
- Improved access and enhancements to public open space;
- Provision of enhanced or new community facilities; and
- Refurbishment / re-use of historic buildings and monuments.

We would also like evergreen trees to be planted to screen the railway both visually and to minimise noise.

BBC also believes that all new railway stations, depots and buildings should be built to a 'net zero' standard, utilising energy efficient systems (e.g. solar panels, ground source heat pumps etc.). If at all possible, the environmental 'footprint' of existing rail structures should also be improved.

Any new structures should use construction methods and materials that minimise the climate change impact in line with EWR's commitment to be a net zero carbon railway. This should prioritise carbon reduction over sequestration.

Electrification

The carbon-free target means that this route should be fully electrified until another viable, carbon-free alternative becomes available.

BBC believes that traction on the completed railway line should be to 'net zero' standards. The Transport Committee's March 2021 'Trains Fit For The Future' report says "electrification is the only immediately viable decarbonisation option for most of the network, not least because alternatives are not suitable for freight and high-speed services due to their high energy demands".³

The Rail Industry Association's report of April 2021 on the case for Rail Electrification states that:

- Electric trains are a future-proof technology that is unique in offering potentially net-zero carbon high-powered transport because the electricity they receive can be generated from any power source. Their power is limited only by the amount of energy they can collect from overhead line or third rail, so they use electricity as it is needed.
- Rail decarbonisation will simply not happen without electrification.⁴ ORR data on the emissions of diesel in 2019 / 20 indicates that replacing a diesel fleet with an electric fleet would give a 76% emission saving.
- Network Rail's Traction Decarbonisation Network Strategy (TDNS) report concluded, in July 2020, that railway decarbonisation requires a large-scale electrification programme and that this has a good business case. The TDNS also shows that electric trains, which are twice as powerful as diesel locomotives, are the only net-zero carbon option for freight'.⁵

We therefore believe that full electrification is the only viable option, and would need to be installed from the outset to avoid expensive and disruptive retrofitting.

³ Why rail electrification? Railway Industry Association, April 2021, p.5.

⁴ Why rail electrification? Railway Industry Association, April 2021, p.5.

⁵ Why rail electrification? Railway Industry Association, April 2021, p.9, p.13, p.48.

Management of disruption (stakeholder engagement)

The Council recognises that with any substantial engineering scheme there is likely to be disruption during construction. What is of critical importance, therefore, is that the contractors do their utmost to avoid unnecessary disruption.

It is vital, therefore, that EWR uses the whole of the planning phase as an opportunity to build and develop a partnership with the local population. Such a strategy can help to overcome misunderstanding, lack of trust, anger etc. amongst those stakeholders who see no benefit from the scheme, but only cost.

EWR seeks to set new standards for customer service, and in the context of the construction of the scheme, the local population should be considered as your customers.

BBC wants to see EWR commit to a policy of local stakeholder engagement which redefines the relationship between a powerful, remote organisation and your local customers. BBC therefore requires EWR to introduce a 24-hour Helpline and a process for tracking and resolving stakeholder issues during the construction period. BBC also seeks confirmation that EWR will fund a BBC employee to act in a traffic management liaison role to help nip any issues in the bud. BBC will work with EWR in the development of this approach

Aspects of construction which are important to local communities include: timescales; hours of work; the impact of work to be undertaken including minimising noise, dust and road closures; the size, location and number of site compounds; and other sources of disruption. We will develop a Construction Management Plan (CMP) for the works at the earliest possible opportunity, and wish to involve local communities in this process. This CMP must be effective, enforceable and adhered to.

The following list sets out specific commitments required from EWR by BBC:

- Hours of operation for construction works to be agreed (no overnight working – or minimal overnight working if specifically agreed for operational reasons).
- That baseline noise measurements are undertaken prior to construction so as to be able to measure any increase during construction and once the railway is operational.
- Jointly agree a phasing plan to minimise congestion in respect of bridge works in Bedford Borough (EWR to supply a draft timetable of bridge works for consultation).
- A temporary alternative bridge is required whilst the Great Ouse Way is being raised in order that the bypass can be kept open at all times.

- To be consulted on the draft plans for compound sites and haul roads to be used by EWR to construct the railway. This is in order to:
 - ensure that appropriate Construction Management Plans are in place
 - agree access routes to the compounds
 - explore potential re-use of Highways England compounds, if appropriate, for the construction of the Black Cat to Caxton Gibbet improvement
 - agree the future use of these sites; either returning them to green field conditions or transferring ownership to local councils as public open space if appropriate
- To agree routes for HGV movements in relation to construction, and agree those routes where such movements will not be allowed
- The use of haul roads and rail access in preference to the existing road network where this is possible
- That access is maintained at all times from the affected communities to the public services (e.g. education and health) that they depend upon
- That Green Lane and Hawk Drive will not be used for access during construction
- If possible, all rights of way should be maintained. Any diversion of rights of way should be kept to the absolute minimum. Post-construction, all rights of way should be returned to a usable, and if possible enhanced condition.

Learning from Buckinghamshire

At a meeting of the East West Rail Consortium Strategic Board on 16 March 2021, Buckinghamshire Council presented feedback from their experiences of working with EWR.

From this evidence, there are clearly opportunities to improve upon the current processes for engagement and delivery followed in Buckinghamshire in respect to the construction phase of works as they affect Bedford Borough.

A key point was that the EWR construction work (on a disused but nevertheless established railway line) had a “larger impact on the county than anticipated”. BBC is eager that lessons are learnt from Buckinghamshire’s experiences, and processes are improved or introduced in order to ensure that Buckinghamshire’s issues are not replicated here. We will seek to establish links between local councils in Bedford and Buckinghamshire so that information and experiences can be shared.

