

Response to Leicester City Council Local Transport Plan consultation – September 2021

<https://news.leicester.gov.uk/news-articles/2021/june/consultation-launched-on-leicester-transport-plan/>

Introduction

Set out below is the response of Railfuture - East Midlands Branch to the consultation on the draft Leicester Transport Plan 2021-2036. The closing date for the consultation is 17th September 2021.

The consultation is primarily being undertaken by Leicester City Council using a detailed online survey, which gives the opportunity to comment openly (as opposed to answering specific questions) on the various aspects of the draft Local Transport Plan. The draft Plan focuses on three main areas:

- developing connected main transport corridors and stations,
- improving transport within local neighbourhoods, and
- managing demand for car use.

Each of these is divided into specific components, with the opportunity to comment on each. Some of these components focus on car use and active travel. As such, beyond broad support, it may not be appropriate for Railfuture to comment in detail. This is reflected in the answers below, though comments are given in the context of access to the rail station ('last mile' etc), improved public transport generally, and decarbonisation, all of which are of interest to Railfuture.

The comments are given in **red** in the boxes for each of the questions below. They should be read alongside the Draft LTP itself, which can be found here:

https://consultations.leicester.gov.uk/communications/ltp4/supporting_documents/Leicester%20Transport%20Plan.pdf

Prepared by: Steve Jones (steve.jones@railfuture.org.uk)

Branch Secretary: Railfuture - East Midlands Branch

Final response: 1st September 2021

Online consultation questionnaire

Do you have any comments on the introduction section of the draft Leicester Transport Plan?

We welcome both the draft Local Transport Plan (LTP) and its recognition of the challenges posed by Covid-19 and climate change, as well as economic and social factors. We welcome the recognition that *'the city boundary is not relevant when considering transport as a whole'*, and that *'many Leicester residents and workers feel that they must use cars because alternatives are not available, or are unsatisfactory, unsafe or just too expensive'*. For too long, Leicester has been far too car-dependent, and its public transport provision has been disjointed, as well as baffling to visitors. We would agree that local authorities are best placed to make decisions on local transport. In conjunction with this, we support local sources of steady funding, to free the locality from over-dependence on central government funding. We also support the sustainability commitments, though note that Leicester's internal transport, by whatever mode, remains entirely road-based. Apart from the desire to reduce transport use generally, especially at the traditional peak times, we fear this does not address the 'Oslo Effect' particulates from tyre, brake and road surface wear, which are a significant risk to public health.

We welcome the desired partnership approach, working with Midlands Connect, the LLEP, and others as identified, including ourselves in Railfuture as the leading national campaign organisation seeking better rail services over a bigger network, both for passengers and freight.

Do you have any comments on the Policy Overview?

We note and support the rail priorities identified in the Policy Overview and recognise their place within the remit of other agencies such as the DfT, these being: Midland Main Line electrification; rail station improvement; HS2 links (subject to decisions awaited on HS2 East); and improved rail links to other cities, of which Coventry must be the immediate priority. The desire to improve Leicester station and its surrounding public realm is welcome and supported. We in Railfuture are in regular contact with Midlands Connect and TfEM, as well as Network Rail and the train operating companies, in seeking enhancements to rail infrastructure and services throughout the East Midlands, including integration with other modes. Railfuture is, of course, pro-rail, but it is not specifically anti-road or any other mode. Nonetheless, we were strongly opposed to the earlier proposals in the *Leicester and Leicestershire Strategic Growth Plan (SGP)* for an additional A46 bypass around the east and south of Leicester and the associated entirely road-dependent development on rural land. We would also strongly oppose any similar proposal for a non-expressway-category bypass, or a collection of link roads forming a bypass. Other aspects of the SGP are supported,

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however, especially the identified rail enhancements. In particular, we support the reopening of the Leicester to Burton railway line, complete with the additional local stations it would provide. We also support the *Leicester & Leicestershire Rail Strategy* and its stated priorities, including modal shift of freight to rail. We note that there is almost no rail freight provision within the Leicester urban area, though numerous rail-linked logistics terminals and mineral extraction sites are located within the surrounding sub-region.

