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30<sup>th</sup> April

GREG JONES QC CROSS-EXAMINATION OF MARTIN FARRINGTON

Jones: understanding your involvement in this matter - were you involved in promotion of the Leeds Supertram decision by council? Involved in any decision? Were you in post at the time?

MF: I have been a director post Aug 2010

J: What were the reasons why council supertram scheme over and above trolleybus? What were the advantages of a supertram?

MF: supertram scheme cancelled in 2006 and I had no involvement

J: did you familiarise yourself with the scheme when supertram was promoted? Good thing to promote a RTS based on a tram?

MF: I didn't explore the background to a scheme cancelled 4 yrs previously

J: you evidence why Leeds needs RTS. You did not conduct any review yourself of pros and cons of Supertram. When considering need for RTS you did not review whether a tram system might be the right system for Leeds. You didn't review Supertram as part of your role and you didn't do that in connection with your suggestion of the need for RTS in Leeds – you didn't conduct an assessment of pros and cons of Supertram in connection to the need for RTS.

MF: correct – I didn't. My colleagues in highways etc. did this.

J: are there any reviews of the supertram (its pros and cons) that you have used in your proof that you rely on?

MF: I rely on the evidence of mr haskins.

J: I do not believe you have

J: No reliance on anyone else's review of pros and cons of supertram?

MF: no I have not relied on them

J: in so far as UDP was concerned gov cancellation of supertram came at v. advanced stage. Rather than go in front of inspector again – decision to insert NGT in place of supertram – same routes were therefore protected, am I correct?

MF: I wasn't familiar with that process

J: [questions on how informed witness is]

MF: I haven't read speaks, but read haskin's some time ago

J: when did you read haskin's evidence

MF: three weeks ago

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J – anyone else

Mf: also read chadwicks – also three weeks ago

J – read any evidence presented by my clients, fwy?

Mf: I read their rebuttals, alexander's, turner's, cheek's, brooks'

J- any other objectors groups?

MF: elements of others, A660 elements – and don't think I have read anything else

J: you haven't actually read our main proofs?

Mf: yes, read main proofs as well – alexander, turner, cheeks, brooks (I think)

J: and you read haskins and chadwicks promoter proofs – not speaks?

MF: correct

J: first point – you've got no idea, you say, as to why council pursued tram instead of trolleybus, you can't help us with that?

Mf: I can't provide a detailed response

J: extraordinary that you didn't inform yourself as to reasons why council pursued tram instead of trolleybus ?

Mf: I think this is unfair – I'm a director, covering a broad range of services. I am responsible for £77mill expenditure and many staff, I take a leading role in no. of schemes, (examples given), the delivery of ngt was promoted through others (highlights transport dept and metro). I took on interim official position in jan 2014 on retirement of director general of metro – so my knowledge of scheme and apportionment of my responsibility is at a high level.

J; you are v. busy. But you are here giving evidence as to why Leeds needs a RTS and it must be a trolleybus. I need to explore your detailed knowledge and how you have come to that decision. Can you tell me what the benefits of a tram over and above a trolleybus system are? You have referred to Manchester, Sheffield etc.

MF: I don't have a detailed view – I think a trolleybus system ...costs less, less disruptive in terms of initial development and work undertaken – the two principle benefits.

J: long term legacy and message it sends out?

Mf: permanence is a strong element, tram, in some opinions, could be seen as marginally more permanent than trolleybus

J: how much money Leeds spent on supertram proposal?

MF: can't answer

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J: how much leeds spent so far on pursuit of trolleybus proposal?

Mf: no, through my directorate but no I don't

J: need to see what your evidence is based upon and what weight inspector should give to the witness. In terms of legacy –how permanent do you envisage ngt to be?

Mf: ngt will be a long term investment proposal.

J; how many years do you envisage ngt scheme lifespan? Have you budgeted or taken a review on it

Mf: decades...

J: sec of state says its inflexible form of transport – is there any doc that you rely on in your evidence that you use to be aware of the longevity and permanence of this.

Mf: strategic case reviews that in docs in front of me in line with dft modelling - showing lifespan of the scheme. (looks for docs)

J: what is your understanding of the longevity of the scheme?

Mf: in my view, I see it as a long term proposal and relate it to London tube systems. I have asked my urban design team to do a similar exercise. I don't foresee it changing soon – just "long term" that will continue

J: we understand that the appraisal period of the scheme is 60 years.

Mf: if the doc says 60 years then I will agree with that

J: in any case, can we agree that a decision made now will commit leeds, so far as your evidence is concerned, for the corridors upon which this application is sought – commitment for decades in a magnitude of around 60 years

MF: yes

J: you've referred to this being potentially the first phase – but this scheme stands all fours on its own merits -

Mf: yes

J: inspector being asked to grant consent for trolleybus on the specific corridors for 60 + years with a prospect that there would be no further extensions?

Mf: that is correct. But with background context that the council is promoting further extensions of the ngt scheme

J: does that mean it [further extensions] must be a trolleybus

Mf: yes

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J: you based this understanding on what?

