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# **Document Control**

# **Version Control**

Version No.	Date	Created/Modified by	Notes
V.1	25.06.2021		First draft
V.2	01.07.2021		Complete document

# **Approvals**

Version No.	Name of approver	Title & organisation	Date
V.1		Rail Strategy Manager, SLC Rail	25.06.2021
V.2		Rail Strategy Manager, SLC Rail	01.07.2021

# **Executive Summary**

#### **Purpose**

Gloucestershire County Council (GCC) has asked SLC Rail for an opinion in respect to the viability of the introduction of a new passenger railway service along the Sharpness branch line.

#### **Background**

The Stroud District Draft Local Plan Review (pre-submission Draft Plan 2021) provides for a 5,000 home, sustainable development called Sharpness Vale 'following Garden City principles', which will be 'boosted by the reopening of the Sharpness rail branch-line to passenger and tourism services'.

The 'Garden City Principle' relies upon sustainable transportation being provided by a combination of the railway and a green bus network, with the emphasis on the railway provision. If the draft plan is accepted on the condition of the delivery of a passenger rail service and it is subsequently found that it is not possible to do so, then the eventual development will not be sustainable in the way that the vision and the plan intended.

#### Railway Service Enhancement Proposal

The developers are clear that 'proposals for Sharpness Vale depend upon the allocation being confirmed in the Pre-Submission Draft Local Plan and the Local Plan being adopted during 2022'. The proposal is currently subject to a Restoring Your Railways application for government funding to develop a Strategic Outline Business Case. The proposal is for one train per hour (TPH) with the intention of increasing to 2 TPH, providing direct connectivity from Sharpness to Cam and Dursley and Gloucester. Infrastructure costs estimated at £34m and the train service will require subsidy. The developer's estimate of daily passenger demand is 4,000 on a typical weekday and 1 million journeys per annum.

#### **Requirements of the Railway Authorities**

The process of approval required to introduce new railway stations requires: a compelling 'strategic purpose'; a 'strategic fit' with the existing rail network; and evidence of a strong business case.

#### Fit between Proposed Scheme and Rail Requirements

Question	Opinion
Strategic Purpose	The promoters have assumed a heavy rail solution without exploring other alternatives fully and explaining why heavy rail is the best solution.
Strategic Fit	The promoters will need to convince Network Rail and the Department for Transport that it is possible to include this scheme as well as other additional services proposed for the Bristol – Birmingham railway (for example by Midlands Connect) without detriment to train performance.
Economic and Financial Cases	The scheme does not currently have a compelling business case. It requires an investment of £34.85m and the resulting service will require subsidy on an ongoing basis.  The level of passengers forecast for the scheme looks unrealistically high compared to a range of existing stations on the network.

Whilst no Benefit Cost Ratio has yet been presented, in our view it is unlikely that the scheme will have a strong value for money case.

Network Rail and the Department for Transport will need to be persuaded that the transformational modal shift assumptions are deliverable.

#### **Opinion**

There are two key factors which should be considered alongside our advice:

- That the transformative nature of the Sharpness Vale vision and, ultimately, the underlying business case is dependent upon (1) obtaining the planning consent for the development and (2) that residents entirely comply with the 'non car' approach. Both elements are, at this stage, uncertain as is the degree to which the Department for Transport would be prepared to accept the 'non car' logic within the underpinning economic business case.
- That the promoters are at an early stage in the railway enhancement pipeline process. Therefore, there are questions asked in this document which may not yet have been considered by the promoters. But the answer to these questions will influence the likelihood of the scheme proceeding to delivery.

In summary, our observations are as follows:

It is our opinion that, based upon the current situation, that there are considerable risks to the viability of the scheme which make it unlikely that it would gain the necessary approvals to progress to delivery.

# 1. Purpose

Gloucestershire County Council (GCC) has asked SLC Rail for an opinion in respect to the viability of the introduction of a new passenger railway service along the Sharpness branch line. This proposed service enhancement forms an integral aspect of the proposal for a sustainable 'Garden City' type development at a location to be known as Sharpness Vale. The purpose of the opinion is to inform the Local Planning process. The development will not be sustainable without the passenger rail service, and without the development there will be no justification for a train service.

SLC Rail has significant experience in working with clients to deliver new railway station schemes. The most recent station, Worcestershire Parkway opened in 2020. SLC Rail is currently working on a number of other station projects and has a detailed and up to date understanding of Network Rail's and the Department for Transport's issues and concerns and the headwinds associated with railway scheme delivery in a post-COVID world.

