

Ms Tracy Brabin

Mayor of West Yorkshire



Dear Mayor Brabin,

HSUK Concerns re WYCA Rail Strategy and its Dependency upon HS2

I am responding, on behalf of High Speed UK (HSUK) and the Network North Partnership, to West Yorkshire Combined Authority's public consultation on its Rail Strategy.

We have reviewed both the Executive Summary and the full 'Rail Strategy' document, and we wish to voice our extreme concern at the proposals set out therein. Due to their lack of integration, and due also to their predication upon the established HS2 proposals, they will comprehensively fail to deliver the transformed and fully-integrated railway network, that the people of West Yorkshire need and deserve.

But equally critically, HS2's funding problems – £20 billion already spent, and estimated final costs of Phase 1 alone now threatening to consume the entire £96 billion budget of the Integrated Rail Plan – seem certain to prevent any meaningful development of West Yorkshire's railway network.

It is plain that the current situation is unsustainable. We are calling upon you, along with all other Northern leaders, to demand that the Government should:

- Suspend with immediate effect all works on the HS2 project;
- Launch a full public inquiry to determine how and why the HS2 project has gone so far wrong; and
- Reformulate its Integrated Rail Plan to ensure integrated and optimal development of local, regional and national railway networks.

Technical Concerns with WYCA Rail Strategy

Our concerns regarding WYCA's Rail Strategy are informed by the vastly superior performance of our own High Speed UK proposals, developed within the Northern Powerhouse region as 'Network North'. This superiority stems from HSUK's design to radically different principles of full integration with the existing network, and complete independence from HS2. These issues are documented in our landmark study *Dissecting the Integrated Rail Plan (DIRP)*, and we would draw your particular attention to Section 6.3 concerning West Yorkshire.

The basic connectivity failure of WYCA's Rail Strategy will have 2 far-reaching consequences:

- It cannot achieve the road-to-rail modal shift necessary for Net Zero.
- It cannot achieve the scale of improvement in links between West Yorkshire's major population centres, that is necessary to achieve Levelling-up.

You will hopefully appreciate that these consequences are of such gravity, that they render the entire WYCA Rail Strategy unfit for its basic purpose of serving the public interest, and meeting your strategic ambitions for West Yorkshire, and for the wider Northern Powerhouse.

We have appended at the foot of this letter our detailed technical concerns; these form the substance of our response to the WYCA consultation. Please note that we are also writing on a very similar basis to alert Transport for the North to parallel failings in their own Strategic Transport Plan, covering the entire Northern Powerhouse region.

WYCA Rail Strategy and TfN Strategic Transport Plan predication upon HS2

There is a common factor in the concerns that we raise with both the WYCA Rail Strategy and the TfN Strategic Transport Plan – their critical dependency upon the established HS2 proposals. Both WYCA's and TfN's strategies are dedicated to achieving step-change improvements in connectivity across the North – yet they are both based upon HS2, which was developed to London-centric priorities, with no thought for improving connectivity between Northern conurbations.

This crucial dysfunctionality has led to a Northern Powerhouse Rail scheme that cannot meet TfN's own specification for improved journey times and service frequencies. (Please refer to **DIRP** Section 6.2 and Table 6.2H – *and please note that these journey time targets have been deleted from all editions of TfN's Strategic Transport Plan since 2018*). It has also led to an 'Integrated' Rail Plan that is integrated in name only, and this in turn has resulted in WYCA's disjointed initiatives for its Rail Strategy and its Mass Transit System, both comprehensively outperformed by our own HSUK/Network North Exemplar Alternative.

HS2 Consuming all Budget for Railway Development in the North?

The ultimate irony is that not only does HS2 cripple the performance of the railway network in the North, it also robs the North of the funds needed to develop this network. Already, £20 billion is reported to have been spent on HS2 construction works, and the budget for Phase 1 alone of the project has risen to almost fully consume the £96 billion allocated to the Government's Integrated Rail Plan. This will leave nothing for railway investment in West Yorkshire, or indeed in any part of the Northern Powerhouse.

This will sabotage any prospect of Levelling-up the UK economy, with a potential cost of around £340 billion per annum – as set out in **DIRP** Section 7.2.

If there is to be any future for a railway network in the North that can drive forward Levelling-up and Net Zero ambitions, then all HS2 construction works must be immediately suspended pending the outcome of a full Public Inquiry.

We hope that you will join us in our Call to Government, and we will contact you shortly with a view to arranging a meeting.