Some of the specific comments made by Buckinghamshire were that processes should be in place to:

- Ensure that sufficient information is provided with highway submissions to avoid delays in determination
- Ensure that road closure plans are appropriate and adhered to
- Over-provide for the expected volumes of engagement and complaints
- Ensure there is no disconnect between the communication and technical teams
- Work to agreed processes in requesting and publicising road closures
- Maintain respect for local communities
- Minimise the length and duration of highway closures
- Make as few changes to the agreed programme as possible
- Give detailed explanations regarding how programme durations are calculated
- Quickly rectify any damage to roads and verges caused
- Closely supervise all contractors / sub-contractors

BBC seeks a firm commitment from EWR to work with the Council to ensure that problems are avoided or minimised, and that robust procedures will be introduced to ensure that there is excellent engagement at all levels between the Council and EWR in regards to the planning and execution of the construction works.

Prevention of Blight / Compensation for Residents

One of the most pressing and immediate issues concerns the residents of the properties which are now blighted by the proposal to increase the number of railway tracks through the town, and construct new tracks across the wider Borough. This includes those identified in the Poets Area, on Ashburnham Road and at other points on the route alignments.

The time when EWR propose to introduce the 'Need to Sell Scheme' is when the preferred route alignment for the railway is announced. Yet, residents in houses within Bedford Borough that may be compulsorily purchased are already suffering blight. No-one will purchase a home that is to be compulsorily purchased.

BBC strongly recommends that the 'Need to Sell Scheme' (or some similar mechanism) is made immediately available to all land-owners where some or all of their property is potentially to be compulsorily purchased. Furthermore, there should be no requirement for them to demonstrate that they have been unable to sell.

The level of compensation payable under this scheme should at least match the level of payments offered by HS2, which are understood to be the market value plus 10%, plus the reimbursement of moving costs.

Conclusion

In conclusion, BBC is enthused by the possibilities created by the delivery of EWR. Our team is eager to work with EWR to maximise benefits and minimise costs and disruption.

We wish to engage as partners in this project, sharing a vision to transform Bedford Borough and the wider Oxford – Cambridge Arc in a sensitive, responsible, sustainable and imaginative manner in order to create a lasting legacy of which we can all be proud.

BBC also recognises, though, that this is a complicated project with a vast number of interdependencies. The devil really is in the detail. So, we wish to work through the detail with you over the coming months to ensure that the utmost is done to integrate learning, to continuously improve, to communicate effectively and to deliver a first-rate project supported by the people who live in the Borough.

As a first step, our detailed responses to your 2021 consultation questions are set out below.

Answers to EWR Consultation Questions

1. The approach to Cambridge

The Southern approach to Cambridge is preferred by BBC because it provides direct access from Bedford to Addenbrooke's Hospital and new employment growth areas of Cambridge as well as being compatible with trains continuing to Ipswich and Norwich without reversing.

2. Train Service

BBC believes that a key requirement of customers is a regular, preferably clock-face, and reliable service with stations served by at least two trains per hour, along with the shortest journey time compatible with meeting the wider objectives. EWR services should, where possible, connect with other services such as at Bedford with the Midland Main Line.

In terms of the preferred service pattern, BBC is strongly in favour of Marston Vale Concept 2 rather than Concept 1; that is, a reduced number of stations with two 'fast' trains per hour and two 'stopping' services.

However, because of the scale of development opportunity in the vicinity of the proposed Stewartby Hardwick station, we strongly believe that at least one of the 'fast' services per hour should call at this station. The outcome of such action would be the provision of one direct service per hour from this station to Oxford, and three to Cambridge. A service of this nature will further increase the viability of future residential and commercial development.

Likewise, given the significant opportunities that exist within the vicinity of Bedford St Johns, as well as the opportunity to serve a wider catchment area by active travel, the benefits of direct Oxford trains from Bedford St Johns needs to be considered.

3. Station experience

The station experience will vary depending upon station size, purpose and train service.

For smaller stations, such as Stewartby Hardwick a key aspect will be how the station facilitates seamless interchange. First and last mile connectivity and 'micro-mobility' will be integral to the success of the railway. It is important, therefore, that the station design is fully integrated into the wider master-planning process for the area.

New stations such as those proposed at Stewartby Hardwick should be considered an integral part of new communities with at least passive provision included within the initial design to cater for 'community hub' facilities (e.g. a nursery and a cycle hub) that will help to integrate the station into the wider environment.

These new stations can unlock land use development and therefore may serve a wider purpose than purely as railway stations. Nevertheless, their primary function is enabling connections for customers.

For larger stations, such as the new Bedford Midland station there are additional aspirations for the station such as influencing 'Place'; of helping to define the area; and stimulating urban redevelopment.

Even before the benefits of EWR are delivered, Bedford Midland is a substantial station. Footfall is around 4 million people per annum, which equates to being the 134th busiest station on the network, or the 54th busiest outside London. Bedford Midland is, therefore, currently ranked in the top 5% of UK stations by footfall.

The importance of Bedford Midland station will only grow with the advent of EWR. The overall scheme for the station should be commensurate with its current and future importance, and not by reference to its current, somewhat inadequate, facilities.

Bedford Midland station will also serve a wider purpose as a key 'entrance' to the town – creating a lasting and timeless feel of confidence and purpose (See response to Question 33 (b)).

The station experience should be intuitive and simple for customers. For interchange stations such as Bedford Midland, facilities should be cohesively integrated into the station design to afford an inviting environment for customers to dwell, not merely to provide a convenience stop.

