

Response to the Rail Needs Assessment for the Midlands and the North (Interim Report)

**The West Yorkshire Combined Authority
and West & North Yorkshire Chamber of Commerce**

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1. Introduction

- 1.1. West Yorkshire Combined Authority and the West & North Yorkshire Chamber welcome the opportunity to comment on the interim report of the Rail Needs Assessment for the Midlands and the North. We agree that the Integrated Rail Plan (IRP) presents an opportunity for the government to integrate all major rail proposals into one coherent, affordable plan to best meet the rail needs of the Midlands and the North.
- 1.2. We would like to provide our comments in two parts. Part one deals with more fundamental points about the scope of NIC's Rail Needs Assessment. Part two deals with the specific questions about the methodology.
- 1.3. We submitted our evidence to NIC in May 2020, the submission covers both national and local infrastructure requirements and what could be delivered earlier to bring wider benefits. What we require is a plan for long term project delivery to address the following:
 - Sustainable inclusive economic growth which helps deliver decarbonisation and drives recovery and rebalancing post Covid19.
 - Delivering on local and national capacity and choice for rail passengers.
 - Increased capacity for freight.
 - A sequencing plan to deliver benefits much earlier and as they arise.
- 1.4. The key priorities included in our previous NIC response are:
 - HS2 Phase 2B – the full 'Y' shaped network;
 - Northern Powerhouse Rail (NPR) new line via central Bradford;
 - Trans-Pennine Route Upgrade (TRU) including full electrification;
 - Leeds Station (pedestrian, track and platform capacity);
 - Programme of electrification;
 - Continued investment in the East Coast Main Line (ECML) to improve reliability and
 - Interventions to allow the regional network to grow and develop.

2. Part One – Scope

The Revised and Limited Scope

- 2.1. In the original Terms of Reference for an IRP for the North and Midlands, the scope of the plan includes, “..... *scoping, phasing and sequencing delivery of HS2 Phase 2b, Northern Powerhouse Rail, Midlands Rail Hub and other proposed rail investments. This should take into account: government commitments; the current state of development for different projects; the transformational and capacity benefits of these schemes; network integration....., the appropriate mix of high speed line and upgrades of conventional network, and the sequencing of these, on any elements of the investments under consideration.*”¹
- 2.2. The published interim report, however, introduces an additional range of criteria in determining what is ‘in scope’ – excluding interventions which:
- “...*don’t have benefits beyond the immediate location.*”
- “...*are best dealt with through the rail franchising process.*”
- “...*are in the scope of the Restoring Your Railway fund.*”
- And that:
- “The Commission will only consider proposals where plausible cost estimates and evidence on the impact of the proposal on journey time and capacity have been provided...”*
- 2.3. In applying the above criteria, it seemed that only the following schemes remain in scope:
- HS2, NPR, TRU
 - Midlands Engine Rail
 - Manchester Piccadilly
 - ECML / MML upgrades
- 2.4. It is not clear in the report regarding the rationale behind the revised and limited scope of the assessment. With the limited scope, it means that key schemes / programmes are excluded in the assessment. Also, the lack of focus on local / Intra-connectivity significantly undermines the robustness of the assessment as it affects its capability to come up with options that works in an integrated network with shared infrastructure. Please note that almost all intercity services are operated on a mixed-use railway in this region.
- 2.5. Additionally, by excluding interventions that do not have “*plausible cost estimates and evidence on impacts*”, the assessment must therefore be caveated and presented as an ‘incomplete’ picture and not the ‘final answer’.

¹ <https://www.gov.uk/government/publications/high-speed-north-an-integrated-rail-plan-for-the-north-and-midlands-terms-of-reference/terms-of-reference-for-an-integrated-rail-plan-for-the-north-and-midlands>

Omission of Key Schemes

2.6. A number of key schemes/ programmes that have national / regional significance are not mentioned in the interim report. These include:

Leeds station (pedestrian capacity) - All the planned investment including HS2, NPR and TRU will either terminate at or operate through Leeds station. It is therefore important to make sure that Leeds station has the capacity to accommodate growth in passenger numbers. Leeds station, the busiest in the North of England with 34 million passengers is a major hub and interchange station servicing both the city and the City Region. The station is already at capacity (before Covid-19) in terms of passenger numbers and will fail by 2026 impacting services and constraining growth. The Combined Authority, Leeds City Council and the rail industry has developed the Leeds Existing Station Programme (LESP) which is designed to focus on resolving station user capacity issues, better integrating and connecting the station with the city and building resilience to accommodate potential future rail programmes. A strategic outline business case (SOBC) has been submitted to the DfT as part of the Rail Network Enhancements Pipeline (RNEP) process. The SOBC submission (provided separately) clearly demonstrates that there is a case for investment.

