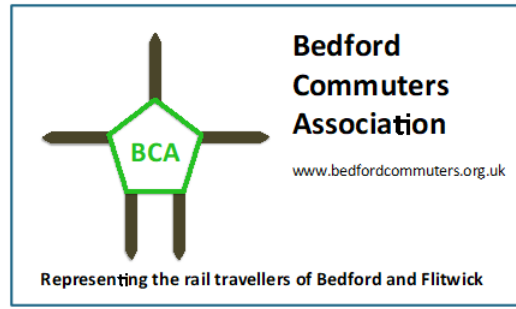




EWR Co 2024-2025 Consultation
Response from the Bedford Commuters Association (BCA)

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Please see our response to the consultation below.

1. BCA support for East West Rail

BCA continues to support the principle of East West Rail as a link between the town and cities of the Oxford-Cambridge arc, and importantly, as a means of linking the main radial routes from London to the north and the west. In particular, we support the EWR Co's preferred route running via Bedford station and to the north of the town, as opposed to a route to the south of Bedford.

2. Project Schedule

In the interests of cost, efficiency and realising the benefits, we urge EWR Co and the Government to identify ways of speeding up the project. Compressing the schedule will also provide greater certainty for residents and businesses who will be impacted by the construction.

3. East West Rail should be fully integrated with other main lines

We do not see EWR as a dedicated line between Oxford, Bedford and Cambridge; rather, the concept should be a link between the Great Western, West Coast, Midland, East Coast, and West Anglia main lines. We would like the design developed in that way with, for example, shared lines and platforms. This potentially creates some risk to performance but would deliver great benefits in terms of optimum use of tracks and stations.

4. Connection Stage 2

Connection Stage 2 is due to be completed by 2030 and will deliver one train per hour between Bedford and Oxford. We feel that is very unambitious given that many of the daily freight paths on the Marston Vale line are unused (www.realtime trains.co.uk) and they amount to almost one path per hour. We understand the issues that restrict the introduction of the EWR service are platform lengths and platform signals, so we ask EWR Co to work with Network Rail and the EWR train operator on the early introduction of a non-stop (or limited stop) service between Bedford and Bletchley.

5. Oxford to Bletchley

We support the proposal for the eastern entrance to Bletchley station, especially if it is combined with direct pedestrian access to the Brunel shopping centre.

We have no further comment, other than to note that the principles applied to the route north of Oxford in order to avoid the need for new tracks should be applied to Bedford (see item 11 below).

6. Bletchley to Milton Keynes is missing from the consultation

The Technical Report (and main consultation document) has chapters on Oxford to Bletchley and Fenny Stratford to Kempton, but Bletchley to Milton Keynes (MK) does not seem to be covered. Figure 33 shows the line from Bletchley to MK as 'Other EWR route section' (figure 19 in the main consultation document), but that route section is not described anywhere.

The section between Bletchley and MK is key to achieving the service frequencies at all Connection Stages. There may be issues about track capacity and pathing, what improvements are needed at MKC station, and so on, and we need to see those issues dealt with by EWR Co.

7. Importance of a direct link to Milton Keynes

Milton Keynes is the largest city on the route and one of the most important destinations for Bedford commuters. The current EWR proposal does not include any train service between Cambridge, Bedford and Milton Keynes. This seems a fundamental error given the importance of Milton Keynes and the traffic flow to and from the city. Indeed it has long been an aspiration of local authorities for a dual carriageway linking the three centres and the final section of it is now under construction. Therefore, the EWR Co proposal needs to include a direct link between the Marston Vale Line and the West Coast Mainline to MK. This could be achieved by building chord lines through the land currently occupied by railway sidings; noting some or all of the Bletchley maintenance depot would need to be relocated. But an advantage of the scheme is that it could be built fully within railway lands.

We suggest you issue a supplement to the consultation documents covering Bletchley to MK and proposals for a direct link from Bedford to MK.

8. Fenny Stratford to Kempston 1 – station locations

For the stations of the Marston Vale link we support Concept 1b – the hybrid of existing and consolidated stations. The reasons we support this concept are:

This retains maximum flexibility in terms of new housing, industry and local facilities. This area will show strong growth over the next 20 years, but it is difficult to predict how and where this area will develop. It is important to retain all the stations so that a local station is available wherever the development occurs.

It provides new stations at the principal locations. We support the relocation of stations at Woburn Sands, Lidlington and Stewartby, but the locations need to be carefully reviewed so that they are convenient for the existing communities and commuters. The stations need to feature comfortable waiting areas and easy access for buses, cyclists and pedestrians. There must also be adequate car parking with EV chargers.

It meets the realisation of latent demand at the smaller stations. Some of the stations have very low annual passenger flows. However, this is probably due to the unreliability of the existing service. Locally, the railway is seen as an efficient way of travelling into/from Bedford and it is very likely there will be very strong growth in passengers once a reliable service is introduced.