In terms of broader local land-use planning, we note that the draft Leicester Local Plan 2020-2036 identifies significant growth being planned around the edge of the city by neighbouring authorities. Another term for this is 'urban sprawl', and its peripheral nature tends towards car dependency for travel. We echo the many calls for this to be constrained as far as possible, with the emphasis shifting to higher-density development of brownfield land within the urban area (though not at the expense of quality). Where it is not possible to accommodate housing demand within the city boundaries, we encourage the City Council to work with neighbouring authorities to create or improve the sustainability of a small number of strategic development locations, centred around the provision of sustainable public transport at the commencement of development. For example, the 'sustainable urban extension' (SUE) at Lutterworth currently has very poor county-level public transport. Kibworth and further afield Desborough are locations which could be suitable for sustainable strategic development, as they lie on an existing railway line - but no longer have stations.

If the aims of the LTP to reduce car use are successful, some of the substantial amount of urban land currently used for car parking could be released for more constructive and imaginative use.

Finally, we welcome and support the recognition in the Policy Overview of associated policies and strategies dealing with climate change, air quality, public health and wellbeing, and general design of the urban realm.

Do you have any comments on Challenges and Opportunities?

We strongly support the ambition for Leicester to become carbon neutral by 2030 or sooner, and the recognition that investment in public transport and active travel is central to achieving it. The Council is also right to identify the major challenges, including the continuance of behavioural changes resulting from the Covid pandemic. Electrification of all forms of powered transport is clearly key, as is modal shift both from private to public transport and from powered to active travel. Part of the challenge in modal shift results from the lack of coordination of bus services at present. (There is currently no real impression of a coordinated network; rather, there is a collection of individual routes whose purpose is to enable travel between suburbs and the city centre, rather than integrated travel around the city.) The above comments about land use planning, which has a major

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effect on transport demand and type, are relevant here, too. We welcome the recognition of the need for better management of existing road space, as opposed to simply adding to it. The challenge of urban sprawl is a major one and we urge the local authorities to coordinate their efforts to minimise it by concentrating development wherever possible on brownfield and under-utilised inner-urban sites, and those best served by transport options other than the private car.

We note the acknowledgement in the draft LTP that usage of Leicester rail station ‘is still underperforming when compared to other cities’. This reflects Leicester’s relatively poor rail connectivity with other cities, and that the East Midlands region suffered disproportionately under the Beeching rail closures, limiting the present network. The February 2017 *Leicester & Leicestershire Rail Strategy* included assessments of rail’s potential for passenger connectivity between Leicester and various surrounding regions, some of which are very poorly connected to Leicester by rail, with correspondingly low usage. It would be instructive to know whether a refresh of this study, or any other analysis of rail usage between Leicester and surrounding towns and cities, has been done since or is planned, especially with anticipated changes post-Covid. We note the major planned improvements for Leicester – Coventry, based on assessments of existing and potential rail market share. There will be other opportunities, for example between Leicester and the north-west, including Manchester.

The East Midlands has also had historically low levels of per-capita investment funding for transport compared with other UK regions. We hope that the DfT’s forthcoming *Integrated Rail Plan* and other rail policies will address the latter. Selective reopenings under the DfT’s *Restoring Your Railway* scheme, specifically (but not only) Leicester to Burton-upon-Trent, would go some way towards improving rail’s local market share, and in turn contribute to the aims of the Leicester LTP.

The recognition of the limitations of present bus services and cycle routes as factors in encouraging excessive car use is welcome; the graph showing an 87.8% modal share for cars for inbound travel from the outer areas is very instructive. A major challenge is that buses traditionally do not attract motorists, and this will have been reinforced by the persistent and damaging ‘demonisation’ of all public transport throughout the pandemic. Overcoming these perceptions will be a major challenge. Though we recognise that installation of rapid transit systems of the kind to be found in nearly all European cities of Leicester’s size and importance would be costly and disruptive in the short term, we are disappointed that there is not even a long-term ambition for this. Trams and metros have been proven many times over to succeed in attracting former motorists in a way almost inconceivable with buses. Nottingham realised this some years ago. We in Railfuture shall be watching Coventry’s emerging ‘Very Light Rail’ (VLR) development with interest, which has the potential to reduce the deployment cost close to that of bus rapid transit (BRT), and we invite Leicester to do the same.