Network capacity at and around Leeds - Track and platform capacity at and around Leeds station is severely constrained. Leeds is the bottleneck of the rail network in the north which impacts the local, regional and national network. As part of Network Rail's Continuous Modular Strategic Planning process (CMSP), several pinch points have been identified on the network in and around the Leeds area² and these interventions should be considered as a single programme. These include:

- Platform capacity at Leeds station.
- Constraints on the western and eastern approaches to Leeds station.
- Platform lengths at 29 stations across the City Region (as selective door opening is considered to have limited practical application in this area).
- Line capacity constraints between Armley Junction and Springs Junction.
- Platform capacity constraints at Bradford Forster Square and Castleford.

Other schemes - Technical evidence on rail capacity analysis within West Yorkshire³ indicates that much of our region's rail network is operating at capacity and will struggle to operate increased services without infrastructure and signalling improvements. The following sections of route are operating close to capacity and need to be considered as part of an integrated rail network. These include:

- Harrogate line – poor signalling headways and platform capacity at Harrogate.
- Airedale / Wharfedale lines – poor signalling headways, single track sections, Shipley station conflicts.
- Huddersfield line- high occupation, Bradley junction and Heaton Lodge Junction.
- Calder Valley line – high occupation, conflicting moves at Bradford Interchange.
- Penistone line – capacity constraints on most single-track sections
- Hallam / Pontefract line – at capacity on many sections especially around Wakefield Kirkgate, Pontefract Monkhill and Castleford stations.
- York / Selby lines –between Leeds and Micklefield junction.

² <https://www.networkrail.co.uk/wp-content/uploads/2020/07/Leeds-Area-Strategic-Study-2020.pdf>

³ WYCA National Infrastructure Commission Response– Steer for WYCA, May 2020 (supplied previously)

- 2.7 It is essential that the identification of priority schemes start from the basis of a full understanding of all the markets that rail serves and will need to serve in the future, having regard to the overriding objectives that we set the transport system in terms of outcomes such as sustainable mobility, socially inclusive growth, decarbonisation and enhanced quality of life. A comprehensive understanding, evidenced by good data, of these priorities, and the system outputs to which they give rise (such as service levels and journey times), should then guide the identification and prioritisation of schemes.

More focus needed on Local or Intra-regional Rail

- 2.8 The interim report repeatedly states that ‘local transport’ is out of scope, the apparent lack of focus on the ‘local’ or ‘intra-regional’ rail⁴ is problematic and affects the robustness of the assessment as:
- It is not easy to distinguish local with regional transport in West Yorkshire which is polycentric in nature and the rail infrastructure is shared and serve different purposes in the absence of a ‘urban transit’ system.
 - The risk of ignoring the requirements of local services will affect the capability to achieve network integration.
 - There is also a danger that consideration of ‘released capacity’ could be over-simplified in the assessment, as it is not always possible to assume high speed projects could automatically take pressure off the congested existing track when rail infrastructure is shared; in some cases the opposite can arise, such as where HS2 or NPR trains run through onto the existing network could have a negative impact on the local and intra-regional rail services. We know for example that TRU won’t fix the problems in and around Leeds and whilst NPR is in early stages of development, it too is looking at infrastructure for its own outputs and on the current assumptions would restrict the ability to the further develop services between West Yorkshire, Sheffield, Skipton and Harrogate. We are working with TfN to address this, but it is an example of how the IRP needs to consider the whole network before giving a view on specific schemes
 - The journeys ‘in and out of cities’ and wider places play a key contribution to economic benefits : real-world journeys are not from one station to another, but from door to door, and even city-centre-to-city-centre journeys are only a part of the market for intercity rail. If we are not careful, important journeys could be excluded in the Rail Needs Assessment.
- 2.9 It is important that NIC can set out the benefits of a project for all communities even if the new infrastructure does not serve them and you are only able to do so if rail investment is planned in an integrated and wholistic manner.

⁴ P.12, Rail Needs Assessment for the Midlands and the North (Interim Report)

3. Part Two – Specific Comments on Methodology

Q1: Please provide specific sources for evidence that the Commission could use in estimating costs and the impact of proposals on journey time and capacity.”

- 3.1. We believe that NIC should have received relevant information from HS2 Ltd, Transport for North and Network Rail in relation to programmes such as HS2, NPR and TRU.
- 3.2. Leeds station is an important transport hub regionally and nationally and should be considered in the Rail Needs Assessment in a wholistic way. The Combined Authority, LCC and the rail industry has already developed a Strategic Outline Business Case⁵ for the Leeds Existing Station Programme (LESP). The business case demonstrates that there is a clear need for investment in the station and recommends an additional overbridge and/or changes to existing bridges, additional entrances to the station and improvements to the station concourses.
- 3.3. Leeds is the bottleneck of the rail network in the north which impacts the local, regional and national network. As part of Network Rail’s Continuous Modular Strategic Planning process (CMSP), several pinch points have been identified on the network in and around the Leeds. These are set out in a report ‘How can forecast growth and partners’ aspirations be accommodated in the Leeds Area up to 2043?’⁶ and include:
 - Platform capacity at Leeds station.
 - Constraints on the western and eastern approaches to Leeds station.
 - Platform lengths at 29 stations across the City Region (as selective door opening is considered to be sub-optimal).
 - Line capacity constraints between Armley Junction and Springs Junction.
 - Platform capacity constraints at Bradford Forster Square and Castleford.

We understand Network Rail has carried out high level assessment on costs and impacts of the proposals on journey time and capacity of the above-mentioned interventions. The overall package of interventions identified at and around Leeds should be treated as a single project/ programme and should be included in the remit of the rail needs assessment. For the detailed information, please contact Network Rail East Midlands, Yorkshire and East Coast Strategic Planning.

- 3.4. The Combined Authority has completed technical work which considered the impact on rail infrastructure in this region of predicted growth in demand and of the Combined Authority’s emerging rail connectivity priorities and has identified locations where infrastructure interventions are likely to be required. The report was provided separately. Further work to develop potential interventions and ascertain cost levels will be completed by December 2020.
- 3.5. Apart from the impact on journey time and capacity, improvements to service frequency and / or the provision of new direct connections (and/or optimised interchange arrangements) are also very important which seem to be treated as secondary aspects in the proposed methodology. Some of the key city-to-city flows such as Leeds – Nottingham / Derby /

⁵ Leeds Existing Station Programme- RNEP SOBC (June 2020). – Confidential and supplied as part of this response.

⁶ <https://www.networkrail.co.uk/wp-content/uploads/2020/07/Leeds-Area-Strategic-Study-2020.pdf>.

Preston / Sheffield and Bradford – Manchester have poor service frequencies at present. As noted above, intercity rail needs to be considered as part of a true end-to-end public transport proposition. This underlines the need to integrate intercity with regional rail and with wider public transport in order that the full benefits of major schemes like HS2 and NPR can be released.

Q2: Given the evidence for how transport impacts growth and competitiveness, is assessing against the Commission’s proposed criteria of productivity, connectivity, and unlocking investment in land around stations a reasonable approach to estimating the impacts of proposed rail investments? Please provide links to any specific sources of evidence you think that the Commission should use to support this methodology.

- 3.6. The broad methodology seems sensible for this type of assessment with a focus on well justified, transparent, proportionate and multi-criteria analysis. We just wonder if the assessment criteria are accepted by the Treasury or the Treasury will continue to apply the “green book” criteria. As NPR is still at an early stage of development with potential changes in routes and alignment. We would be interested to know how NIC could assess the impacts of NPR before the alignment / routes are finalised. This issue also applies to HS2 should there be any changes to the route / alignment.
- 3.7. As mentioned earlier, we have significant concerns regarding the NIC’s proposed scope as outlined in paragraphs 2.1 to 2.9 of this response. The revised limited scope, the omission of key schemes / programmes and the lack of focus on local / Intra-connectivity significantly undermine the robustness of the assessment and its capability to come up with options that works in a mixed-use railway network.
- 3.8. It is not clear how the proposed methodology could help to join and integrate the programmes through a holistic set of outputs. There is a danger that individual rail projects are being considered and evaluated in isolation and interventions could be picked and chosen to fit the funding scenarios instead of achieving true network integration. It is unclear how the overall impact of individual projects is being taken into account so that the total impact/benefit of the interventions can be considered in a wholistic manner. The result would be a suboptimal and non-integrated rail network, potentially trading off the ability to improve regional rail links and/or freight against enhancements to intercity services.
- 3.9. It is unclear how hubs could be considered holistically. In the interim report only Manchester Piccadilly is specifically mentioned. In West Yorkshire, Leeds station is an important national and regional transport hub, Bradford is a major city but lacks regular and direct access to a wide range of national and regional services, and Huddersfield is severely constrained by the reliability and capacity issues on the Transpennine route.
- 3.10. There is a lack of details on how NIC will approach the programme to ensure that projects could be commenced as soon as possible without delay. The longer the delay, greater the economic impact. Every year that HS2 is delayed costs the Leeds City Region’s economy £1.7 billion.⁷
- 3.11. It is not clear if the regeneration benefits of rail investment are sufficiently captured in the methodology. The proposed HS2 station in Leeds will support the South Bank regeneration

