

# East Coast Mainline May 2022 Timetable Consultations

## West Yorkshire response

July 2021

### Summary of principal issues

The East Coast Mainline (ECML) is arguably the most important rail artery in the whole country, and is of fundamental importance to West Yorkshire as our principal rail connection to the south and north for passenger and freight traffic, as well as being pivotal to regional and local connectivity. It is therefore vital that timetable planning gets it right in balancing these priorities against highly constrained network capacity. The northern section of the ECML has yet to see the infrastructure investment that has been delivered (and is welcomed) to free up capacity further south. Investment in the northern ECML is seriously overdue and a clear government commitment is now needed, if the “Levelling-up” agenda is to be meaningfully reflected in moving the North forward with the Trans-Pennine Route Upgrade, Northern Powerhouse Rail and High Speed 2.

Against this background, while they would bring some positive features such as a more even daily pattern of Leeds – London services and at least paving the way towards the long-awaited second fast Leeds – Sheffield train, the proposed May 2022 timetables overall fail to deliver the right balance, and the £1.2bn of investment delivers little for West Yorkshire. This appears to be in no small part to the proposals having been developed without a clear overall strategic objective or a ‘guiding mind’ – a fundamental issue reflected in a dysfunctional process of multiple parallel consultations on these timetables.

In terms of specifics, we would particularly highlight that:

- The **major losses of east-west connectivity**, including links from West Yorkshire to the North-East and Scotland, sacrificed primarily to allow additional London services many of which duplicate one another’s function, are not acceptable and represent a prioritisation that is wrong and retrograde.
- The **proposal to reduce Bradford – London King’s Cross services to one per day** must be rejected. We understand that this proposal is largely driven by a desire to reduce LNER’s fleet until additional trains are delivered, which was never the operator’s policy previously and is not sustainable. Twice-daily trains must be retained and work prioritised to deliver the infrastructure required to enable the promised bi-hourly services all day.
- The proposals appear to be fundamentally **incompatible with the Trans-Pennine Route Upgrade (TRU)** programme.
- The current Cross-Country **Leeds – Sheffield fast service** should not be reduced until the proposed new shuttle service has been introduced to replace the lost services.
- We are concerned that the timetable attempts to run too many trains on the core ECML, which is not only detrimental to the **timetable structure** as regards being easily understandable to the normal passenger, but is likely to be associated with poor **performance**, which has long been a serious concern on the ECML.

***We therefore believe that the May 2022 timetables should not, as a whole, be introduced in their proposed form.*** The industry should work collaboratively together to reconsider the requirements of all markets against the railway’s strategic objectives, and reach a better balance that is in keeping with the Williams-Shapps priorities in putting the passenger and freight customer first. The first step must be to achieve a more balanced timetable to replace

the current May 2022 proposition, but the industry must then work towards a set of infrastructure phases, aligned to logically staged timetable configurations, that are based on a programme of investment in the central and northern sections of the ECML, and ultimately take us towards what is required for HS2 East and NPR.

## 1. West Yorkshire Combined Authority and the ECML: our priorities

The West Yorkshire Combined Authority, working in partnership with the Leeds City Region Enterprise Partnership, operates to ensure that our region is recognised globally as a strong, successful economy where everyone can build great businesses, careers, and lives. We bring together local councils and businesses to achieve this vision, so that everyone in our region can benefit from economic prosperity and a modern, accessible transport network. In this context, the City Region is defined as encompassing the districts of Bradford, Calderdale, Kirklees, Leeds and Wakefield. The railway plays a vital role – and one that must be increased and strengthened – in delivering our region’s strategic objectives of sustainable and socially inclusive economic growth which respects the environment and delivers quality of life as well as high standards of living, while enabling the transition to a post-carbon society.

The East Coast Mainline (ECML) is one of the most important transport arteries in the country, of critical relevance to our region’s strategic connectivity to a whole swathe of the country from London and the South-East through East Anglia, the East Midlands and North-East right through to the Scottish Highlands, and even to the Continent as our link to Eurostar and the Channel Tunnel. It is also vital within our region in terms of the connectivity of Leeds, Wakefield, York and Sheffield, and the communities along the West Riding section. Freight to and from our region is heavily dependent on it too. A developing, reliable and well-balanced ECML is therefore a prerequisite to the delivery of our [Rail Vision](#)<sup>1</sup>, and the case for a thriving ECML is underlined more widely by the evidence garnered by ECMA<sup>2</sup>. Investment in the ECML is anything but in conflict with the case for HS2: southwards from our region, the ECML will be unlocked for a step-change in connectivity for passengers and freight across a variety of new journeys (such as connections with the East of England) as well as delivering our vision for regional connectivity; northwards, investment in the ECML is a *sine qua non* for HS2 to reach York and the North-East, as well as to pave the way for Northern Powerhouse Rail. The choices we make in 2022 and beyond must pave the way towards achieving these objectives: consolidating existing links and developing those of the future – connectivity from which all of West Yorkshire’s five districts and its two major hub cities must benefit.

