



HOUSE OF COMMONS

LONDON SW1A 0AA

24 January 2025

Re: East West Rail Non-Statutory Consultation

Dear Sir/Madam,

This latest consultation from East West Rail continues to be dogged by this project's "original sin": the selection of a route from Bedford to Cambridge which has inflated costs and which will cause irreparable damage to the environment of North Bedfordshire.

As my response to this consultation demonstrates, the folly of this route selection has only become more apparent since the last time East West Rail consulted local residents.

East West Rail has still not decided a route at the eastern edge of Bedfordshire creating unnecessary tension for my constituents in the parishes of Roxton, Tempsford and Chawston, Colesden and Wyboston;

East West Rail has not kept pace with the development plans for Bedford Hospital which is used by many of my constituents, and the company has created lots of confusion about access and parking at the hospital;

East West Rail appears ignorant of the increased risks of flooding – especially in Clapham – and continues with its blight heavy proposals for crossing the A6 and carving up hill toward Ravensden ignoring local calls for a tunnel alternative to be explored;

East West Rail's land grab for construction and its lackadaisical approach to the disruption that its plans will cause to those in and around Bedford mean that more and more will be asked of residents for very little in return; and

East West Rail's route choice now looks even more obtuse given the imminent decision on Universal Studios Theme Park to the South of Bedford.

I have written this week to the Secretary of State for Transport to highlight the apparent conflict with the Chancellor's commitment to her fiscal rules and "ruthless" approach to public spending by pointing out that East West Rail's business case loses £3bn of taxpayer's money and gives a return of only 30 pence on the pound.

I hope that the East West Rail team will review all submissions and respond carefully to each and everyone of the points made and questions asked. The project is at a crucial stage. There is still time for them to fix their errors, save taxpayer's money and achieve some, if not all, of their objectives.

Yours sincerely

A handwritten signature in black ink that reads "Richard Fuller".

Richard Fuller CBE MP

East West 2024 Consultation
Submission by Richard Fuller CBE MP for North Bedfordshire

Impact on Bedford Hospital

The impact on access to, and operations of, Bedford Hospital is emerging as one of the more concerning aspects of the development of East West Rail.

The company has not provided sufficient details or clarity on crucial aspects of their proposal that will have a major impact on staff, patients, and the overall quality of health provision upon which many of my constituents rely.

In addition to the extended period of disruption, noise and air pollution caused by the construction phase, there are unanswered questions about the provision of hospital parking thereafter, about the impact on hospital finances from future ownership arrangements and about the impact of the proposed encroachment onto NHS land already earmarked for essential service infrastructure upgrades at the hospital.

Communication between EWR and stakeholders has been severely wanting and created more uncertainty.

East West Rail's rationale for the station at Bedford hospital was based on supposed advantages to staff, patients and visitors. Yet neither Milton Keynes nor Luton hospitals, near neighbours of Bedford, have such proximity and yet are being encouraged to expand.

In summary what East West Rail has positioned as a major selling point – relocation of St John's station – is in fact instead creating additional problems and incurring extra costs for a project that is already heavily loss making.

Car Parking:

Significant car parking will be lost at Bedford Hospital to make space for the relocated Bedford St John's station.

Whilst the planned 9-storey carpark will ultimately have the potential to replace much of this lost parking capacity, nowhere in the consultation document does it state whether a significant portion of this multistorey carpark will be ring-fenced for hospital users, or whether it could be used entirely by rail users.

There should not be a situation where East West Rail can construct a replacement car park without meeting the full needs of the hospital for parking spaces based on their long-term plans, as well as for users of East West Rail.

East West Rail should meet urgently with Bedfordshire Hospitals Trust and agree a common plan for future car parking. This plan should be shared for public comment.

This plan should also include an agreed timeframe for construction and the number and location of available parking spaces on a month-by-month basis during construction.

Hospital Finances:

It has been reported, although there is no mention of this in the consultation document, that funding for this carpark will cost in the region of £35 million.

