

# PROPOSED NETWORK RAIL (HUDDERSFIELD TO WESTTOWN (DEWSBURY) IMPROVEMENTS) ORDER

## STATEMENT OF CASE

### OF

## THE WEST YORKSHIRE COMBINED AUTHORITY

### 1. INTRODUCTION

- 1.1 This document comprises West Yorkshire Combined Authority (the Combined Authority)'s Statement of Case in connection with the application by Network Rail for the Network Rail (Huddersfield to Westtown (Dewsbury) Improvements) Order ("the proposed Order"). The proposed works included in the proposed Order (referred to as "the scheme") would form part of the Transpennine Route Upgrade ("TRU").
- 1.2 The Combined Authority submitted a representation in connection with the application on 17 May 2021. This document supersedes that representation. Whilst the Combined Authority is supportive in principle of the TRU, its representation identified that the proposed Order raises a number of issues that require further engagement with Network Rail. In particular:
  - 1.2.1 the proposed Order authorises works and 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.
  - 1.2.2 the proposed Order confers powers to carry out street works, permanently and temporarily stop up streets, and put in place traffic regulation measures. These powers have the potential to disrupt the operation of bus services.
- 1.3 The Combined Authority's representation was classified as an 'objection' by the DfT and was given the reference 'OBJ/41'. The DfT has since confirmed that the correct numbering is '**OBJ/40**'.
- 1.4 By a letter dated 18 May 2021, the Combined Authority received notice under rule 4 of the Transport and Works (Inquiries Procedure) Rules 2004 that the Secretary of State has decided to hold a public inquiry into the application.
- 1.5 The 2004 Rules 2004 require objectors to a proposed order under the Transport and Works Act 1992 to provide a Statement of Case. The purpose of the Statement of Case is to set out full particulars of the case that the Combined Authority proposes to put forward at the Inquiry.
- 1.6 This Statement of Case includes at Appendix 1 a list of the documents to which the Combined Authority currently intends to refer to or to put in evidence at the Inquiry. References to the documents that have been included in the list in Appendix 1 are identified in bold.

## 2. ABOUT THE COMBINED AUTHORITY

- 2.1 The Combined Authority was established in 2014 to bring together economic development and transport functions across West Yorkshire in a more strategic way.
- 2.2 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) [OBJ/40/1]**, specifically around “Delivering 21st Century Transport”.
- 2.3 Transforming transport connectivity and building 21st century infrastructure that will support the City Region to grow and compete globally is critical to meeting the ambitions of the SEF.
- 2.4 The Combined Authority is the statutory Local Transport Authority for the administrative areas of Bradford, Calderdale, Kirklees, Leeds and Wakefield Councils. The Transport Acts confer on the LTA powers and duties to:
  - 2.4.1 Prepare, consult and publish a Local Transport Plan for the region including plans to develop and enhance rail and bus services
  - 2.4.2 Respond to Government as a formal consultee on many aspects of the provision of rail services and infrastructure
  - 2.4.3 Administer funds provided by Government to improve local transport including the planning and delivery of schemes
  - 2.4.4 Identify the need for and commission socially necessary bus services
  - 2.4.5 The administration of concessionary fare schemes and statutory ticketing schemes
  - 2.4.6 The provision, management and operation of public transport facilities and assets including bus stations, interchanges, bus stops and shelters.
  - 2.4.7 The provision and co-ordination of public transport information
- 2.5 The Combined Authority's current **Transport Strategy 2040 [OBJ/40/2]** was adopted on 3 August 2017 and sets out the transport policies and strategies to help deliver the SEP.
- 2.6 As noted, above, under the Transport Act 1968 the Combined Authority has a duty to consider the need for socially necessary bus services and a power to procure such services. Approximately 15% of all bus service mileage operating in West Yorkshire is procured by the Combined Authority through contracts with bus operators.
- 2.7 The **West Yorkshire Bus Strategy 2017-2027 [OBJ/40/3]** was formally adopted on 3 August 2017. The Strategy forms a key component of the Transport Strategy and SEP and will be used in shaping and delivering change to the bus system.

### 3. SUPPORT FOR THE TRANSPENNINE ROUTE UPGRADE

- 3.1 The Combined Authority is very supportive in principle of the Transpennine Route Upgrade and the proposals included in the proposed Order.