Against this background, we would summarise our priorities as (not intended to be in order of priority):

- An approach which aligns to our overall strategic objectives and balances the different demands on scarce network capacity to put the passenger – and the passenger’s real-world journey – first, alongside the freight customer
- A clear ‘roadmap’ to future network configuration states that will link key outputs required at the delivery of each stage to the infrastructure investment commitments
- A recognition that non-London intercity and regional connectivity are at least as important as traditional London intercity routes, and the one cannot be traded off against the other – because current markets need to be consolidated and strengthened, but the markets of the future must also be cultivated: those driven by new opportunities, by future development, and by the imperative of modal shift

Applying these principles to the specifics of ECML services, we believe that the short-term (May 2022 and beyond) timetables need to be reworked, in accordance with the priorities of ensuring that:

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<sup>1</sup> <https://www.westyorks-ca.gov.uk/improving-transport/connectivity/>

<sup>2</sup> See, for example: <https://investineastcoast.co.uk/research/>

- Bradford's London link is preserved at the present levels, as a bare minimum, alongside a commitment to delivering the full bi-hourly service as soon as the relevant infrastructure can be delivered
- Current non-London intercity connectivity (such as trans-Pennine and cross-country routes) is at least as good as today (pre-Covid) – and paves the way to future needs such as Thorpe Park station, the Trans-Pennine Route Upgrade (TRU) and Northern Powerhouse Rail
- Improved Leeds – Sheffield services are delivered (a second hourly fast service) without delay and before any reduction in cross-country services, and expanded to serve Bradford as soon as possible
- Enhanced London connections, where they add to connectivity and drive modal shift, are delivered as investment allows this to happen without detriment to other priorities, or where they can (as with extensions beyond Leeds which do not add to core ECML traffic) complement other services
- The railfreight industry is able to flourish and grow, enabling modal shift on the ECML itself and, in the future, to allow trans-Pennine freight to develop
- The timetable is based on simple hourly (bi-hourly on extensions beyond Leeds) repeating clockface patterns that are consistent all day and every day, and are designed to maximise connectivity and unlock journey options, across all operators
- The railway can run punctually and reliably, with the flexibility, resilience and capacity to recover from perturbations
- The timetable for 2022 and beyond is the first stage in a coordinated and phased upgrade of ECML connectivity that delivers our wider and longer-term objectives, such as in the context of HS2 and NPR

## 2. Format of this response

This document is intended to form a single response from WYCA to all relevant consultations on the May 2022 ECML timetable proposals, including in particular (though not necessarily limited to) those being carried out by LNER, Northern Trains Limited, Trans-Pennine Express and Cross-Country. This is because we consider separate consultations to miss the point of an exercise of this nature, as the proposals and outcomes need to be viewed holistically if they are to be viewed meaningfully. This is therefore being submitted as our response to all four.

We would add that, while we have attempted to review the material provided in as much detail as possible, the information available to us is piecemeal, has been derived from a variety of formal and informal sources, and is highly complex. It is therefore entirely possible that some relevant details may not be captured in this response, despite our best endeavours, and we therefore must reserve the right to raise any such further issues which come to our attention through the relevant channels.

## 3. The consultation itself

We consider this consultation process – and indeed the retimetabling exercise that underlies it – to be something of a missed opportunity. It is unfortunate that DfT did not elect to carry out a single consultation exercise on behalf of the industry as a whole, but instead chose to rely on the normal consultation requirements within train operators' contracts – which by definition do not cover open-access operators. This has led to inadequate, incomplete, piecemeal and occasionally misleading information coming out of different parts of the industry, which has not been helpful. We have had to expend significant officer time and public money in collating the information that has come to us from a panoply of different sources to provide a meaningful

view as to what the ECML May 2022 proposals actually are and mean for us – such as, for example, having manually to construct timetables ourselves for the ECML and key adjoining routes.

The process followed for this consultation is at odds with the ethos and ways of working which the Williams-Shapps recommendations rightly advocate towards creating a more joined-up railway which puts the passenger and freight customer first.

These concerns are underlined by the hints in a number of the operators' consultation documents that the consultation itself may not be particularly meaningful in terms of the consultees' responses actually having much impact; to quote one of them:

Realising the benefits to long distance connectivity on the East Coast inevitably involves some changes to some existing local and regional services. This means that the timetable does involve a series of trade-offs which we'd welcome your views on although changes are unlikely to be able to be made.

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We are submitting this response on the basis, and in the expectation, that our comments will be taken seriously and will result in reconsideration of the issues we raise.

#### **4. Context and principles of the May 2022 timetable proposals**

The proposed timetable appears to owe more to historic regulatory decisions, allied with a traditional and simplistic approach to railway revenue modelling, than to a root-and-branch, clean-sheet review of the different functions that the ECML needs to fulfil, and of the strategic objectives that these serve. There is little evidence of the “guiding mind” that Williams-Shapps rightly identifies as needed for the railway, nor of regarding the ECML as part of the wider rail system. The failure to carry out such a thorough review and to consider the balance of priorities that the ECML needs to reflect, founded on an early and meaningful consultation and on collaboration with key stakeholders such as ourselves, represents a missed opportunity and is most disappointing. Indeed, it was our belief that DfT had indeed instructed the industry to carry out such a clean-sheet exercise for the ECML, and we are uncertain what has become of this.

As the industry squares up to the challenges and opportunities of the post-Covid and post-franchising world, to the recognition of the “levelling-up agenda”, and to the imperative of decarbonisation, this would have been an ideal time to have carried out such fresh review, including questioning whether decisions and franchise commitments made five and more years ago still hold good, on a route which has seen largely incremental changes to services for many decades.

A further clearly relevant factor here is the imbalanced nature of recent investment, particularly in infrastructure: while we understand that around £1.2bn has been invested in recent years in the ECML, and almost all of this should benefit the wide swathe of the nation that the ECML serves, it is a fact that the vast bulk of the investment has been in the southern section of the line – and proposals previously made to invest further north, such as around Newark, Doncaster and (in our view most pressingly) on the York – Northallerton – Newcastle section, were shelved. Many of the most serious shortcomings in the May 2022 proposals are a direct result of such decisions.