My understanding is that the current plan is that the East West Rail Company will borrow the required funds but subsequently require the hospital to pay off the carpark loan.

This is an unacceptable financial arrangement. East West Rail should fully incorporate in their costs the construction of the car park with the requisite number of spaces and then gift ownership and the future revenue streams from the spaces allocated for hospital use.

In the absence of an arrangement along these lines, I fear that East West Rail will inadvertently create significant jeopardy to the financial security of Bedford Hospital.

East West Rail must create a clear arrangement for managing the costs of constructing and maintaining the proposed car park and state clearly that there will be no financial burden on Bedford Hospital.

Further, East West Rail should agree to “gift” to Bedford Hospital ownership and the future revenue streams associated with the spaces at the new car park that are allocated for hospital use.

Encroachment onto NHS Land:

The multistorey carpark featured in the consultation document is positioned on hospital land that has already been earmarked for the construction of new operating theatres which are important to the development of the hospital services and ultimately, to the health outcomes of local residents.

My understanding is that this proposed ‘annexation’ of additional hospital land came completely out of the blue just prior to the release of the consultation document. Such lack of coordination is not acceptable.

Nor is this the only example. There appears to be an unwillingness, or inability for East West Rail to interact in a coordinated way with other major local projects. There have been numerous iterations of East West Rail’s plans in the proximity to the Black Cat roundabout and the final routing is still not settled. The proposed Universal Studios Theme Park will create new demands on the Milton Keynes to Bedford section of East West Rail yet there is no sign yet that East West Rail has factored into its plans the urgency of meeting those demands on the timescale required by Universal Studios.

East West Rail should agree with Bedford Hospitals Trust which land can be made available during any construction phase and demonstrate that this will have no impact on the capital plans of the hospital itself.

Impact on Transport into and Around Bedford

For over 12 months from June 2019, Bromham road bridge was closed for its height to be raised to accommodate new overhead power lines on the railway below.

This closure caused significant traffic congestion in and around the town as the local transport infrastructure simply doesn’t have the capacity to accommodate the scale of diversions that such a closure entails.

The proposed EWR development works in section 10 of the consultation document detail at least 6-7 major projects, each and every one of which can reasonably be expected to result in disruption akin to the Bromham bridge closure and most likely for a substantially longer time period.

Notwithstanding the impact this will have on Bedford residents, for those who live in the villages in my constituency of North Bedfordshire the upheaval will be considerable.

Many rely on easy access to the town for dropping their children off at local schools, or to access GPs based in the town, to take advantage of Bedford’s retail and hospitality sectors, and of course the railway station. These are not a set of ‘nice to have’ options but an essential part of daily life.

The EWR consultation document makes no reference to this disruption to people's lives and there seems to have been no thought as to how this will be mitigated. A reminder of the sheer scale of these developments:

- Relocating Bedford St Johns station.
- Building a new two-track railway to the north of Sandhurst Road.
- Moving Jowett sidings to Cauldwell Walk.
- Rebuilding Bedford Mainline station building including the creation of a new station plaza.
- Construction of an additional two tracks alongside the Midland Main Line north of Bedford Mainline station.
- Construction of a new 1.1km long viaduct over the River Great Ouse and Paula Radcliffe Way.

Each of these are significant individual projects in their own right, requiring road and rail realignments, demolition of properties and the colossal movement of building materials into, and the removal of surplus debris from, those areas.

It may be feasible that these projects could be conducted simultaneously but that would likely create complete gridlock in the town. Alternatively, if the operations were to run consecutively, then the residents of, and visitors to Bedford would have to endure many, many years of disruption.

Taken together these will cascade into an extended, shifting, frustrating and economically damaging impact on the local economy.

East West Rail should publish an outline plan for the sequencing, timing and assessed impacts on the area from each of their construction projects.