#### **Current Issues**

- 3.2 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.
- 3.3 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.
- 3.4 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**

- 3.5 The 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:
- 3.5.1 **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 proposed Order 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.
- 3.5.2 **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 proposed Order.
- 3.5.3 **Decarbonisation:** The proposed works in the TWA0 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 [OBJ/40/4]** 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 [OBJ/40/5]. 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 TRU will help to achieve this ambitious target.

- 3.5.4 **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 TRU.

3.6 The Combined Authority does however have wider observations regarding its support in principle for the scheme:

- 3.6.1 **Northern Powerhouse Rail (NPR) and TRU:** Due to the current funding and affordability challenges, the Combined Authority is concerned that the NPR and TRU programmes might be combined together or one chosen 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. The Combined Authority 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 of England 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 will serve the inter-regional, local and freight markets. Both programmes are vital and are part of the wider jigsaw puzzle of integrated improvements needed, including in particular the crucial upgrades at the hubs of Leeds and Manchester, to allow the full benefits to be realised (see below in relation to Leeds).

- 3.6.2 **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 wider TRU can be realised when the Government confirms the scope of the TRU and its funding commitment for the full implementation of TRU. The Combined Authority urges the Secretary of State in granting the application to provide a 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 proposed Order application).

- 3.6.3 **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 would be enhanced further through the resolution of the capacity issues at Leeds and surrounding areas. We therefore urge the Secretary of State to prioritise work on resolving the capacity issues at Leeds and surrounding areas which includes both track and station capacity.

- 3.6.4 **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 [OBJ/40/6]. 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. ACQUISITION AND USE OF LAND

- 4.1 Part 3 of 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 and around Huddersfield bus station.
- 4.2 The Combined Authority manages and operates the bus station in accordance with its powers and duties as a Local Transport Authority. The bus station is situated in Huddersfield town centre, underneath the multi-storey car park. It is bordered by the Ring Road (Castlegate A62) and can be accessed from High Street, Upperhead Row and Henry Street. It is the busiest bus station in West Yorkshire and is used by approximately 38,000 passengers every day.
- 4.3 The bus station includes 25 pick-up and three alighting only stands. It is served by a number of operators, including First West Yorkshire and Arriva. National Express operates nationwide coaches from the bus station.
- 4.4 In 2022/2023 (and possibly running into early 2024), the Combined Authority together with Kirklees Council will be undertaking a major refurbishment to transform the bus station (including building works to increase the size of the station) with funding provided by central Government under its Transforming Cities Fund.
- 4.5 Sections of Work No. 1A and Work 1B which are proposed to be authorised by the proposed Order pass beneath the bus station. Whilst the majority of these works take place within the tunnels below ground level, the powers in Part 3 of the proposed Order for the acquisition and use of land in connection with these authorised works have the potential to:
- 4.5.1 cause significant disruption to the safe and efficient operation of the bus station and to the journeys of up to 38,000 people each day, and
  - 4.5.2 adversely affect the works to refurbish the bus station which are scheduled to commence in 2022 and run through 2023 / into 2024.
- 4.6 These provisions include:
- 4.6.1 Article 23 (protective works to buildings, roads and apparatus of a statutory undertaker): This gives Network Rail a broad power to enter onto land and buildings for the purposes of carrying out protective works. The power applies before and during construction and for a period of 5 years from the date the authorised works are opened for use. The power can be exercised without notice in the case of an emergency, or with a minimum of 14 days' notice in all other cases. The only means for the Combined Authority, as the relevant landowner, to challenge the power of entry would be to refer the question of whether it is necessary or expedient to carry out the protective works to arbitration in accordance with article 58.
  - 4.6.2 Article 31 (power to acquire subsoil and imposition of restrictive covenants): This article limits the general power of acquisition in article 26 to the acquisition of subsoil only. However, it also provides that restrictive covenants may be imposed on the land "as may be required for the purposes of maintaining or protecting any subsoil works constructed in the subsoil or under surface of that land for the purposes of strengthening and stabilising Work No. 1A and Work No. 1B." This power is intended to be used to impose restrictive covenants on the land above the ground anchors that will be installed in the subsoil beneath the bus station to support the works to the railway tunnels. The application does not specify what form these restrictive covenants will take, but they clearly have the potential to restrict the nature and scope of development that can be carried out.
  - 4.6.3 Article 34 (temporary use of land for construction of works): provides a broad power for Network Rail to enter onto land for the purposes of carrying out construction. The power can be exercised with a minimum of 14 days' notice to the landowner and entitles Network Rail to carry out a range of temporary works including removing buildings and occupying

airspace with cranes. The power authorises Network Rail to remain on the land for a period of up to one year from the date the relevant works are completed. The power applies to a section of the bus station and the Combined Authority understands it is intended to be used in connection with utility diversions. The exercise of this power clearly has the potential to cause significant disruption to the safe and efficient operation of the bus station.