#### 2. Background

Policy PS36 of the Stroud District Draft Local Plan Review (pre-submission Draft Plan 2021) provides for a 5,000 home, sustainable development called Sharpness Vale (2,400 dwellings will be completed by 2040 and the remainder by 2050). The Draft Local Plan characterises the Sharpness development as: 'following Garden City principles', which will deliver 'a truly sustainable pattern of living'; that 'sustainable forms of transport will be boosted by the re-opening of the Sharpness rail branch-line to passenger and tourism services'; and will benefit from a 'new railway station and enhancements to the Sharpness branch line and contributions to support a regular passenger service to Gloucester'.<sup>2</sup> The developers of Sharpness Vale are Sharpness Development LLP.

Sharpness Development LLP's transport advisors, Stantec, state that Sharpness Vale will be 'a mature, attractive settlement that will provide for many day-to-day needs and reduce the need to travel'.<sup>3</sup> Stantec state that 'the Sharpness philosophy is geared around attracting those that understand the approach that is being taken, it will be self evident'.<sup>4</sup> Stantec go on to explain that they are 'expecting people to want to buy into this lifestyle change', but then mention that they 'expect people to be attracted to Sharpness Vale because of its key transport links'.5

The 'Garden City Principle' relies upon sustainable transportation being provided by a combination of the railway and a green bus network, with the emphasis on the railway provision. If the draft plan is accepted on the condition of the delivery of a passenger rail service and it is subsequently found that it is not possible to do so, then the eventual development will not be sustainable in the way that the vision and the plan intended.

<sup>1</sup> Stroud District Local Plan Review (Pre-submission Draft Plan 2021), p.176, p.178.

<sup>&</sup>lt;sup>2</sup> Stroud District Local Plan Review (Pre-submission Draft Plan 2021), p.162, p.179.

<sup>&</sup>lt;sup>3</sup> Sharpness Vale: Transport Approach: Stantec, 2020, p.5.

<sup>&</sup>lt;sup>4</sup> Sharpness Vale: Transport Technical Appraisal: Stantec, 25 June 2020, p.1.5.

<sup>&</sup>lt;sup>5</sup> Sharpness Vale: Transport Approach: Stantec, 2020, p.5.

# 3. Railway Service Enhancement Proposal

Stroud District Council and Sharpness Development LLP are proposing a reinstatement of a passenger rail service to the Sharpness branch line. The location of the branch is shown on the map below.



Figure 1 - Map of Sharpness (c) Ordnance Survey

The branch is 4 miles long, and joins the main Birmingham – Bristol line at Berkley Road Junction. Its sole use is for nuclear flask trains for the decommissioned Berkley power station. There is one path per day shown in the industry timetable, arriving at 09.19 and departing at 13.28. The path is shown as to be used "as required". The branch has a maximum permitted line speed of 15 mph. Access to the branch requires the train driver to collect a Train Staff, which is kept in Cheltenham Alstone Level Crossing Signal Box<sup>6</sup>. The line is therefore not currently suited for passenger traffic.

The proposed passenger service would initially constitute one train per hour (TPH) with the intention of increasing to 2 TPH, providing direct connectivity from Sharpness to Cam and Dursley and Gloucester. It would also provide indirect connectivity: changing at Cam and Dursley to access Bristol and the south west; and at Gloucester for Cheltenham, Birmingham and beyond. The proposal is currently subject to a Restoring Your Railways application for government funding to develop a Strategic Outline Business Case.

It is clear that considerable work has been undertaken to develop a business proposition for this scheme. A number of infrastructure requirements to upgrade the line, build a station, and enhance capacity at Gloucester have been identified. The infrastructure costs have been estimated at £ 34.65m (£12m station, £17.65m track and signal enhancements, £5m allowance for Gloucester stations works (only in 2 TPH scenario)), excluding optimism bias. The assumption is that a Train Operating Company will provide the trains, and that the service will require subsidy. The cost

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<sup>&</sup>lt;sup>6</sup> Western and Wales Sectional Appendix, section GW425

of the subsidy is calculated at £1m in year 4 and reducing pro-rata to £206k in year 19. Presumably the subsidy in years 1-3 will exceed that of year 4. There is no explanation of what occurs after year 19, presumably the subsidy will continue to be required.

The importance of the rail connectivity to the developer becomes clear in the following statement:

'The philosophy is that, as sustainable mode capacity will exist, sufficient to allow every movement likely to take place during the key peak periods to be undertaken without reliance on the private car, then no highway capacity provisions will need to be made'.