Stations are primarily transport interchanges, and need to make provision for all of the potential exchanges between travel modes. We recommend that EWR pays attention to the work currently being undertaken by WSP for England's Economic Heartlands on first and last mile journeys in this regard. This should include the provision of secondary access / egress points to provide more direct routes and ease passenger congestion at the main entrance; e.g. at Bedford Midland a secondary entrance at the northern end of the station to serve the Bromham Road area is required as well as a main entrance near Midland Road.

In all cases, interchange with buses should be an integral part of station design, with easy access for buses to the interchange and for passengers transferring between buses and trains. Routes between bus stops and station entrances should be covered walkways throughout.

Walking routes should be direct, follow the pedestrian desire line and include controlled crossing points across all traffic routes.

Ideas concerning current best practice should be imported from across the world. For example, there could be consideration of the provision of bicycle 'club' hub interchange facilities similar to those experienced on the Dutch railways. Ambition should not be limited, though, to existing ideas; as new technologies such as electric bicycles become more mainstream so there will be, for example, requirements for charging and for safe storage and, maybe, traffic segregation.

Within stations, the public areas should be designed to ensure that passenger flows and flows of disabled people / lift-users do not need to cross and re-cross each other.

To ensure inclusivity in terms of accessibility and the broader station experience stations should be designed so that:

- There are no unstaffed ticket barrier lines: calls from unstaffed barrier lines to 'help' facilities are often answered very slowly.
- Coloured on-floor markings guide people through facilities / to their platform.
- Accessibility is immediately visible on approach to the station.
- For people who cannot use stairs, there is not only a lift, but a second lift in case one of them fails.

Toilets should be provided at all stations.

Since there is a symbiotic relationship between stations and communities, BBC would like to engage with EWR in developing an integrated masterplan for each of the stations in the Borough.

This masterplan will build on and encompass the Council's Bedford Town Investment Plan which is currently being assessed by central government.

4. On train experience

In terms of facilities, BBC desires:

- Best in class seating / leg room
- Sufficient seating capacity to minimise standing (and means to grow capacity with demand)
- Means to be able to undertake work / activity (Wi-Fi, (see below), table, sockets, lighting)
- Reliable air conditioning
- Reliable W/C's – with natural light and a feeling of pristine hygiene. There should be measures to ensure accessible toilets are no more likely to out-of-order than other toilets.
- To cater for cycling customers (with full size cycles) without impinging upon non-cycling customers
- Flexible multi-purpose space of innovative design (and in keeping with an Inter-City standard) and robust build capable of being multi-functional e.g. seats and cycle space.
- Step-free accessibility for wheelchair / mobility scooter and buggy users without the use of ramps, and level access to trains at platforms.
- Adequate provision for wheelchair / buggy / mobility scooter users so that they do not feel as if they are an afterthought.
- The harnessing of smart-phone app technology to enable personal video connectivity between:
 - customers and railway control employees for live face-to-face communication in the event of problems/disruption
 - customers and British Transport Police in order to provide additional security or to deter crime
- Best practice in on train information (including connection information / available seating etc.)

In terms of access to mobile connectivity, a holistic solution would be to enable strategic location of mobile network 5G+ coverage along the line of route. Such an approach would not only ensure that Wi-Fi connectivity on the train was uninterrupted and of high quality, it would also bring real benefits to local residents.

5. Interaction with colleagues

Technology assists us in many ways to make life easier, but technological developments increasingly mean that human interaction is lost. Sometimes, though, customers need the human touch. EWR should make personal service a part of the core customer proposition. Ideally this should be in person. However, this does not necessarily need to be face-to-face; the ability for a customer

to 'inter-face' in real time with a human being by video means with smart phone and tablet applications could provide a means for providing customer service, reassurance, complaint resolution etc. in real time.

We would also wish to see the provision of easy to use systems on trains and at stations for those who are not 'digitally native'.

The benefit of accessing staff in a 'Zoom'-like context would not only lever staffing efficiencies but could also enable a much greater degree of human support where and when it is needed. The utilisation of technology to open new routes of access for customers to EWR employees could be extended to the provision of a means for a 'safety link'.

Employees at stations, where they are required, should be in customer-centric roles engaging with and living the customers' experience alongside them. The most memorable railway customer experience (for good or bad reasons) is often the human interaction with railway employees. Where it is possible, the local community credentials of EWR can be strengthened by employing locally.

6. Customer information

The principles of simplicity and accessibility, which are of paramount importance to customers, should underpin both the customer experience and the provision of customer information. The EWR website should be intuitive in operation and really simple to use. There should be a clear route to problem resolution which includes a phone number that allows contact with a human being.

Where possible there should be an automated resolution process where the railway company is at fault.

The provision of accurate and appropriate real-time information during periods of service "perturbation" is important to customers. Where possible, appropriate automatic alerts should be directed to individual customers' mobile phones. The principle should be that 'too much information is bewildering, guide me via my phone and update me!'

We would also wish to see the provision of easy to use systems on trains and at stations for those who are not 'digitally native'.

7 Section A – Oxford to Bicester BBC has no opinion

8 Section A – Oxford to Bicester BBC has no opinion

9 Section A – Oxford to Bicester BBC has no opinion

10. Section B – Bletchley / Marston Vale Line

BBC is strongly in favour of Marston Vale Concept 2.

11. Section B – Marston Vale Line and preference for stations

BBC strongly supports Marston Vale Line Concept 2 which it believes offers more and better journey options, and has better potential to deliver growth.

In relation to the proposals for a new station in the vicinity of Stewartby Hardwick:

- We require at least one of the Oxford to Cambridge services to call at this station;
- Specific access arrangements will be required from the station to Kimberley College on Green Lane, Stewartby
- We would like to work with EWR to understand and develop thinking on the connectivity between this new station and the nearby communities in Wixams and Wootton.

