

**Response to application for the proposed Network
Rail (Huddersfield to Westtown) (Dewsbury
Improvements) Order**

Transport and Works Act 1992

West Yorkshire Combined Authority

Date of submission: 17 May 2021

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1. Introduction and Summary

- 1.1. This document comprises West Yorkshire Combined Authority's response to the application by Network Rail for the Network Rail (Huddersfield to Westtown) (Dewsbury) Improvements) Order (the Order). The proposed works included in the Order would form part of the Transpennine Route Upgrade (TRU).
- 1.2. West Yorkshire Combined Authority (the Combined Authority) is the transport authority covering Leeds, Wakefield, Kirklees, Bradford and Calderdale districts, we play a key role in planning for West Yorkshire's transport future. The Leeds City Region Local Planning Authorities are committed to partnership working to ensure a joined-up approach to spatial planning including tackling cross-boundary issues and agreeing strategic priorities. These strategic priorities are reflected in the objectives of the Leeds City Region Strategic Economic Framework (SEF), specifically around "Delivering 21st Century Transport".
- 1.3. The Combined Authority is supportive in principle of the Transpennine Route Upgrade and the proposals included in the Order. However, the application for the Order raises a number of issues that require further engagement with Network Rail. In particular, the proposed Order confers powers of compulsory acquisition and temporary possession over land owned by the Combined Authority, including in the vicinity of Huddersfield bus station. These powers have the potential to disrupt the operation of the bus station.
- 1.4. The Combined Authority looks forward to working with Network Rail to obtain suitable assurances that the powers in the Order will not adversely affect the safe and efficient operation of the bus station. We expect that such assurances can be secured prior to any inquiry or hearing held in connection with the TWAO application. However, in the unlikely event that WYCA's concerns have not been satisfactorily resolved by that time, the Combined Authority would wish to have the opportunity to of appearing before and being heard by the person appointed by the Secretary of State for that purpose.
- 1.5. The proposals in the application raise a number of other issues which the Combined Authority would like to discuss with Network Rail. These include:
 - **Communications plan** – it is important that any communication to the travelling public, communities and businesses about the impacts of disruption and travelling alternatives needs to be made jointly and through our channels and not just to existing rail passengers.
 - **Disruption and mitigation measures** – we would like Network Rail to continue to work with our officers on a comprehensive management strategy, to mitigate the potential impacts on residents and businesses and for this to be agreed at the earliest opportunity. Station Travel Plans and Construction Traffic Management Plans need to be developed jointly with the Combined Authority due to the impact on the public transport network. We are particularly

disappointed that there is generally a lack of information in relation to diversionary bus services. Based on our assessment, we believe that bus customers and impacts on the bus network are not adequately considered in the assessments accompanying the application.

- **Train Services** - we would like to work closely with Network Rail and the rail industry to shape the train services that meet the needs of this region.
- **Skill** - we would like to explore the potential to include an additional skills premium to maximise the economic potential of the project.

- 1.6. We value regular updates from Network Rail in relation to the TRU project and it is important that our officers, district partners and politicians are kept up to date about the progress and impact of the project to our communities and businesses.
- 1.7. As with any major infrastructure project, the impacts of the construction and operation of the works authorised by the proposed Order would result in changes to the quality and character of neighbourhoods along the route. It is our understanding that Kirklees Council as the planning authority and landowner will be responding to the application addressing the localised issues, listed building consents and land issues.
- 1.8. This response contains the following parts:
 - Introduction and summary (this section);
 - Importance of TRU;
 - Land acquisition and use;
 - Wider issues of the TRU that remain to be resolved and
 - Representations on the Environmental Statement accompanying the application.
- 1.9. Any correspondence relating to the WYCA's representation should be sent to the following address:

Liz Hunter
West Yorkshire Combined Authority
Wellington House, 40-50 Wellington Street,
Leeds,
LS1 2DE

2. Importance of Transpennine Route Upgrade (TRU)

Current Issues

- 2.1. The Transpennine route currently handles a mix of fast express, local stopping services and freight, but has not seen significant infrastructure investment in enhancements to increase capacity for many years. The section between Huddersfield and Westtown is one of the most congested sections of the Transpennine route.
- 2.2. This is the main route linking two major cities with large volumes of traffic using the railway. The route has suffered from poor performance. In the last three rail periods of 2019 the average PPM (Passenger Performance Measure) for TransPennine Express using the North Route (which includes the Transpennine Route) was 64% and cancellations and significant lateness ranged between 13.2% and 25.2%. Whilst there was some impact from the introduction of new trains, this was significantly poor performance compared to the rest of the country. The Transpennine route was crowded and congested, journeys were slow and unreliable. As the current infrastructure provision is relatively dated, there is limited capacity to accommodate growth on the existing railway line.
- 2.3. Whilst the impact on rail demand is still uncertain in the post-Covid world, it is believed that the Transpennine route will continue to play an important role in economic recovery, regional connectivity and meeting the ambitious target set by the region to achieve a net-zero carbon target by 2038. From 1997/1998 to 2019/20, the four stations in West Yorkshire (Deighton, Mirfield, Ravensthorpe and Huddersfield) experienced significant growth ranging from 93% to 320% growth in the pre-Covid period.