We believe that the decisions effectively to trade intra-North and east-west connectivity for increased quantum of north-south (London) connectivity are based on outdated thinking and simplistic application of historic industry demand and revenue models (such as Moira and traditional PDFH methodologies) that have long ill-served the North. These relatively primitive models assume that high-volume and high-yielding flows (such as business travel from the North and Midlands to London) have unlimited capacity for growth rather than being mature markets where rail in fact already has relatively high modal shares. Conversely, they assume

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<sup>3</sup> TPE consultation document

that non-traditional markets such as interurban travel within the North, where a relatively poor service offer (in journey time, capacity and frequency terms) was historically associated with relatively low demand levels, are relatively unimportant and will always remain so. Such assumptions fly in the face not only of the levelling-up agenda, and of the reality of rail's historic low modal shares and therefore of substantial potential market growth, but also of the empirical evidence of the growth between and within the city regions of the North over the past two decades to 2020 – growth that such models entirely failed to predict.

Beyond these simplistic assumptions in relation to revenue lies the wider question of the purpose of the railway as a whole; it is our view that, while it must be cost-effective, the railway does not exist primarily in order to be a commercial exercise but rather to serve the needs of society as a whole, including the creation of wealth and the distribution of opportunity in a socially inclusive and sustainable manner. A concentration purely on the most directly revenue-generative train services, as opposed to striking the balance that achieves the best economic and social outcomes, will almost always bias in favour of long-distance flows rather than economically vital regional travel, and is not a policy that West Yorkshire can support.

It is our belief that these factors have driven poor decisions in particular about the allocation of the unimproved capacity north of York on the ECML under the proposed May 2022 timetables, with too many London trains (including open-access services which duplicate those of LNER) provided at the expense of east-west services (especially those of TPE), and intermediate connectivity also suffering as a result. May 2022 should be an opportunity to look afresh at those priorities, independently of past track access decisions based on a flawed system, now in the process of reform, and assumptions that no longer hold good.

As a result, while both LNER and TPE have carried out major investment that has renewed the majority of their fleets, the imbalanced May 2022 proposals mean that TPE is unable to obtain full value from its investment or deliver on its franchise commitments, while LNER is attempting to operate service patterns designed to maximise revenue but without a sufficient fleet to provide all services needed. As for Northern, which has also carried out significant investment in enhancing its fleet, once again the operator used by more passengers in the North than any other appears to have been treated as an afterthought, as metaphorically and possibly literally “the last on the graph”.

The overwhelming issue affecting the May 2022 ECML timetable proposals, alongside the suboptimal choices and poor structure, is plainly the failure to deliver investment in the middle and northern sections of the line, especially (but not limited to) from York northwards. As such, it is imperative that, alongside the industry reconsidering in the context of May 2022 the allocation of the constrained capacity in the shorter term to come up with better interim outcomes, Government commit itself to delivering the infrastructure upgrades required now on the northern sections of the ECML, and to a clear programme of further phases to provide logical configuration states to take the railway on to meet the challenges and opportunities of Northern Powerhouse Rail and High Speed 2. In this way, what happens in May 2022 should become a logical interim phase, rather than a retrograde step or a strategic cul-de-sac.

## **5. Structural and overarching issues**

We have set out above the reasons why we consider it wholly anachronistic, inappropriate, and strategically misguided to sacrifice connectivity within the North in favour of London connectivity, and this fundamental flaw in the May 2022 timetables as proposed requires revisiting for them to constitute an acceptable set of proposals from WYCA's standpoint.

An equally fundamental issue with the proposals is that not only have the timetables had scant regard to the needs for intra-North travel in terms of present-day TPE and Northern journeys and in terms of paving the way towards Northern Powerhouse Rail (NPR); they appear, as we

understand it, also to be wholly incompatible with the Trans-Pennine Route Upgrade proposals as they currently stand. It is our understanding that, on current assumptions, post-TRU trains to and from Leeds, Manchester and Liverpool could not be pathed beyond York without excessive dwell and/or pathing time such as would destroy the journey-time gains from TRU itself – and in some cases could not be pathed at all. If this is indeed the case, then it is plain that these timetables cannot be introduced in this form – or at least, if they were introduced, they would have to be subject to a further major re-cast within a few years to take account of TRU, which would appear to be highly undesirable.

Further structural consequences of the flawed principles underlying the May 2022 timetabling exercise include:

- The failure to introduce standard hours (or even standard 2-hourly patterns)
- “Asymmetrical” timetables where Up and Down directions’ services are not necessarily the same in terms of journey times, stopping patterns or clockfaces
- Critical journeys with services mixed across several operators, which in the absence of fares and ticketing reform is likely to harm rail’s attractiveness
- While extremely limited information has been provided, it appears that very little consideration has been given to routes connecting into and out of ECML services at nodes up and down its length – modal shift from car use will in the coming years be critically dependent on rail being able to capture modal share on these non-traditional routes rather than the largely mature London rail markets, and success in this will hinge on the ability to provide a coordinated service offer with good, consistent and reliable interchange
- As a result of the squeezing of the maximum possible number of intercity services into and out of King’s Cross, there appears to be excessive flighting of such services, including in some cases trains that largely duplicate one another’s function, to the detriment of stopping patterns and of services in the North that perform different and essential functions (such as TPEs)
- There is no clear and logical hierarchy of services – e.g. TPE cease stopping at Northallerton but pick up Chester-le-Street, and Cross-Country pick up several flows that are really regional / local in nature. This is evidently again a product of attempting to cram too many London services onto the ECML.
- The timetables are full of inconsistencies, irregularities, of pathing time and excessive dwells – all of which strongly imply a railway that will be overfilled and would deliver poor performance (we have seen little or no detail of what performance modelling has been carried out).