It should be remembered that all this disruption will be caused because of the decision by the Council under former Mayor Dave Hodgson to encourage a routing of East West Rail through the centre of the town of Bedford rather than via a "Bedford Parkway" station at Wixams.

Given the highly questionable benefits of rail travel benefitting the hospital, the proposal for Universal Studios south of Bedford, and the sheer scale of costs, demolitions and disruption caused by trying to route the railway through an already congested town, it is high time that the government compel East West rail to abandon this ridiculous routing decision.

Significant Impact on North Bedfordshire Communities

The proposed route of EWR through North Bedfordshire traverses some of the most unspoilt and beautiful countryside in the county. This is a quiet and peaceful area and many of those who have chosen to live there have done so to enjoy the tranquillity of living in a natural environment.

East West Rail will irrevocably change the nature of this countryside and village way of life as well as creating irreversible harm to our local environment.

Visual Scarring of North Bedfordshire:

The extent of cuttings, embankments and viaducts across North Bedfordshire will alter the visual appearance and distinctly rural character of the area.

For example, the 1.1km long viaduct over the flood plain north of Bedford will be up to 18m high and a series of embankments will reach heights of 10m.

No manner of planting or mitigation will be possible to obscure these fundamental changes to the landscape.

In addition to the structures that will be constructed to carry the railway itself, significant infrastructure, such as new bridges will have to be built to redirect local roads, footpaths and bridleways along the route.

Whilst it is to be welcomed that EWR is seeking to maintain such transport and leisure routes, these new structures, such as the diverted Colesden Road at 7 metres above ground level, also serve to permanently change the visual nature of the surrounding countryside.

As more than one Parish Council has commented, the public rights of way and footpaths that EWR are seeking to preserve through diversions and bridges, are used by people to enjoy tranquil and clean immersion in the countryside, free of the noise and fumes associated with urban areas. These rights of way will have far less appeal when they involve walking in, over and around a busy railway.

On other, non-Bedfordshire sections of the EWR route, the company has committed to using tunnels in response to public feedback and to preserve local visual aspects. Clapham Parish Council has specifically requested such mitigation in the form of a tunnel in the section of the route that directly affects them. EWR should explore this alternative and feedback whether it is a viable alternative and if not, why not?

Effect on Biodiversity:

The EWR railway corridor will create significant scarring across the open countryside of its route through North Bedfordshire and will create discontinuous habitats.

Wildlife will be significantly affected both by the disruption of the construction phase and the subsequent changes to their habitats and ability to traverse ancient pathways. It could be years, if ever, for the impact of these construction on the populations of wildlife including deer, foxes and bats to return to normal.

It is essential that wildlife corridors and channels are created alongside the timely and commensurate replacement of important flora that will be lost during construction.

This will maximise the chances that local wildlife returns more quickly to the affected areas.

It must also be a prerequisite that the 10% biodiversity net gain that all nationally significant infrastructure projects must now deliver is focussed on the areas where it may be lost.

It is not acceptable that biodiversity loss in North Bedfordshire is made up or credited through mitigation actions elsewhere.

The environmental impact assessment reports of major projects can be highly technical and hard to access documents.

East West Rail should publish a short document that details its assessment of the environmental impact of the proposed railway specifically on North Bedfordshire, including demonstrating that their plans will lead to a 10% biodiversity gain within North Bedfordshire itself and how this is assessed.

Road Congestion and Damage:

The majority of roads along the proposed EWR route are not suitable for the kind of heavy machinery that will be commonplace during the construction phase.

The size and weight of the heavy goods vehicles involved could cause long-lasting damage to the road surfaces which potentially create new hazards and risks of vehicular damage to local residents forced to use damaged roads before repairs are able to be completed.

The consultation document indicates the construction of routes alongside the railway corridor for use by construction vehicles, however it is clear that given the topography of the route, and the extent of varying cuttings, embankments, viaducts and so on, such routes will not be possible along the entirety of the railway.