Importance of TRU to the Region

- 2.4. West Yorkshire Combined Authority is very supportive of the Transpennine Route Upgrade. It is a project that was first announced in 2011 and is a vitally important short-medium term project for the North and for this region, buying us time and long overdue additional rail capacity on the north's main east – west rail artery in advance of a new Northern Powerhouse Rail (NPR) line via Bradford city centre. The following paragraphs highlight the importance of the TRU for our region.

- **Economic growth and levelling up:** The Transpennine route is a key transport corridor for providing connections between cities in the North of England. The proposed works outlined in the application for the Network Rail (Huddersfield to Westtown) (Dewsbury) Improvements) Order (the TWAO Application) therefore are crucial to support economic recovery, economic growth and “levelling up” opportunities in this region, as well as across the North of England which is crucial in the post-Covid world.

- **Capacity and connectivity needs:** The section between Huddersfield and Westtown is a key constraint on the capability and reliability of the whole Transpennine route. Our emerging rail strategy is considering capacity and our analysis shows that this section of the railway needs significant improvements and provision of four-track railway is crucial to meet the capacity and connectivity requirements of this region. We therefore support the increase in track capacity, platform capacity and line speed improvement as outlined in the Order.
- **Decarbonisation:** The proposed works in the TWAO Application includes the construction of electrification equipment to electrify the railway between Huddersfield and Westtown. These electrification works will assist in the decarbonisation of the railway network and will improve journey times and resilience of the railway. This accords with Network Rail's Decarbonisation Strategy in which TRU was specifically identified.

West Yorkshire currently emits 11.1 million tonnes of carbon dioxide equivalent per year. Transport is the largest emitting sector, dominated by road transport and private vehicle use. The Combined Authority published a report titled "[Tackling the Climate Emergency - Emission Reduction Pathways report](#)" in July 2020. West Yorkshire could reduce emissions by 100 percent and achieve its 2038 net-zero target by delivering between 73% and 82% of emissions savings through the measures that have been modelled in the Emissions Reduction Pathways study. The electrification of the Transpennine Route will help to achieve this ambitious target.

- **Accessible stations:** Fully accessible stations should be the minimum standard for any modern railway. We are pleased to see that the TWAO submission has included the delivery of four fully accessible and compliant stations at Huddersfield, Deighton, Mirfield and Ravensthorpe, with step-free access, drop-off arrangements, and blue badge parking made available at all these stations. The same standards should be applied to all stations along the Transpennine route.

3. Acquisition and use of land

- 3.1 The proposed Order confers powers of acquisition and use over a number of parcels of land in which the Combined Authority has an interest. These include parcels in an around Huddersfield bus station.
- 3.2 The table below sets out the relevant parcels of land and the purpose for which we understand these parcels have been included in the Order.

| Plots | Use/reason |
|--|--|
| 9-019, 9-117 | Both plots are within the Limit of Deviation of highway works: Work No. 6 (Whitacre Street) for Plot 9-019 and Works No. 7 (A62 Leeds Road) for Plot 9-117. These highways are both subject to realignment works. |
| 3-031, 3-034, 3-036, 3-040, 3-047, 3-052, 3-058, 3-076, 3-106 and 3-107 | <p>Plots 3-031, 3-034, 3-036, 3-040 and 3-052 are areas where works will be required at the subsurface only to install ground anchors to support the works in the railway tunnels. A restrictive covenant will be placed on this land for the protection of the ground anchors.</p> <p>Plots 3-047, 3-058, 3-076, 3-106 and 3-107 are areas where works will be required at the subsurface to install ground anchors to support the works in the railway tunnels. A restrictive covenant will be placed on this land for the protection of the ground anchors. Temporary works are also required at the surface as part of utility diversions.</p> |
| 3-046, 3-050 | Both plots are within the Limit of Deviation of Work No. 1A (Plot 3-046) and Work No. 1B (Plot 3-050) above the railway tunnels. Railway works will be undertaken within the tunnel only. Temporary works are also required at the surface as part of utility diversions. |
| 3-044, 3-046, 3-047, 3-076, 3-106, 3-107, 3-109, 3-153, 11-034, 16-041, 17-006, 18-004, 22-043 | <p>Plots 3-044, 3-046, 3-047, 3-106, 3-107, 3-109 are required for temporary works as part of utility diversions.</p> <p>Plot 3-153 is required for temporary works as part of the John William Street Bridge and highway works.</p> <p>Plot 11-034 is required for environmental mitigation (at river level). Access required from the bridge.</p> <p>Plot 16-041 is required for temporary use as a temporary car park for Mirfield station during the works.</p> |