This is not to say that there are no positive aspects to the May 2022 proposals, and these have been highlighted below under the specific operators to whom they relate.

## 6. Operator-specific matters

*General note:* The comments below need to be seen in the context of the general points made above, several of which are fundamental, and imply that a significant rethinking of the timetable proposals is needed. We would hope that, in the context of such a rethinking, the positive factors identified below could be retained, while the negative are addressed.

It should be noted that, for any service not currently operating, we can be assumed to adopt a neutral / open-minded stance as to which TOC should in practice operate it, and therefore the TOC heading under which it appears below is not necessarily decisive.

## **(a) LNER**

*General note:* We believe that a number of the negative features of the LNER proposals as noted below reflect LNER's plan no longer, in contrast to previous plans and statements, to retain a fleet of 225 sets in operation until the proposed additional new fleet is delivered, which seems unlikely to happen before around 2024. The result is that LNER appears to be attempting to resource its service with an insufficient, Azuma-only, fleet, with evident negative consequences. We believe that this plan should be reconsidered and sufficient 225s retained, and provided for in the timetables, to enable sufficient services to operate and seating capacity to be provided.

### *Leeds – King's Cross*

We welcome the proposed regularisation (albeit that it is not complete) of departures from both ends of this service, with more consistent journey times and some, albeit very modest, journey-time improvements. We also welcome the plan to retain Wakefield and Doncaster stops in all services, as these are valuable for intra-Yorkshire connectivity, and the latter is a vital strategic interchange node.<sup>4</sup> Improvements to Sunday services, essentially providing a consistent offer every day of the week, are particularly welcomed.

We are surprised that the journey-time improvements are not greater, given the publicity from LNER as to the capabilities of the "Azuma" units, and are asymmetric as between the two directions; is this a product of pathing constraints and possibly excessively high line capacity utilisation? We note with some concern that, despite LNER's statements that their timetables concentrate capacity where it is most needed on core routes (with this prayed in aid in the context of the proposed cut to Bradford services), it appears that seating capacity between Leeds / Wakefield and London is actually reduced from 18,500 to 18,000/day. We believe this is linked to the fleet issue flagged above and consider that it needs revisiting.

Finally, while we are aware that historically Saturday nights and Sunday mornings have been made available to Network Rail (and previously BR) for engineering work, we suggest that this practice, reflected in a poor Leeds service on a Saturday night, is no longer appropriate to the modern world, in particular to the nature of the present leisure economy. We would look to the industry to work together to consider alternative approaches to routine engineering possessions that are more in tune with modern needs.

### *Bradford Forster Square – London*

We must protest in the strongest terms against the proposed withdrawal of one of the two daily train-pairs between Bradford and London, and ask that it be reconsidered as a matter of urgency. The alteration of the Down return train from King's Cross to depart as late as 19:40 (as against the present 16:33 and 18:33) is likely to be perceived by the city as "adding insult to injury".

Bradford, a city of over half a million, one of the fastest-growing and youngest cities in the country, and the heart of a district with world-class tourist attractions, has long been poorly served by the rail network, and only recently regained a second daily LNER London train (alongside the valuable Grand Central open-access service from Bradford Interchange, which serves a major and complementary role). There is strong evidence that the perceived and actual poor connectivity of Bradford has tangibly disadvantaged the city in economic terms, and this cannot be allowed to be exacerbated as we recover from the Covid crisis and meet the challenges of decarbonisation.

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<sup>4</sup> In this regard, while not a timetabling point, we also welcome LNER's confirmation that they are to abandon compulsory reservations, which were incompatible with the short-distance role LNER play in West Yorkshire.

The former Virgin Trains East Coast committed itself to introducing an all-day service between Bradford and London, operating every two hours. It was subsequently decided that this could not be introduced without additional infrastructure works in and around Bradford, but these have yet to be delivered. Unfortunately it is now most unlikely that, even if authorised immediately, such works could be delivered by May 2022. Nonetheless, concluding the work to arrive at a preferred option, financing and implementing it on the ground must be priorities for the industry and Government – and doing so in a manner that is compatible with the development of Northern’s successful Leeds North-West electric network.

In the meantime, a minimum of the current two return trains per day must be retained, operating on attractive timings, with options for a phased introduction of additional Bradford trains beyond these under active study. LNER have confirmed that the decision to propose withdrawal of one of the two trains is based not on the inability to path it from Bradford and back, but on a decision to prioritise the deployment of the Azuma fleet elsewhere – a fleet that is manifestly understrength in the proposed absence of the legacy 225s and of the planned additional new units. LNER have suggested that the train that currently operates one of the two Bradford trains is poorly utilised and spends much of the day out of use at Neville Hill, but this is wholly immaterial to the May 2022 timetable, which would in any event be structurally different: the second Bradford train would operate as an extension of a core Leeds – London service rather than as a standalone diagram. As stated above, we therefore ask that LNER revisit the May 2022 timetable on the basis that some diagrams will be retained 225 trains and Bradford will have at least two return London trains per day.

#### *Harrogate – London*

While the journey-time improvements to these through trains are useful, the shift at both ends from odd hours to even hours has a number of consequences that we consider negative – most markedly in that the last through Harrogate train would depart King’s Cross as early as 16:39, nearly an hour earlier than at present and too early for many leisure and business travellers. We note also that the timetable is also unbalanced, i.e. asymmetrical, in that there are only six Down trains as against seven Up. We would ask that the scope to introduce an additional Down train, at around 18:30 from King’s Cross, be examined.