Although there is an assumption that this new community will be largely self-contained, there is also an assumption that many residents will seek to travel to Gloucester and beyond:

'The vision focuses on the morning and evening peak periods, when the whole network is under stress. We believe that if we can make sure that almost everyone could complete the journey they need to make by a sustainable mode, then we can remove the need to provide unsustainable highway improvements'.

The developer has estimated that Sharpness Vale, when completed, will boost the existing 4,500 residents by a further 13,000–15,000 new residents as well as the incoming employees that will form part of the growth area. The developer's estimate of daily passenger demand amounts to 4,000 on a typical weekday and 1 million journeys per annum.

The developer has calculated peak demand to be between 8am and 9am and 5pm (300 departing and 94 arriving-total 393) and 6pm on a weekday (273 arriving and 140 departing – total 413).<sup>11</sup> It is not clear when this level of custom will be achieved. If it is when the development is completed, then it is likely to be after 2050 (29 years hence) and only if the additional 2,600 units is given consent at the Local Plan extension in 2040. If construction commences in 2023 and achieves an average build-out rate of 342 pa (to achieve 2,400 by 2040) then 1,250 units will have been completed by 2027 and the halfway mark of 2,500 by 2031.

The projected built-out rate will have a direct impact upon the volume of passengers, which in turn will have a direct impact on the subsidy required. If the build-out rate is slower than anticipated and/or the proportion of rail users is lower than anticipated, then the requirement for subsidy is likely to increase. As part of the financial case clarity will be required in respect to: who pays the subsidy; whether there an open-ended guarantee to pay the subsidy and if not clarity on what then happens; the approach if rail patronage does not align with the business case; and what happens in respect to subsidy after year 19.

In terms of deliverability of the railway scheme, it is understood that Sharpness Development LLP commissioned a detailed timetable study for the proposed scheduled services, which it is stated, has been signed off by Network Rail, and which demonstrates that the services can be accommodated. Although elsewhere in the Restoring Your Railway application it is also stated that: 'discussions with Network Rail and the timetable study have confirmed that there should

<sup>&</sup>lt;sup>7</sup> Sharpness Vale: Transport Technical Appraisal: Stantec, 25 June 2020, p.1.4

<sup>&</sup>lt;sup>8</sup> Sharpness Vale: Transport Technical Appraisal: Stantec, 25 June 2020, p.1.3.

<sup>&</sup>lt;sup>9</sup> Stroud District Council: Restoring Your Railway Bid, 2021, P.19

<sup>&</sup>lt;sup>10</sup> Stroud District Council: Restoring Your Railway Bid, 2021, P.20.

<sup>&</sup>lt;sup>11</sup> Sharpness Vale: Transport Technical Appraisal: Stantec, 25 June 2020, p.8.72, p.8.75.

<sup>&</sup>lt;sup>12</sup> Sharpness Vale: Technical Note: Stantec, 18 June 2021, p.2.

be no capacity issues on the branch line itself. Network Rail has indicated that train paths and capacity on the mainline either side of Berkeley Road are more constrained. <sup>13</sup>		
The developers are clear that 'proposals for Sharpness Vale depend upon the allocation being confirmed in the Pre- Submission Draft Local Plan and the Local Plan being adopted during 2022'. <sup>14</sup>		
<sup>13</sup> Stroud District Council: Restoring Your Railway Bid, 2021, P.20.		

<sup>&</sup>lt;sup>14</sup> Stroud District Council: Restoring Your Railway Bid, 2021, P.13.

# 4. Requirements of the Railway Authorities

The process of approval required to introduce new railway stations onto the network is complex, onerous and time consuming. There is a requirement to satisfy Network Rail and the Department for Transport on:

- the compelling strategic purpose for the new station
- the strategic fit with the existing network
- evidence of a strong business case which demonstrates both value for money and proves that the proposal is the best use of limited resources and rail capacity.

Each of these aspects will be considered in more detail in the table below.

Requirement	Considerations	
Strategic Purpose	The strategic case needs to explain:  • what 'problems' are to be solved; • what alternatives there are which could resolve the 'problems'; • why rail is the best solution; • why the 'problem' needs to be solved now.  An aspect of the strategic case is to explain and justify whether there are other potential benefits of the scheme. For example, some new stations can act as 'parkway' stations, or provide access to the railway network for unsatisfied customer demand, and unlock residential development.	
Strategic Fit	<ul> <li>On top of a strategic purpose, Network Rail and the Department for Transport need to be satisfied that:</li> <li>there is a 'Strategic Fit' with the existing rail network and rail strategy.</li> <li>the impact of the proposal on 'Resilience' relating to train performance and timetabling, on the rail network is understood,</li> <li>the opportunity cost of provision of the proposed service on the limited capacity of the railway network is known.</li> </ul>	
Economic and Financial Cases	There is also a need to prove a business case, that the scheme represents value for money, and that it is affordable, both in terms of its initial capital cost but also in terms of any requirement for ongoing operational subsidy.	

Figure 2 - Requirements of railway authorities

# 5. Fit between Proposed Scheme and Rail Requirements

#### 5.1. Strategic Purpose

The strategic case needs to explain: what 'problems' are to be solved; what alternatives there are which could resolve the problems; why rail is the best solution; and why the problem needs to be solved now.

The 'Problem Statement' for Sharpness Vale station would appear to be to provide rail connectivity for the proposed development. The vision for this 'Garden City' type development is that a very high proportion of residents will not use the car. Indeed, the underlying logic is that this development will attract residents who 'buy in' to this ethos. It remains to be seen to what degree this vision becomes reality. The 'car minimal' assumption does drive an aggressive assumption in respect to projected passenger numbers (see below). The existing Sharpness population is small, and because of the geographical location there is no prospect of a 'Parkway' role – there is already a station at Cam and Dursley that can perform this role to an extent, and which is closer to the trunk road network.

At this stage, which is pre-Strategic Outline Business Case, there appears to have been comparatively little consideration in respect to alternative solutions to the underlying 'problem'. A detailed 'Non-Car Movement Strategy' has been produced which considers the viability and funding of express bus services, but these are considered to be an essential addition to the rail service, and not an alternative. The 'non-car' strategy is not included as an alternative option as part of the business case development, but is an entirely separate document. There also appears to have been no consideration, for example, of other solutions such as: a branch line operation or train, or light rail; a fast bus service to Cam and Dursley station for integration into existing services. Network Rail and the Department for Transport would expect consideration of the alternatives within the Transport Business Case.

### 5.2. Strategic Fit

Although the railway scheme concerns the reintroduction of passenger services onto a branch line, the proposal does involve access to the strategically important Birmingham to Bristol main line. This important rail corridor is heavily utilised and any alteration to current and future timetables needs to be given detailed and careful consideration. This route is a conduit for some of the longest passenger train journeys in the country (such as an hourly Edinburgh to Plymouth, which in some hours extends to Aberdeen and Penzance). Because of the integrated nature of railway timetabling, a minor delay of a key long-distance train can have a large impact not only on its punctuality, but also the punctuality of many other services. This is particularly the case for services which travel through Birmingham New Street, which is the 5<sup>th</sup> busiest station in the country, and the busiest 'through' station. For this reason, any alteration of the timetabling on this route is likely to require considerable scrutiny.

The Restoring Your Railways application is slightly ambiguous in relation to the maturity of timetabling work with Network Rail. It is mentioned that the proposed timetable has been 'signed off' by Network Rail but also that there have been 'discussions with Network Rail and the timetable study has confirmed that there should be no capacity issues on the branch line itself. Network Rail has indicated that train paths and capacity on the mainline either side of Berkeley Road

<sup>15</sup> Stantec: Sharpness Vale: Mobility-as-a-service and express coach services, 30 March 2021.

Junction are more constrained'. 16 The strategic fit, and ultimately deliverability of this scheme, hinges upon the ability for this service to be integrated into the main-line timetable without introducing any additional performance risk.

The introduction of the Sharpness service has the potential to create new performance risk. The southbound journey between Gloucester to Sharpness will involve two additional conflicting moves with the northbound mainline. The first as the train joins the mainline from Gloucester and the second as it leaves the mainline at Berkeley Road Junction. Such moves introduce additional complexity and performance risk.

During 2021 Network Rail has been leading the Bristol to Birmingham Corridor Strategic Study in respect to future aspirations for train service improvements, the underlying business rationale, and the scale of infrastructure requirements needed to unlock the increased capacity to deliver the enhanced train service.<sup>17</sup> This study, undertaken collaboratively with stakeholders (including Gloucestershire County Council) identifies a range of strategic enhancements in relation to fast express services, regional services, and increased freight provision as shown below. There is no mention of the proposed Sharpness to Gloucester service within this document.

Type of service	Proposed additional services (per hour)
Fast Express	Birmingham to Bristol
services	Birmingham to Cardiff
Regional	Bristol to Worcester
services	Gloucester to Bristol
	Swindon to Cheltenham
Freight 'paths'	Increase in freight paths to 2 per hour in each direction

Figure 3 - Identified service improvement aspirations on Network Rail Corridor Study

In terms of 'strategic fit' the proposed Sharpness to Gloucester service has the disadvantage of taking up valuable capacity on the main line whilst only servicing the new development and Cam and Dursley. In contrast, the proposed new regional services have potential to provide much greater connectivity to far more residents over a much wider geographical area. The Sharpness proposal needs to either prove that the business case is stronger than these alternatives, or to determine whether there is sufficient capacity for these services plus the Sharpness proposition.

The Corridor Study is very recent work that begins to map out the possible future direction of the railway. It may be that, in the short-term, and in the absence of these enhanced services it is technically possible to introduce a Sharpness service. But that might not be the best fit for the railway network in the long-term.

<sup>&</sup>lt;sup>16</sup> Stroud District Council: Restoring Your Railway Bid, 2021, P.20.

<sup>&</sup>lt;sup>17</sup> Network Rail: Bristol to Birmingham Corridor Strategic Study, June 2021.

'Strategic fit' is important not only in relation to track capacity, but also in respect to train set utilisation and railway demand. There should be a strong case as to why scarce rolling stock should be used on the branch line when it could, arguably, be used more effectively enabling some of the additional regional services.

It would appear that, as yet, no compelling case has been made for the strategic fit of the Sharpness proposal. At this stage, given the longer term and wider scope aspirations of connectivity, it is difficult to envisage such a fit.

#### 5.3. Economic and Financial Cases

Transport Business Cases require evidence of a strong, WebTag compliant, benefit cost ratio. Such a BCR would indicate that a project constitutes good value for money.

The indicative appraisal in the Restoring Your Railways application suggests that even with an aggressive assumption in respect to passenger numbers, the proposed service will require a sizeable subsidy for many years (see below). In other words, despite the capital expenditure of around £34.65m (not including optimism bias) the resulting railway service will be loss making.

In terms of a WebTag compliant business case, it seems unlikely (although not impossible) that in railway investment terms a positive BCR will be generated on a subsidised service which requires a capital investment of at least £34.6m.

We have estimated the annual operating costs of a 'Sprinter' style service on 1 TPH basis at £1.6m p.a and £3.1m for 2 TPH. The Restoring Your Railways document refers to a subsidy of £1m at year 4. A simple comparison of costs to subsidy would suggest that the projected ticket income is based around £600,000 p.a. (on the assumption of 1 TPH) or £2.2m (on 2 TPH).

	1 TPH	2 TPH
Estimated operational costs	1.6m p.a.	3.2m p.a.
Subsidy (at year 4)	1.0m	1.0m
Estimated ticket income required with subsidy to break even	0.6m	2.2m

Figure 4 - Operational costs, subsidy and estimated income

The Restoring Your Railways bid assumes that there will be 1 million passenger journeys per annum (a single trip being a passenger journey). The average ticket yield is likely to be low as most customers are likely to travel to Gloucester, or perhaps Bristol. It is not clear from the documentation how the journey profile has been created, or which year the patronage achieves this level. It is, though, a very optimistic level of customer demand. Whilst it is accepted that the whole rational of the Sharpness Vale project is that customers will eschew the car, it remains to be seen to what degree they do in reality and chose to utilise the train. The business case of the service is built, though, upon this optimistic assessment.

By way of comparison, the current level of journeys of local stations is shown in Figure 5. It can be seen that four stations in Gloucestershire have less than 200,000 journeys per annum. Stroud has a much larger patronage of 561,000 but that is just over half of what is proposed for Sharpness Vale. By way of comparison, if Sharpness Vale delivered 1 million journeys per annum it would be the 346<sup>th</sup> largest railway station outside of London out of 2,200. It would be comparable to stations at Kettering, Wellingborough and Stratford-upon-Avon. Many of the stations listed in the table below have a larger population, a wider catchment area, or a role as a parkway station.