| | |
|--|--|
| | <p>Plot 17-006 and 18-004 are required for temporary use for railway works and works to Wheatley's Viaduct (MVN2/196)</p> <p>Plot 22-042 is required for temporary use for the provision of access to utility works.</p> |
| 3-037, 3-039, 3-048, 3-048a, 3-051, 3-053, 3-057 | All of these plots are within a Protective Works Limit, meaning no works are proposed other than any protective works in line with Article 23 of the Draft Order. |

3.3 The acquisition and use of these parcels of land has the potential to affect the safe and efficient operation of Huddersfield bus station which is a public facility. It might also have potential impacts on our proposed works at the bus station. We urge Network Rail to share the detailed information with us including:

- Clear plans showing existing & proposed utility diversions, proposed duration and timing of the works

3.4 As regards to the proposed strengthening works to the subsoil, there are potential short, medium and long term impacts to the normal and safe operation of the bus station for which the Combined Authority will seek suitable assurances and indemnities against any loss of service or costs arising. These include:

| Timescales | Potential Impacts |
|-------------------|---|
| Short term | Loss of use or service of the bus station function through vibration, noise and/or dust or unforeseen loss of utility service supply or drainage. Impacts on tenants and/or users. Any structural damage to the fabric of the bus station buildings, carriageways and hardstanding including utility services attributable to the Network Rail works. |
| Medium term | Impacts upon the design, development and construction of the proposed refurbishment of Huddersfield Bus Station under the Transforming Cities Fund programme. |
| Long term | Loss of service or development potential of the bus station. |

3.5 Whilst our officers have been involved in the previous consultation on the Order proposals, Network Rail has not previously provided our officers with details of the proposed acquisition and use of these parcels. Since the submission of the Application, we have held constructive discussions with Network Rail regarding the provisions in the Order, their potential impacts, and the assurances that are required to protect the Combined Authority's assets and statutory responsibilities.

- 3.6 The Combined Authority looks forward to working with Network Rail to obtain suitable assurances that the powers in the Order will not adversely affect the safe and efficient operation of the bus station. Discussions regarding these assurances have commenced with Network Rail.

4. Wider Issues of the Transpennine Route Upgrade

- 4.1 Whilst we are supportive of the TRU and the proposed works outlined in the TWAO Application in principle, we have concerns over a number of wider issues which are outlined in the following paragraphs.
- 4.2 **Northern Powerhouse Rail (NPR) and TRU:** Due to the current funding and affordability challenges, we are concerned that the Government will try to combine NPR and TRU programmes together or choose one over the other. This will either lead to a substantial downgrade of the NPR programme or a significant delay of TRU, neither of which delivers what is needed for the region or the transport network in the North. We would like to reiterate that both TRU and NPR are required to boost economic growth and recovery, to bridge the productivity gap, to maximise “levelling-up” opportunities and to help decarbonise our economy. The North needs more railway if it is to achieve these objectives, with these two routes having different roles to play in the north’s east-west rail connectivity in the future. A new NPR line from Manchester to Leeds via Bradford will form the north’s inter-city east-west trunk route and TRU should be re-focussed to better serve the inter-regional, local and freight markets. Both programmes are vital and are part of the wider jigsaw puzzle of integrated improvements needed. These also include but are not limited to the crucial upgrades at the hubs of Leeds and Manchester, to allow the full benefits to be realised (see below).
- 4.3 **Delivered in full:** Whilst the proposed works outlined in the TWAO submission will unlock one of the ‘bottlenecks’ for the entire Transpennine route, the full potential and benefits of the TRU cannot be realised until the Government confirms the scope of the TRU and its funding commitment for the full implementation of TRU. We urge the Government to provide commitment to the delivery of TRU in full without further delay with full electrification, optimised line speed improvements, W12 gauge for freight, European Train Control signalling and accessible stations throughout the route (not just the four stations identified in the TWAO submission). Also, as it is likely that more people will be using the route after the TRU, it should be within the TRU remit to provide an appropriate level of station facilities to match the forecast demand, this applies to waiting shelters, lifts and car parking facilities etc.
- 4.4 We would like to reiterate the importance of electrification and provision of W12 gauge clearance to meet the newly announced Government target to cut carbon emission by 78% by 2035. W12 gauge clearance will help to encourage modal shift of freight from road to rail particularly from the congested M62 motorway. This has the potential of reducing 1,500 HGV journeys everyday with significantly greater benefits than the inferior W8A gauge clearance. In our estimates, in consultation with the rail freight industry, the provision of W12 gauge clearance plus electrification could have the potential to reduce 520 tonnes of CO2 everyday which is equivalent to more than 187,000 tonnes of CO2 per year. Generally, an electric

passenger vehicle produces 24% the CO2 emissions of a diesel passenger vehicle and rail freight produces 11% the emissions of road freight.¹