In addition, we note that Horsforth calls are proposed to remain set-down-only in Down trains and pick-up-only in Up trains. Given the important role that LNER play in providing connectivity within the Harrogate line itself and that in a post-franchising world ORCATS revenue allocation should not be an issue, we ask that this be revisited. We appreciate that the relatively short platforms at Horsforth pose some challenges, but it is our understanding that LNER’s Azuma fleet, which serves many short platforms on other parts of the network such as in Scotland, is fitted with ASDO, so these issues should not be insuperable.

#### *Huddersfield – London*

We welcome the delivery of this new, once-daily service. That said, we are disappointed that the timings provided involve such long dwell times at Leeds (far longer than required for the splitting and joining moves) that in practice it appears that it would always be quicker to take a TPE (or Northern) train and change at Leeds. Given that, as discussed below, Kirklees would also suffer significant negative consequences under the proposals for TPE, we would suggest that the solution is not an optimal result for Huddersfield and Dewsbury.

#### *Skipton – London*

We welcome the proposed retention of this train at similar times to today but with improved journey times.

### *Wider connections via LNER*

LNER services form a critical part of journeys to many other parts of the east of England to which West Yorkshire is not connected by direct trains, such as via Peterborough to Cambridge, Stansted, Harwich and East Anglia; and via Doncaster, Retford, Newark or Grantham to Lincolnshire. We have seen no information as to the consequences of the May 2022 proposals for this connectivity, and it is unclear what work has been done to assess the consequences for these markets, which represent journeys where rail traditionally has a low modal share as against car, and where modal shift is essential in pursuit of transport decarbonisation.

Finally, it is our understanding that LNER propose to withdraw the train-pair that directly connects Leeds in the morning with Edinburgh and returns in the evening. We consider this most unfortunate, particular in the context of the wider proposals that would greatly impair West Yorkshire's direct connectivity to Scotland and the North-East via TPE and Cross-Country, as discussed below.

### *Longer-term aspirations for Leeds - London*

We are aware of the plans of the former Virgin Trains East Coast franchise to introduce an additional train every other hour between Leeds and London, running either via Wakefield or via east Leeds and Hambleton, and indeed of a longer-term aspiration to move to 3tph between Leeds and London. We note that the May 2022 proposal does not contain this additional 0.5tph, but that it is retained as an aspiration by LNER and reflected in their consultation document.

We confirm that we are content for this not to be pursued in the short term and in the absence of adequate infrastructure capacity to accommodate reliably the services required across all markets. While in principle enhanced service frequencies can bring passenger benefits even for longer-distance journeys and additional services clearly play a role in accommodating peak demand:

- The scale of such benefits is modest for journeys of two hours and longer, particularly in comparison to the benefits of increasing the frequency of regional services and where relatively few long-distance passengers are using flexible walk-up ticketing products;
- The requirement for direct services at attractive times for Bradford, Harrogate, Skipton and Huddersfield can readily be accommodated with a regular 2tph pattern;
- Where appropriate, additional peak-only services can be operated, as happens at present (pre-Covid base timetable);
- Capacity constraints on the West Riding Line would mean a conflict between any additional London train operating this way and other service enhancement priorities, such as the second Leeds – Sheffield fast train plus second hourly regional stopping services on the Doncaster and Sheffield routes, as well as accommodating freight;
- If the additional 0.5tph train were introduced, it is difficult to see what valuable use could be made of the “spare” 0.5tph path in the hour when the train would not run;
- Without additional infrastructure both on the West Riding Line itself and at Doncaster, an additional London train would be likely to constitute a performance risk both within these sections and on the core ECML further south, bringing the risk of importing and exporting delay in both directions and to/from a wide variety of other passenger and freight services;
- A 2.5tph Leeds – London timetable would be confusing for passengers, both directly because of its irregularity, and because of the compromises that operating the additional service would likely require to other services (i.e. flexing of their times);
- Connecting services as a rule run, outside urban areas where turn-up-and-go frequencies may occur, at 1tph or 2tph; therefore a 3tph pattern (or a 2.5tph pattern designed to be

increased to 3tph) must either be incompatible with integration with such other services, or would have to be designed with irregular intervals, i.e. 30:15:15;

- The same incompatibility is also operationally problematic in terms of the paths of other, non-3tph, services: this has been clearly demonstrated on the West Coast Mainline, where the move to 3tph between Manchester and London saw major disruption to the south Manchester suburban network, harming timetable structures for passengers and adding to Northern's operational costs.

We therefore confirm that in the short term and until adequate infrastructure capacity can be provided to serve all markets better, a move to 2.5tph, or indeed 3tph, is not at present a high priority for West Yorkshire. We would prefer a simple, consistent and well-structured basic daily 2tph pattern, with additional services inserted where they are needed such as to cater for peak business or leisure flows.

In the medium to longer term, for example when significant infrastructure enhancements have been delivered on the Leeds – Wakefield – South Kirkby Junction – Doncaster West Riding line, additional London trains would be valuable to West Yorkshire, if these can be delivered as complements to other services (and not as an alternative to enhanced regional services) and are well integrated with their clockface patterns. Doing so would pave the way for HS2.

### **(b) Trans-Pennine Express**

As noted above, it appears that strategic east-west and intra-North connectivity, above all that provided by TPE, is one of the most significant “victims” of the decision to prioritise London flows.