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Covid-19 has changed behaviours significantly and we note that the traditional weekday peak has been much reduced - and may have gone forever. The draft LTP rightly notes this trend. In its place, there appears to be emerging a more even flow of passengers and road users throughout the day and week. This is an opportunity for more cost-effective development of public transport, which is likely no longer to need massive capacity for limited periods of the day and week; expensive capacity that lies unused or underused for the rest of the time.

Do you have any comments on the Transport Vision?

We support all the stated ambitions for 2036. However, we have a number of comments, including surprise at the modesty of some of the aspirations.

Though hinted at in the draft Plan, there needs to be full recognition that, although mass peak commuting is likely to be a thing of the past, and probably rightly so, city centre economies are highly dependent on the businesses and services that support major office and commercial employment or depend on its associated footfall. Working from home and online purchasing are crucial and fast-developing aspects of modern life, and they bring huge benefits in terms of reduced peak travel. However, they can lead to social isolation and loss of city centre vibrancy.

Park & Ride: Although serving a useful function, P+R schemes should not encourage people to drive for most of the way on journeys that could be better made throughout by public transport, especially rail for the longer journeys.

We welcome the recognition of the climate emergency and the growing public desire for a 'green recovery'. In promoting active travel, we see a great opportunity for bike + rail to become a more attractive and readily available option for many non-local journeys. It would, however, require significant investment in related facilities by the rail industry, not least in cycle stowage capacity on rolling stock, and we look to Leicester City Council and all local authorities to promote this. It is especially important for major university cities such as Leicester.

When compared with what is available in many cities of Leicester's size elsewhere around the world, we doubt very much that battery-electric buses really do amount to a 'world leading public transport system'. Undoubtedly, the Greenlines will be a major improvement on what is available now, but hardly 'world leading'! Having said that, we support the proposals as far as they go, but repeat calls for Leicester to give serious consideration to a fixed-track transit system. As well as the higher quality experience such systems provide, the visible 'permanence' of their infrastructure and their potential to be objects of civic pride add to their attractiveness (e.g. to motorists), their effectiveness in achieving modal shift from cars, and their value as catalysts for economic development. Manchester amply illustrates all of these with its Metrolink system.

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We support the wider objectives neatly summarised in Figure 8 and in the Figure 9 table at Section 4.3 translating these into transport objectives. Transport resilience to e.g. extreme weather is important and it is good to see this included.

We support the targets outlined in Section 4.4, *Strategy*, for monitoring progress, noting particularly the 33% increase in rail passenger numbers at Leicester station by 2036. However, this latter target seems unduly modest when the present (pre-Covid) relatively low level of rail usage in Leicester is considered. The present rail market share between Leicester and Coventry, for example, is stated by Midlands Connect to be 3%, indicating a massive potential for increase when the planned upgrade of that route is completed. Together with other desirable enhancements to the local rail network, including a reopened 'Ivanhoe Line' to Burton-upon-Trent, there is great potential for a far higher increase in rail usage post-Covid, especially as rail's green credentials will become ever more relevant in the efforts to achieve net zero carbon. In saying this, we recognise, and support, the travel hierarchy described in Section 4.5, which places public transport after (a) reduced need for travel, and (b) active travel, as a guiding principle.

We also support the promotion of accessibility for all in transport. Any redesign of Leicester rail station, future rail passenger vehicles, and all other public transport (including taxis), must fully and intelligently accommodate the needs of all users, including those with disabilities of all kinds. We support the free city centre circular bus service, provided it conveniently and visibly serves the rail station. The lack hitherto of city centre 'distributor' public transport for people arriving at Leicester by train has long been a limitation in the city's appeal, especially as Leicester's retail development has tended to move further from the station (e.g. Highcross).

The aspiration in the Bus Services Improvement Plan to increase bus usage by over 10% over a ten-year period is astonishingly modest. Developing the present assortment of bus routes into a proper integrated and visible network, with high-quality interchange with rail at Leicester station, would be a major step forward.

