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Dear Rob

Thank you for the opportunity to respond to the West Yorkshire Combined Authority Mass Rapid Transit (MRT) informal public consultation.

Please accept this letter as Leeds City Council's (LCC's) feedback on the MRT proposals for the Leeds and Bradford Line route options along with the Mass Transit Sustainability and Placemaking Strategies. The response as outlined in this letter has been endorsed by LCC's Executive Board on the 18<sup>th</sup> September 2024.

LCC welcomes MRT. We recognise its strategic importance, its role in improving connectivity across the city and wider West Yorkshire region and how it will be a key driver in promoting economic growth by bringing people within easier reach of jobs, education, and opportunities.

Our commitment to the delivery of MRT remains as demonstrated by its inclusion in the emerging Local Plan update and the Connecting Leeds Transport Strategy. MRT is viewed as an enabler to the Council delivering on its key ambitions to grow the city inclusively and to be a city where you don't need a car.

To ensure we meet these ambitions, MRT will need to be fully integrated into the existing public transport network which includes rail, bus and active travel. Interchanges will be required at key locations to allow seamless transition between transport modes which will help encourage modal shift away from the car to more sustainable forms of transport. The move away from private vehicles will also help achieve the city's ambitions as outlined in Vision Zero, which is to eliminate all traffic fatalities and severe injuries by 2040. So, we are pleased to see WYCA's commitment to designing and implementing a public transport system that aims to improve frequency, capacity and reliability of service whilst being fully accessible and a low-cost alternative.

Improved connectivity is critical to inclusive economic growth as detailed in the Best City Ambition and Inclusive Growth Strategy. As a city we want our communities to be better connected to our local and regional centres, we therefore welcome the improved connections to Bradford and the local centres that align the proposed routes. Enhanced transport links will connect people to employment centres and encourage more businesses to locate to our city which in turn will provide greater job opportunities for the people of Leeds. MRT can also have a profound impact on the city's new homes target. As part of the Leeds Transformation Regeneration Partnership with MHCLG, Leeds will aim to deliver 20,000 new homes surrounding the city centre over the next 10 years, MRT investment has the potential to enhance, support and complement this offer.

Transport sits at the heart of LCC's commitment to being carbon neutral by 2030. Leeds city centre is a built-up environment, so it is important that any development whether that be building, or transport aims to minimise the impact on the local environment. We therefore welcome WYCA's proposals that MRT will focus on green sources of renewable energy as a means of powering the transport system and that low carbon materials are used in the construction and operation of MRT to reduce emissions and improve air quality. LCC also

welcomes the opportunity to look at ways the design can deliver bio-diversity net gain wherever possible within the lines of the route.

Over the last 5 years there has been significant change in national rail strategy. The Integrated Rail Plan for the North and Midlands in 2021 and Network North in 2023 ignored the growth and statutory spatial plans developed over the previous 10 years in the form of Leeds Local Development Framework, South Bank Regeneration Framework and HS2 Growth Strategy. Instead, the new policies introduced a series of investments in existing railway and mass transit. These investments are an important interim step to enabling the future growth potential of the City and Region. However, these are yet untested in respect of how and to what extent they will support economic growth as an integrated network. As the MRT routes and designs are developed it will be equally as important that work is undertaken to understand the wider West Yorkshire economic growth and benefits and spatial context of the investment in MRT and rail. The Council will seek to provide support to WYCA in developing these.

Whilst we recognise that the design development for the scheme is at a very early stage based on the information provided in the public consultation document and in respect of the Leeds Line, LCC continue to support routes that connect key destinations such as the White Rose Shopping Centre and Business Park, Elland Road Stadium, Leeds Station, the universities, hospitals, the Innovation District, and existing housing developments. This support extends to routes that offer opportunities that accelerate urban regeneration and where MRT can be a catalyst for wider change by helping to unlock brownfield development and placemaking that contributes to new housing delivery and economic delivery. The L1 route option provides strong growth opportunity and builds on the changes we have made to the city centre transport network in recent years and L6 provides strong economic growth and economic regeneration potential. Subject to assessing the detailed proposals as they develop, both L1 and L6 are particularly strong against the other options. As such LCC's preferred route in the city centre is L1 via East Parade and Infirmary Street and in South Leeds, L6 via Elland Road, Elland Road Stadium and Ring Road Beeston.

LCC offer the following observations regarding the Leeds Line which we hope will aid WYCA as you move towards a preferred option for this corridor. .