While there are choices to be made with regard to limited ECML capacity, particularly north of York and until overdue infrastructure investment is carried out, we consider that the wrong decisions have been made in this regard for the 2022 proposals. In our view it is fundamentally wrong to introduce new services at the expense of existing services, as is proposed here, with TPE forced to withdraw from the Newcastle – Edinburgh section of the ECML and to reduce the Newcastle service down to 1tph. Given the extent to which the additional London services proposed to use this capacity duplicate services already provided, this is particularly inappropriate.

But the harm to the North's strategic connectivity is not limited to the loss of these TPE services: it is exacerbated yet further by both the remaining TPE services, and the Cross-Country trains, having their journey times significantly extended because of poor pathing on the ECML and at York. Specifically, Down / eastbound / northbound TPE trains in particular almost all have excessive dwells at Manchester Victoria and/or Leeds and/or York, such that, for example, the Manchester Piccadilly – Leeds service is reduced to 2tph, with journey times of 1h11m and 1h01m (best at present is 56m; until 2018 it was 49m). Similarly, Leeds – Newcastle becomes slower than now despite the loss of the Northallerton stop: a full 9 minutes slower than in 2017, and 8 minutes slower than the proposed timing in the opposite direction in May 2022!

These flaws appear once again to reflect the fact that the timetable has been focused solely on London flows, with the result that many paths at York and north thereof simply do not work. The effect of this on journey times exacerbates the passenger impacts of the cut to 1tph to Newcastle with TPE, not only because of the frequency impact itself but because this means that the remaining train has to pick up the Chester-le-Street stop, harming the journey time yet further.

We consider these choices, and therefore these aspects of the May 2022 timetables, to be unacceptable, to the extent that even in isolation they would constitute grounds enough for the timetable structure to be rejected.

With regard to other TPE matters:

- *(Newcastle –) York – Manchester (– Manchester Airport):* The proposed curtailment of this service (which has not run through much of the Covid period) at Manchester is a product of the Manchester Recovery Taskforce work, but is reflected in the May 2022 timetable proposals. West Yorkshire takes the view that a short-term curtailment in Manchester is potentially acceptable provided that:
  - (a) It is accompanied by a firm commitment from Government to provide the infrastructure required to enable it to be restored to running through to the Airport;
  - (b) The train that does continue to run to the Airport stops at Dewsbury as well as Huddersfield;
  - (c) The curtailed service runs not to Victoria but (via Guide Bridge) to Piccadilly: we consider the reversal of the train at the congested Victoria station (involving shunt moves to and from the reversing sidings) to be a performance risk, and would also highlight that Piccadilly has frequent onward connections to the Airport as well as being the preferred city centre destination for Manchester and having a wide variety of onward rail connections
- *Garforth stops switching from TPE to Northern service:* This proposal, which would see Garforth lose its links to/from the Huddersfield direction, is inextricably linked with wider concerns regarding the east Leeds corridor, which are discussed further below in the context of Northern Trains.
- *Extension of Redcar service to Saltburn:* We have no difficulties with this proposal.
- *Additional peak-only York – Scarborough trains:* We recognise that the leisure market on this route makes the delivery of the long-promised upgrade to a 2tph service a priority, and one particularly relevant to the post-Covid recovery, but note that this proposal only introduces a limited number of trains – albeit noted as being a first step to an all-day 2tph service. We would flag that it is not necessarily the case that the ‘traditional’ commuting peaks will coincide with peaks in demand on a line like this.
- *Loss of Northallerton calls from TPE services:* Northallerton is well within commuting distance of Leeds, and this is a significant flow. The service proposed between Northallerton and Leeds is so heavily compromised, split between two operators and with irregular, often long, gaps and no consistency, as to be unacceptable to West Yorkshire. There is additional concern arising if there is no coordination of the ticketing offer between XC and TP (see below).
- *Manchester – Huddersfield (– Wakefield – Castleford – York):* We are most disappointed that the proposed extension of this service east of Huddersfield, which would provide very valuable connectivity enhancements to Kirklees and Wakefield, is not included in the proposals, and we would ask why this is the case.
- *Increase to 2tph Manchester – Huddersfield local stations:* This step is welcomed.
- *Weekend services:* We are most concerned to know next to nothing about Saturday and Sunday services. We understand that the relevant work may not even have been completed yet, which adds to the impression of a timetable that is not in a state that it could sensibly be introduced in May 2022. We are aware that TPE has, laudably, tried to move towards regular seven-day-a-week service patterns, but we do not know to what extent this has been incorporated in the May 2022 proposals.

### **(c) Cross-Country services**

We note that the extent of changes to XC services that would directly affect West Yorkshire is comparatively modest. Nonetheless, several material issues do arise:

- *Changes to southbound clockface:* On the face of it, the shift to the XC service departing Leeds for Sheffield after, rather than ahead of, the LNER London service is welcome, as it is likely to be good for performance on the West Riding line and the ECML, as well as potentially the Calder Valley.
- *Loss of afternoon additional Leeds – Sheffield and v.v.:* We note that this train is proposed to be diverted to run in the standard York – Doncaster – Sheffield route rather than via Leeds. This represents the loss of an important peak link (and the evidence is that the PM peak is recovering quickly post-Covid) between two major centres that have anomalously poor rail connectivity. We submit that this change should not proceed unless and until the replacement service is introduced, i.e. the proposed new hourly fast Leeds – Sheffield service (discussed below under Northern).
- *Slower journey times:* Almost all connections between Leeds and the North-East / Scotland become slower, primarily as a result of the inappropriate switching of Northallerton stops into XC from TPE<sup>5</sup>.
- *Poor timetable structure:* The XC timings are particularly afflicted by the structural flaws set out above which make for highly inconsistent timings between successive services, such that times and stopping patterns vary from train to train, which is poor timetabling practice, would confuse passengers, render the service less attractive, and is often associated with poor operational performance.