⁷ <https://www.hs2east.co.uk/data/ckeditor/brochure/Volterra-HS2-Eastern-Leg-NICInput-REISSUE-1.pdf>

which is over 200 hectares in size and is one of the largest city centre regeneration schemes in Europe. It is expected to deliver over 35,000 new jobs and 8,000 homes⁸. A city centre NPR station in Bradford will act as a catalyst for new residential and commercial development which is forecast to provide a £14.6 billion boost to Bradford's economy and create up to 14,250 additional jobs by 2060⁹.

- 3.12. Productivity (P.42 of the interim report): The assumption that demand for employment in city centre is constrained by capacity seems difficult to justify as evidence is still limited. We are interested to see how / which Travel to Work Areas (TTWAs) are used in the assessment. For example, the 2011 Census TTWA for Leeds does not extend along Airedale on to Harrogate. Use of TTWAs generally may lack some of the nuance in how commuting into cities works in reality particularly for rail where modal share is relatively low and skews towards longer journeys.
- 3.13. Connectivity: Is there any thought/assessment been given to the impact of transport resilience such as resilience to weather-related infrastructure failures? Any proposed infrastructure options should also be strategic resilient i.e. be able to cater for a wide range of scenarios in an uncertain future. We have seen in the lockdown that rail freight played a key role in the supply chain of food/materials and freight should be included in the review. Measures which secure or improve capacity and flexibility to maintain regular service patterns should be prioritised. Resilience in the rail network is fundamental and should be considered in any rail needs assessment.
- Q3: “Given the evidence for how transport impacts sustainability and quality of life, is assessing against the Commission’s proposed criteria of amenity benefits, impact of rail freight, natural capital, and lifecycle carbon emissions, a reasonable approach to estimating the sustainability and quality of life impacts of proposed rail investments? Please provide links to any specific sources of evidence you think that the Commission should use to support this methodology.”**
- 3.14. There is a potential for rail to play a greater role in reducing carbon emissions given the current low modal share. Authorities within West Yorkshire have strengthened their commitment to local emission reductions through the declaration of a climate emergency and the setting of targets to reach net zero carbon emissions by 2038 with significant progress by 2030. Rail could potentially play a greater role by encouraging modal shift and further decarbonisation of the railway through electrification to meet our target and comply with the Paris agreement to reduce emissions by 14.5% year on year.
- 3.15. Amenity benefits: Amenity quantification should be given greater importance. The transport system in West Yorkshire has suffered years of underinvestment which leads to poor amenity in places such as the city of Bradford. Any assessment will need to have equity in mind so that investment could target on urban centres that suffer from social exclusion with poor amenity and productivity.
- 3.16. With the proposed criteria, there is not enough emphasis on access for different groups in society. Also, the spatial variation is not considered in the proposed criteria.

⁸ Southbank Leeds Regeneration Framework – Leeds City Council

⁹ https://www.nextstopbradford.com/wp-content/uploads/2019/03/NPR_Bradford_Growth_Strategy.pdf

- 3.17. Reliability: The Interim report (P.45) said, “*The Commission will also be building on existing analysis to understand the impacts of the packages of rail proposals on reliability of services.*” We will be interested to know how this will work and we will require more details on this before we can comment on this further.
- 3.18. Impact of rail freight (p.44): we will be interested to know where and how the needs of freight are considered instead of just considering the impacts of the proposed schemes on freight.
- 3.19. The interim report mentioned that sensitivity testing will be undertaken. We will be interested to know what NIC intend to test and how will you go about in identifying the important inputs and assumptions that will be subject to testing.

Q4: “Do you agree with the Commission’s proposed approach to uncertainty?”

- 3.20. We support the high-level, transparent approach which emphasises the role of the decision-maker with a clear set of assumptions.
- 3.21. We are keen to engage with NIC to come up with a set of clear and realistic assumptions to deal with the perceived uncertainties.
- 3.22. Sensitivity testing of different scenarios will be helpful to provide a wider range of perspectives in dealing with uncertainty. Any proposed infrastructure options should also be strategic resilient i.e. be able to cater for a wide range of scenarios in an uncertain future.

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