- 4.7 The table below sets out the proposed use of parcels of land in which the Combined Authority has an interest at the bus station and explains the potential impacts.

Plots	Description of Land	Effect of Proposed Order	Impact
3-031, 3-034, 3-036, 3-040	Huddersfield Bus Station - this is the bus apron which is due to be re-surfaced and the existing surface drain removed as part of the refurbishment	Subsoil can be acquired and restrictive covenants imposed on land above.	The restrictive covenants have the potential to affect the refurbishment of the bus station including the extension of the Henry Street alighting building.
3-032, 3-033, 3-035, 3-050	Huddersfield Bus Station – this is the Henry St alighting building where part demolition partial rebuilding is anticipated, including new foundations, as part of the refurbishment	Within the limits of deviation of Works No. 1A and 1B Acquisition of subsoil only, no temporary possession of land above.	On the basis that the subsoil only is being acquired, there should be no impact if the acquisition does not prevent the carrying out of the necessary foundations.
3-037, 3-039	Huddersfield Bus Station – this is the bus apron which is due to be re-surfaced and the existing surface drain removed as part of the refurbishment	Subject to full powers of compulsory acquisition. Subject to the protective works power in article 23 of the proposed Order.	Any acquisition of the surface and/or airspace of the bus station or part thereof will disrupt the provision of bus services.  Temporary possession of these plots has the potential to disrupt the operation of the bus station and the provision of bus services  The ability to enter onto the land at short notice to carry out protective works has the potential to disrupt the operation of the bus station and the provision of bus services.  The restrictive covenants have the potential to affect the refurbishment of the bus station including the bus concourse refurbishment.
3-048, 3-048a,	Huddersfield Bus Station – this is the concourse and retail units where full	Subject to full powers of compulsory acquisition.	Any acquisition of the surface and/or airspace of the bus station or part thereof will

	refurbishment, reconfiguration and replacement of curtain walling and new shop fronts are proposed	Subject to the protective works power in article 23 of the proposed Order.	<p>disrupt the provision of bus services.</p> <p>Temporary possession of these plots has the potential to disrupt the operation of the bus station and the provision of bus services</p> <p>The ability to enter onto the land at short notice to carry out protective works has the potential to disrupt the operation of the bus station and the provision of bus services.</p> <p>The restrictive covenants have the potential to affect the refurbishment of the bus station including the bus concourse refurbishment.</p>
3-051, 3-053	Huddersfield Bus Station – this is the end of the main concourse where some internal reconfiguration is proposed as part of the refurbishment	<p>Subject to full powers of compulsory acquisition.</p> <p>Subject to the protective works power in article 23 of the proposed Order.</p>	<p>Any acquisition of the surface and/or airspace of the bus station or part thereof will disrupt the provision of bus services.</p> <p>Temporary possession of these plots has the potential to disrupt the operation of the bus station and the provision of bus services</p> <p>The ability to enter onto the land at short notice to carry out protective works has the potential to disrupt the operation of the bus station and the provision of bus services.</p> <p>The restrictive covenants have the potential to affect the refurbishment of the bus station including the bus concourse refurbishment.</p>
3-052	Huddersfield Bus Station – this is the end of the main concourse where some internal reconfiguration is proposed as part of the refurbishment	Subsoil can be acquired and the restrictive covenants imposed on land above.	The restrictive covenants have the potential to affect the refurbishment of the bus station including the extension of the Henry Street alighting building.
3-057	Huddersfield Bus Station – this appears	Subject to full powers of compulsory acquisition.	Any acquisition of the surface and/or airspace of the access