A further concern, on which we would require reassurance, is that several stations' services would under these proposals either entirely change from one operator to another (such as TPE to XC) or would become a mixed service. Aside from the challenges, at least as long as historic franchise-based thinking persists, of ensuring consistent and comprehensive passenger information, this poses real difficulties from the point of view of fares and ticketing. We have above highlighted the example of Northallerton – Leeds commuting flows, but many pertinent leisure and business flows will also be affected by the issue. What steps would the industry propose to ensure:

- (a) that tickets for flows to be split between operators are interavailable, including all discounted products available at present and restricted to one operator?
- (b) that discounted advance-purchase and similar tickets will continue to be available on at least as good terms as now for a flow that, for example, switches from TPE to XC? (We would comment in this regard that TPE have historically had a fairly good record in making such products available, but XC much less so.)

### **(d) Northern Trains**

We have commented above on our concerns that Northern (NT) services appear to have been very much an afterthought in this process, which is wholly inappropriate to the role they play and the passenger volumes they carry.

- *Harrogate line:* We welcome the long-awaited delivery of the second hourly service from Harrogate continuing beyond Knaresborough to York. We note, however, that there appear still to be gaps in the evening service at the Leeds end of the route, which under the commitments of the former Arriva franchise should have been increased to 2tph – we

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<sup>5</sup> We would observe that the lack of progress in improving Leeds – Newcastle – Glasgow journey times underlines the case to move forward with proposals for a new Leeds – Carlisle – Glasgow fast service.

urge the industry to deliver this within the scope of May 2022. In delivering the second service into York, it is essential that both this service and the core ECML services (passenger and freight) have robust and attractive paths that avoid conflict between Skelton Junction and York station. There is overwhelming evidence that the only long-term solution to allow this is the provision of an additional track over this section.

- *East of Leeds:* There are significant issues here – linked in part but not solely to the problems highlighted above (under TPE) in relation to pathing in and around York.
  - The Blackpool – York train gains (from TPE) a further stop at Garforth, diluting yet further any claim of this service to be a “Northern Connect”-style semifast train
  - The present unsatisfactory “semi-stopper” pattern is retained
  - The proposed loss of peak-hour stops east of Leeds (we have been warned of proposals to remove no fewer than three stops at Garforth alone, the busiest intermediate station on the line, within a single PM high-peak hour) is simply unworkable and must not be put into practice
  - Additional irregularities in the local services (such as missing stops at certain times) are not acceptable and again are a symptom of a timetable that is poorly structured and attempts to force too many trains onto congested infrastructure.
  - While we appreciate that infrastructure investment is desperately needed on this corridor and a stopping pattern at Thorpe Park which is acceptable in the medium term cannot be delivered without this, it is not clear to us how much regard has been paid in the May 2022 work to the implications of this major new station scheme.

It is our view that this opportunity should be taken to revisit the east Leeds corridor. We would favour the resumption, until TRU creates extra capacity and electrifies the line, of the historic pattern under which the Blackpool – York (nowadays diagrammed for fast-accelerating 195 units) formed the Leeds – York stopper, and the removal of the present additional “semi-stopper”, providing a benefit to rolling stock and crew utilisation as well as to performance. Without prejudice, however, to this, the top priority must be to ensure no loss of current stops (peak or off-peak) in May 2022 (noting that not all of those lost in 2018 have even now been reinstated).

- *Huddersfield – Wakefield – Castleford:* While not featured directly in the ECML consultation itself, we are concerned at a seeming lack of proposals to reinstate this hourly service, which was only introduced in May 2019 and largely withdrawn in 2020. The reinstatement of this service at 1tph is a priority matter for West Yorkshire, and we are already in contact with NTL to ask for confirmation that it will be reinstated in December 2021, or at the very latest May 2022.
- *Leeds – Wakefield Westgate – Sheffield:* While we warmly welcome the provision of paths for this service, we are disappointed that it is not believed deliverable until December 2023. As we have flagged with NTL and as noted above under XC, we would be keen to explore options to accelerate this, including to ensure that the PM-peak additional XC services between Leeds and Sheffield are not withdrawn (diverted away) until this new NT service begins running.
- *York – Scarborough:* See above under TPE.
- *York – Pontefract – Rotherham – Sheffield:* We note that this service is shown as still running at only 3/day. While we are aware that there is as yet no commitment to operate regular 1tph services, we ask the industry to confirm that the relevant paths would be available every hour. If not, this would be a major concern regarding the structure of the May 2022 proposals.

- *Other structural issues:* As is the case with other operators, but particularly for NT, the timetable is full of irregularities and inconsistencies which represent bad practice, are not passenger-friendly, and tend to be associated with poor performance.
- *Weekend services:* As with TPE, we have seen no information regarding Saturdays and Sundays. This is a particularly serious concern with respect to NT, because historically NT have continued to operate significant different service patterns on Sundays, not only in terms of greatly reduced frequencies but also often radically different clockface structures. We hope that NT will be taking the opportunity to follow other operators in moving towards a daily service structure but do not know whether or not this is in fact the case.

Finally, and for the avoidance of all doubt, we are aware that post-Covid changes to travel habits may in some cases lead to a reappraisal of connectivity needs and therefore of rail service specifications. This is entirely legitimate and we look forward to working with our industry partners to explore how services should evolve in the medium term whilst being consistent with our longer-term strategic aims. However, what must not happen is for the May 2022 ECML-led timetable change to be used as “cover” to circumvent such an evidence- and consultation-led process and curtail any services, whether on NT’s network or elsewhere, as a reaction to short-term demand reductions and/or financial pressures.