Mf: my understanding on basis of compatibility on the entirety of any future network

J: is it based on any definition for ngt?

Mf: no

J: if there were not technological reasons, is there is any reason that another form of RTS could be used? Are you shutting any prospect on Leeds having a tram, other RTS guided bus etc. Are you asking the inspector that he should only envisage any RTS arrangements using trolleybuses?

Mf: once we develop a trolleybus system then we will develop this further but that will be complementary to other forms of transport as well

J: so thrust of RTS will be extension of trolleybus with trolleybuses?

Mf: yes

J: what this means is that this is a crucial decision setting out commitment for transport for Leeds for the next 60-100 years

Mf; yes, it is important.

J: it is important the right decision is made, am I right?

Mf: yes

J: the vision was for a tram for a more extensive area than currently before the inspector.

Mf: yes in the initial proposal in 2006 for supertram

J: in terms of the corridors as part of supertram - land which was acquired for the supertram is still currently being held by council for what is now the ngt corridor, is it not?

Mf: yes

J: line and money spent on routes of supertram and on the acquired land, has impacted on decisions taken in respect to promotion of ngt scheme. Are they down same part of same route for the two?

Mf: yes, broadly

J; they have already acquired land which now they can use for ngt?

Mf: I am aware we have acquired land for many years in relation to land required for this route

J: one of the factors you rely on is the comparison of leeds. How many other cities have an operational trolleybus system

Mf: I am not aware of any

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J: when did the last trolleybus cease operation

Mf: I don't know

J: turning to appendices of yours – council meeting of july 2013 and nov 2013. I have looked at the officer's reports – confirm that when the decision was taken to commit to trolleybus scheme were you aware of the decision made by the sec of state in the Merseyside trolleybus scheme?

Mf: personally, no

J: when did you first become aware of it?

Mf: yesterday morning

J: am I right in understanding that the council, when they made the decision... - did you attend those council meetings?

Mf: yes in non-speaking capacity

J: Merseyside matter was not drawn to other members' attention in the council?

Mf: no

J: has mr farrington got the decision of the inspector and report for Merseyside trolleybus. Have you read this decision letter from sec of state?

Mf: yes

J: this decision letter is highly relevant to the decision as to whether to invest in the leeds trolleybus, right?

Mf: no I don't agree

J: you say that this is an irrelevant to decision that sec of state has to make here?

Mf: no, I said not 'highly' relevant - but of some relevance.

J: paragraph 5 of decision letter: one of the factors highlighted by inspector and sec of state as an important negative factor is its constrained flexibility of operation. There is reference to inspector's report where inspector examines in greater detail the negative aspects of this. Pg 419 – vehicle attributes (in full report). He says 'however tastefully designed, cannot be presented as attractive'.

Mf: the Manchester, Sheffield tram scheme also has over head cables.

J; that's not the question - diesel buses (compared to trolleybus in decision letter) are not trams.

Mf: the wires don't add to the attractiveness.

J; you say the wires are neutral? It is a dis-benefit is it not?

Mf: I say it is neutral-to negative.

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J: do you disagree with the letter's view?

Mf: I am not promoting that they are attractive.

J: general comment on visual impacts on townscape – 60 applications for listed building and conservation consent. A very high, no?

Mf: I can't say. You must compare with other schemes

J: how many conservation areas and listed buildings affected by Merseyside?

Mf: I don't know

J: the inflexibility of trolleybuses have not changed has it?

Mf: no – but this is the same for any scheme for any transport with over-head cables etc – like trams

J: but not for a bus service, am I right?

Mf: they don't have permanence but yes, they have more flexibility

J: in Merseyside case, the sec of state was not persuaded that the degree of permanence was a benefit overcoming the lack of flexibility and visual impacts?

Mf: yes, but that is a point of fact/history

J: do you point to any factors relevant to that point in your evidence as to why a different approach should be taken in this case?

Mf: this was decision in 1999, 4 parliments ago, pre-dates eddington report, doesn't take into account existng current policy in current parliament (single parliament pot), relates to Liverpool not leeds (which experienced population decline whilst leeds in growing in pop), we are not looking at leeds supertram TWA order

Mf: 2000 supertram scheme which also delivered permanence was granted funding etc in that period

J: are you saying that need for overhead cabling is more flexible than it was in 1999?

Mf: no

J: since 1999 are you aware of any changes in technology that visual impact etc is unattractive

Mf: not aware of any technology changes

J: so far as eddington report is concerned, it does not address the issue of the visual impact of these cables, does it?

Mf: no, but it does highlight the need to look more broadly at transport for wider economic benefits etc.

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J: eddington report: does this deal with the issue of permanence. You are not relying on anything in the eddington report in respect of the so called permanence argument?

Mf: I don't have an encyclopedia knowledge of this. I base my evidence on the sir david lee report??

J: decision to adopt a trolleybus was taken without any reference to the Merseyside scheme, was it?

Mf: I am not aware of any reference to this when decision was taken.