With adequate rail infrastructure both slow and fast trains can share the route. The project needs to include sufficient loop lines or 4-track sections and associated signalling so that the all-stations trains can be overtaken by the limited stop trains.

Concept 1b is still good value compared to road investment. This concept requires the highest investment but it brings the most benefits. The road alternative – a system of dual carriageways and roundabouts – would cost £80-100 million per mile, based on recent projects; the railway is still good value for money.

9. Fenny Stratford to Kempston 2 – frequency of service

We note that in CS3, train services west of Stewartby will be limited the 3 trains per hour (tph) each way. We propose that between Stewartby and Milton Keynes additional infrastructure (level crossing replacement etc) is provided so that all remaining restrictions to a 4 tph service are lifted.

10. Bedford stations

10.1 Support for EWR Co proposals

BCA supports EWR Co proposals for:

- The relocation of Bedford St John's station;
- The relocation of Jowitt sidings to Caldwell Walk; and
- Lengthening platform 1A of Bedford station.

The last of these points should be added to the scope of CS2.

10.2 Bedford station development

BCA does not support the development of the station as simply the addition of tracks and platforms dedicated to EWR. Instead, Bedford station redevelopment needs to encompass a comprehensive redevelopment of all the platforms, tracks and the public realm. Its planning should involve all the operators, Network Rail and, for the peripheral land, the local authorities.

Redevelopment should be consistent with Network Rail's Bedford Strategic Advice document.

In particular, for development of the platforms and tracks we propose:

(1) **Additional platform capacity for express trains** between London and East Midlands in accordance with Network Rail's Bedford Strategic Advice (section F2). This involves a new platform on the west side of the station, and the extension of platform 4 to the east). We understand that Network Rail has already made passive provision on the southern approach to the station for those enhancements.

(1A) As an alternative to the Strategic Advice, **platform 3 could be built out to the up (southbound) fast line** removing the need for trains on the Midland Mainline to use the slow line platforms.

From EWR's viewpoint, these enhancements will free up capacity and improve flexibility, and may be a factor in not requiring new dedicated tracks north of the station.

(2) **A new public entrance to the station on the west side.**

Detailed design of these enhancements should be undertaken jointly by Network Rail, EWR, and the train operators. They should be included by Network Rail in a future Control Period, or included in the EWR package and statutory consultation.

10.3 Station facilities and public realm

BCA recommends EWR Co engages with the local authority to develop a comprehensive redevelopment plan for the area around the station. This should include a new station approach and access on the west side, and easy access for pedestrians and cycles from the north (Bromham Road) side.

For the public facilities we ask EWR Co to ensure:

- During construction, adequate car parking space is maintained during all phases;
- Easy pedestrian and cycle access from the north (Bromham Road) side of the station is ensured.
- There is ample space for easy bus connections;
- The pick-up / drop-off and taxi space close to the main entrance;
- There is easy and secure cycle parking;
- High power EV charging points are introduced.

11. North of Bedford station

BCA does not support the expansion of the railway to six tracks north of Bedford station, for the following reasons:

1. Bromham Road bridge would need to be rebuilt with a wider span. This would be very disruptive to users and people living nearby. It would also probably mean that the approach roads either side would need to be completely rebuilt, adding to cost and disruption.
2. The need to demolish, or take land from, residential property.
3. The proposal for extra tracks is not consistent with the design of EWR to the north Oxford, the south of Milton Keynes, or the south of Cambridge where four tracks are deemed adequate. Oxford and Milton Keynes both have an intensive suburban, long distance, and freight service sharing the four tracks.

BCA recommends that to avoid the need for six tracks:

1. The same principles that EWR Co has applied to north of Oxford are applied to north of Bedford (ref. Consultation Document section 8.2):
'EWR Co is continuing to look at timetable and operational based solutions to unlock capacity in the Oxford area. Operational solutions include considering how trains could continue beyond Oxford to provide a better service for passengers as well as relieving pressure on the station.
This work is being developed with Network Rail and other stakeholders and further information will be provided at the statutory consultation.'
2. A new study of the system is undertaken with Network Rail and the operating companies to examine how a system of crossovers, bidirectional signalling, and the application of modern train control (see 'Signalling principles' under Route Wide Matters below) could avoid the need for six tracks. The study must allow only for growth consistent with the allowance for Oxford and Milton Keynes.

12. Clapham Green to Colesden

We support the proposals.

13. Roxton to East of St Neots including Tempsford

13.1 Tempsford

BCA does not support EWR Co's proposals for Tempsford – they are too restrictive. BCA believes that Tempsford should be a major interchange with the ECML.

Bedford commuters and travellers need not only to travel to/from Cambridge, but also to all major towns and cities on the ECML, preferably without changing trains. Therefore we propose EWR Co should:

- Provide an interchange for EWR passengers with both slow and fast lines at Tempsford. The interchange facilities must be fully accessible for those with limited mobility or bulky luggage.
- Develop a full 'clover leaf' interchange at Tempsford between EWR and the ECML.