- a) MRT needs to run where existing public transport routes are currently at capacity or limited.
- b) MRT needs to be integrated with Leeds Station and Network Rail's onwards travel statutory obligations. This is particularly important following the removal of HS2 to the city. The existing pick up and drop off (PUDO) at Leeds Station is not fit for purpose and adversely affects the local highway network. A secondary PUDO is required south of the station and needs to be fully integrated with other transport modes.
- c) MRT needs to ensure that city centre highway network resilience and emergency service access particularly to Leeds General Infirmary is maintained
- d) MRT routes through the city centre needs to enhance and integrate with pedestrian, active travel, and bus routes, not seek to displace them to less desirable routes.
- e) MRT routes need to integrate with other modes of travel including taxi ranks, private hire, and hackneys, loading bays and blue badge parking.
- f) MRT routes and stops need to enhance and maximise placemaking opportunities both within the immediate vicinity of the route and local district centres in which the routes run through.
- g) MRT routes should support and complement city centre event space, existing greenspace, and public realm. LCC would seek MRT stops which do not compromise the ability for the Town Hall to host international events, Millenium Square to function as event space or the loss of existing greenspace in the city and local communities where possible.
- h) MRT routes should be integrated into local master planning work to support, act as a catalyst to regeneration and have consideration of significant investments either recently implemented or in the process of being delivered
- i) MRT routes should safely integrate with the city's key destinations including health, sport, education centres and key destinations which attract high volumes of visitors such as White Rose, Elland Road Stadium, the Leeds Arena, Leeds General Infirmary, St James Hospital and the Universities.
- j) MRT routes should provide opportunities to drive development, the delivery of new homes and economic growth in the city centre and Leeds south.
- k) MRT routes should complement LCC's aspirations to redevelop its strategic land holding around Elland Road Stadium and the current temporary Park and Ride.

- l) MRT routes options do not interchange with the existing bus station under this initial phase and we would like to work with you to keep interchange options with buses under review as the scheme progresses.

In relation to the Bradford Line, LCC support improved connections between the city centre, Pudsey and Bradford but would welcome further discussions with WYCA on the route options to further understand the integration and impact of the routes on the existing railway and Northern Powerhouse Rail proposals, how the disruption to the local highway will be kept to a minimum and how MRT will serve the communities along the route. LCC look forward to having further conversations on the design development with WYCA to fully inform future considerations on a preferred option for the Bradford Line

Further observations regarding the Bradford Line include,

- a) MRT routes should support existing greenspace and public realm.
- b) MRT routes should support economic growth in this area of Leeds.
- c) MRT routes should minimise the impact on existing residential areas.
- d) MRT routes and stops need to enhance placemaking opportunities both within the immediate vicinity of the route and local district centres in which the routes run through
- e) Proposed MRT routes that utilise the highway network in this part of Leeds would require strategic network and junction modelling to demonstrate to LCC that all measures have been taken to minimise the impact and maintain network resilience.
- f) The design solution to reduce the impact on the green belt and support biodiversity net gains along the route

More broadly as the scheme develops there will be design elements on both lines that will need to be resolved including,

- a) How MRT unlocks future economic growth for the city recognising the increasing densification and expansion of the city centre to the west and south-west.
- b) Placemaking opportunities along the routes and in local district centres and how it will integrate with and support the city's regeneration ambitions including the Leeds Transformation Regeneration Programme and Innovation Arc.
- c) How MRT will fully integrate with the existing highway, bus network, active travel routes and rail stations.
- d) Impact on existing highways including, Traffic Regulation Orders, UTMC control, abnormal load routes, drainage, road safety and existing structures. Further discussion is required on the management, implementation and enforcement of these areas.
- e) Impact on the city during construction recognising the need for WYCA, LCC and Network Rail to work closely to mitigate impact on businesses, events, and inward investment.
- f) How the impact of MRT on the District's landscape and green belt will be minimised
- g) Delivery of Biodiversity Net Gain wherever possible within the line of the route.
- h) As the scheme develops it will be important to understand different customers' requirements and needs e.g. someone commuting from the M62, someone travelling from Bradford to University in Leeds or vice versa, someone bringing their child to a hospital appointment etc and how the beginning and end of their journey will integrate with the MRT system.

LCC welcomes the Collaboration Agreement that has been signed between both organisations recognising both LCC's role as strategic partner and its existing statutory functions and obligations. We view this as a positive step forward allowing us to share resources and local knowledge which will be of benefit as the MRT scheme progresses.

We look forward to continuing to work with you on the development of MRT.

Yours sincerely,

**Martin Farrington**  
**Director of City Development**