	to be the area beneath the car park rams and may include the bus station toilets.	Subject to the protective works power in article 23 of the proposed Order.	to the car park or the bus station toilets will disrupt the provision of bus services.  Temporary possession of these plots has the potential to disrupt the operation of the bus station and the provision of bus services  The ability to enter onto the land at short notice to carry out protective works has the potential to disrupt the operation of the bus station and the provision of bus services.  The restrictive covenants have the potential to affect the refurbishment of the bus station including the bus concourse refurbishment.
3-044, 3-046,	Henry Street, Huddersfield – this is where resurfacing works and street works are proposed as part of the refurbishment	Within the Limit of Deviation of Work No. 1A above the railway tunnels.  Subsoil can be acquired.  Temporary possession of land at surface.	Temporary possession of these plots has the potential to disrupt the operation of the bus station and the provision of bus services.
3-047, 3-058, 3-076	Henry Street, Huddersfield – this is where resurfacing works and street works are proposed as part of the refurbishment.	Subsoil can be acquired and restrictive covenants imposed on land above.  Temporary possession of land at surface.	The restrictive covenants have the potential to affect the refurbishment of the bus station including the extension of the Henry Street alighting building.  Temporary possession of these plots has the potential to disrupt the operation of the bus station and the provision of bus services.
3-106, 3-107	Westgate, Huddersfield	Subsoil can be acquired and restrictive covenants imposed on land above.  Temporary possession of land at surface.	Temporary possession of these plots has the potential to disrupt the operation of the bus station and the provision of bus services.
3-044, 3-046	Henry Street, this is where some resurfacing work is intended as part of the refurbishment	Within the Limit of Deviation of Work No. 1A above the railway tunnels.  Subsoil can be acquired and restrictive covenants imposed on land above.	Temporary possession of these plots has the potential to disrupt the operation of the bus station and the provision of bus services.



		Temporary possession of land at surface.	
3-106, 3-107,	Westgate, Huddersfield	Subsoil can be acquired and restrictive covenants imposed on land above.  Temporary possession of land at surface	Temporary possession of these plots has the potential to disrupt the operation of the bus station and the provision of bus services.
3-109	Westgate, Huddersfield	Temporary possession – utility works	Temporary possession of the plot has the potential to disrupt the operation of the bus station and the provision of bus services.

- 4.8 The Combined Authority is seeking detailed information from Network Rail regarding the exercise of the powers referred to above. This includes clear plans showing existing and proposed utility diversions, and information about the proposed duration and timing of the works in the vicinity of the bus station.
- 4.9 Alongside this information, the Combined Authority is seeking suitable assurances from Network Rail to ensure the impacts of these works on the Combined Authority assets and the operation of the bus station are suitably managed and mitigated. These impacts include:

Timescales	Potential Impacts
Short term	Loss of use or service of the bus station function through temporary possession, vibration, noise and/or dust or unforeseen loss of utility service supply or drainage. Impacts on tenants and/or users. 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. There is potential for impacts on the cost of the proposed refurbishment if rescheduling, redesign or an extended construction period are required. Discussions will be required with Network Rail to understand any residual impacts to bus services; where residual impacts are identified the Combined Authority would look to Network Rail to provide funding for alternative transport arrangements.
Long term	Loss of service or development potential of the bus station.

- 4.10 Discussions between the Combined Authority and Network Rail regarding these assurances have commenced.

***Other land in which the Combined Authority has an interest***

- 4.11 The proposed Order also provides powers of acquisition and use over other parcels of land in which the Combined Authority has an interest which are remote from the bus station. These plots are

identified in the table below. The Combined Authority will also seek suitable assurances from Network Rail in relation to these parcels of land to the extent that their acquisition or use under the proposed Order may affect the Combined Authority's assets or statutory functions:

Plot	Description	Proposed use
<b>3-153</b>	1003 square metres Public road, footways and bus stop (John William Street, Huddersfield)	Temporary possession – worksite and access
<b>9-019</b>	703 square metres Public road, footways and bus stop (Whitacre Street, Deighton)	Within the Limit of Deviation of highway works: Work No. 6 (Whitacre Street) Works No. 7 (A62 Leeds Road)  Highway subject to realignment works.
<b>9-117</b>	903 square metres Public road, footway and bus stop (A62 Leeds Road, Deighton)	Within the Limit of Deviation of highway work: Work No. 7 (A62 Leeds Road) Highway subject to realignment works.
<b>11-034</b>	499 square metres Public road, footways and bus stop (Leeds Road, Bradley)	Required for environmental mitigation (at river level). Access required from the bridge.
<b>16-041</b>	3629 square metres Agricultural field to the east of Hopton New Road, Mirfield	Required for temporary use as a temporary car park for Mirfield station during the works.
<b>17-006</b>	1025 square metres Agricultural field to the north of the River Calder, Mirfield	Required for temporary use for railway works and works to Wheatley's Viaduct (MVN2/196)
<b>18-004</b>	246 square metres Agricultural field to the north of the River Calder, Mirfield	Required for temporary use for railway works and works to Wheatley's Viaduct (MVN2/196)
<b>22-043</b>	2004 square metres Public road, footways and bus stops (Ouzelwell Lane, Ravensthorpe)	Required for temporary use for the provision of access to utility works