J: so there was no evidence in public domain that decision letter was taken into account and it would have been rejected due to it being 'not relevant' and shouldn't influence the decision making process in respect to leeds

Mf: so far as I'm aware, no

J: so far as you're concerned any reason given now about its relevance, they're after the event of the decision being taken to adopt the trolleybus scheme

Mf: it didn't form any part of my thought process. Whether it was part of the members/council's decision process I can't say

J: as part of the applicant's case, reference was made to adoption of trolleybus in Montreal, Geneva etc. we will see how comparable they are. You've not looked at those?

Mf: not in detail. I cannot answer any meaningful questions on it

J: another commonality between Merseyside and Leeds scheme is that there is no suggestion in terms of overall air quality that any benefit of a trolleybus will be anything more than marginal

Mf: no, this scheme has not been promoted as a result of benefits in air quality. No proposal to link it to green energy infrastructure but there is a prospect

J: no difference between Merseyside and this scheme in terms of air quality?

Mf: I don't have the technical background to provide an informed comment

J: para 14 of Merseyside decision letter – dealing with pedestrianisation. This scheme will go through pedestrianized zones and is passing both ways, yes?

Mf: yes to a degree

J: that also occurred in the Merseyside scheme, in para 14 the concerns raised in the extremely quiet nature of the vehicles

Mf: I wasn't party to discussions concerning safety of pedestrians.

J: it is compelling, strong wording [in relation to the safety of pedestrians]?

Mf: yes, it is strong wording

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J: how will it be addressed?

Mf: bell alerts and audible systems.

J: is this something that has been made up yesterday? Do you know this?

Mf: it is in the rebuttal evidence of north side pass neighbourhood association

J: has it been assessed

Mf: I'm not aware of that point

J: RTS – this does not need to be a trolleybus does it?

Mf: no

J: you indicate the Manchester tram and Cambridgeshire guided bus etc are also RTS

Mf: yes

J: you don't acknowledge existence of guided buses on m64 or scuttle road, and Manchester road Bradford?

Mf: no

J: these are RTS?

Mf: of a sort, yes

J: Manchester tram is 17mile/hr – are you aware of that? Midlands/docklands etc miles/hr?

Mf: I am not aware of that

J: your evidence is given without knowledge of average speed of these comparisons. Ngt average speeds is about [?] miles/hr

Is average speed not a relevant factor when comparing RTS with other cities?

Mf: yes, speed is a relevant factor

**BREAK**

J: Sourcing RH trolleybuses (comparing this to London underground) – how many RH trolleybus systems in the world operating?

Mf: not my area – my haskins deals with this

J: but this witness is endorsing mr haskins etc. in terms of technology in the future and how this will relate to leeds' aspiration for future development and growth – did you see the PWC report advice to wellington council?



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Mf: I am aware of the report but haven't read it in detail

J: the recommendation is not to continue with trolleybuses – have you looked at the pros and cons of using trolleybuses in that report?

Mf: yes

J: one disadvantage is crashing with pedestrians – do any of those disadvantages not apply to leeds?

Mf: they are all general disadvantages relating to trolleybuses – but also can relate to other RTS.

J: so they all apply to the leeds trolleybus scheme. Can you identify where PWC says the need to create the upfront funding and infrastructure is an advantage in terms of permanence

Mf: no

J: it's not in it. Are you aware of any other consultant reports produced that identifies the degree of permanence as an advantage in respect of trolleybuses?

Mf: no I am not

J: STG was produced in jan 2014 after the decision was made by the promoters to adopt trolleybus

Mf: yes

J: are you aware of any distinctions from wellington that means new Zealanders/overseas investors would react differently to the issue of permanence than investors investing in leeds?

Mf: I have no familiarisation with investment into wellington, nz

J: what steps have you taken to reassure yourself that leeds will be able to secure, at a competitive price, replacement upgrades, extensions of rh trolleybuses over 60 + years?

Mf: no evidence that has been brought to my attention that there has been a problem with that supply. I took over as interim chair, I have had discussions with senior managers and reassured on that point. I don't have any evidence to ref here.

J: how many suppliers are there currently, that you were told of

Mf: I can't recall

J: do you know the vast majority are LH drive?

Mf: yes, that's my understanding

J: vital you can guarantee a supply of the trolleybus equipment

Mf: correct

J: someone has to be making them so there is a competitive market

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Mf: yes, that is a risk

J: you don't think it's a big risk

Mf: I don't personally

J: that assessment is based on your knowledge of how many existing companies?

Mf: I don't know right now

J: are you aware of any other local authorities that have taken a decision to invest within uk in trolleybus system?

Mf: no I am not

J: a point from the eddington report – you take from it that provision of good infrastructure can improve the economy

Mf: yes it is an enabler

J: as far as you're aware, eddington doesn't say one needs to have a trolleybus system to secure that?

Mf: no that's not the point I'm making

J: secondly, it doesn't say that buses should not be considered as something that would provide infrastructure improvements that could bring economic benefit

Mf: no, it doesn't exclude buses

J: vision for leeds (D -69 page 5) – (people told them what they would like leeds to be like in 2030 and how to make it happen) – are the detailed questions a matter for different witnesses?