12. Section B – Why (to Q11)

BBC rejects Marston Vale Line Concept 1 because:

- a one train per hour service for the stations in the section is insufficient;
- the increased journey time of the additional calls will make the service uncompetitive;
- the existing stations in the Borough (Stewartby and Kempston Hardwick) are not in the optimal locations to serve existing communities or stimulate economic development
- Stewartby is the busiest station on the line between Bedford and Bletchley yet has a lower level of service.

13	Level Crossing – Fenny Stratford	BBC has no opinion
14	Level Crossing – Fenny Stratford	BBC has no opinion
15	Level Crossing – Bow Brickhill	BBC has no opinion
16	Level Crossing – Browns Wood	BBC has no opinion
17	Level Crossing – Pony	BBC has no opinion
18	Level Crossing – Woburn Sands	BBC has no opinion
19	Level Crossing – Aspley Guise	BBC has no opinion
20	Level Crossing – Husborne Crawley	BBC has no opinion
21	Level Crossing – Lidlington	BBC has no opinion
22	Level Crossing – Millbrook	BBC has no opinion

23. Level Crossing – Green Lane (TL 014 422) Public Highway

BBC supports Option 1 as the preferred approach. We would note that the junction arrangements in this area will require particular attention to be paid to the known movements of abnormal loads and the Traffic Management Plans for nearby developments.

24. Level Crossing – Wootton Broadmead (TL 020 435) Public Highway

At this stage BBC has not identified a preferred option, although we support the replacement of the crossing with a bridge.

However, in reaching a decision, EWR must give proper regard to the use of the station by students from Kimberley College.

25. Level Crossing – Wootton Village (024 443) Public Footpath

Because of the potential for future development of the land in the area of this footpath, BBC believes that EWR should future proof the crossing by constructing a bridge with ramps.

This section of the Consultation Technical Report also mentions the proposal to close the existing Stewartby Brickworks crossing at TL016 425. Because of the importance of this site for redevelopment, it is our view that plans should be included to retain a crossing of the railway.

26. Level Crossing – Kempston Hardwick TL 026 448) Public Highway

At this stage BBC has not identified a preferred option.

27. Level Crossing – Woburn Rd (TL 034 464) Public Footpath

We have no objection to Connectivity Option 2 which shortens the length of diversion required for Kempston Footpath No 1.

28. Level Crossing - Bedford Carriage Sidings (TL 043 494)

BBC accepts that further work is required to determine revised access proposals to these sidings dependent upon wider route access decisions.

29. Preference for proposed options for Marston Vale Line

BBC would, prefer that the chosen option would be the one which achieved the quickest delivery of the new railway. Option 2 appears to best-placed to achieve this, followed by Option 3 and Option 1.

However, there is a lack of detail available and further information is required to allow a definite decision to be reached. This includes:

- Estimates of the time taken to deliver under each option
- What would the mitigation be for customers in respect of replacement transport for the duration of the works
- How the disruption from construction works would be managed

The works will require timely two-way engagement between EWR and stakeholders in the community. There is an opportunity to win or lose advocates in how EWR approaches this work.

We would expect this stage of work to be completed before the Bedford – Cambridge connection, and would want to see a service from Oxford to Bedford to be implemented at the earliest opportunity.

30. Why to Q 29

BBC recognises the importance in the potential of transformation of this aspect of the scheme. The Council supports the approach that will yield the best economic outcome in the shortest duration. Furthermore, the Council recognise that all of the options will create some disruption, especially to passengers, and contingency plans need to be developed to minimise individual disruption.

31. Preference for the proposed options for Fenny Stratford additional track

BBC supports the proposal for the provision of an additional track at Fenny Stratford. BBC has no preference in respect to Option 1 or 2.

32. Why to Q31

BBC has no preference in respect to Option 1 or Option 2.

33. Section C Bedford – Bedford Area

(a) Bedford St Johns and the areas around it.

A relocated St Johns station has the potential to open up a significant portion of the south Bedford residential area to a regular and speedy rail service. This will have the knock on benefit of easing congestion and parking capacity at Bedford Midland.

A new St Johns station situated close to the hospital (Option 1 – Hitchin alignment) will improve sustainable travel options to the hospital, and open up a 'health-link' to Addenbrooke's hospital in Cambridge.

This option will help to stimulate economic regeneration of land in the immediate vicinity of the station, thus helping to bring jobs and prosperity to the immediate area. Option 2, a station further south, is not congruent with these aims.

Option 1 will allow much better linkages to the bus network than option 2, supporting sustainable travel options.

We are keen to explore access arrangements to the station platforms, and whether these might include a Cauldwell St entrance.

(b) Bedford Midland station and the area around it.

The opportunities presented by an EWR stimulated redevelopment of Bedford station is the biggest single opportunity in the redevelopment of this area of Bedford since the station was rebuilt in 1978, and perhaps since the railway came to Bedford in 1859.

BBC actively supports the approach of EWR in respect to the opportunities that are inherent with a carefully designed and integrated masterplan for the station and the surrounding hinterland. The opportunities to maximise the economic, social, cultural, and architectural benefits will only be fully realised if EWR works closely with BBC and integrates station development with the emerging Bedford local planning processes.

As well as the introduction of a western access into Queens Park, it will be important to construct a further entrance to the redeveloped station; either to allow access on foot from the Bromham Road direction if the northern concept is chosen; or at the south end of the new station if the southern concept progresses. Passengers should not be required to walk past the train they wish to catch in order to enter the station and then retrace their steps.