## 5. STREET WORKS AND IMPACTS ON BUS SERVICES

- 5.1 The proposed Order contains a number of powers to carry out works in streets and otherwise interfere with or stop-up streets:

Power	Extent
<b>Article 13 - To execute works in streets</b>	Only those streets listed in <b>Schedule 3</b>
<b>Article 14 – stopping up of streets</b>	Only those streets listed in <b>Schedule 4</b>
<b>Article 15 – Power to alter layout of streets</b>	Any street listed in <b>Schedule 5</b> .  <u>And, with the consent of the street authority, any other street in the Order limits.</u>
<b>Article 16 – Temporary stopping up of streets</b>	<b>Without limitation</b> , but only with the consent of the street authority.
<b>Article 17 – Power to lay out access to works</b>	At any point listed in <b>Schedule 7</b> .  <u>And, with the consent of the street authority, at any other point in the Order limits.</u>

- 5.2 The following streets are used by buses and may be affected by the exercise of the powers above and in some cases are subject to powers of acquisition or temporary possession.

Street	Order Power <sup>1</sup>	Impact on bus services
<b>Cross Church Street</b>	Scheds 3 (Streets subject to Street Works), 6 (Streets to be Temporarily Stopped Up) and 7 (Access to Works)	Low / moderate impact: used only by the Huddersfield Town Bus which has a straightforward diversion via Queensgate and Southgate.
<b>Westgate</b>	Scheds 3 (Streets subject to Street Works) and 6 (Streets to be Temporarily Stopped Up)	Severe impact: this is a major route through the town centre for bus services, including busy cross-town services to Huddersfield Royal Infirmary and for access into the bus station, access to Sainsbury's car park, bus station car park and a major taxi rank. Great potential for delays with lane closures/ temporary lights. Lane closures could result in bus stops being inaccessible, lack of space for temporary stops would leave some services with no town centre stop.
<b>John William Street</b>	Scheds 3 (Streets subject to Street Works), 5 (Streets Subject to Alteration of Layout) and 6 (Streets to be Temporarily Stopped Up)	Severe impact: used by Bradford Road and St John's Road services and an inbound route to the bus station - 18 buses per hour in each direction daytimes. The closure will force buses to take alternative routes to and from the bus station and the obvious route would be via Castlegate, but this would mean no on street town centre

<sup>1</sup> Not including powers of acquisition or temporary possession.

		bus stops would be served, all passengers would need to use the bus station.
<b>A641 Northgate / Bradford Road</b>	Scheds 3 (Streets subject to Street Works and 6 (Streets to be Temporarily Stopped Up)	Moderate / severe impact: used by 13 buses per hour in each direction daytimes. When the road is closed, buses would divert via Spaines Road & St John's Road, adding time to journeys but also leaving Bradford Road and Fartown without a bus so any closure should take place overnight.
<b>A62 Leeds Road</b>	Scheds 3 (Streets subject to Street Works, 4 (Streets to be Stopped Up) and 6 (Streets to be Temporarily Stopped Up)	Moderate / severe impact: used by 7 buses per hour in either direction daytimes. When the road is closed, buses would divert via A641 Bradford Road and Bradley, adding time to journeys and would leave a long section of Leeds Road between Bradley and Huddersfield without a bus service, so any closure should take place overnight.
<b>Alder Street</b>	Scheds 3 (Streets subject to Street Works), 5 (Streets Subject to Alteration of Layout), 6 (Streets to be Temporarily Stopped Up) and 7 (Access to Works)	Low / moderate impact: used by an hourly daytime service which could easily divert via Bradford Road but would leave residents of Abbey Road estate with a walk of about 20 minutes to the nearest bus stop
<b>Henry Street and Upperhead Row</b>	Scheds 3 (Streets subject to Street Works and 6 (Streets to be Temporarily Stopped Up)	Severe impact: these streets form the entrance to the bus station so any works would be highly disruptive in impacting access to the bus station by the buses. We would want any closures to take place outside of the operational hours of the bus station.
<b>Springwood Avenue</b>	Sched 6 (Streets to be Temporarily Stopped Up)	Moderate impact: used by 8 buses per hour in either direction daytimes. A suitable diversion via Westbourne Road is available but would leave some Springwood and Greenhead residents with a 15/20 minute walk to the nearest bus stop.