Mf: I wasn't part of the process of the creation of this doc

J: it says that it "could include a good quality bus service"

Mf: yes it can along with other types of transport

J: doc G4-101 – you refer to figure 2 page 8 – nobody identifies the need for a trolleybus specifically in their responses, do they?

Mf: I don't have a breakdown of individual responses

J: we don't find anyone identifying a trolleybus do we?

Mf: no we don't but it does say 'integrated transport system'

J: shouldn't we agree that anything that is done is integrated into the existing transport system?

Mf: I don't agree with the premise that existing transport system should stay as it is – it should be developed in a complementary way but – where it doesn't have the existing system changing either.

J: I said 'integrate' not that it 'shouldn't change'

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Mf: I am stating that they should integrate 'with each other'

J: at least 75% of trolleybus customers will be drawn from those currently already using public transport – either bus or train (from the promoters' latest figures) are you not aware of what your case is on modal shift?

Mf: my proof doesn't deal with modal shift.

J: you aren't promoting this scheme in that it will create a significant modal shift from car to trolleybus ?

Mf [?]

J: what % of passengers using the trolleybus will come from the car?

Mf: I'm not in position to answer

J: you've got frankly no idea what, if any, modal shift from those that currently use the car to go to ngt – it can't therefore be a principle reason therefore why you're promoting a RTS (and that that should be a trolleybus) – as the interim director of this scheme what then is the ballpark figure of modal shift from car use?

Mf: I have no idea

J: did you write this proof?

Mf: a mixture

J: someone else has made first draft?

Mf: yes

J: you seem to have very little grasp as to the basis as to scheme

Mf: my evidence is a high-level overview of the needs for RTS in leeds

J: you as the high-level person should, legitimately, at least have some clue as to what your people are telling you what the modal shift will be

Mf: no I don't have that information

J: you don't even know what your experts are saying about the modal shift and other evidence to back up your main proof reasons. In terms of modal shift, can we agree this – that if you're simply shifting people to another form of public transport – it is not a modal shift is it (not the gov. aim to get ppl out of their cars?)

Mf: no

J: the city of leeds in its centre has a very high level of privately available car parking near the city centre

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Mf: that is a qualified level ... it has some capacity

J; one of the factors of modal shift would be the availability of car parking and cost of it

Mf: yes

J: you refer to the Tetley site (which has temporary permission for car parking for 5 years– both long and short stay) – close to the town centre. Do you have any view as to the level and provision of private car parking for offices and publicly available on the strategic level

Mf; car parking in city centre has been an issue. Aftermath of credit crunch was increase in no of brownfield carparks without planning consent – council took enforcement action on those – planning inspector upheld council decision that they didn't have consent and contrary to transport policy – therefore we closed them. We recognised we hadn't delivered a RTS so we developed an interim policy that facilitated temporary car park consent – 3200 permissions granted on 5 year basis. Temporary because 1) it is not part of our long term strategy and 2) land value view point there was a danger that open market value of site of car parking was greater than the development value.

J: Page 14 of your proof - Victoria gate – which you say benefits from ngt.

MF: phase one- 820 car parking spaces granted that is permanent in Victoria gate

J: for phase one?

Mf: yes

J: the application Leeds making (in your proof 3.24) –to fully devolve ring fenced ngt fund to enable efficient delivery of the project. Have you had a response?

Mf: I am not aware of a response

J: was a letter written to sec of state by leeds

Mf: I didn't deal with that communication.

J: that request was made with a reason. Without that flexibility there is a doubt as to whether or not project can be delivered efficiently

Mf: if you look at way in which gov. controls our expenditure of large capital scheme (£5 mill +) (high level control of the scheme) – we need this devolution to ensure we can micro-manage the scheme and deliver it more efficiently

J: what provisions are you seeking to have removed?

Mf: control of fund releases through various stage of the scheme

J: who deals with the letter etc.

Inspector: who is party to the decision?

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MF: leeds combined authority officer who is not due to give evidence

J: 2.3 chris cheek refers to what you say at para 16 – if the view was taken that phase one doesn't represent value for money it is highly unlikely that subsequently phases would do either?

Mf: yes, any further phases would have to stand on phase one's merits.

J: so far as any other routes for trolleybus, they are dependent, aren't they, on this corridor getting approval

Mf: yes, if future phases then that is correct

J: you've not given evidence that freestanding schemes in other parts of leeds can come forward for trolleybus provision independent of the phase one

Mf: that's correct

J: do you agree with mr cheek that, without further ref to future schemes, this scheme will stand or fall on its merits alone

Mf: yes...

J: page 2 of cheek's rebuttal para 2.2 – do you agree that those four matters set out are conditions which a transport scheme of this nature must achieve in order to have an effect on economic dev and employment

Mf: I don't take issue with those factors – the balance and weight of those individual factors relating to the proposed scheme remain to be

J: if you look at one of those - real and substantial contribution to traffic congestion – this relates to the extent of modal shift, does it not?

Mf: yes that is part of the business case

J: these factors are all conditions which need to be satisfied as the business case and strategic decision – you don't look at this?

Mf: leeds city council does but I don't

J: do you have any views on any of those conditions in cheek's rebuttal ?

Mf: ability for ngt to have significant parts of its route from other transport – gives it a competitive edge to other transport

J: mr cheek's factors: they are all conditions need to be satisfied, am I right?

Mf: they are all relevant factors yes

J: you said that ngt would be have a competitive advantage over other transport providers. Please elaborate?

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Mf: the amount of separation from the other traffic on the route – is an advantage in terms of punctuality – an attraction to passengers.

J: so it gives it a privileged position in terms of priority use on road

Mf: yes

J: it appears to my clients and others that therefore it is a two-tiered approach to bus operations.

Mf: yes priority is given,

J: its main competitive advantage is its priority use, right?

Mf: that's correct

J: as a matter of principle, there is no reason why bus prioritisation (we have a RTS already, not acknowledged by you) must be created using trolleybuses and not normal/guided buses?

J: so it is not something that is peculiar to types of vehicle that needs overhead cables

Mf: that is my understanding

J: mr alexander's rebuttal proof – how much of the west Yorkshire transport fund is to be allocated to the improvement of bus services

Mf: I don't know

J: do you know how much has been allocated to expand the ngt network

Mf: no I am not aware of any allocation

J: issue raised at 2.8 – not demonstrating any link to deprived southern areas. You sought to remedy that in your evidence in chief yesterday – giving examples to support that you will have links to southern areas. Do you accept that criticism in 2.8 that the ngt did not set out a cogent case in linking the southern areas of leeds to the city centre?

Mf: no, it was always my intention to expand those issues through oral evidence.

J: southbank – Tetley site – has an application been made on that parking site for any other planning permission which is currently before the council

Mf: no

J: in terms of railway infrastructure and redevelopment of these large sites, is it right to say that the council would have aspirations to redevelop the southbank?

Mf: yes

J: redevelopment of the southbank is not at an advanced stage?

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Mf; it is a big area, the college building and station entrance is on site. Hulbeck centre etc are forthcoming. It is at a mixed stage of development

J: development of southbank is going to be a long term issue

Mf: yes

J: lots of unknowns – you don't have any idea of the detail of development coming through

Mf: we have a framework – [having a controlling hand is not so good but better let it happen]

J: so it is not that if we build it they will come – do you agree with this theory

Mf; no it's not that simplistic

J: you need to respond to the development proposals in a flexible way when they do come

Mf: yes

J: are you aware of the bus services serving the southbank area.

Mf: I don't have a detailed knowledge

J: southbank is currently well served by bus provision, no?

Mf: yes

J; ngt doesn't go through the middle of the southbank does it?

## **LUNCH**

J: MF has agreed that southbank is well served by buses. You didn't have a detailed knowledge of bus routes. [This map of southbank bus services] becomes FWY/104. Attraction for developers – overseas investors in particular would be disinclined to look to development opportunities where there wasn't a sense of permanence. You said that buses didn't have a sense of perm.

Are you aware of the approaches made by metro and allied London in respect of development in Clarence dock in southbank – proposed new bus routes that will permeate into the southbank and serve allied London developments. Are you aware of their discussion with my clients?

Mf: evidence I gave yesterday – not absolute that you need something like ngt to get permanence, simply running along with the principles of the eddington report – it is an enabler to development.

J: is it not your evidence that ngt is NEEDED to attract development. You rely upon the eddington report only for improvement of transport as enabler to economic growth – not for the issue of permanence then?

Are you aware of discussions with allied London and metro and my clients

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Mf: I am aware but high-level only

J: are you aware of diff routes proposed by them to my clients?

Mf: no, no detailed knowledge

J: discussions indicate that allied London (international company) is prepared to invest and invest in circumstances based upon a bus provision, doesn't it?

Mf: I wouldn't go so far as that [why not?] – Michael Ingle – chief exec of allied – there acq of Clarence doc was opportunistic purchase because that development wasn't working. They sold the head lease for 1.5mill a small sum – Ingle acquired it because scheme before wasn't working and one critical issue was lack of con activity. so no surprise for me that he would speak to all parties to help that problem. [on a side note] He is also supportive of ngt.

J: developers want to make a profit on cheap things – but ngt wasn't a condition on him buying it.

Mf: no, not conditional

J: those routes show that the buses can respond to those requests rapidly?

Mf: yes, they would

J: and flexibly, in terms of route and penetration

Mf: yes, in that they can come and go at the discretion of the provider

J: what buses can do is respond rapidly and flexibly, go beyond the NGT route without TWA order and massive infrastructure to serve and provide stock provision adjacent to

MF: that is an attribute

J: with southbank, we don't know how it will plan out in the future

Mf: we have mixed info on how it will plan out – we know city college is there so confident phase 2 will follow, we know that Leeds dock is development there that has deficit in terms of con activity. other areas we have less knowledge of [looking at plans - 'high speed plan' FWY 105]

J: we have marked on this plan and named it FWY105 - so far as ngt route is concerned, that follows what was a reserve route for the supertram. That pre-dates hs2. Trolleybus was not in any relation to hs2 – hs2 wasn't a factor in respect of the routing of trolleybus.