#### **(e) Other passenger operators**

We have seen next to no firm information regarding open-access operators, barring some supplied informally. This is a major shortcoming of the consultation process.

##### *Grand Central Bradford - London*

We understand that the GC Bradford – Halifax – Mirfield – Wakefield – Doncaster – London King’s Cross service is to continue at four trains per day, but with some changes to its timings. It is unclear from the information we have obtained whether the changes are beneficial, harmful or neutral – and we understand that even Grand Central themselves do not yet (at the time of writing) have a final version of the draft timetable. We have received no information regarding weekend timings which at present are quite different from weekdays (including different routing patterns). Given the importance to West Yorkshire of GC’s services and the value we place on them (they serve every district in the county bar Leeds), this lack of clarity is far from ideal. We understand however that the opportunity has not been taken to standardise GC’s routing through West Yorkshire, which is disappointing – our preference would be for all services to run via Pontefract.

##### *Other open-access operations*

We note that other open-access services are proposed to increase in frequency. While we can easily see the benefits to Humberside and Wearside of First Hull Trains and Grand Central increasing their services, which provide connectivity that would not otherwise exist, doing so alongside increases to LNER London services on the core ECML to King’s Cross places additional burdens on finite track capacity. However, the greatest single concern in this regard arises from First East Coast Trains being granted paths for five return services per day running the full length of the ECML, for services that exclusively duplicate LNER connectivity. We would question whether this represents a good use of network capacity at a time when core operators such as TPE are proposed to be forced to reduce their services.

#### **(f) Freight**

While we have received no information with regard to the impacts of the proposals on freight capacity and paths, and have not received representations from this sector, we would

emphasise that as a combined authority, WYCA is committed to supporting and promoting the growth of rail freight as playing a critical role in our region's environmentally sustainable and economically efficient industrial development and supporting our transition to a post-carbon society. We would be most concerned if the outcomes of the May 2022 timetables did not allow FOCs to continue to operate efficiently and competitively, with room for them to grow and expand their modal shares. In this spirit, we look forward to receiving reassurance that the freight sector is entirely content with the proposals.

## 7. Next steps

It seems plain from the above that the May 2022 timetables as proposed under these consultations contain too many serious, and in some cases structurally fundamental, flaws to continue in this form. This is notwithstanding their containing some positive aspects from West Yorkshire's standpoint. Disappointingly, the only logical conclusion that can be drawn from this is that, as it is now July 2021 at the time of writing, the timetable change at least for the core ECML itself must be postponed.

What we consider needs to happen now, is to make productive use of the time won and to progress in the spirit of the Williams-Shapps reforms. We consider that a productive way forward would involve steps such as the following:

- Cease work developing the consultation timetables themselves in their current form
- Make available to all relevant stakeholders any and all work already done by Network Rail and other industry partners to look at alternatives to the consultation timetables, including but not limited to any clean-sheet timetabling exercises that were carried out, plus relevant analysis and appraisals that pertain to them
- Set up an appropriate grouping and a governance structure, overseen by a senior and independent industry figure and to include funders, specifiers and senior stakeholders alongside industry partners, with a remit to build on the responses to these consultations and develop an interim timetable for December 2022 (or such other date as agreed which allows an effective process to be followed), and to develop subsequent timetables as infrastructure changes are delivered; this group should have the remit to identify capacity constraints and develop options (including infrastructure schemes) to address them, and the ability to influence Government investment priorities (see next point)
- Obtain clarity from Government (as far as possible in advance of the Integrated Rail Plan if this is not to be published imminently) as to its medium and long-term plans for investment in the ECML, especially but not limited to the sections north of York

We are aware that several other authorities and other bodies along the ECML have made similar representations, identifying serious flaws with the timetable proposals and proposing steps comparable to the above. In particular, we have seen an early draft of TfN's response and note that it makes similar proposals as to the way forward.

We consider the following principles to be appropriate to the development of the interim timetable (this list is not intended to be comprehensive and the proposed group should agree these at the commencement of its activities): that timetables should be planned:

- By reference to agreed strategic principles including policy objectives of national, regional and local government, where revenue and direct financial aspects will be an important but not the sole decisive criterion, and socio-economic value is paramount – in other words, to be guided by the functions that the railway exists to serve

- On a whole-railway basis, viewing the railway (the “Great British Railway”) as a system which needs to work as an integrated whole to provide the connectivity (direct and via interchange) that the passenger needs
- In the context of the climate emergency driving the need for modal shift from aviation for longer-distance and London journeys, and from car for shorter-distance and non-London journeys
- In a manner that is cognisant of the imperatives of social inclusion, “levelling-up” and the distributional effects of decisions regarding finite rail network capacity
- With a starting point of “no detriment” – that is, an initial assumption that no new service should be introduced at the cost of removing or impairing the attractiveness or efficiency of an existing service, with any proposals for such changes to be agreed by the group as exceptions, based on the strategic evidence
- Around an assumption of standard hours on the core ECML (London – Leeds / Edinburgh)
- On an operator-agnostic basis – again to place the passenger and his/her journey first
- Over the medium and longer terms, on the basis that the services required are the starting point and the infrastructure follows, rather than agreeing an infrastructure specification first and then attempting to design a workable timetable around it
- On the basis that service changes, in particular longstanding enhancement proposals, that can be introduced without prejudicing timetabling for the core ECML itself, should be so introduced without delay and ahead of other changes, such as in May 2022
- With the interests of the freight on an equal footing to passenger operations and with comparable assumptions and principles applied, and an assumption that significant growth will be required in freight capacity on the ECML