- 5.3 We set out some further comments and queries in relation to the assessment of bus impacts in the ES in section 7 of this Statement of Case below.
- 5.4 We look forward to working with Network Rail to ensure that such impacts are mitigated. We should be fully consulted on any affects to streets to assist with mitigation and the notification of bus users of any impacts.
- 5.5 In most cases the issue is likely to be one of the delays caused by congestion as a result of traffic displaced from their usual routes. Where closures are in place, suitable diversion routes are available for buses but in some cases, these would leave areas unserved by bus so we would strongly request that these closures be carried out overnight, otherwise a replacement shuttle bus service may be required, funded by Network Rail for the period of any closures.

## 6. DESIGN CONSIDERATIONS

- 6.1 Whilst the Combined Authority is supportive of the TRU and the proposed works outlined in the TWAO Application in principle, it has some concerns regarding aspects of the design in relation to how it will accommodate future aspirations of the Combined Authority. These are not substantive objections to the application but the Combined Authority requests that Network Rail confirms that the matters they set out are not precluded by the application and that, where appropriate, adequate passive provision is included in the application design.
- 6.2 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. The Combined Authority seeks confirmation from Network Rail that those station facilities within the scope of this application will meet future demand from a fully implemented TRU.
- 6.3 The Combined Authority reiterates that the works should be able to accommodate (or be retrofitted to incorporate) electrification and provision of W12 gauge clearance to meet the recently announced Government target to cut carbon emission by 78% by 2035. W12 gauge clearance for the TRU 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. The Combined Authority seeks confirmation from Network Rail that the works within the scope of the application will all accommodate W12 gauge operation and/or can be economically retrofitted for W12 gauge and electrification at a future date.
- 6.4 The Applicant's Statement of Aims (NR04 – 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:
- 6.4.1 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. The proposed design should make passive provision for an additional platform north of the proposed platform.
- 6.4.2 Similarly, passive provision should be made for additional crossover could be provided from the "slow" lines to the "fast" lines east of Huddersfield. This would 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.

## 7. MITIGATION AND MAXIMISING BENEFIT

- 7.1 **Communications plan:** A clear communications plan to be shared and agreed in advance with the Combined Authority is important, so that we can help to raise the awareness of the scheme 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.
- 7.2 **Travel Disruption and mitigation:** We understand that there will be disruption to train services and the highway network during the construction of the scheme, 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 scheme.
- 7.2.1 A Station Travel Plan (STP) for each affected station which seeks to ensure that throughout the works, station users can continue to be connected to the key destinations ordinarily available from that station. This may require a bespoke approach to rail replacement transport. The STP should also identify how the scheme affects access to and from the station. Each STP to be reviewed dynamically as the scheme 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 scheme is completed.
- 7.2.2 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 to mitigate impacts on all road users and to prevent severance/ isolation for communities impacted. In addition to traffic management provisions, this may involve the applicant funding diversionary bus services and/ or shuttle services.
- 7.3 **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, has 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. 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. The Combined Authority would urge Network Rail to develop an employment and skills plan for agreement with the Combined Authority in order to deliver the maximum benefit to the region.

## 8. HIGH LEVEL RESPONSE IN RELATION TO ENVIRONMENTAL STATEMENT

- 8.1 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**

- 8.2 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**, we set out our role in strategic planning amongst other policy areas including the **Leeds City Region Statement of Common Ground [OBJ/40/8]** that includes a commitment to supporting strategic transport infrastructure.
- 8.3 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 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.
- 8.4 The document (Table 5-2, p.14) does not refer to the emerging **West Yorkshire Connectivity Infrastructure Plan [OBJ/40/9]** (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.
- 8.5 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.
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***

- 8.6 We understand that our district partner would be better placed to provide detailed air quality comments due to their statutory air quality function.
- 8.7 A **West Yorkshire Low Emission Strategy [OBJ/40/7]** 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.
- 8.8 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***

- 8.9 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.
- 8.10 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, and share all subsequent Equality Impact Assessments relating to the scheme with the respective Council and the Combined Authority.

### ***Traffic and Transport***

- 8.11 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.
- 8.12 Here are the specific comments in relation to Environmental Statement, Volume 2i, Chapter 14 - Traffic and transport:
- 8.12.1 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.