Mf: No

J: this doc produced march 14

Mf: your question on degrees of certainty – on the discovery centre (bottom right hand side) I signed off for that site to be brought forward for the hs2 college. To the north(or nw) of Leeds city college there is another free school being planned. Development on the southbank is coming forward in a range of phases subject to change but I am clear that there will be significant quantum of



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development. It is clear there will be a sig skills element attracting young ppl who make use of public transport

J: we see on the map that the ngt route progresses up and that there is no penetration into that area of the southbank (western edge) by ngt route. A problem with southbank is permeability into the big sites – the ngt doesn't facilitate this.

MF: it contributes to solving the problem.

J: it's not serving a large amount of the southbank development. Will it serve the hs2 station.

MF: it doesn't join to hs2 station at this time – the final location of hs2 station has not been decided – lord dyson (?) proposals will look at final positioning of the station

J: the inspector can note that there is no commitment as part of this proposal that it will link any hs2 station, am I right?

MF: no, no commitment

J: hs2 station is proposed in area that is least well served by ngt route.

MF: I don't think it's possible to say it's poorly served at this time – as this is a proposal put forward by hs2 ltd not a formal proposal by us, the leeds council. Issues of con activity to existing and future transport infrastructure will be key elements we will look at before we finalise the station location.

J: hypothetically, if the hs2 station is located in or close to where it is currently proposed, we can agree the trolleybus route is such that the station would be poorly served, no?

MF: no, my position is that the hs2 station is not where that circle is. The entrance and exit is to the north of that. [description of the exits etc on map] where those final position of hs2 and exits and entrances will be determined at later date

J: let us assume that it is at the northern most part – it's still poorly served by the ngt route, isn't it?

MF: I don't agree that it is poorly served

J: You talk a lot about con activity – [points to station] – you say that the situation of the station approximately is good con activity?

MF: we are going through master planning of station not finalised yet. What we have is a new city centre park – through other side of park – is then the ngt line.

J: the whole point of your evidence was that if I am leaving leeds from hs2 I want to jump on ngt and get off near the station

MF: I think it will be 100m from the ngt route to the station

J: Lets assume that the rail is close to the exit – do you think that's good con activity?

MF: similar to challenges at kings cross London. That has been addressed by the concourse and hinterland between them.

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J: you are happy for the inspector to advise the sec of state that that is good con activity.

MF: its an area we will work on and I don't have that solution at this time.

J: is it going to be on the Tetley site?

MF: [non-descript answer]

J: at the moment it is no where near

MF: it will land on tip of asda side adjacent to the Tetley site

J: look how big the Tetley site is though?!

MF: 22 acres.

J: you will be locking leeds in for 60 years. You put forward that it is well connected to hs2 – but clear as matters stand and even if we are generous of the station location, that committing now to ngt trolleybus route is not going to provide a well connected facility.

MF: I don't think I said yesterday that it was ideally located. My point was to highlight the broad point that ngt goes to the leeds southbank and this area is major area of regeneration. Turner and cheek rebutted saying that there was little economic regen attached to ngt and I am showing that there is regeneration in the southbank in general - Hs2 and ngt together major changes regenerating southbank

J: a well supported bus service can provide permeability and interconnectivity for wherever the hs2 station ends up - serving southbank development area as a whole, no?

MF: bus serves can do that depending on how plans come forward. Key issues of this part of the city centre is that it is over dominated by traffic etc so part of the master planning proposals is to reduce amount of traffic infrastructure – I wouldn't assert and assume that the bus routes would continue long term.

J; but you don't know how much modal shift will happen in the long term.

J: in respect to the "master plan", what is the time scale of this at the moment

Mf: We expect it completed in draft form by sept – we would have stakeholder consultation (ask bus providers etc)

J: council presumably has not yet formed a view, i.e. no draft at the current moment

MF: no, we haven't. The emerging view is that hs2 station should be as close to the river and Victoria bridge as possible

J: HEADINGLEY: you spoke about leeds girls grammar school as benefitting from ngt.

MF: I raised it in context of housing and pop growth along that corridor.

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J: they are objectors, no?

MF: yes, my understanding

J: need for ngt – planning dev for housing already been granted no?

MF: been through panel, yes

J: effect of trolleybus proposal would be to reduce no. of dwelling that can be brought forward on the site

MF: some impact, yes

J: was this not seen as ...

MF: that's correct

J: you are a director of Yorkshire cricket club, what interest does council have?

MF: Yorkshire council cricket club had to acquire ground to keep test cricket here –Leeds council lent the money for the club to acquire the site. Therefore they have an entrenched seat on the board

J: headingley as a test venue related to the need for trolleybus system - I think was suggested... headingley is served by buses since 1956 – on event days there are extra buses. In terms of its test match status, isn't this more to do with headingley pitch conditions and not to do with connectivity? [goes on to say that £2 mill lost by the pakistan Australia game lasting three days instead of five – Yorkshire cricket club is not in position to bid for ashes due to that gamble].

MF: it's true that the no. of spectators didn't come. At end of 2019 – it will hold an ashes test. Headingley will stay a test venue due to combined factors – in part it is the connectivity to the city centre.