Of course, we support the delivery of improved regional and national rail services at Leicester. This includes the welcome commitment to 'support feasibility work for Ivanhoe Line Stage II, the reopening of the railway line to passenger traffic between Leicester and Burton-upon-Trent', which is strongly supported by Railfuture. Reinstating this route would greatly improve access to a string of growing but post-industrial towns in North-West Leicestershire and we call upon the City Council to facilitate its development, including access to Leicester itself via the missing curve at Knighton Junction. This rail corridor also offers potential for a local light rail connector within the City area, serving the primary city centre traffic objectives as well as the main Leicester rail station. Alternatively, a tram-train solution, as successfully piloted between Sheffield and Rotherham, and as under construction for the Cardiff Bay and Valleys area, would combine the advantages of rail with

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city centre penetration. Indeed, this solution was advocated a few years ago for the Leicester – Burton line by a former Network Rail area manager.

Though the regeneration of St Margaret’s Bus Station is welcome, it is an unfortunate accident of history that it is more-or-less as far away from the rail station as it could possibly be while still within the city centre. This has impeded integration between local and county-wide bus services and rail for medium-distance and longer journeys (say, between Glenfield and London, or Thurmaston and Birmingham). We look to the improved interchange at the rail station to make such connections far easier – and therefore practicable - in future. The ‘hub & spoke’ model makes obvious sense. It must, however, be truly integrated, with easy transfer between modes and routes, and established as a genuine network, both on the ground and in people’s minds - like the London Underground.

Though going beyond the direct scope of the draft LTP, there is a related point to be made about integrated transport generally, which is that to be truly effective, it must apply across the whole country. As well as the city and surroundings, the vision in the LTP should apply also to any destination in the UK from any point in Leicester’s area of responsibility. One should be able to walk from one’s front door to a nearby public transport starting point with a pre-bookable end-to-end ticket and detailed itinerary for a fully integrated journey to anywhere in the UK! Key urban areas such as Leicester City Council should be basing their local planning on this approach, and jointly using their influence, so that they will integrate smoothly into a future nationwide travel system.

We support the exploration of a workplace parking levy as a source of funding for transport improvements, including its role in influencing behavioural change. Our only qualification of that is the risk of further discouraging the ‘return to the office’ for those who have the option to work from home, while unduly penalising those who do not, such as healthcare workers. As the draft Plan recognises, it must also not encourage displacement of parking from workplace car parks to nearby residential streets.

Finally, the rail industry is exploring the potential to reinstate light goods and parcels traffic, either on passenger trains or on dedicated high-speed logistics trains directly serving city centres. It is ironic that ‘parcels’ used to be a major business sector for rail but was discarded by the industry decades ago. The growth in online shopping and light-goods logistics, especially centred upon the logistics ‘golden triangle’ in the East Midlands, lends itself to rail, supplemented by zero-carbon last-mile collection and delivery from the railhead, for example, using cargo-bikes or click-and-collect pick-up points at stations. Within the powers available to the local authorities, Leicester should promote such services, especially given the recent massive growth in ‘white vans’ on the roads.

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Key Themes and Proposed Projects

Please indicate which key theme you would like to view in more detail / comment on

(Required)

Connected Corridors and Hubs

- Connected corridors comments

We welcome this, especially the ‘transformed Leicester Rail Station’. As is the case in many UK towns and cities, especially after bus services were deregulated in the 1980s, Leicester’s bus services are not a coordinated network. Rather, they are a collection of individual routes linking outlying residential areas with the centre, with little visible integration. As such, they are largely unfathomable to visitors to the city, though it is acknowledged that this is by no means unique to Leicester, and that information provision has improved in recent years. (Imagine, for example, an average family from, say, Luton, arriving at Leicester by train for a family day out at the National Space Science Centre. Would they have a clue about how to get there from the station by bus?!) The draft LTP is quite right therefore to recognise the need to support visitors to the city, as well as its residents.

We support the provision of improved bus and active travel infrastructure.