BBC welcomes the proposals of EWR and is looking forward to working closely with EWR to maximise the collective opportunities and to minimise any dis-benefits associated with the scheme.

(c) North of Bromham road.

BBC wants to see the four-track option north of Bromham Road bridge in Bedford. This option will provide the necessary railway infrastructure for EWR without requiring the compulsory purchase of numerous houses alongside the route.

BBC believes that it is not necessary to construct additional tracks – a plan that would necessitate substantial demolition of private property. The use of the existing slow lines between Bromham Road and the junction for Cambridge would in our view, and that of Network Rail, be achievable within the constraints of existing traffic on the route.

The Slow Lines north of Bedford station are only used on a regular basis by freight trains, of which there are typically one or two per hour each way. Southbound East Midlands Railway trains calling at Bedford also use part of the slow line from Bedford North Junction to Bedford. This happens twice an hour. The simplified track diagram below shows that conflicts between eastbound EWR trains and southbound trains on the Midland Main Line could occur at points A, B and C.

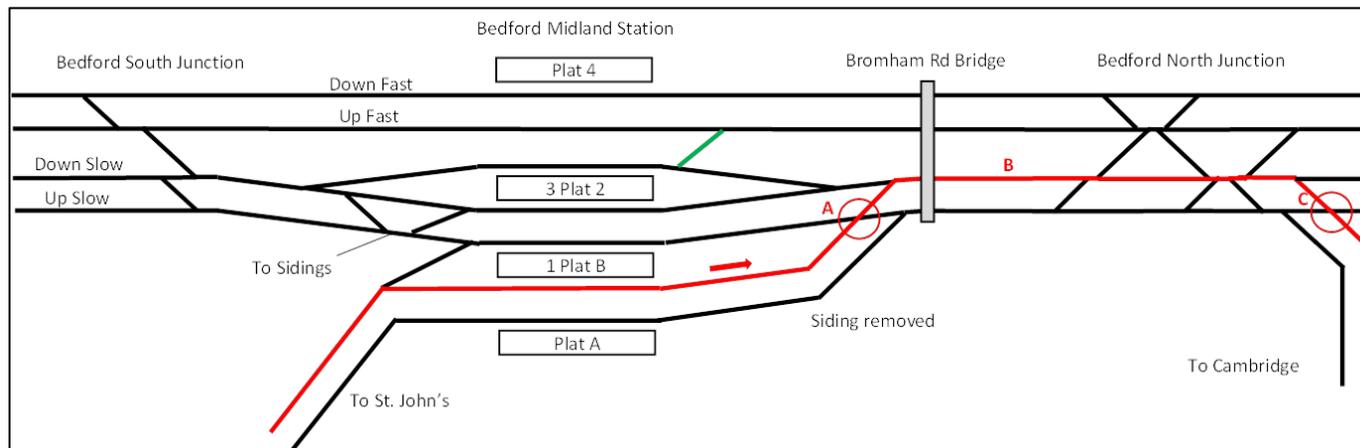


Figure 6: a 4-track solution for EWR.

As suggested in paragraph 8.5.15 of the EWR Consultation Technical Report, the installation of a new crossover between the 'up fast' line and Platform 3, south of Bedford North Junction (shown green on the diagram above), would remove conflicts between the other passenger services and EWR services (removing opposite direction conflicts across track shown at position B).

We calculate that such an intervention would mean that, assuming two freight trains per hour each way using the slow lines on the Midland Main Line, line availability for eastbound EWR trains would be 40 minutes per hour.

This, as Network Rail found, should be more than sufficient to cater not only for the currently proposed four EWR services per hour, but also for any future aspiration of six trains per hour.

The Consultation Technical Report also notes (paragraph 8.6.65) that the installation of this crossover would necessitate a reduction in line speed on the 'up fast' from 125 mph to 110 mph through this point (presumably because of track geometry). This speed reduction is a small price to pay, perhaps costing half a minute in the journey time of non-stop southbound trains, for the sake of the demolition of houses in the Poets Area, with all the associated disruption and misery caused to the residents affected.

The introduction of this crossover introduces positive benefits whereby southbound passenger trains can call at the station more easily (this applies to both expresses from the East Midlands and the Corby electric services to London). In such cases the crossover would reduce the time penalty associated with calling at Bedford. According to East Midlands Railway, the time penalty of up to 7 minutes is one of the reasons why they are currently reluctant for trains to / from Nottingham to call at the station.

The provision of a platform on the 'up fast' line as part of the station reconstruction would also remove conflicts with EWR services, and reduce the time penalty from calling at the station.

If, despite this, EWR were to reject the four track option and press on with six tracks, then BBC strongly believes that the land requirement necessary for the creation of two more tracks is less than the provision within the Consultation Document. The Consultation Document suggests that 19 metres of additional land is required for the addition of two new tracks. The Council believes that a maximum of 11.5 metres would be required in accordance with current railway standards.

- Network Rail Standard NR/L3/TRK/2049/mod01 A.6.4 part 2 (p31) describes track intervals of 1970mm between track pairs, and 3188mm between pairs of tracks. With a 3500mm allowance to boundary fence line, that results in a total width of just over 11.5 metres. We recognise that this 11.5 metres arrangement may not give EWR the flexibility to gain access to their tracks for inspection and maintenance without interface with Network Rail. However, we would suggest that a permanent fence line between the two railways would assist with this, leaving room for a safe access position between each railway's nearest rails and the fence. This arrangement would not need to significantly increase the overall EWR corridor width beyond the 11.5m suggested.
- It is worth noting that the 19 metres suggested is approximately the same as the full width of the current overhead line portals on the existing Midland Main Line covering four tracks.