J: but it's the notorious pitch in bad weather, and also situation at the site which is penned in by residential development. Re-development is hampered due to residential developments surrounding the pitch stadium as no land is free around that area for further expansion.

MF: it is not purely a matter of its capacity whether headingley stays a test venue. [uses examples, e.g. trent bridge which is small but developed well]. Not just about size but quality of environment we create. My simple point is that part of that is connectivity and quality of transport infrastructure.

J: capacity to deal with sudden increase of sudden visitors for sporting event is what makes a stadium.

MF: yes, using a flushed or staggered exit. I led development of first direct arena – promotes dwell time because of facilities in that area. Headingley also promotes dwell time but in comparison ellen road does not facilitate dwell time.

J: ngt would only have two spare trolleybuses. That's across the whole network. The flexibility to deal with events at headingley, instead of improving, will be limited as there will be an ability at most to lay on two extra [spare] trolleybuses. You are saying this is an improvement?

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MF: ngt is an improvement to infrastructure

J: even with only 2 trolleybuses extra?

MF: yes.

J: if we can turn then to wider con activity. there is no link from ngt route to leeds Bradford airport is there?

MF: no

J: FWY106 document – (full copy can replace the extract from yesterday – Belle Isle and Middleton Neighbourhood framework). In terms of middleton and belle isle, there is no penetration of the area we see in the map by ngt. It is wrong to suggest that ngt is providing any penetration into these areas, isn't it?

MF: no, it provides penetration to Belle Isle circus. [you are] wrong to say that there isn't any penetration.

J: majority of belle isle is not served is it?

MF: I don't have defined boundary of belle isle – not in a position. I see belle isle circus as a centre of bell isle and see that it does penetrate.

J: we see on the plan that you refer to the extent of the penetration.

A factor that will need to be taken into account is that the buses that currently serve middleton and belle isle will be adversely impacted (their run time) should the trolleybus system go ahead. We have spoken of a two-tier priority system.

MF: I am aware but I don't know the details of that. I am aware of the potential of bus adverse impacts etc.

[Housing developments which could benefit from the proposed northern route]:

J: Folder 11 with the maps – UDP review: Ottley and surrounding countryside D 2-8  
H3-3A-21 map 1 – anticipated capacity of 135 dwellings which you referred to  
H3-3A30 east of ottley map 8 – just over 30 hectares anticipated capacity of 550 dwellings

MF: I don't have detail – mr speak has details

\*\*\*\*J: I will be asking mr speak about council's views on housing growth\*\*\*\*

Swallow drive – [...] housing capacity there

If we look at wolfdale/swallow drive it is about 8 km from bodington park and ride – and 11-12km from the other two sites. Travel down the A660 to get into bodington. Those who take public transport around there take the x84 bus (a speedy limited stop bus) – I am looking at the reality of those who drive – going down the A660 – is it seriously being suggested by you that anyone using cars will be attracted out of their car having gone 11km down to bodington to get onto the trolleybus for the last part of the route? Is that a serious suggestion from you?

MF: there is housing growth on the a660 and the bodington park and ride

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[MF goes on to mention Addle site –nearer bodington]

Leeds experiencing housing growth as of now – A660 corridor will have increased traffic impact and the intervention of ngt is park and ride

J: the fast limited-stop bus service is already serving that corridor – isn't that the obvious way forward?

MF: that is only one way forward

J: you are asking the inspector to recommend this – you don't know if the ngt park and ride is actually going to help

MF: it's not my role to give any detail-

J: but you should know, you don't even know the modal shift. The council should have some clue as to what the best way to serve these outlying districts is before deciding ngt is the way forward. Will the ngt attract people from ottley to drive 10km to boddington and get out to then get the ngt?

MF: I don't have a view on that – other witnesses will provide the detail. Ngt provides better journey times. Increase in attractiveness than the current position. Park and ride is a mechanism to offset increased traffic from increased housing and pop growth.

J: [asks if you don't actually know what will happen with the modal shift in the area, you don't have a view whether they will use the trolleybus etc. are you only saying what other have told you.]

MF: my view is that the a660 needs intervention. Minor modifications will not create substantive changes and long lasting legacy

J: my understanding is that you don't have a view whether that will be achieved by trolleybus and park and ride or a priority bus system.

MF: ngt scheme will deliver permanence that a priority bus would not.

[talks about A660 route and need for intervention]

J: you are just repeating a mantra.

J: can we agree this, the housing growth you've identified is likely to come forward in any event?

MF: I would expect all these sites to come forward

J: so that growth has not been hindered by lack of 'permanent' infrastructure has it? - Without the need for there to be some visible/permanent infrastructure.

MF: yes that's correct – this part of the city is one of the most affluent housing growth areas. Following recession housing sites have been pushed to green field sites outside city centre. But absence of permanent infrastructure is not a barrier to those specific sites coming forward.

J: so having no permanent infrastructure is not a barrier to growth in these areas – ottley etc.