Regards

Colin Elliff BSc CEng MICE (HSUK Civil Engineering Principal)

3RD September 2023

APPENDIX A : HSUK detailed response to official Consultation on West Yorkshire Combined Authority's 2023 Rail Strategy

HSUK concerns with the WYCA Rail Strategy are detailed in the following numbered paragraphs:

1. **The WYCA Rail Strategy's proposed interventions are not scaled to match the stated problems.** All 5 West Yorkshire Districts have declared a 'climate emergency', to which the WYCA Rail Strategy makes frequent reference. This surely demands radical intervention to transform the region's railway network – but the proposed schemes (3 new local stations, a few new services and even the ongoing Transpennine Upgrade) can only be characterised as 'incremental'. The WYCA Rail Strategy offers no new rail links between West Yorkshire's major communities, and it will only deliver modest improvements in connectivity and capacity. As a result, the WYCA Rail Strategy will fail to bring about significant road-to-rail modal shift.
2. **This means that the WYCA Rail Strategy cannot bring about significant emissions reductions, and it will fail to make its required contribution to achieving Net Zero.**
3. **For similar reasons, the WYCA Rail Strategy's incremental connectivity gains will also fail to achieve significant Levelling-up.**
4. **The WYCA Rail Strategy lacks any ambition to create a better-connected West Yorkshire rail network.** There is:
 - no assessment of how well the local network performs in interconnecting the major communities of West Yorkshire;
 - no understanding of the critical pressures on Leeds City Station (the primary focal point of the entire network, and by far the busiest station) and no viable proposals for any major increase in capacity at Leeds;
 - no ambition for all major communities to be directly interlinked (thereby improving network connectivity and resilience, with reduced dependency on connections at Leeds);
 - no concept that the disconnect between Bradford Interchange and Bradford Forster Square stations (a unique situation in inland UK cities) might be a primary reason for Bradford's depressed economic state;
 - no concept that this disconnect might be putting extra load on Leeds City Station and causing additional congestion (see above);
 - no attempt to sort out the Bradford problem, and unite the rail networks to north and south of the city;
 - no attempt to develop the network (i.e. to connect places that currently are not directly connected, as distinct from building new stations or increasing service frequencies on existing routes). All new-build railway interventions are encompassed within the parallel West Yorkshire Mass Transit System.
5. **There is no apparent attempt to quantify and measure connectivity.** If WYCA don't have a structured and scientific means of measuring network connectivity, then they can't properly assess alternative schemes to demonstrate that the chosen scheme will optimise network connectivity. This suboptimality will of course extend to the network's performance in delivering economic and environmental benefits (i.e. Levelling-up and Net Zero, see above).

6. **The WYCA Rail Strategy appears to have been developed completely independent of WYCA's parallel strategy to develop a 'West Yorkshire Mass Transit System'.**
From examination of the 2 programmes, for rail and mass transit development, it is clear that there is a major inconsistency between WYCA's twin ambitions, for the rail network, and for a future mass transit system. All ambitions for new route development are concentrated upon the mass transit system, while there are no proposals whatsoever to develop new routes for the existing rail network. The 2 programmes appear to have been developed in separate 'silos', with no holistic overview taken to ensure optimum network performance.
7. **The WYCA Rail Strategy displays a worrying predication upon established major projects i.e. Northern Powerhouse Rail and HS2 Phase 2b (east), both cancelled in the 2021 Integrated Rail Plan.** It should be noted that NPR and HS2 were hugely modified in the Government's 2021 Integrated Rail Plan (IRP), with all new-build elements within Yorkshire cancelled. Yet the WYCA Rail Strategy endorses both NPR and HS2 in their pre-IRP versions. The validity of the WYCA Rail Strategy, an official scheme originating from an organ of regional Government, in direct conflict with central Government's Integrated Rail Plan, must be questioned.
8. **The WYCA Rail Strategy endorses established major projects i.e. Northern Powerhouse Rail and HS2 Phase 2b (east) which cannot deliver WYCA's ambitions for long-distance connectivity.** The WYCA Rail Strategy correctly identifies major 'gaps' in West Yorkshire's rail links to other UK regions (P27/91), for instance to 'Nottingham, Leicester and the East Midlands', to 'Carlisle, Glasgow and the West of Scotland' or to '...Wales'. However, the published schemes that it endorses (i.e. Northern Powerhouse Rail and HS2, see Figure 5) offer no direct links from West Yorkshire to any of these destinations, are plainly incapable of filling these gaps. It is clear that the WYCA Rail Strategy has failed to properly consider the need of West Yorkshire communities for direct links to other major UK communities.
9. **Northern Powerhouse Rail and HS2 Phase 2b (east) also hugely compromise WYCA's ambitions for improved connectivity within West Yorkshire.** These established schemes impose unworkable station 'solutions' onto West Yorkshire's travelling public:
 - i. HS2's proposed 'T' station in Leeds will preclude any possibility of trains arriving from London into Leeds and running on to Bradford, Skipton and Harrogate, as intercity services from London currently do.
 - ii. NPR's proposed St James Market station in Bradford is unacceptably far from the city centre, and will leave the city with 3 separate stations (assuming that commuters currently using the better-located Bradford Interchange will insist on their existing station remaining in use). Bradford needs 1 single central station, not 3 separate and disconnected stations.
10. **Although the word 'integrated' appears around 20 times in the WYCA Rail Strategy, there is little sign of any integration, in practical terms.** This lack of integration hugely damages the performance of the overall rail network, and it also damages the connectivity 'offer' for the citizens of West Yorkshire, either locally, regionally or nationally:

- i. As previously noted, the WYCA Rail Strategy is an entity that seems completely removed from the WYCA West Yorkshire Mass Transit System, with each sitting in its separate silo, and all new-build interventions confined to the West Yorkshire Mass Transit System.
 - ii. There is also no effective integration between the WYCA Rail Strategy and longer-distance proposals i.e. TfN's Northern Powerhouse Rail and the Government's HS2.
 - iii. There is also no integration between Northern Powerhouse Rail and HS2. This has hugely compromised Northern Powerhouse Rail's ability to interconnect the cities of the Northern Powerhouse, and most intercity journey times fail to comply with the specification established in 2016 by Transport for the North.
11. **With no effective integration, either internally or externally, there seems no chance that the WYCA Rail Strategy can deliver the WYCA 'Rail Vision' for the rail network to be the core of a fully integrated multi-modal network of public transport.**
12. **With the HS2 project threatening to consume all of £96 billion of Government funds committed to the Integrated Rail Plan, it now seems increasingly unlikely that funding will be available for any significant development of West Yorkshire's rail network.** These critical budgetary problems render 'academic' all of the detailed concerns raised in this response; the biggest problem facing the rail network in West Yorkshire (and also any future Mass Transit System) is that the massive overspending on the HS2 project will prevent any investment in other more worthwhile railway projects. With £20 billion already squandered on HS2, it is vital that further spending is stopped with immediate effect, and a full public inquiry launched to determine a more responsible way forward for developing the UK's local, regional and national rail networks.

APPENDIX B

HSUK/Colin Elliff (CSE) Response to WYCA Rail Strategy Consultation

Response dated 1st September 2023, referenced to CSE letter to Tracy Brabin dated 03/09/23

Copy of substantive elements of response in blue below. Responses re race, religion, sexual orientation etc omitted

Q3 Please tell us which business or organisation you are answering on behalf of:

Response made by High Speed UK

Q4 What is your position in the organisation?

Colin Elliff, Civil Engineering Principal

Q6 Do you support the Rail Strategy?

No, not at all.

Q7 If you **don't agree with the Rail Strategy please explain why:**

The WYCA Rail Strategy does not result in an efficient local rail network for West Yorkshire in which connectivity between its major communities is maximised. It makes no attempt to improve the fundamental Leeds-centric configuration of the local network, in particular resolving existing dysfunctionalities in Leeds and Bradford. This appears to be due, to a large extent, upon the WYCA Rail Strategy being predicated upon established stand-alone proposals i.e. Northern Powerhouse Rail and HS2, which have been developed without the necessary integration with the existing system. The deficiencies of WYCA's Rail Strategy are exposed by the massively superior performance of our High Speed UK/Network North Exemplar Alternative, developed from the outset as a fully integrated system addressing local, regional and national connectivity needs.

Reference should be made to our landmark study *Dissecting the Integrated Rail Plan*, in particular Section 6.3 which examines connectivity in West Yorkshire.

Our concerns are summarised in our letter to West Yorkshire Mayor Tracy Brabin, dated 3rd September 2023.

Q8 Do you agree the Rail Strategy will help to deliver the objectives set out in the Rail Vision (consulted on in January 2021)

Strongly disagree to all.

Q9 To achieve the objectives set out in the Rail Vision, the Rail Strategy sets out four key priority areas:

- Delivering capacity for growth
- Improving station facilities and train services
- Decarbonisation (Transpennine route upgrade and future electrification)
- Increasing capacity for freight (reducing freight miles on roads)

Please tell us to what extent you agree that these are the key priorities:

Neutral to all.

Q10 Please use the space below if you think there are any other **key priority areas** that have been missed from the Rail Strategy:

All the priorities listed above are important. But there appears to be no recognition of concepts of full integration and optimisation of network performance, which are vital to achieving an efficient and optimised railway network.

Q11 Please use the space below if you would like to tell us anything else about the Rail Strategy:

There appears to be no proper design process that recognises concepts of full integration and optimisation of network performance, and the result will be a highly inefficient West Yorkshire rail network that fails to properly serve the people of West Yorkshire, and fails to deliver the transformed connectivity necessary to achieve Levelling-up and Net Zero emissions.

This point is proven by the hugely superior performance of Network North/High Speed UK, as documented in *Dissecting the Integrated Rail Plan*.