EWR links five major rail lines between Cambridge to Oxford so this omission seems inexplicable given that it has great potential for new passenger and freight flows.

We understand that there will be temporary junctions with ECML at Tempsford for maintenance and construction purposes. Therefore we recommend that these links should not be removed but should be retained to allow future passenger and freight services to ECML locations, especially from the Oxford / WCML / MML direction. It seems unwise to remove this link (and rebuild it in future) given that other parts of EWR are being designed with future capacity needs in mind.

Even if the interchange itself is not included in the statutory consultation, at least the land requirements should be established and protected from development.

13.2 St Neots

We are surprised that the options for a station at St Neots, described in the previous consultation, have been dropped. St Neots has a population 34,000 and the station has nearly one million passengers per year. Although the commuting pattern is distributed to/from Cambridge and north-south, a direct link between Bedford and St Neots is important to our members.

The St Neots conurbation is currently expanding eastwards: the new Wintringham community will occupy all the land between the A428 and the ECML. Has the extent and significance of this development, and the proximity of the EWR route, been appreciated and taken into account by EWR Co?

An additional EWR station at St Neots Wintringham provides a good opportunity for EWR to serve this new community and, through direct bus and cycle links, the rest of St Neots. We understand that the reason that no station is currently proposed for St Neots is because the preliminary timetabling does not allow for another stop between Tempsford and Cambourne. However, commuting by car to Cambridge is a major traffic flow in the area, so there is the great potential for transport modal change if there is a station at St Neots Wintringham.

The assumption that potential EWR users will drive between Tempsford and St Neots, or travel by train via St Neots ECML station, is unrealistic and flawed especially for journeys to/from Cambridge. If they cannot take a train to close to their origin/destination they will drive the whole way.

It should be noted that the new A421 will motivate continuing car use in the absence of a St Neots EWR station. Therefore we propose that EWR Co:

1. Finds a location for an additional station St Neots Wintringham on the EWR route.
2. Investigates ways in which the additional station can be accommodated in the timetable such as additional loop lines or other infrastructure and train control techniques.
3. Provides a justification for the additional station by encouraging modal shift from travel by car to travel by rail, taking into account that people living and working in St Neots are unlikely to travel via Tempsford.

14. Croxton to Cambridge

We support the proposals.

15. Route-wide matters

15.1 Proposal for powering the trains

We support the concept of partial electrification as a way of bringing environmental and performance benefits at a lower cost than full electrification. However, EWR Co should undertake the following in 2025:

- A study on the performance of trains under partial electrification, drawing on international experience of high passengers loadings and extreme weather.
- A cost comparison of full and partial electrification including the additional cost of operation and maintenance of battery powered trains over conventional electric trains.
- An assessment of whether freight trains can be electrically powered under partial electrification.
- Ensuring that the design allows for full electrification should that prove beneficial eventually. We note all bridges in structures in Connection Stages 1, 2, and 3 are designed for overhead line equipment.

15.2 Rolling stock requirements

We believe EWR trains are likely to see higher passengers loads than forecast, from initial opening in 2025 through to completion of CS3. This assertion is based on the experience of new stations and lines over many years, e.g. Exeter to Okehampton.

The minimum train length for Milton Keynes to Oxford and Bedford to Oxford should be 4 cars for CS1 and CS2 and longer trains such as 8, 10 or 12 cars considered for CS3. All trains should be equipped with selective door opening where EWR serves existing stations and the platforms are not long enough; SDO is a well-developed technology in GB.

15.3 Approach to freight

We support the use of the line for freight and all the proposed of loop lines for freight trains. Adequate allowance needs to be made for growth of east-west freight in the design of Connection Stages 2 and 3. The practicality and acceptability of diesel powered freight trains by the late 2030s needs to be assessed should diesel be necessary under partial electrification. This is important given the objective in the Transport Decarbonisation Plan to remove all diesel powered trains by 2040 (ref: Technical Report section 14.1.1.)

15.4 Rail system assets – signalling principles

European Train Control Systems (ETCS) are being introduced progressively on the national network (ref: Network Rail Long-Term Deployment Plan). We suggest EWR Co undertake a joint study with Network Rail of how ETCS can be used on EWR to improve the speed and frequency of the service (in comparison with conventional signalling) without needing extra tracks, platforms and other infrastructure.

15.5 Station design

We propose the following design features for all stations, both new and existing stations on the EWR route:

1. Platforms long enough for 12 carriages, or at least land reserved to enable platform extensions to that length.

2. Platform canopies along the whole length of the platform.
3. Comfortable waiting rooms with toilets.
4. Space for a café and community use.
5. Full facilities for integrated transport:
 - bus interchange;
 - drop off/ pick-up and taxi parking close to the main station entrance;
 - easy pedestrian and cycle access and secure storage;
 - EV charging.

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