- Greenlines electric bus network comments

Though we support this as a significant improvement on the present arrangements, we are surprised and disappointed to see it portrayed as somehow superior to ‘an expensive fixed tram network’. Buses are undoubtedly more flexible, but that very flexibility also means impermanence, and the lack of fixed infrastructure makes the whole thing less of a statement of civic pride and confidence, and less of an anchor for inward investment. The Greenlines buses are certainly welcome, but they should be seen as a first step towards a more substantial mass transit system. (An analogy might be the ‘pre-metro’ tram subways in Brussels, which were a transitional stage in upgrading first-generation conventional tramlines to full a metro system.) For example, reliable level boarding at all stops, which is an inherent feature of all modern fixed-track transit systems, remains sub-optimum with buses except those that run on guideways. Technology will of course advance over time and may well address this particular characteristic in due course. It is worthy of note that Leicester’s two primary neighbouring cities are Nottingham, which has a well-established ‘conventional’ modern tram system, and Coventry, which is developing the innovative Very Light Rail (VLR) concept. Leicester’s faith in a fleet of battery electric buses appears unambitious by comparison! We invite Leicester at least to watch the VLR developments in Coventry and be open to exploring low-cost but flexible transit systems of this kind. In saying this, we recognise that several new-generation tram systems in the UK are significantly based on former heavy rail alignments; something not available in Leicester.

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- **Integrated transport hubs comments**

It is an unfortunate accident of history that Leicester, a medium-sized city, has two separate bus stations, neither of which is near the rail station. Integration of public transport in the city has consequently always been sub-optimum. Though the three stations (rail and two bus) remain in the draft LTP, we welcome the planned improvement of all three, the improved walking links between them, and the proposed city centre electric bus link. Making this fare-free is also welcome, and it is essential that it is easy to use, with frequent services and clear 'visibility' in terms of stops and connections.

All modes of transport should be accommodated as far as is practicable at the transport hubs, given that few end-to-end journeys rely entirely on just one mode of transport. We therefore welcome the provision of good pedestrian, cycle and taxi access. Information provision is also key, in ensuring that people unfamiliar with Leicester are not left baffled about which service to catch, where from, at what time, and how to pay the right fare. That includes clear and visible identification of all stops on all routes, such that the user also knows when they have reached their destination.

- **Transformed Rail Station comments**

Not surprisingly, Railfuture welcomes the recognition that Leicester station is 'underperforming' and 'requires a complete upgrade'. The proposals are equally welcome, especially the 'impressive and welcoming new entrance and public square at Station Street'. We await details of the improved platforms but note that additional platform capacity would be needed if Leicester's station and the rail services into it are to achieve their full potential. There are at least three *Restoring Your Railway* projects that aspire to deliver services into Leicester, but they are encountering resistance because of a lack of platform and passenger capacity at Leicester station, and an understandable desire to prioritise Leicester - Coventry improvements, which leaves little capacity for further services and destinations to be served.

This in turn requires other infrastructure improvements, as part of the upgrade of both the Midland Main Line (including electrification) and the east-west route as part of the 'F2N (Felixstowe to Nuneaton) freight corridor. We recognise that all this falls outside the powers and duties of Leicester City Council and the remit of the LTP. However, we would expect the City Council, in conjunction with TfEM and Midlands Connect, to support enhancements including four-tracking and possible speed upgrades for the whole route between Syston and Wigston Junctions, as put forward in the July 2020 Network Rail *Leicester Area Strategic Advice*. This would have the advantage of separating the Nuneaton-direction traffic from the Midland Main Line south of Leicester station, thus removing conflicting moves between the east-west freight trains and MML Intercity trains at Wigston. It would also more readily accommodate a reopened Ivanhoe Line to Burton-upon-Trent via reinstatement of the west-to-north curve at Knighton Junction.

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The proposals for improved multi-modal access to the station for pedestrians, cyclists, bus and taxi users, and residual car pick-up and drop-off are important and welcome. We also welcome the greatly improved public realm at what is currently an under-utilised asset, both the new public square and the more imaginative use of the porte cochere.

Finally, several major city-centre rail stations elsewhere in the UK have seen substantial commercial developments directly above the station infrastructure, often facilitating and financing enhancements to the station itself. Leicester station lends itself well to such development, its track and platforms lying largely below the level of surrounding land and, apart from the porte cochere, containing little by way of architectural merit of the kind that might constrain such development. It is essential, however, that any over-site development at the station must not impede future rail access and enhancements, such as reinstated track or additional platforms.