MF: not an obstacle, [just additionality]

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J: in those areas the need to have a physical permanent presence, so it is not necessary in those areas (north, ottley etc) –are you saying it is additional but not necessary?

MF: [yes]

J: so it is not an obstacle to growth in the north part of the city and ottley etc?

MF: no

J: there are downsides to the scheme that you would even acknowledge? E.g. the overhead wires – why is it that visual scarring is identified as disadvantage in those reports (PWC etc)

MF: I think it's a matter of opinion.

J: you did agree with me before about the PWC report when I took you through each point as to the visual scarring.

J: so you need to compulsorily acquire property (\*\*\*\*\*You say that in the north the ngt scheme is not NECESSARY to unlock growth there\*\*\*\*\*.)  
– one of the relevant factors for a CPO is whether the scheme is *necessary* to unlock growth for that part of the city, is it not?

MF: I don't have detailed understanding of CPO process. But that should be one of the factors.

J: in terms of making of the order itself, one needs to look to see if there are reasonable alternatives

MF: yes

J: this scheme is promoted on basis of 60+ years of permanence – the inspector must be confident how likely it is within that period that Leeds isn't saddled with a dated white elephant and that there aren't better solutions likely to come forward. That is a relevant consideration, isn't it?

MF: yes

J: and its right that it's not simply a question, is it, of saying, look at the position it is now, if we don't take this opportunity now we won't have another chance (we've missed the bus, so to say) – as we will be stuck with it for 60+ years

MF: Leeds needs a RTS network in the city to meet future needs.

J: it wouldn't be right to say that this is the only scheme that is available and we should take it because of that.

MF: [impact of not delivering this scheme will set this city apart].

J: jubilee extension – isn't the DLR the one that opened up the docklands, am I correct? Canary wharf created a demand which jubilee extension sought to meet.

MF: DLR had issues in terms of its speed – it slowed movement of ppl down – I see why the jubilee line was needed.

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J: they had to find substantial funding to respond to existing development pressure that was already there

MF: my evidence is that Leeds has a critical issue between separation of north and south bank. Ngt will in part help to address that.

J: it is a completely different case – jubilee line came in £1bill more than it was predicted – is that something you were going to rely upon

MF: no

J: Edinburgh tram – would you rely on this as a successful scheme?

MF: no I am not relying on it. It is only an example of a tram scheme currently being finalised – currently as a tram scheme being delivered in the UK going into a city centre and has an impact on sensitive heritage areas

J: do you know how long-delayed Edinburgh scheme was from its initial projection

MF: no I do not

J: how much over budget Edinburgh tram already is?

MF: I know it was significant but not actual amount

J: when will it become operational? (one part of)

MF: is it 2015?

J: do you know how much of the original tram will be in operational?

MF: no, but I'm aware that it's broken down into a no. of phases

J: it has been a disaster

MF: I know it is – but it is not my evidence to give successes and failures

J: but you are relying on that

MF: [...] management of the project has been very poor

MF: I have delivered East Leeds extension (highways schemes) on time and under budget [gives several examples of transport and infrastructure projects that this city has delivered on budget]

J: A65 bus – do you regard it as permanent?

MF: a degree of permanence?

J: everything has a degree of permanence, even if transient.

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J: FINALLY, back to your appendices – app 134 (wakefield doc) – perception based survey – it is a matter of interpretation and submission as to what weight we give to this evidence. Nothing in there that talks about trolleybuses, is there?

MF: no, not directly

J: we need to look at this doc as a whole

MF: yes

J: best cities to locate a business (pg 6) and also (pg 7) essential factors for locating a business. Ease of travelling around the city is the only relevant factor here. (pg 22) best cities in terms of internal transport – Leeds has shot up five places. In terms of internal transport Leeds is punching above its weight as it is in the top 10 European cities. Some with trolleybuses – such as Geneva are below Leeds on the list.

MF: yes

J: pg 6 – best cities to locate a business – we see that when we look at internal transport Leeds is going up. This doesn't suggest that this supports the argument that there is a need to commit Leeds 60 years to a trolleybus scheme

MF: as I said before, there is complacency because of the existence of this ranking that in terms of the long term planning Leeds does not need to do anything. It does need to improve and in terms of its master list has stood still and therefore can be seen to have gone backwards. Leeds is weak in terms of its RTS.

J: this evidence in appendix does not show evidence that Leeds is being left behind. So far as this specific evidence is concerned it supports the view that Leeds is doing well - regarded as 10<sup>th</sup> best in Europe.

MF: it does not make any mention of the quality of transport, only perception of the ease.

J: if you say that Leeds is falling behind in general investment attractiveness and if this table I have I have illustrated shows that the ease of internal transport has gone up - then is it not other factors in Leeds that have resulted in its overall attractiveness to investors ranking going down – you should be looking at all the other factors which effect investment into the city. You need to be looking at other issues which effect how Leeds is perceived in the market – NOT the issue of transport ease as this, as I have demonstrated, has not been a negative factor in your 'master list'.

MF: I am not solely relying on this document [list]. If you are solely relying on this evidence then yes, that is right.

BREAK

Other objectors' cross-examinations till end of day