- 4.5 **Leeds station capacity:** Apart from the section between Huddersfield and Westtown, Leeds station and its surrounding area is a known bottleneck in the railway in the north, not only causing issues on the current timetable but limiting any future enhancements in capacity for this region and the North. The benefits of TRU and any future rail investment cannot be fully realised until the capacity issues at Leeds and surrounding areas are resolved. We therefore urge the Government to prioritise work on resolving the capacity issues at Leeds and surrounding areas which includes both track and station capacity.
- 4.6 **Communications plan:** A clear communications plan to be shared and agreed in advance with the Combined Authority (CA) is important, so that we can help to raise the awareness of the project and help with the passenger travel disruption planning. The communications plan should be developed alongside a collective approach to Travel Demand Management with the Combined Authority and the relevant district Councils in order that travel advice is offered to all travellers via our communication platforms to the travelling public, communities and businesses not just to existing rail passengers. The level of information provided to all residents and landowners must be consistent so that residents, landowners and businesses could assess the impact of the proposed work and make alternative plans.
- 4.7 **Disruption and mitigation:** We understand that there will be disruption to train services and the highway network during the construction of TRU, impacting local communities and those wishing to travel. The completion of TRU will help to support modal shift to public transport in the medium and long term. However, we would like Network Rail to continue to work with our officers on a comprehensive management strategy, to mitigate the potential impacts on residents and businesses and for this to be agreed at the earliest opportunity. In addition to disruption for rail passengers, local journeys by bus and road will also be disrupted and it is crucial that the mobility of local communities is not adversely affected. We request that the following plans be developed and in place as part of the TRU development.
- A Station Travel Plan (STP) for each affected station which seeks to maintain connectivity for the key journeys made by station users. This may require a bespoke approach to rail replacement transport. The STP should also identify how the project affects access to and from the station. Each STP to be reviewed dynamically as the project develops jointly by Network Rail, the TOCs (Train Operating Companies), the Combined Authority and the relevant District Council and provide a legacy for station travel planning after the project is completed.
 - At each point where the scheme is anticipated to impact on the highway, a plan is devised and agreed with the local Council and the Combined Authority

¹ [Why Rail Electrification? Report - New Tab \(riaagb.org.uk\)](https://riaagb.org.uk)

to mitigate impacts on all road users and to prevent severance/ isolation for communities impacted. In addition to traffic management provisions, this may involve funding diversionary bus services and/ or shuttle services.

- 4.8 **Train services:** Once the scope and funding of TRU is confirmed, we would like to work closely with Network Rail and the rail industry to shape the train services that meet the needs of this region. We have set out our 'Ambition for TRU' in [Item 6 - TRU update - Appendix 1.pdf \(moderngov.co.uk\)](#). For example, the relocation of Ravensthorpe station will enable services on the Wakefield line to stop at the relocated Ravensthorpe station serving housing growth in the area. The increase in track capacity will also provide an opportunity to deliver an appropriate level of rail services to the proposed new rail stations at White Rose and Thorpe Park.
- 4.9 **Skills:** The transport agenda is inextricably linked with skills and employment. Large-scale infrastructure projects such as TRU will require access to skills and labour which is already in high demand and short supply in this region. At the same time, TRU could provide opportunities for training and employment to up-skill the labour force of this region. The Future Ready Skills Commission, made up of leading experts from education, policy think tanks and employers set out its blueprint for a post-16 skills system. One of the nine recommendations of the Commission was that large-scale public infrastructure projects designed to level up areas should include an additional skills premium of up to 5% of the total budget of the project to maximise their economic potential.² The additional money raised through a skills premium and devolved to areas would fund future workforce needs, as well as support social mobility through better connections between local skills strategies and investment. This would ensure projects deliver their full social and economic potential and deliver the benefits to the communities the investment is intended for. We urge the government to include this skill premium as part of the TRU.

² For more information please see www.futurereadyskillscommission.com

5. Part Three – High Level Response in Relation to Environmental Statement

- 5.1 As Kirklees Council will provide a detailed response on localised issues, our response will focus on wider issues such as planning policy, air quality, inclusivity, diversity and equality, traffic and transport, walking and cycling, climate effect and vulnerability and socio-economic impacts.

Planning Policy

- 5.2 The Environmental Statement (ES) does not refer to the regional context (section 5.4, p.9). West Yorkshire does not have statutory regional plan but within the Strategic Economic Framework (<https://www.westyorks-ca.gov.uk/growing-the-economy/strategic-economic-framework/>), we set out our role in strategic planning amongst other policy areas including the Leeds City Region Statement of Common Ground that includes a commitment to supporting strategic transport infrastructure.³
- 5.3 There is some confusion in the document in relation to the Local Transport Plan and West Yorkshire Transport Strategy 2040 (section 5.5, p.13). For the avoidance of doubt, the West Yorkshire Combined Authority has a statutory duty to produce and keep under review a Local Transport Plan for West Yorkshire. The West Yorkshire Transport Strategy 2040 provides the overarching transport strategy, accompanied by constituent documents providing detail for bus, rail and other forms of transport and replaces the West Yorkshire Local Transport Plan published in 2011. It is the current adopted Local Transport Plan for West Yorkshire.
- 5.4 The document (Table 5-2, p.14) does not make reference to the emerging West Yorkshire Connectivity Infrastructure Plan (currently under consultation). The Connectivity Infrastructure Plan is jointly developed by the Combined Authority with our partner councils, it sets out a proposed delivery pipeline of infrastructure improvements. The aim of the plan is to better connect all of our places, communities and economic assets, within our region and beyond.
- 5.5 We have also reviewed the Design and Access Statement as part of NR15. Here is a summary of our comments:

| Issues | Suggestion |
|---|---|
| There is no mention of trees or wider landscaping measures within any of the proposals, despite citing Local Plan policy LC24 | This should be included in the future design. |

³ [lcr-statement-of-common-ground-march-2020-final-1.pdf \(westyorks-ca.gov.uk\)](#)

| Issues | Suggestion |
|--|---|
| Cycle storage is not shown on the drawings, despite the citing of the above policy LC24 | This should be included in the future design. |
| Lighting is also not shown | This should be included in the future design. |
| Deighton station- the lift shafts are very tall and overbearing on the nearby houses. | Should hydraulic lifts be considered if this is due to the lift machinery. |
| Ravensthorpe Station | The route to the station needs to be as easy, direct and safe as possible for all users including pedestrians and cyclists. |
| Fieldhouse Overbridge - Is there any reason why a canopy is needed on a pedestrian bridge? Is galvanised steel an appropriate material to use next to the weathering steel? | Clarification might be required in the future design. |
| Wheatley's Viaduct – It is not clear what the 'constructability considerations' are that led to the portals not lining up with the piers. | Clarification might be required in the future design. |

Air Quality

- 5.6 We understand that our district partner would be better placed to provide detailed air quality comments due to their statutory air quality function.
- 5.7 A West Yorkshire Low Emission Strategy has been adopted by the Combined Authority and all West Yorkshire Partner Councils. This outlines measures to significantly improve air quality across the region and makes a series of recommendations which include planning and new development. The proposed works in the TWAO submission need to be developed cognisant of its contents. The strategy can be downloaded from: [West Yorkshire Low Emissions Strategy 2016 to 2021 \(bradford.gov.uk\)](https://www.bradford.gov.uk)
- 5.8 We assume that there will be negative impacts on air quality during the construction period due to construction activities and congestion on the local highway network. Network Rail should consider the use of electric vehicles and greater use of rail freight to reduce the negative impact on air quality.

Inclusivity, Diversity and Equality

- 5.9 Developing inclusive growth that is accessible to all is vital to transforming our economy, we are pleased that the TRU project supports this principle (15.3.24). We urge Network Rail to incorporate the principle of inclusive growth in every stage of development. Consideration of equality issues should be incorporated in the engagement process and communications plan. Businesses affected will need support to minimise disruption to their business operations and potential job losses. The principles of inclusivity, diversity and equality should be incorporated in the

design of the stations and the network, mitigation measures, disruption planning, employment of the workforce and the operation of the railway. Design should take into consideration our aging population and those with long term health conditions, it is important that these groups are considered throughout the process to ensure there are no physical barriers to travel.

- 5.10 We are however surprised that the initial summary of Chapter 15 suggests that the impact of the proposed works on transport and active travel will be the same for the vulnerable groups as well as the wider group. It would be helpful if Network Rail could provide us with details in relation to the mitigation measures and a copy of the Equality Impact Assessment (if available) in relation to the proposed works.