- 8.12.2 Table 14.1 should include the declaration of climate emergency.
- 8.12.3 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.
- 8.12.4 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).
- 8.12.5 The following clarifications are required in relation to table 14-9:

Location	Issues
<b>John William Street</b>	Will Viaduct Street still be open inbound as a diversionary route?
<b>Castlegate</b>	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?
<b>Northgate</b>	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.
<b>B6118 Colne Bridge</b>	Significant diversion needed, any alternative better mitigation for cyclists and pedestrians on this section?
<b>Calder Road</b>	Significant diversion needed via A644, any alternative better mitigation for cyclists (not sure if much pedestrian demand on this section)?
<b>Thornhill Road</b>	Significant diversion needed, any alternative better mitigation for cyclists and pedestrians on this section?

- 8.12.6 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?

- 8.12.7 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.
- 8.12.8 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.
- 8.12.9 The comments below relate to Environmental Statement, Volume 3, Chapter 14 -Traffic and transport, Appendix 14-1 Transport Assessment:

Ref.	Issues
<b>5.5</b>	5.5.3 seems to understate scheme benefits.  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.  Further works might be required to optimise routing and timetables of replacement buses and temporary train services to minimise disruption & inconvenience.
<b>7.1.14 and Insert 39</b>	References to google maps - we consider the 'robust' Saturn transport model is a good model to manage the highways impacts of the scheme.
<b>7.2.4 and 7.5.8</b>	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)?
<b>7.2.9</b>	It is unclear what will happen to the main car park and pick up and drop off at Huddersfield station. Appropriate parking facilities for the station must be retained at all times and the impacts of any reduction adequately assessed.
<b>7.2.8</b>	Reduced access to Huddersfield bus station for 6 months. We will require details in relation to the proposed disruption.
<b>7.2.11</b>	Information is not clear.
<b>7.2.12</b>	Diversionary route could be problematic including narrow lanes, height restriction on Hillhouse lane. This does not appear to have been modelled.
<b>Table 7.10</b>	The commentary mentions significant impacts for bus services but is not quantified in terms of actual delays.
<b>7.5.7 and 8.2.6</b>	Temporary platform provided at Hillside, only accessed by bus from Huddersfield rail station.
<b>7.5.10</b>	It is unclear what is meant by medium level congestion.
<b>Table 8.4</b>	It is unclear if there will be sufficient capacity on Alder Street for these traffic flows given the width & speed humps.
<b>Table 10.4</b>	B6118 carries 1,500 vehicles in the peak, however, its closure is not reflected in increased flows on the surrounding road network.

Ref.	Issues
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 – It is questioned whether from a accessibility perspective 700m is an acceptable walking distance for interchange with buses? Further from a safety perspective, the route is isolated and given its length, it is considered any safety concerns should be mitigated by, for example, CCTV to cover the route, and lighting for when it is dark.

- 8.13 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***

- 8.14 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 [OBJ/40/10]**.
- 8.15 The Combined Authority needs 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:
- 8.15.1 Network Rail should liaise with relevant stakeholders including Calderdale and Kirklees councils, the Canal and Rivers Trust and Sustrans as appropriate.
- 8.15.2 The Combined Authority needs to understand the detailed programme of closures to assess the impact on walking and cycling routes.
- 8.15.3 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.
- 8.16 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.
- 8.17 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***

- 8.18 The Combined Authority's comments in relation to Chapter 17 of the Environmental Statement are:

<b>17.2.10</b>	Not an up-to-date reflection of local context.
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	Does not reflect the findings of the WY (West Yorkshire) Carbon Emission Reduction Pathways and our net-zero carbon by 2038 ambition.
<b>17.3.6</b>	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.
<b>Table 17-2</b>	Unclear if the impact of COVID-19 has been factored into estimated patronage numbers.
<b>Table 17-2</b>	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.
<b>17-3 (Carbon Factors)</b>	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 and Industrial Strategy) produce estimates of how they think that the grid carbon intensity will change over time.
<b>17.3.13</b>	It is understood that bi-mode operation is required at the initial and interim stages of TRU. However, the route should be fully electrified to achieve emission reduction ambitions. This should be made clear in the document.
<b>17.3.18 and 17.5.23</b>	Level of significance needs to be placed against local commitments to meet net-zero.  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.
<b>17.5.24</b>	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.
<b>17.6.3</b>	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.  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.
<b>17.8.1</b>	Cumulative effects should consider potential for the scheme to take cars off the road. Greater consideration should be given to the cumulative emission reductions that might be achieved through the scheme by taking cars off the road.

### **Socio-economic**

- 8.19 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.
- 8.20 The forecast increase in local employment is welcomed, the Combined Authority would be interested to see how the scheme performs against the specific targets set especially in relation to placement and diversity of workforce.

- 8.21 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.
- 8.22 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.
- 8.23 The Combined Authority is aware that a number compulsory purchase 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***

- 8.24 Further information is required regarding adverse cumulative and residual effects on PRow (Public Rights of Way) on route section 6 and 2 (p.3 22, 22.5.20). Will these affect pedestrians or are these used for leisure purposes?
- 8.25 It is noted 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). Has the impact in the worst-case scenario been quantified?

#### ***Summary of Mitigation***

- 8.26 As discussed before, CTMP is important to mitigate disruption impact for travellers beyond the rail network. The Combined Authority would like to work with Network Rail to support Network Rail in discharging Network Rail's responsibility for disruption planning and the provision of information to travellers and the public at large (as set out in section 6 above).

#### ***Other Comments***

- 8.27 In Chapter 2 of the non-technical summary, it is mentioned that a replacement pedestrian footbridge (Hillhouse and Fartown) cannot be compliant with standards due to space. Whilst we understand that the proposed replacement pedestrian footbridge will be an improvement, all upgraded and replaced facilities should seek to be accessible for all users.

## 9. CONCLUSIONS

- 9.1 The Combined Authority reiterates its support in principle for the TRU and for the application as set out in **Section 3**. This Statement of Case sets out the policy basis for that support.
- 9.2 The Combined Authority has a range of concerns in relation to the exercise of powers under the proposed Order, especially powers of acquisition or temporary possession, over Huddersfield bus station, particularly as to how this might affect the on-going provision of bus services as set out in **Section 4**. The Combined Authority requires detailed information from Network Rail regarding the exercise of the powers referred to in this Statement of Case, by reference to plans and the works programme. **Section 4** sets out clearly the potential impacts on bus services and users. The Combined Authority requires suitable assurances from Network Rail to ensure adverse impacts of these works on the Combined Authority's functions and bus operators and users are avoided.
- 9.3 Similarly, as set out in **Section 5**, the Combined Authority is concerned about the impacts that the exercise of the various powers over streets might have on the provision of bus services. The Combined Authority wishes Network Rail to work with it to ensure that such impacts are mitigated. The Combined Authority should be fully consulted on any affects to streets to assist with mitigation and the notification of bus users of any impacts. Suitable diversion routes may not be available and in such cases street closures should be carried out overnight, otherwise a replacement shuttle bus service may be required, funded by Network Rail for the period of any closures.
- 9.4 Passive provision or other accommodation should be provided for the matters set out in **Section 6**.
- 9.5 The mitigation and other measures to maximise benefit as set out in **Section 7** should be provided.
- 9.6 The explanations regarding the Environmental Statement sought in **Section 8** should be provided and the necessary mitigations agreed with the Combined Authority and/or the relevant local authority.

9 July 2021

## APPENDIX 1 - LIST OF DOCUMENTS INTENDED TO BE REFERRED TO OR PUT IN EVIDENCE BY THE WEST YORKSHIRE COMBINED AUTHORITY

In addition to the application documents, the West Yorkshire Combined Authority will refer to the following:

1. [Leeds City Region Strategic Economic Framework](#) (SEF) [OBJ/40/1]
2. [Transport Strategy 2040](#) [OBJ/40/2]
3. [West Yorkshire Bus Strategy 2017-2027](#) [OBJ/40/3]
4. [Network Rail's Decarbonisation Strategy](#) [OBJ/40/4]
5. [Tackling the Climate Emergency - Emission Reduction Pathways report](#) [OBJ/40/5]
6. [Ambition for TRU' in Item 6 - TRU update - Appendix 1](#) [OBJ/40/6]  
(<https://westyorkshire.moderngov.co.uk/documents/s9022/Item 6 - TRU update - Appendix 1.pdf>)<sup>2</sup>
7. [West Yorkshire Low Emission Strategy](#) [OBJ/40/7]
8. [Leeds City Region Statement of Common Ground](#) [OBJ/40/8]
9. [West Yorkshire Connectivity Infrastructure Plan](#) [OBJ/40/9]
10. [DfT LTN 1/20 Design Guide](#) [OBJ/40/10]

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<sup>2</sup> To access, copy and paste URL into browser.