The Consultation document states that some of this land is needed for construction. Demolishing residential properties purely to facilitate temporary construction activities is unacceptable.

The length of the pinch point of affected residential properties is approximately 320 metres, so it should be possible to position most lineside equipment either side of that section, to reduce more general impact. Where such equipment cannot be relocated, we would expect EWR to limit the impact through limited and restricted use of some garden space rather than complete properties.

The 4 metre additional construction space beyond the fence line is unnecessary. Suitable access can be managed through the staging of the works rather than permanently taking land and property for what would be only a temporary requirement. Network Rail, for example, work within the railway boundary when they undertake substantial renewals work.

The EWR identification of all houses within any terraced housing group as being 'at risk' seems unnecessarily alarmist. We would expect that it would be far cheaper to strengthen and appropriately seal the outer faces of what are currently mid-terraced properties than compulsory purchase whole terraces.

The Council, therefore, insists that in the event that six tracks were to be found necessary in the view of EWR, further work is undertaken to verify in detail only the minimum amount of land which is absolutely needed.

It is also imperative that the residents in the area are afforded the optimal level of sound insulation possible. We believe that is essential that, in this instance, a wall, not a fence, should be constructed to a jointly agreed specification to protect the residents.

Furthermore, in the event that six-tracks are constructed and a four metre 'buffer' between the permanent boundary and a temporary boundary is acquired for the construction period, that prior to the opening of the railway mature trees are planted in order to enhance the visual amenity and to provide further sound proofing.

34. Rank Preference for St Johns

BBC wholeheartedly supports Option 1, siting the station between the Cauldwell Street and Ampthill Road bridges with the potential for secondary access to these roads. We reject Option 2.

35. Why to Q 34

Option 1 provides sustainable transport connectivity to the hospital, creates a 'health-link' to Addenbrooke's Hospital and helps to unlock future development in the vicinity which will improve the economy of the town.

36. What do you think is important to consider when developing the preferred option for Bedford Midland Station

A carefully crafted Bedford Midland Station design offers, for example, the potential to:

- integrate the existing north-south services with the new by careful design and a holistic railway approach to customer delivery, making connectivity at Bedford simple and easy;
- create an iconic architectural statement in station and hinterland design which describes the future ambition of both the railway companies and the town;
- provide a plaza or entrance to the town, integrating with redevelopment opportunities for Bedford;
- serve the station and the town better by upgrading the Ford End Road bridge for stronger east-west connectivity to meet the needs and demand generated by the station;
- by repurposing land and making more effective use of real estate to creating a centrepiece for urban regeneration – establishing a new Quarter for the town
- provide adequate car parking
- deliver top-class interchange facilities for those leaving and arriving by bike, bus or taxi

In terms of station design to maximise operational and customer service benefits, BBC considers the following to be important aspects for the redevelopment of Bedford Midland Station:

- A high-quality station design – appropriate for the 21st Century.
- A platform is included on the Up-Fast line to enable better connectivity between EWR and the East Midlands, and to potentially unlock a post-HS2 Bedford to Leeds service.
- All aspects of the station are easily accessible in a step-free manner, including a western entrance serving Queen's Park and cycle access from Bromham Road.
- With the main station entrance moving to the Midland Road area, secondary entrances should be constructed to the north or south of the site depending on the concept that is chosen.

- Design of tracks and platforms includes capacity for future growth (not just EWR)
- That the operational hinterland of sidings etc. is developed to facilitate the optimum operation of EWR, East Midlands Railways, Thameslink and the station.
- That the station complex helps to enable, and integrates with, the economic development and regeneration of the area.

37. What do you think is important when developing option for north of Bromham Road Bridge

Please see our detailed response to Q33(c) above.

38. Section D Clapham Green to Eversdens – preference

Although this question relates to the proposed route through Bedfordshire and Cambridgeshire, our feedback is based purely on the route options and their impacts within the Bedford Borough area

The EWR Consultation Document includes five possible alignments split into North and South options which do not diverge until they approach the A1:

- North Alignments:
 - 1 (Dark Blue) EWR's 'Emerging Preference';
 - 2 (Red); and
 - 6 (Light Blue)
- South Alignments:
 - 8 (Yellow); and
 - 9 (Purple) EWR's 'Emerging Preference'

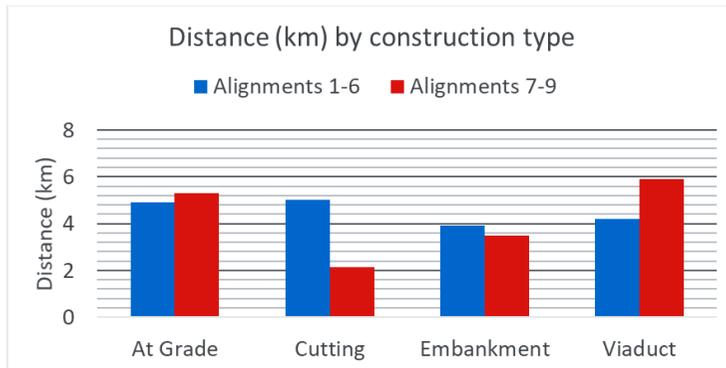
Consideration of North and South Routes

In our analysis we have utilised the mapping available from EWR to estimate the route geography. Based upon this geography an assessment has been made of the likely location of cuttings, embankments and viaducts. An assessment was then made of the impact of the infrastructure of the northern and southern routes.

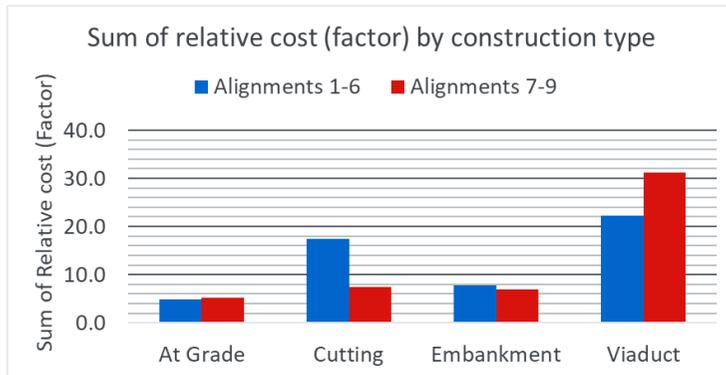
Separate pieces of work have examined the impact of the routes on the historic environment – from both an archaeology and a conservation stand point – and in relation to the Council’s Minerals and Waste Plan.

Infrastructure Costs

We analysed the comparative requirement for track infrastructure engineering as: ‘at grade’; cutting; embankment or viaduct. Our assessment took no account of the cost implications of managing the gas pipelines which cross the route corridors. We would need to be assured that the costs of crossing these pipelines are understood in coming to a decision on alignments.



Graph 7: Comparison between Northern and Southern alignments by distance by construction type.



Graph 8: Comparison between Northern (alignment 1-6) and Southern (alignment 7-9) routes by relative cost construction type.

It can be seen from Graph 7 that the primary difference is that the northern routes (blue) require more than double the distance of cuttings and the southern routes (red) requires around a third more distance on viaducts. In terms of relative price comparison the increased cost of cuttings on the northern routes is balanced by the increased cost of viaducts on the southern route. The conclusions are that there appears to be little cost difference between the routes as they run within Bedford Borough.

Looking at the route as a whole, the figures supplied by EWR at Table 9.2 of the Technical Report suggest that the Northern routes are all cheaper than routes 8 or 9.

Horizontal Alignment

The southern route passes very close to the Brickhill Country Park, which has been recently planted to become a woodland for the enjoyment of future generations. The proximity of the southern route to this is likely to result in greater noise impact than the northern option.

Whilst the northern route passes very close to Wilden, the southern has significantly more viaduct and embankment on the approach to the ECML, passing between Great Barford and Roxton villages and boxing Roxton in between the A421, A1 and EWR. The southern route is therefore likely to have a greater visual and noise impact than the northern route on residential areas.

Vertical Alignment

The Northern routes rise for a long time in cutting north of Clapham because the ground gradient is steeper than the desirable track gradient. The central section is then largely at grade before rising on the approach to the East Coast Main Line on embankment and viaducts to cross the A1, River Great Ouse and the London – Edinburgh railway.

The Southern routes require less cutting at the western end, but more embankments and viaducts in the central and eastern sections due in part to the need to additionally cross the A421.

Noise

The noise impact of the Northern routes is asserted by EWR in Table 9.3 to be less than that from the Southern routes, with each of routes 1, 2 and 6 showing a minor improvement on routes 8 and 9.

- On the Northern route, the consultation document states that residual noise impacts would be limited to residential properties in Graze Hill and Sunderland Hill, Ravensden; Colesden and Chawston.
- We believe that there will also be an impact on receptors in Wilden.
- On the Southern route, the consultation document states that residual noise impacts would be limited to residential properties in Ravensden Church End and Woodend Lane and Bedford Road, Roxton.
- We believe that the raised section of the Southern routes over the A421, A1, River Great Ouse and East Coast Main Line will have an impact on receptors in Great Barford and Roxton due to extended noise transmission.

Recognising that electric trains are likely to be quieter than diesel traction, the Council wants to see full electrification of the route from day one – including end-to-end electrification for all significant freight flows.

Freight

The Council appreciates that EWR is planning to maintain capacity for existing freight movements – nine trains per day at the Cambridge end of the line and five on the Marston Vale as set out in Figure 3.2 of the Technical Report – but wants to understand in more detail the likely freight flows in future years.

Natural Environment

We are disappointed that EWR has not yet gone further than producing high-level environmental appraisals of the potential routes, and that the assessment of environmental factors is thus necessarily limited at this time.

However, reference to Table 9.3 of the Technical Report shows that the Northern routes all show a major improvement on route 8, and some improvement on route 9.

Historic Environment

The Historic Environment Team has assessed the impacts of the proposed route alignments using the information currently available, including the potential impacts to Scheduled Monuments, listed buildings and conservation areas.

These assessments are based solely on the route horizontal alignment drawings provided by EWR. For this reason, the assessments are not comprehensive or final, and may change as more information becomes available.

The National Planning Policy Framework provides guidance on when a planning proposal might cause harm to the significance of a heritage asset. The level of 'harm' to a heritage asset is categorised into three areas:

- Substantial Harm;
- Less Than Substantial Harm; and
- No Harm

Within the "less than substantial harm" category, three further sub-divisions are made:

- High;
- Moderate; and
- Minor

The tables below summarises the findings of the Historic Environment Team assessments using those categorisations.

The Northern route is likely to harm more Listed Buildings than the southern route

The Southern route will result in a higher impact on Scheduled Monuments – those at Palaceyard Wood, Birchfield Farm and Mowsbury Hillfort – and Conservation Areas – those in Roxton and Great Barford Hill.

	Sub-division within the “Less than Substantial Harm” category					
	Minor		Moderate		High	
	North	South	North	South	North	South
Scheduled Monuments	5	2	-	3	-	-
Listed Buildings – Grade I	2	2	-	-	-	-
Listed Buildings – Grade II*	1	-	-	-	-	-
Listed Buildings – Grade II	18	14	12	3	5	5
Conservation Areas	-	-	-	-	-	2

Table 9: Impacts on the Historic Environment

Minerals and Waste

Route Alignment options 8 and 9 run through allocated Strategic Mineral Sites in the Adopted Minerals & Waste Local Plan near Roxton. This could lead to the sterilisation of these sites which will mean that they will need to be replaced by identifying sites elsewhere in the plan area.

Interchange with the East Coast Main Line (ECML)

The Council is currently preparing a new Local Plan, and the government is preparing a Spatial Strategy for the Oxford – Cambridge Arc; including a potential new Development Corporation centred on the EWR / ECML interchange station. Whilst decisions have not been made on growth allocations as a result of either work stream, we believe that the St Neots South Options are likely to offer the best focus for growth.

The council strongly supports the added benefits of ensuring an ECML interchange station is built, and not just an EWR station.

Access to the East Coast Main Line station

Whichever station is chosen from the four East Coast Main Line interchange options, we will require excellent links from new and existing settlements to encourage sustainable travel. For example, the bridges carrying EWR over the A1 and River Great Ouse must contain provision for cyclists and walkers to travel safely alongside the railway.

Additionally, access from the trunk road network (A1, A421 and A428) to the new station must be easy, safe and direct to encourage its use as a “parkway” access point to the rail network, thus encouraging drivers to shift modes.

Potential Mitigation

Northern Routes:

The proposed Northern route options pass very close to the village of Wilden. If this route were chosen, we would propose that the route is altered locally to run further away from the village to the north of the currently planned alignment. Such an alteration would reduce the disturbance and environmental impact to residents of Wilden and avoid the demolition of a residential property.

We would also wish to see additions to the “Bedford Green Wheel” of cycle tracks around the town, which could be extended to run alongside the new railway, with “spokes” running into the town at convenient points such as through an extended Brickhill Country Park.

Southern Routes:

If the Southern route were to be chosen, BBC would like Brickhill Country Park to be extended up to the line of the railway; and measures put in place to ensure that there is no impact on Great and Little Early Groves, and on the setting of Mowsbury Hill Fort.

We would also wish to see additions to the “Bedford Green Wheel” of cycle tracks around the town, which could be extended to run alongside the new railway, with “spokes” running into the town at convenient points.

Summary of route analysis

The Council has considered the likely impacts of the Northern and Southern routes from a variety of perspectives and found:

- There is no appreciable difference in cost between routes within the Borough, but overall the Northern routes are cheaper than the Southern
- The Northern and Southern routes are very similar in terms of journey time. Routes 8 and 6 are virtually identical.
- There is a greater noise and visual impact on settlements from the Southern route
- There is a greater impact on Scheduled Monuments and Conservation Areas from the Southern route
- There is a greater impact on grade II Listed Buildings from Northern route
- There is likely to be a need to reallocate Strategic Mineral Sites to accommodate the Southern route

Route Preference

On the basis of the analysis above, the Council prefers the Northern routes to the Southern routes.

Given EWR's emerging preference for a route via Camborne North, we would therefore support **Alignment 1**.

However, we believe that **Alignment 6** offers advantages if a route via Camborne South was adopted.

39. Why Q38 and any other comments?

Our answer to Question 38 sets out the position of the Council with regard to route choice selection.

40 Section E Harlton to Houxton BBC has no opinion

41 Section F Shelfords to Cambridge BBC has no opinion

The Proposed Need to Sell Scheme Feedback

1. Is the proposed Need to Sell Scheme the right way to support those whose land and property is affected by East West Rail or are there other forms of help we should offer?

It is essential that compensation is to be offered to those whose property is affected by EWR's proposals.

However, we do not believe that the proposals go far enough; nor are they available in a timely manner.

One of the most pressing and immediate issues concerns the residents of the properties which are now blighted by the proposal to increase the number of railway tracks through the town, and construct new tracks across the wider Borough.

The time when EWR propose to introduce the 'Need to Sell Scheme' is when the preferred route alignment for the railway is announced. Yet, residents in houses within Bedford that may be compulsorily purchased are already suffering blight. No-one will purchase a home that is to be compulsorily purchased.

BBC strongly recommends that the 'Need to Sell Scheme' (or some similar mechanism) is made immediately available to all land-owners where some or all of their property is potentially to be compulsorily purchased. Furthermore, there should be no requirement for them to demonstrate that they have been unable to sell.

The level of compensation payable under this scheme should be at least match the level of payments offered by HS2, which are understood to be the market value plus 10% plus the reimbursement of moving costs.

Residents who do not own the property they are living in must also be properly compensated for the loss of their home, to recognise that the disruption and detriment to their lives is not just a narrowly defined financial loss.

2. Do you agree with the proposed criteria and parameters for the Need to Sell Scheme as detailed in the document?
 - a. Where the Scheme should apply?

The scheme should apply throughout the route, and to any property where any land is impacted by proposals for the construction or operation of EWR.

b. Who should be eligible for the Scheme?

It is not clear why non-residential owners are not proposed to be eligible for the scheme. We believe that they should also be eligible.

c. When the Scheme should start and finish?

The scheme should start immediately and applications should be accepted up to one year after construction of the railway is completed and longer if exceptional circumstances can be demonstrated (e.g. significant ill health)

d. What applicants should be required to demonstrate in order to qualify for the Scheme?

Applicants should not need to demonstrate a “need to sell” or that they have been unable to sell.

e. How applications are proposed to be dealt with?

The level of compensation payable under this scheme should at least match the level of payments offered by HS2, which are understood to be the market value, plus the reimbursement of moving costs. It is unreasonable to ask owners to pay their own surveyor’s costs, legal fees and moving expenses when they would not otherwise have been intending to sell.