It is also noteworthy that such construction routes, in the same vein as the construction compounds, represent a further 'land grab' of agricultural or amenity land, that greatly extends the footprint of EWR beyond the actual railway tracks.

Due to the nature of the HGVs that will use them, and the materials that will be stored on them, these sections of land will take considerable time to revert to their original uses after construction has been completed.

Continuing the theme of poorly thought-out transport implications, Tempsford Parish Council have raised the important question of access to the planned new station. They have pointed out that the current plan for access using existing minor roads makes no sense with the new A421 running just metres away from the new station. There must be a very strong argument for there a dedicated junction on the new road constructed to handle all the traffic for the new station and its car park.

East West Rail should provide more clarity on proposed dedicated construction traffic corridors. For example, how much of the section of railway between Bedford and St Neots will have a dedicated transport corridor alongside the railway and therefore alleviating the need for HGVs and other construction traffic using the local road network?

East West Rail should also clarify where on the route are EWR construction corridors not expected to be viable and what assessment been done of the suitability of the local roads in respect of: their ability to withstand the size and weight of EWR construction vehicles; and the impact on existing road users and the likelihood of the need for, and frequency of road closures and diversions

East West Rail should also provide guidance on how it will compensate for damage caused to local roads and any damage caused to local residents' vehicles either directly through contact with EWR traffic or through driving on roads that have been adversely affected by EWR traffic use.

EWR should re-look at vehicular access to the planned new station at Tempsford and explore the feasibility of a dedicated junction off the A421.

Noise Mitigation:

Of major concern to residents along the proposed route is the noise pollution that will endure long after the construction phase has ended. It is widely accepted that diesel freight transport is expected to be significant with very heavy rolling stock causing noise at generally antisocial times of day. To mitigate noise levels there have been widespread calls for embankments in place of viaducts, for any essential viaducts to be constructed of concrete to minimise vibrations and for

East West Rail should commit to embankments where possible rather than viaducts, for viaducts to be constructed of concrete and for tracks to be of continuous welded design.

Excessive Land Appropriation:

The maps set out in the consultation document have raised significant alarm in many areas of my constituency as the sheer scale of the land areas required both during construction, but also following completion are laid bare.

It is now apparent that the total amount of land required will be substantially greater than the originally envisaged footprint. With at least five construction compounds along the North Bedfordshire section of the route, together with the passing loops planned in the Colesden area, this represents a significant land grab and although some will eventually be returned, it will take years, if ever, for them to return to their natural state.

East West Rail should continue its efforts to limit additional land use and make explicit statements about its intentions for the subsequent use of any land purchased for the construction phase but not subsequently needed for railway operations.

Flooding:

Whilst the consultation document references flood assessments that will be carried out, this has not allayed fears that the construction of the railway will exacerbate existing issues with flooding.

There are substantial concerns about the proposed viaduct over the flood plain to the South of Clapham. This viaduct traverses an area known to flood extensively every year and residents of Clapham have themselves been subject to repeat flooding in recent years.

There is strong concern that whilst the footings for the proposed viaduct are unlikely to interfere directly with the water flow from the North, the free flow of the river will be interrupted by the footings and their foundations and thus will have an adverse impact on the water table, and the flood plain.

Clapham Parish Council state that *“it is likely that construction of the embankment and the cutting may disturb any aquifers and focus run off to an area north of the Sainsbury Roundabout increasing the flood area”*.

It is also well known that flooding is increasingly prevalent in and around Tempsford and again, there are major concerns locally that the disruption to subterranean waterways caused by EWR infrastructure. In the particular case of Tempsford these concerns are amplified by the arguments that in order to pay for the extensive losses racked up by the East West Rail project, their rural area will be required to transform to a large town or even more substantial urban area.

East West Rail should liaise with Parish Councils along the proposed route whose areas are already subject to significant risk of flooding and jointly establish clear parameters for flood risk assessments in and around the route.

East West Rail should publish the results of these assessments and commit to holding local meetings with residents to explain the findings and answer any questions.