Traffic and Transport

- 5.11 Bus customers and impacts on the bus network are not adequately considered in Volume 3, Appendices – Appendix 14 Transport Assessment. This area is a key weakness of the TWAO Application and we request further information on these impacts and the measures that will be taken to mitigate them. We are concerned that so far there has been very little engagement between the Combined Authority and Network Rail in relation to this area. Buses are vital to West Yorkshire, its people, its businesses and its economy. Each week people in West Yorkshire make over 3.5 million journeys on local bus services, making them the most highly used form of public transport. Those journeys link them to jobs, education, training, shopping and vital health services. Buses also provide essential connections with friends and family, for days and evenings out. Network Rail must commit to fully understanding bus customers, the bus and road network impacts in both the construction phase and end state. We expect fully funded mitigation to be provided. This will include new Station Travel Plans. It is expected that additional bus resources and compensation for lost bus revenues and increased operating costs will also be needed as part of the mitigation measures. Agreed customer communications with the Combined Authority Customer Service team are also expected. We urge Network Rail to work closely with the Combined Authority to finalise the requirements and solutions around this area.

- 5.12 Here are the specific comments in relation to Environmental Statement, Volume 2i, Chapter 14 -Traffic and transport:

- Construction Traffic Management Plan (CTMP) - It appears that Network Rail have a good evidence base to assess the impacts on the highway network as a result of construction activities related to TRU. However, at this stage there is little consideration of how these impacts will be mitigated apart from the initial identification of potential diversionary routes. It is acknowledged that a CTMP will be produced for each section of the route as design progresses involving Kirklees council. It is imperative that the Combined Authority officers are included in those discussions given the construction will severely impact 37 roads with associated impacts on public transport including the operation of rail replacement bus services. We urge Network Rail to engage

with officers of the Combined Authority at an early stage to develop and finalise the CTMPs to minimise the impact to residents and commuters.

- Table 14.1 should include the declaration of climate emergency.
- The document (14.5.6) mentions that much of the construction material will be brought in by rail. We welcome this statement given the amount of potential disruption on the highway network. Network Rail, however, needs to make sure that there are sufficient freight train paths available in the network given the number of diversions of TPE services and existing capacity pressure on alternative routes.
- Diversionary routes (14.5.32) – We understand that there will be further discussions with the highway authority, however, there is very little engagement with the Combined Authority. We urge Network Rail to involve the Combined Authority in these discussions and we are of the opinion that some of the proposed routes might not be suitable for buses or HGVs (covered in detail below).
- The following clarifications are required in relation to table 14-9:

| Location | Issues |
|---------------------|--|
| John William Street | Will Viaduct Street still be open inbound as a diversionary route? |
| Castlegate | It is not clear here what will be closed for 3 months? Is it the A62 and Unna Way? If so, the impacts will be massive. Is it possible to mitigate with lane closures rather than full closure? |
| Northgate | Willow Lane E & Hillhouse Lane are not suitable routes for HGVs and buses inbound given height restriction on Hillhouse Lane viaduct and tight junction between Bradford Road and Willow Lane E. Can you please confirm if swept path analysis has been undertaken for these routes? Ray Lane could be considered as an alternative for buses/HGV's if parking is removed. |
| B6118 Colne Bridge | Significant diversion needed, any alternative better mitigation for cyclists and pedestrians on this section? |
| Calder Road | Significant diversion needed via A644, any alternative better mitigation for cyclists (not sure if much pedestrian demand on this section)? |
| Thornhill Road | Significant diversion needed, any alternative better mitigation for cyclists and pedestrians on this section? |

- Rail replacement buses and strategy (14.5.36 and 14.6.65): There are insufficient details in these sections. Some passengers' pick-up and drop off locations will be as existing and we are not convinced that it is feasible as access to highways at Mirfield, Ravensthorpe and Deighton stations will be severely affected. It is noted that there will be a rail replacement strategy. We would like Network Rail to involve the Combined Authority in formulating the details of this strategy. We are interested in the details so that we can

shape and help to mitigate the impacts to our communities. For example, will rail replacement buses run to Leeds (which might have the issue of congestion) or railheads (say Dewsbury or Brighouse)? What are the plans for Penistone line users?

- Temporary platform at Hillside (14.5.37 and 14.6.65): More information is required regarding this proposed facility. This includes frequency of service, destinations, level of facilities such as accessible ramps and platform, waiting shelters, toilets, passenger information etc. We also have concerns about this proposed facility as (a) any buses accessing the temporary platform will be caught up in all the general traffic congestion around Huddersfield town centre and (b) elsewhere in the TWAO it mentions that 5 buses per hour between Hillside and Huddersfield which would only just accommodate 1x class 185 train of passengers equivalent to an hourly service. This is far from sufficient given the size of rail market to destinations east of Huddersfield.
- Discrepancies in information: there is a discrepancy between construction time periods in table 14-9 and the commentary in table 14-3. For example, table 14-9 mentions the B6118 is closed for 7 weeks but the commentary mentions construction impacts for 9 months.
- Comments below relate to Environmental Statement, Volume 3, Chapter 14 - Traffic and transport - technical appendices:

| Ref. | Issues |
|----------------------|---|
| 5.5 | <p>5.5.3 seems to understate scheme benefits.</p> <p>The section is not sufficiently clear about Network Rail's intention of running whatever permutation of amended rail services is possible under each possession scenario, to minimise reliance on buses.</p> <p>Further works might be required to optimise routing and timetables of replacement buses and temporary train services to minimise disruption & inconvenience.</p> |
| 7.1.14 and Insert 39 | We consider the more 'robust' Saturn transport model should have been used. |
| 7.2.4 and 7.5.8 | It is unclear what the plans are to cater for rail users when the George Street car park is closed (300 spaces) (mostly used by station users). Are there sufficient other car parks in Huddersfield for rail commuters? Is there sufficient capacity at nearest alternative car park on Cambridge Road (220 spaces)? |
| 7.2.9 | It is unclear what will happen to the main car park and pick up and drop off at Huddersfield station. |
| 7.2.8 | Reduced access to Huddersfield bus station for 6 months. We will require details in relation to the proposed disruption. |
| 7.2.11 | Information is not clear. |
| 7.2.12 | Diversification route could be problematic including narrow lanes, height restriction on Hillhouse lane. This does not appear to have been modelled. |

| Ref. | Issues |
|-----------------|---|
| Table 7.10 | The commentary mentions significant impacts for bus services but is not quantified in terms of actual delays. |
| 7.5.7 and 8.2.6 | Temporary platform provided at Hillside, only accessed by bus from Huddersfield rail station. |
| 7.5.10 | It is unclear what is meant by medium level congestion. |
| Table 8.4 | It is unclear if there will be sufficient capacity on Alder Street for these traffic flows given the width & speed humps. |
| Table 10.4 | B6118 carries 1,500 vehicles in the peak, however, its closure is not reflected in increased flows on the surrounding road network. |
| 11.1.30 | 202 bus service does not operate via A644 in Mirfield centre. |
| 11.1.34 | There will be significant increases in traffic on Hopton Lane. It is unclear where the traffic will go. If it is the B6118, what happens when this is closed? |
| 12.2.15 | Some services are missing in the description. |
| 12.2.18 | It does not have a lost property office. |
| 12.2.20 | Ravensthorpe station - Is 700m an acceptable walking distance for interchange with buses? It is not a great walking route especially in the evenings. |

- 5.13 We would also like to understand if there are any works completed to assess the short to medium term impacts on public transport including buses and rail following the implementation of the proposed works i.e., impact on public transport following disruption.

Impact on Walking and Cycling

- 5.14 When temporary diversions are required, Network Rail should consider if the facilities are appropriate for pedestrians, cyclists and particularly for disabled footway users considering the length of accessible diversionary routes and changes in level. We are aware that Kirklees Council has a road user hierarchy, pedestrians and cyclists should therefore be prioritised over motorists. All diversions/temporary works for pedestrians and cyclists should be designed as per latest guidance e.g., no inaccessible temporary footways; sufficient separate temporary cycle space to latest best practice in LTN 1/20 design guide.
- 5.15 We need to understand if there are any impacts on NCN (National Cycle Network) route 66, Spen Valley Greenways and other walking and cycling schemes. Here are some specific considerations:
- Network Rail should liaise with relevant stakeholders including Calderdale and Kirklees councils, the Canal and Rivers Trust and Sustrans as appropriate.
 - The Combined Authority would need to understand the detailed programme of closures to assess the impact on walking and cycling routes.

- The Combined Authority are delivering a number of improvements along the route for active travel. Some of the proposed works affect sections of routes that the new improvements would link to. We would like to understand if there is any scope for additional funding to tie the stations and any changes to the road layout into the wider walking and cycling network as part of mitigation measures. This is so that the network can be in place before the start of construction.

- 5.16 Wherever possible, Network Rail should be looking at betterment e.g., where there are current footbridges with access problems or poor conditions, these should be addressed; future proofing for future cycle networks by adopting a standard pedestrian and cycle bridge with sufficient widths and parapet heights to suit (DfT LTN 1/20). All bridges/underpasses should be built to accommodate pedestrians and cyclists.
- 5.17 Road closures can be an opportunity for pedestrians and cyclists offering quieter road conditions, therefore it is important that access for these modes can be maintained as far as possible.

Climate Effect and Vulnerability

- 5.18 Here are our comments in relation to Chapter 17 of the Environmental Statement:

| Ref. | Issues |
|-----------------------|--|
| 17.2.10 | Not an up-to-date reflection of local context. Does not reflect the findings of the WY (West Yorkshire) Carbon Emission Reduction Pathways and our net-zero carbon by 2038 ambition. |
| 17.3.6 | Uncertain whether the proposal factors in mode shift to rail from private car. Unclear if the proposed work will result in private cars being taken off the road and if that has been factored into the Environmental Statement. |
| Table 17-2 | Unclear if the impact of COVID-19 has been factored into estimated patronage numbers. |
| Table 17-2 | If local climate emergency declarations and targets have been taken into consideration in terms of informing the estimates of patronage in future years. For example, the work we have done for WY suggests there will be a need for rail distance travelled to increase by over 50% by 2038. |
| 17-3 (Carbon Factors) | While using current carbon factors is helpful, it is not representative of the likely carbon factors that will apply at the time of construction. Has any work been undertaken to estimate how these carbon factors might differ in the year of construction? For example, BEIS (Business Energy |

| Ref. | Issues |
|---------------------|---|
| | and Industrial Strategy) produce estimates of how they think that the grid carbon intensity will change over time. |
| 17.3.13 | We understand that bi-mode operation is required at the initial and interim stages of TRU. However, the route should be fully electrified to achieve our emission reduction ambitions. This should be made clear in the document. |
| 17.3.18 and 17.5.23 | <p>Level of significance needs to be placed against local commitments to meet net-zero.</p> <p>The magnitude of significance if placed in the context of the UK carbon budget is always going to be small. As such it should be placed in the context of local and regional carbon targets as a way of demonstrating significance at those levels. It will be helpful to illustrate if the proposed work is a significant contributor to the regional emissions target of achieving net-zero carbon target by 2038.</p> |
| 17.5.24 | Annual emission savings should increase as we go through time to reflect that the carbon intensity of the national electricity grid will decarbonise over time. |
| 17.6.3 | <p>A key way of reducing the emissions associated with vehicles is to, where possible use electric vehicles in place of those that use diesel. Advances in EV technology mean that by the time of construction there are likely to be EV alternatives that could be used.</p> <p>In addition, it is not clear from the report whether alternatives to the construction materials highlighted have been considered e.g., those with a lower carbon impact.</p> |
| 17.8.1 | <p>Cumulative effects should consider potential for the scheme to take cars off the road.</p> <p>Greater consideration should be given to the cumulative emission reductions that might be achieved through the scheme by taking cars off the road.</p> |

Socio-economic

- 5.19 The submission states that the socio-economic benefits of the scheme are not quantified yet. It would be helpful if Network Rail could confirm when this information can be made available for review by the Combined Authority.
- 5.20 The forecast increase in local employment is welcomed, the Combined Authority would be interested to see how the project performs against the specific targets set especially in relation to placement and diversity of workforce.

- 5.21 Whilst there are regeneration benefits associated with the relocation of Ravensthorpe station, this will result in a longer walking distance for the existing residents to the north of the station. Network Rail should explore mitigation measures to reduce the walking distance and ensure a safe walking route.
- 5.22 Given the length of disruption in Huddersfield, we would like to know if there will be any impact on bringing forward development in the town centre. Network Rail should explore measures to mitigate those impacts.
- 5.23 We noticed that a number Compulsory Purchase Order (CPO) notices have been served to businesses in West Yorkshire which could have significant impact on the viability of the businesses. We urge Network Rail to engage directly with the affected businesses and work up plans that will mitigate impact on them.

Scheme Wide Cumulative Effect

- 5.24 Regarding adverse cumulative and residual effects on PRow (Public Rights of Way) on route section 6 and 2 (p.3 22, 22.5.20) further information is required. Will these affect pedestrians or are these used for leisure purposes?
- 5.25 We note that there may be significant temporary adverse effects if the proposed works and Dewsbury Riverside are under construction at the same time (22.8.2). We would like Network Rail to confirm if there is any work completed to quantify the impact in the worst-case scenario.

Summary of Mitigation

- 5.26 As discussed before, CTMP is important. The Combined Authority can help to share the plan to mitigate disruption impact for travellers beyond the rail network.

Other Comments

- 5.27 In Chapter 2 of the non-technical summary, it is mentioned that a replacement pedestrian footbridge (Hillhouse and Fartown) cannot be compliant due to space. Whilst we understand that the proposed replacement pedestrian footbridge will be an improvement, all upgraded and replaced facilities should be accessible for all users.
- 5.28 The submission (NR04 – Statement of Aims. P.8) sets out the proposed track layout from Huddersfield to Westtown. We would like to make the following comments in relation to the network capability:

- In order to achieve the longer-term aspirations of our region, to allow more flexible timetabling options, and to allow greater operating resilience, a second east-facing bay at Huddersfield would be highly beneficial. It would be helpful if the proposed design could make passive provision for an additional platform north of the proposed platform.
- It would be beneficial if additional crossover could be provided from the “slow” lines to the “fast” lines east of Huddersfield. This will provide more flexibility in timetabling, enhance the ability to provide an integrated clockface timetable at Huddersfield and improve the maintainability and the resilience of the railway.

Find out more

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