	Passenger numbers p.a.	Population	Wider local catchment?	Possible parkway function?	Connectivity
Sharpness Vale	lm	19.5k*	No	No	*(with 5,000 new homes)
					Cam and Dursley/Gloucester
Local stations					
Stroud	561k	32.6k	Yes	No	London and Cheltenham/Gloucester
Kemble	387k	1k	Yes	Yes	London and Cheltenham/Gloucester
Lydney	198k	8.8k	No	No	Cardiff/Gloucester/Cheltenham/ Birmingham/Nottingham
Cam and Dursley	191k	19.1k	No	No	Bristol/Gloucester/Cheltenham/Worcester
Stonehouse	166k	7.7k	No	No	London and Cheltenham/Gloucester
Ashchurch	102k	11k	Yes	Yes	London/Cheltenham/Gloucester/
					Birmingham/Cardiff/Nottingham/
					Worcester
1m Journey stations					
Kettering	lm	56k	Yes	Yes	London/Leicester/Nottingham/
					Derby/Sheffield
Wellingborough	lm	49k	Yes	Yes	London/Leicester/Nottingham/
					Derby/Sheffield
Stratford-upon- Avon	lm	27.5k	No	No	Birmingham

Figure 5 - Benchmarking the proposed Sharpness Vale station

The scale of the ambition in relation to passenger numbers can be demonstrated by comparing the relationship between the size of the population and the number of rail journeys per annum (first two columns in Figure 5), and this is presented in the graph below. In Lydney, Stroud, Stonehouse and Cam and Dursley the notional resident makes less than 20 rail journeys per annum. This number is broadly similar to the larger stations of Wellingborough and Kettering. Kemble and Stratford-upon-Avon stand out for different reasons at around 40 rail journeys per notional resident. The former is skewed because the town is tiny and acts as a parkway station for Cirencester, the latter because of the number of tourist visitors. All are eclipsed, though, by Sharpness, which would have a ratio of 50 journeys per resident per annum.

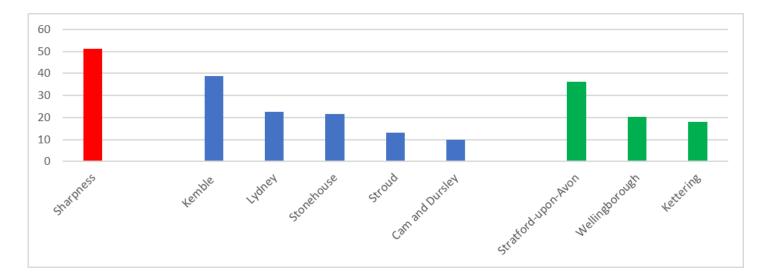


Figure 6 - Benchmarking graph: journeys per resident per annum

How the formula for subsidy has been calculated is unclear. If the subsidy is based upon the 1 million customers and that number is not achievable, then the service will require an even greater subsidy.

The relationship between build-out rate and thus passenger uptake and required subsidy are aligned. Whatever that relationship is, it is quite possible that passenger uptake is much slower than anticipated.

# 6. Opinion

There are two key factors which should be considered alongside our advice:

- That the transformative nature of the Sharpness Vale vision and, ultimately, the underlying business case is dependent upon (1) obtaining the planning consent for the development and (2) that residents entirely comply with the 'non car' approach. Both elements are, at this stage, uncertain as is the degree to which the Department for Transport would be prepared to accept the 'non car' logic within the underpinning economic business case.
- That the promoters are at an early stage in the railway enhancement pipeline process. Therefore, there are questions asked in this document which may not yet have been considered by the promoters. But the answer to these questions is likely to influence the likelihood of the scheme proceeding to delivery.

In summary, our observations are as follows:

Question	Opinion
Strategic Purpose	The promoters have assumed a heavy rail solution without exploring other alternatives fully and explaining why heavy rail is the best solution.
Strategic Fit	Whilst the lack of inclusion of the Sharpness project in the Corridor Study does not mean that it cannot happen, it is clear from the study that there will be considerable pressure for access to the mainline from other more strategic service enhancements.
	The promoters will need to convince Network Rail and the Department for Transport that it is possible to include this scheme as well as the other additional services without detriment to train performance.
Economic and Financial Cases	The scheme does not currently have a compelling business case. It requires an investment of £34.85m and the resulting service will require subsidy on an ongoing basis.
	The level of passengers forecast for the scheme looks unrealistically high compared to a range of existing stations on the network. If further forecasting work shows this to be the case, the level of subsidy required would be correspondingly higher than that suggested by the promoters.
	Whilst no Benefit Cost Ratio has yet been presented, in our view it is unlikely that the scheme will have a strong value for money case.
	Network Rail and the Department for Transport will need to be persuaded that the transformational modal shift assumptions are deliverable.

Figure 7 - Summary of our opinion

It is our opinion that, based upon the current situation, that there are considerable risks to this scheme which make it unlikely that it would gain the necessary approvals for the scheme to progress to delivery.