Connected Healthy Neighbourhoods

- Connected walking and cycling networks comments

Beyond supporting the policies and plans under this heading, we have no further comments, subject to the need for good access between these networks and the rail station. This should include access for cargo-bikes associated with last-mile collection and delivery of light goods (parcels and pallet-loads) consigned by rail.

- Connected city centre / neighbourhoods comments

Beyond supporting the policies and plans under this heading, especially in terms of access to the rail station, we have no additional comments to those identified above.

- Connected local neighbourhoods comments

No specific comments beyond broad support.

- Local bus network comments

No specific comments beyond broad support. Again, we point to integration with other public transport, especially rail.

- Fewer, cleaner vehicles comments

Beyond broad support, our only comment is that, in themselves, electric vehicles only address tailpipe emissions at the point of use. Without other measures, they do nothing for congestion, wasteful land-use for parking, and 'Oslo Effect' particulate pollution from tyre, brake, and road surface wear.

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Managing demand for car use (includes workplace parking levy)

Parking management and co-ordination comments

We support better management of parking, including sufficient short-stay and long-stay parking at the rail station to the extent that is consistent with the other policies regarding car usage. We repeat the comment above that park + ride, while valuable, should not encourage longer-distance journeys that would be better made throughout by public transport. Release of car parking land for more constructive and attractive use would also be welcome.

Workplace parking levy comments

We support a workplace parking levy as a means both of managing demand and raising sustained funding for other modes, along with the potential to leverage other funding. As recognised in the draft Plan, a WPL must be part of a package of measures to prevent displacement of parking from employers' car parks into residential streets. The 'stick' of the WPL must be simultaneously accompanied by the 'carrot' of improved alternative travel options.

Behaviour change comments

We support the measures outlined. Though the Covid pandemic has been a catalyst for increased cycling and other active travel, it has been devastating for public transport and attitudes towards it. As we move to 'normality', efforts must be redoubled to ensure that people happily and confidently return to public transport. There is an equality issue here, too, as not everyone is able to partake in active travel and may not have access to private transport.

Smart transport comments

No specific comments beyond broad support, especially for bus, cycle, and pedestrian priority measures where appropriate on the road network.

Network management comments

No specific comments beyond broad support, especially for bus priority and traffic-free cycle networks. Though perhaps tangential to the management of road-space, the City Council should take advantage of opportunities for physical 'greening' of road corridors by means of planting suitable types of trees and shrubs. It is unfortunate that the opportunity presented by tramways for 'grass track', as is commonplace in many such systems, will not be available in Leicester.

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Do you have any comments on Delivery and Funding?

No specific comments beyond recognition of the constraints on funding and broad welcome for the measures proposed, including the workplace parking levy. We support planning policies aimed at reducing car dependency. It is likely that the costs of electric cars will reduce over time, which, without other balancing measures, will increase the competitive pressure on bus fares. The references in the draft Plan to 'early electrification of the Midland Main Line' and 'Committed investments in inter-city rail links, particularly east-west regional connections' are strongly supported. To these, we would add expansion of the local rail network, especially the reopening of the Leicester to Burton-upon-Trent 'Ivanhoe' line, plus possible additional stations in the greater Leicester conurbation, such as at Blaby and East Goscote, and around it, such as Kibworth. The recognition of the cross-boundary nature of much travel, and the related need to work with partner agencies such as Midlands Connect, is welcome.

Leave a Quick Comment

The quality of the draft LTP documentation makes it clear that a lot of thought has gone into its development and the interdependencies between transport, land use, economic and social factors, and the environment generally.

We broadly support the draft LTP but regret that the public transport aspirations extend no further than a limited network of battery electric buses, plus improvements to the rail and bus stations. We certainly welcome all of these. We also recognise that a more 'permanent' mass transit system would be expensive as well as disruptive during construction, though would be more effective once completed. Nonetheless, despite the limited aspirations for public transport, we welcome the commitments to manage transport demand, encourage healthy active travel, and decarbonise the remaining powered transport. We are grateful for the opportunity to comment, and we look forward to working with the City Council on any future work affecting the rail station and the lines and services to and through it, both for passengers and freight.

Ends

Submitted online 01-09-2021: