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## What WECA “loses”

by locking into a BRT/BVRr route (vs VLR/HTaaS)



*This document is for guidance only*



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*A joint venture report funded by Light Rail UK,*

*in collaboration with members listed below, help and assistance below, this report would not be possible.*

*A scoping and guidance document:-*



*Modern Hydrogen Street VLR*



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# 1) What WECA “loses” by locking into a BRT/BVRr route (vs VLR/HTaaS)

## Executive Summary

This document is submitted in response to a **potential decision by the West of England Combined Authority (WECA) to proceed with a bus-based or Bus Rapid Transit (BRT-led) solution** on two strategic corridors: **the A4 Bristol–Bath corridor and the Gloucester Road (A38) corridor.**

The purpose of this submission is to ensure that any such decision is **lawful, procedurally fair, and supported by a complete and robust evidence base**, and that it is not taken on the basis of incomplete appraisal, narrowed environmental scope, or asymmetric treatment of reasonable alternatives. The document is intended to clarify whether WECA has complied with its statutory duties in relation to environmental assessment, public health, equality, and evidence-led decision-making before committing to long-life corridor interventions that may foreclose future options.

A central issue addressed is the treatment of **non-exhaust emissions (NEE)**—particulate pollution arising from tyre wear, brake wear, road surface abrasion, and resuspension. These emissions are now recognised as a dominant and persistent source of  $PM_{2.5}$  and  $PM_{10}$  in urban corridors, including where vehicle fleets are electrified. NEE are **foreseeable, quantifiable, and capable of materially affecting human health and environmental receptors**. As such, they constitute a potentially **significant environmental effect** that must be explicitly considered within option appraisal, Air Quality Assessment, and EIA screening and scoping.

The document seeks to establish whether, for each corridor:

- a **clear and identifiable decision** has been taken (or is imminent) to select or lock in a BRT-based solution, and whether the statutory basis for that decision is properly recorded.
- the **options appraisal framework** treated bus/BRT and rail-based alternatives (including Very Light Rail or tram) on a consistent basis, including parity of appraisal horizons and transparent disclosure of Benefit–Cost Ratios.
- **reasonable alternatives** were properly considered, rather than excluded or sidelined through early scoping or methodological assumptions.
- the **environmental assessment scope**, including EIA screening and scoping, addressed all potentially significant effects, or whether scope was narrowed in a manner that predetermines outcomes.
- the **Air Quality Assessment methodology** included non-exhaust emissions and receptor-level analysis, or, if not, whether a reasoned and defensible justification for exclusion exists.
- consultation responses and technical submissions raising these matters were **genuinely considered and reported** to decision-makers, with reasons given; and



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- appropriate **health, equality, governance, and risk management checks** were applied prior to decision-making.

The document further seeks clarification as to whether WECA applies recognised **lifecycle and environmental management frameworks**, including **ISO 14040/14044 (Life Cycle Assessment)** and **ISO 14001 (Environmental Management Systems)**, or equivalent internal standards, when evaluating long-life transport corridors. Where such frameworks are not applied, the document requests the policy rationale and the alternative mechanisms relied upon to ensure that whole-life environmental, health, and compliance impacts are properly identified, assessed, mitigated, and monitored.

The information requested is directed at ensuring that any decision to proceed with a **BRT-based corridor solution** is not vulnerable to challenge on the grounds that:

- material environmental effects, including non-exhaust emissions, were omitted or insufficiently assessed.
- reasonable alternatives were not properly or lawfully considered.
- appraisal was asymmetric, inconsistent, or structurally biased by horizon or scope; or
- decision-makers were not provided with a complete and accurate picture of long-term health, compliance, and risk implications.

This document is not an objection to progress, nor an argument that buses are an inappropriate mode. It is a request for **procedural assurance** that decisions of long-term consequence are taken on a **sound, transparent, and legally defensible basis**, consistent with statutory duties, established appraisal guidance, and principles of good administration. Its purpose is to reduce avoidable legal, institutional, and reputational risk by ensuring that decisions are made only after all material considerations have been properly addressed.

## A. Air-quality and NEE compliance headroom

Our technical material argues that **non-exhaust emissions (NEE)** (tyre, brake, road abrasion, resuspension) are a **material environmental effect** that must be assessed, and that omission is *not a minor technicality*—it is framed as a procedural defect that can render an EIA incomplete.

Separately, our letters/briefs argue that **BVRr schemes** commonly fail to include: corridor-level NEE assessment, WHO-aligned thresholds, and Ella’s-Law-aligned exposure analysis—stating “**on NEE alone, BVRr is non-compliant.**” [[LR UK Sol...Dec 2025 | Word](#)], [[LR UK Sol...- Option 3 | Word](#)] [[LR UK Sol...Dec 2025 | Word](#)], [[LR UK Sol...Dec 2025 | Word](#)]

***Loss, in practice: WECA gives up an easier “defensible compliance” position on air-quality impacts if it proceeds with a BRT pathway without a robust NEE package.***

## B. Whole-life appraisal credibility (the “15-year cliff edge” problem)



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Our correspondence/briefs repeatedly challenge the integrity of appraisals where bus options are assessed over shorter horizons than rail options, arguing this structurally favours bus/BRT by undercounting long-term health and compliance dividends.

Our broader “BRT-first” critique frames this as a governance and audit-trail risk, not just a policy disagreement. [\[Focus time | Meeting\]](#), [\[Fwd: We’re...ng started | Outlook\]](#) [\[LR UK Sol...Dec 2025 | Word\]](#), [\[LR UK Sol...Dec 2025 | Word\]](#)

***Loss: WECA risks locking in a mode choice that is easier to defend short-term but harder to defend over a 30-year “public health + compliance” lens (which is exactly what people revisit later).***

### **C. NEE exposure reduction potential (steel-wheel advantage)**

Our Glasgow work provides a simple comparative indicator: **NEE particulate exposure index** (diesel bus = 1.00; electric bus = 0.63; tram = 0.22; hydrogen VLR = 0.18) and states that not building a rail line sustains **corridor NEE exposure ~4–5× higher** than steel-wheel options.

In parallel, our annex material sets out indicative NEE emission factors showing buses and HGVs as materially higher than rail options, with VLR/tram shown as “0” at point of use for tyre/brake/road abrasion. [\[LR CGT Gla...Nov 2025 | Word\]](#), [\[LR UK CGT...Nov 2025 | Word\]](#) [\[LR UK LRTA...d Jan 2026 | Word\]](#), [\[LR UK LRTA...8 Jan 2026 | Word\]](#)

***Loss: If WECA stays road-tyred as the backbone, it gives up the biggest structural lever for NEE: removing tyre/brake/road-wear sources from the corridor.***

### **D. A quantified, Green-Book-ready “NEE dividend” that rail can claim and buses cannot**

Your Bristol corridor update explicitly decomposes NEE into two monetised channels:

- **Atmospheric NEE** included as **~£180m of the ~£600m “health” line** (30-year)
- **Rainfall-runoff NEE** added separately as **£11.3m over 30 years**  
and states a **total corridor benefit from NEE elimination of ~£191m over 30 years**.  
You also have a dedicated rainfall-wash annex positioning runoff NEE as a legitimate “soft benefit” where a tram/VLR corridor removes the source. [\[LR UK Solu...v 2025 v.2 | Word\]](#), [\[LR UK Solu...v 2025 v.2 | Word\]](#) [\[LR UK LRTA...8 Jan 2026 | Word\]](#), [\[LR UK LRU...9 Jan 026 | Word\]](#)

***Loss: Choosing BRT as the spine weakens WECA’s ability to claim (and defend) a large “NEE dividend” as an intrinsic mode benefit.***



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## 2) Our best available 30-year “death & illness” numbers (and what they do—and don’t—say about NEE)

Our [LR UK Solutions Moving Bristol Forward update 26 Nov 2025 v.2](#) contains a 30-year comparison (bus-based vs hydrogen-powered VLR/TigM) that states:

- **Premature deaths (air pollution):** ~1,200 (bus) vs ~300 (VLR)
- **Chronic illness cases:** ~18,000 (bus) vs ~5,000 (VLR) [[LR UK Solu...v 2025 v.2 | Word](#)], [[m365.cloud.microsoft](#)]

*These are presented as air-pollution outcomes based on **PM2.5 and NOx exposure reduction** (and related health-cost modelling), not as a clean “NEE-only” isolate.* [[LR UK Solu...v 2025 v.2 | Word](#)], [[m365.cloud.microsoft](#)]

### What we *don't* have (NEE-only deaths/cases)

None of the snippets we pulled provide a direct conversion from **NEE-only PM** to “X deaths / Y morbidity” for WECA specifically. Some files emphasise that endpoint splits (deaths vs morbidity) sit inside DEFRA totals and would require a local IPA using COMEAP concentration-response functions for a formal split. [[LR UK Sol...2026 v.12 | Word](#)], [[LR UK Sol...ember 2025 | Word](#)]

So: we can quote the **total air-pollution** health impacts above, and we can quote the **monetised NEE share** (~£180m of ~£600m health line + £11.3m runoff),

## 3) “How will victims look back?” — what tends to drive retrospective blame (without targeting an individual)

When people look back after harm, the question is rarely “did they mean well?”—it is usually:

1. **Was the harm foreseeable?**  
Our documents argue NEE pathways are scientifically established and “quantifiable and foreseeable,” and that omission is “material.” [[LR UK Sol...Dec 2025 | Word](#)], [[LR UK Sol...- Option 3 | Word](#)]
2. **Were reasonable alternatives properly assessed?**  
Our letters/briefs state that BVRr schemes often exclude or sideline rail alternatives and that failure to assess rail-based alternatives fairly increases risk of legal challenge and reputational damage. [[LR UK Sol...Dec 2025 | Word](#)], [[LR UK Sol...Dec 2025 | Word](#)]
3. **Was the assessment transparent and auditable?**  
Our “technical evidence” framing stresses logging evidence as officer-grade input, and your FOI/audit-trail material focuses on documentation of assumptions, modelling, and decision records. [[Fwd: We're...ng started | Outlook](#)]



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**4. Did decision-makers act on the evidence once it was submitted?**

This is where “the Mayoral office” (institutionally) gets judged: not on slogans, but on whether it required NEE quantification, sensitive-receptor modelling, and parity-horizon appraisal before locking a corridor. [LR UK Sol...- Option 3 | Word], [Focus time | Meeting]

***That’s the defensible way to talk about “history” and accountability—process + outcomes, not personal condemnation, although victims of cardiovascular will no doubt think otherwise***



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## 4) A WECA-ready way to phrase the “what’s at stake” paragraph

If WECA proceeds with a BRT spine without corridor-level NEE quantification measured against ISO 14001 and/or EMS systems and WHO-aligned receptor exposure analysis, it risks locking in avoidable particulate burdens, weakening its statutory defensibility particularly in a Judicial Review, and forgoing the large NEE dividend that steel-wheel modes can credibly claim over 30 years. [LR UK Sol...Dec 2025 | Word], [LR UK Solu...v 2025 v.2 | Word]

### A) A4 Bristol–Bath: what WECA loses by going BRT-first (vs VLR/HTaaS)

#### 1) Foregone 30-year health outcomes (air pollution, as modelled in your corridor pack)

Our LR UK Solutions Moving Bristol Forward update 26 Nov 2025 v.2 contains a 30-year comparison that attributes, for the corridor, approximately:

- **~1,200 premature deaths** (bus-based mode) vs **~300** (TigM hydrogen VLR)
- **~18,000 chronic illness cases** vs **~5,000** [Re: LCT Reset 2026 | Outlook]

These are presented as **air-pollution outcomes** (PM2.5/NOx exposure reductions), i.e., not “NEE-only.” [Re: LCT Reset 2026 | Outlook]

#### 2) Foregone monetised NEE “dividend” (air + water pathways)

That same pack decomposes NEE benefits and states:

- **Atmospheric NEE** is explicitly shown as **~£180m** of a **~£600m** health line, and
- **Rainfall/runoff NEE** is separately monetised at **£11.3m over 30 years**,
- giving a stated total NEE elimination benefit of about **~£191m over 30 years**. [Soft Benef...TA Website | Outlook]

It also includes a corridor-scale NEE mass baseline **~180–240 tonnes/year**, and a monetised **30-year benchmark £216–£504m** (health damages from PM2.5/PM10) using DEFRA damage costs applied to that NEE mass. [LR UK Solu...v 2025 v.2 | Word]



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### 3) Compliance/audit exposure if NEE is not properly assessed

Our ISO/EIA-style notes argue that failure to quantify tyre/brake/road abrasion and receptor-level PM analysis is a **material omission** that can make an assessment incomplete.

Separately, our letters argue that BVRr/BRT-first approaches often fail to include corridor-level NEE assessment and WHO-aligned particulate thresholds. [[Subject: S...rd Support | Outlook](#)], [[LR UK Ligh...ember 2020 | PDF](#)] [[JH Copy of...Nottingham | Word](#)], [[\[WETA\] tra...in cities | Outlook](#)]

**Bottom line for A4: choosing a BRT spine risks locking in avoidable 30-year health burden and forgoing a large stated NEE dividend (plus creating avoidable process/audit weakness if NEE is not fully modelled).** [[Re: LCT Reset 2026 | Outlook](#)], [[Soft Benefit...TA Website | Outlook](#)], [[LR UK Ligh...ember 2020 | PDF](#)]

## B) Gloucester Road: what WECA loses by going BRT-first (vs VLR/HTaaS)

### 1) What our Gloucester Road OBC pack claims VLR delivers (and a BRT spine risks not delivering)

Our [LR UK LRUK Sol Bristol Gloucester Road Revisited Feb 2026](#) frames the starter line as directly addressing:

- **worsening congestion, declining bus reliability, poor air quality, and stagnating high street performance**
- **by providing “fast, reliable, high-capacity transport” and “zero-emission vehicles” plus a cleaner, safer, more attractive high street** [[LR UK LRUK...Feb 2026 | Word](#)]

It also states the scheme is positioned as aligned to **WECA’s Joint Local Transport Plan** and wider policy objectives, with an indicative capital cost **£40m–£60m** and BCR **2.5–4.0**. [[LR UK LRUK...Feb 2026 | Word](#)]

Our [Tram\\_HTaaS\\_Presentation 1](#) additionally frames Gloucester Road as a “flagship mass-transit and clean-energy innovation zone” for WECA by pairing VLR with HTaaS hydrogen production/storage/off-take logic.



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## 2) NEE: what we can credibly quantify today (and what we can't)

We **do have** a worked, corridor-style NEE calculation in our materials (not Gloucester Rd-specific, but explicitly presented as a 5 km example):

- baseline PM2.5 NEE ~98 g/day → post-VLR ~59 g/day
- **~40% reduction; ~14.2 kg/year PM2.5 removed** [[Soft Benef...TA Website | Outlook](#)], [[LR UK LRTA...d Jan 2026 | Word](#)], [[LR UK LRTA...8 Jan 2026 | Word](#)]

And Gloucester Road is described as a **5–6 km** starter line in our Bristol materials, which makes that example *directionally relevant as an illustrative worked template* (but it is not a corridor-specific EIA). [[LR UK Solu...v 2025 v.2 | Word](#)], [[Soft Benefit ..TA Website | Outlook](#)]

We do not currently have a Gloucester-specific “NEE-only deaths and illness cases” count in the retrieved sources. Where our documents discuss deaths/cases, they do so at the **total air-pollution level** (e.g., the A4 30-year table). [[Re: LCT Reset 2026 | Outlook](#)], [[LR UK LRUK...Feb 2026 | Word](#)]

## 3) Practical “losses” if WECA locks Gloucester Road into BRT

Based on the Gloucester Road OBC narrative, a BRT-first lock-in risks:

- ***leaving Gloucester Road in a persistent state where air quality remains poor and bus reliability continues to decline (as the “without intervention” trajectory described).*** [[LR UK LRUK...Feb 2026 | Word](#)]
- ***losing the cross-silo HTaaS “stable off-take” and “clean-energy innovation zone” concept described for WECA.***



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## C) WECA-wide “how it’s judged later” — the safe, defensible framing (institutional, not personal)

What we *can* do is set out the **institutional criteria** that later reviews (public, audit, legal, health stakeholders) tend to focus on — and our own documents point to four:

### 1) Foreseeability

Our ISO/EIA-style documents explicitly treat NEE as a **material environmental effect** requiring quantification, receptor analysis, and cumulative burden assessment. [[Subject: S...rd Support | Outlook](#)], [[LR UK Ligh...ember 2020 | PDF](#)]

### 2) Reasonable alternatives

Our letters argue that excluding or sidelining rail/VLR alternatives increases risk (including legal/reputational), and that BVRr schemes often fail reasonable-alternatives assessment. [[JH Copy of...Nottingham | Word](#)], [[\[WETA\] tra...in cities | Outlook](#)]

### 3) Transparency and parity in appraisal

Our WECA correspondence stresses that unequal appraisal horizons (e.g., shorter for buses vs longer for rail) can structurally bias outcomes and should be corrected (parity horizon). [[Breathing...equalities | Meeting](#)], [[\[lrta-deve...amendments | Outlook](#)]

### 4) Documented decision trail

Our own “technical evidence submission” approach argues for presenting material as officer-grade technical input that must be logged and considered as such.

**WECA-wide “judgement” sentence that stays professional and defensible:**

***In retrospect, institutions are judged less on rhetoric and more on whether they required corridor-level NEE quantification, WHO-aligned receptor exposure assessment, and a transparent alternatives appraisal before locking in a long-life corridor decision.*** [[LR UK Ligh...ember 2020 | PDF](#)], [[JH Copy of...Nottingham | Word](#)], [[\[lrta-deve...amendments | Outlook](#)]



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## B) Gloucester Road (starter line): what WECA loses if it locks into a BRT/BVRr route (vs VLR/HTaaS)

### 1) The core “case for change” and what a BRT lock-in risks leaving unresolved

Our Gloucester Road pack says the status quo is not sustainable and lists the “without intervention” trajectory as: **congestion worsening, bus reliability continuing to decline, air quality remaining poor, retail performance stagnating** and growth areas staying poorly connected.

It positions the Gloucester Road VLR starter line as directly addressing this by providing **fast, reliable, high-capacity transport, zero-emission vehicles, and a cleaner, safer, more attractive high street**, explicitly aligned with WECA’s policy context. [[Fwd: LR-UK...ct-2025pdf](#) | [Outlook](#)]

**What WECA “loses” under BRT-first:** the specific “starter line” proposition that is presented as the clean, high-capacity foundation for the wider network and corridor regeneration narrative. [[Fwd: LR-UK...ct-2025pdf](#) | [Outlook](#)]

### 2) The HTaaS “multiplier” on Gloucester Road (cross-silo value)

Our Gloucester Road HTaaS presentation frames the combined VLR + HTaaS concept as a **flagship mass-transit and clean-energy innovation zone**, intended to connect transport reliability with hydrogen production/storage/off-take and wider regional hydrogen-sector growth. [[LR UK Solu...v 2025 v.2](#) | [Word](#)]

**What WECA loses under BRT-first:** the specifically stated “unified concept” that uses tram operations as an anchored mechanism in the hydrogen ecosystem. [[LR UK Solu...v 2025 v.2](#) | [Word](#)]

### 3) Non-Exhaust Emissions (NEE): what we can quantify today for Gloucester Road

You have an LRTA technical annex (worked 5 km corridor example) showing:

- Baseline  $PM_{2.5}$  NEE: **~98 g/day**
- Post-VLR: **~59 g/day**
- Net reduction: **~39 g/day**, about **~14.2 kg/year  $PM_{2.5}$** , i.e. **~40% corridor  $PM_{2.5}$  NEE reduction** (from the scenario assumptions). [[Focus time](#) | [Meeting](#)]

**Important limitation (to keep it defensible):** this is presented as a **worked example** (not a Gloucester-specific EIA), so it’s best used as “illustrative corridor logic” unless/until we insert Gloucester Road traffic counts into the same framework. Not available in the time frame and public domain [[Focus time](#) | [Meeting](#)], [[Fwd: LR-UK...ct-2025pdf](#) | [Outlook](#)]



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## A) A4 Bristol–Bath: what WECA loses by going down the BRT route (vs VLR/HTaaS)

### 1) 30-year health outcome comparison in your A4 pack (overall air pollution)

Our A4 corridor update includes a 30-year comparison table stating:

- **Premature deaths (air pollution): ~1,200** (bus-based) vs **~300** (TigM hydrogen VLR)
- **Chronic illness cases: ~18,000** vs **~5,000**

These are framed as air-pollution outcomes based on **PM2.5 and NOx exposure reduction**. [\[LR Uk Sol...2 Original | Word\]](#), [\[LR UK CGT...5 Main v.1 | Word\]](#)

### 2) The monetised NEE “dividend” you already show for A4

The same update explicitly decomposes NEE and states:

- **Atmospheric NEE** is shown as **~£180m** of the **~£600m** “health” line,
- **Rainfall runoff NEE** is added as **£11.3m over 30 years**,
- giving **~£191m over 30 years** total “NEE elimination benefit” (as presented in the document). [\[Focus time | Meeting\]](#), [\[LR Uk Sol...2 Original | Word\]](#)

It also provides a corridor-scale NEE mass baseline of **~180–240 tonnes/year**, and a monetised benchmark for health damages from PM2.5/PM10 of **£216–£504m over 30 years** using DEFRA damage cost ranges (as stated in the pack).

### 3) Compliance / defensibility risk if BRT proceeds without corridor-level NEE modelling

Our materials describe NEE (tyre/brake/road wear and resuspension) as a **material environmental effect** requiring quantification and receptor analysis and argue that omission is “material” and can make an assessment incomplete.

Our letters further argue that BVRr schemes often fail to include corridor-level NEE assessment and WHO-aligned thresholds, framing this as a non-compliance pattern risk. [\[Surgery \(e...in August\) | Meeting\]](#), [\[Re: \[Irt...d suggest | Outlook\]](#) [\[Warrington...d by HTaaS | Outlook\]](#), [\[Urgent upd...kes RSVP | Outlook\]](#)

**Bottom line for A4 (using our sources):** WECA risks giving up both

- (i) the stated 30-year health delta and
- (ii) the stated, Green-Book-framed NEE dividend if it treats BRT/BVRr as the spine rather than a steel-wheel corridor. [\[LR Uk Sol...2 Original | Word\]](#), [\[Focus time | Meeting\]](#)



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## C) WECA-wide: what gets judged later (institutionally) — without personalising it

### 1) Foreseeability and materiality

Our ISO/EIA-style notes explicitly treat NEE as foreseeable, quantifiable, and **material**—requiring proper assessment (including receptor-level analysis). [\[Surgery \(e...in August\) | Meeting\]](#), [\[Re: \[Irta-...Id suggest | Outlook\]](#)

### 2) Reasonable alternatives

Our letters/briefs argue that rail-based alternatives must be assessed fairly and that sidelining them increases legal/reputational risk. [\[Warrington...d by HTaaS | Outlook\]](#), [\[Urgent upd...kes RSVP | Outlook\]](#)

### 3) Appraisal parity and transparency

Our WECA engagement materials emphasise that unequal appraisal horizons and incomplete comparison frameworks create structural bias and procedural vulnerability. [\[Cut Electr...Blueprint | Outlook\]](#), [\[LRUK LIPF\\_...y Nov 2025 | Word\]](#)

### 4) Audit trail and evidence logging

Our “technical evidence” framing is about ensuring submissions are logged and considered as officer-grade technical input rather than dismissed as campaigning. [\[LRUK LIPF\\_...y Nov 2025 | Word\]](#)

**A professional, WECA-safe sentence you can use (institutional, not personal):**

***In retrospect, the issue becomes whether WECA required corridor-level NEE quantification, WHO-aligned exposure assessment, and a transparent alternatives appraisal before locking in a long-life corridor decision.*** [\[Re: \[Irta-...Id suggest | Outlook\]](#), [\[Warrington...d by HTaaS | Outlook\]](#), [\[LRUK LIPF\\_...y Nov 2025 | Word\]](#)



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## A) A4 Bristol–Bath corridor (what WECA loses if it goes down the BRT route vs VLR/HTaaS)

### 1) 30-year health outcomes already stated in our materials (overall air-pollution, not “NEE-only”)

Our [Mayor consultation response](#) (the A4 corridor pack) sets out a 30-year comparison between a bus-based mode and TigM hydrogen VLR and states: **~1,200 premature deaths vs ~300 and ~18,000 chronic illness cases vs ~5,000**. [[Mayor cons...n response](#) | [Outlook](#)]

### 2) 30-year NEE burden benchmark (still present even if buses electrify)

Our [LR UK Solutions Moving Bristol Forward update 26 Nov 2025 v.2](#) states the A4 corridor generates **~180–240 tonnes of NEE annually**, with a **30-year cumulative benchmark of 5,400–7,200 tonnes**, and notes these are PM10/PM2.5 from tyre wear, brake wear, road abrasion and resuspension that persist even with full bus electrification. [[LR UK Solu...v 2025 v.2](#) | [Word](#)]

### 3) What we formally submitted to WECA on the A4 consultation (the “loss” is the alternative package)

Our A4 consultation submission says the VLR + HTaaS integration is presented as a **cost-effective, clean alternative to bus-based modes**, and that it is **Green Book-compliant** and mapped to WHO air-quality guidance (as described in the email acknowledgement thread). [[RE: Respon...nsultation](#) | [Outlook](#)]

### Plain-English “loss” statement for A4 (defensible from your sources):

If WECA locks into a BRT spine, our own A4 materials say it is foregoing the package that claims substantially lower 30-year air-pollution harms (deaths/illness) and the corridor-scale NEE burden that persists under road-tyred solutions. [[Mayor cons...n response](#) | [Outlook](#)], [[LR UK Solu...v 2025 v.2](#) | [Word](#)]



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## B) Gloucester Road (starter line) (what WECA loses if it locks into BRT vs VLR/HTaaS)

### 1) The Gloucester Road starter line is framed as the “first corridor” of a wider VLR network

Our RE: Gloucester Road summary describes a multi-corridor Bristol Mass Transit network with **Gloucester Road as the starter line**, and frames “bus priority alone” as insufficient for capacity and delivery of objectives, with VLR as the preferred scalable intervention. [[RE: Gloucester Road | Outlook](#)]

### 2) The Gloucester Road business case pack gives specific technical/benefit inputs for the starter line

Our [LR UK LRUK Sol Bristol Gloucester Road Revisited Feb 2026](#) provides:

- **Route length 5–6 km; Total capital cost £40m–£60m; Full BCR 2.5–4.0**
- Environmental and health benefit inputs, including **PM2.5 reduction (£5m–£8m)**, **NO<sub>2</sub> reduction (£4m–£6m)**, **Rainwash reduction (£1m–£2m)**, plus **health benefits (£10m–£15m)** and **NHS cost savings (£5m–£8m)** (noted as “General Information Only”). [[LR UK LRUK...Feb 2026 | Word](#)]

### 3) The “HTaaS multiplier” framing for Gloucester Road (cross-silo hydrogen/transport package)

Our [Tram\\_HTaaS\\_Presentation 1](#) explicitly frames the integrated tram + HTaaS proposition as designed to turn the Gloucester Road (A38) corridor into a **flagship mass-transit and clean-energy innovation zone** for the West of England, linking VLR operations to hydrogen production/storage/off-take and wider regional hydrogen assets.

We also have a dedicated briefing file: [LR UK LRUK Sol Bristol Gloucester Rd Integrated Tram HTaaS Feb 2026](#), which describes itself as unifying the Gloucester Road tram proposition and HTaaS into a single briefing aligned to WECA priorities. [[Tram\\_HTaaS...entation 1 | PowerPoint](#)] [[LR UK LRUK...Feb 2026 | Word](#)]

### Plain-English “loss” statement for Gloucester Road (defensible from your sources):

If WECA locks Gloucester Road into a BRT-first pathway, our documents say it is foregoing

- (i) the starter-line VLR case with stated costs/BCR and specified benefit lines, and
- (ii) the integrated Gloucester Road VLR+HTaaS “innovation zone” framing. [[LR UK LRUK...Feb 2026 | Word](#)], [[Tram\\_HTaaS...entation 1 | PowerPoint](#)], [[LR UK LRUK...Feb 2026 | Word](#)]



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# 1) 30-year BCR comparison (BRT vs VLR/HTaaS) “through an ISO 14001 lens”

## What “ISO 14001 lens” means in your own documents

Our ISO-framed material treats ISO 14001 as an **Environmental Management System discipline**: identify aspects/impacts (air/water), quantify material effects (including NEE), document controls/KPIs, and maintain an auditable risk register and continuous improvement.

That matches ISO’s public explanation of ISO 14001 as a framework for managing environmental impacts, legal compliance, pollution prevention, and continual improvement. [\[LR UK Sol...Dec 2025 | Word\]](#), [\[LR UK Lett...c 2025 v.2 | Word\]](#) [\[iso.org\]](#)

So, the comparison we are asking for is essentially:

- **BCR over 30 years, plus**
- whether the appraisal is **defensible** on ISO-style “aspects & impacts” (air + water + NEE) and associated risk governance. [\[LR UK Sol...Dec 2025 | Word\]](#), [\[LR UK Sol...2026 v.12 | Word\]](#)

## A) The cleanest 30-year BCR comparison we *do* have on file (ISO-explicit)

Our [LR UK Sol Derby Combined Authority Starter line Jan 2026 v.17 Draft \(1\)](#) contains an ISO-framed 30-year comparison table that includes **public-sector BCRs** for BRT and VLR options:

- **BRT (Diesel): BCR ≈ 2.7**
- **BRT (Electric BEV): BCR ≈ 2.6**
- **VLR – Hydrogen (HTaaS + LVC): BCR ≈ 4.8**
- **VLR – Hydrogen (public only): BCR ≈ 3.1** [\[LR UK Sol...Draft \(1\) | PDF\]](#), [\[LR UK Sol...2026 v.12 | Word\]](#)

It also explicitly flags the ISO 14001-style environmental differences (e.g., NEE PM, runoff/microplastics risk, “point of use” pollution) in the same framing. [\[LR UK Sol...2026 v.12 | Word\]](#), [\[LR UK Sol...Draft \(1\) | PDF\]](#)

**So, if we want a “BRT vs VLR/HTaaS 30-year BCR comparison according to ISO 14001,” the Derby starter-line pack is the most complete, explicit precedent we currently have.** [\[LR UK Sol...Draft \(1\) | PDF\]](#), [\[LR UK Sol...2026 v.12 | Word\]](#)



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## B) What we do have for Bristol corridors (A4 / Gloucester Road)

### Gloucester Road (VLR)

our [LR UK LRUK Sol Bristol Gloucester Road Revisited Feb 2026](#) gives a 30-year business case position for the VLR starter line including:

- **Full BCR: 2.5 – 4.0** (stated as “High Value for Money”) [[Warrington...CA Review | Outlook](#)], [[LR UK LRUK...Feb 2026 | Word](#)]

### Gloucester Road (BRT / bus-based)

In the same Gloucester Road file, “Bus-Only improvements” are described qualitatively as **insufficient capacity** and “still stuck in traffic,” but **no numeric 30-year bus/BRT BCR is stated** in the retrieved excerpts. [[LR UK LRUK...Feb 2026 | Word](#)], [[Warrington...CA Review | Outlook](#)]

### A4 corridor (bus vs VLR)

For the A4 corridor, we have a strong **30-year health/economic comparison narrative** (deaths/illness, costs) in [Mayor consultation response](#), but again this does **not** provide a numeric BRT/BCR figure in what we retrieved. [[Re: Happy...ar, James! | Outlook](#)]

### Bottom line on Bristol:

- We can cite a **VLR BCR (Gloucester Road: 2.5–4.0)**. [[Warrington...CA Review | Outlook](#)], [[LR UK LRUK...Feb 2026 | Word](#)]
- We do **not** currently have a stated **BRT/bus BCR** for Gloucester Road or the A4 corridor in the retrieved content, so we cannot truthfully compute or claim a Bristol BRT BCR from these sources alone. [[LR UK LRUK...Feb 2026 | Word](#)], [[Re: Happy...ar, James! | Outlook](#)]



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## C) How the ISO 14001 framing changes the “BCR debate” (what our documents argue)

*Across our ISO-related packs, the argument is that bus/BRT appraisals often under-recognise or omit material aspects like NEE and runoff, and that ISO-style governance requires those to be treated explicitly.*

*That's why the Derby ISO table includes NEE and runoff risks as explicit comparison lines. [LR UK Sol...- Option 3 | Word], [LR UK Sol...etter 2026 | Word], [LR UK Halt...4 Nov 2025 | Word] [LR UK Sol...2026 v.12 | Word], [LR UK Sol...Draft (1) | PDF]*

## 2) “Do we have a winnable Judicial Review case?”

### Quick safety/legal note

#### A) The legal test framework (high-level, reputable source)

A mainstream summary (Institute for Government) states the three main JR grounds are

- **illegality,**
- **procedural unfairness,** and
- **irrationality.**

courts review lawfulness and process, not whether the decision is “best.” [\[institutef...ent.org.uk\]](https://www.instituteforgovernment.org.uk)



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## B) What our own documents suggest could create JR exposure (potential grounds)

### 1) Procedural unfairness / incomplete assessment

Our [LR UK Sol Cambridge BRT - ISO - Option 3](#) explicitly asserts that where NEE is not quantified and receptor impacts aren't assessed, the **EIA is incomplete**, the decision-maker has been misinformed, and the proposal "cannot be lawfully determined" on the existing documentation. [[Re: Warrin...d by HTaaS | Outlook](#)], [[LR UK Sol...- Option 3 | Word](#)]

That is exactly the kind of "process failure / incomplete environmental assessment" allegation that usually sits under **procedural unfairness / failure to take required steps** (in public law terms). [[instituteof...ent.org.uk](#)], [[Re: Warrin...d by HTaaS | Outlook](#)]

### 2) Failure to consider relevant considerations / reasonable alternatives

Our [LR UK Sol Leeds Mayor Brabant 30 Dec 2025](#) argues BRT-first planning can cause:

- appraisal asymmetry,
- premature corridor lock-in, and
- mischaracterisation of "zero emission" due to NEE, and warns failure to assess rail alternatives fairly increases risk of **legal challenge** and reputational damage. [[LR UK Sol...Dec 2025 | Word](#)], [[LR UK Sol...Dec 2025 | Word](#)]

### 3) ISO 14001-style "material environmental aspects" omitted

Our ISO notes reinforce the line that NEE is "material" and that ISO-aligned governance requires it to be measured and managed, strengthening the claim that these aren't optional add-ons. [[LR UK Sol...Dec 2025 | Word](#)], [[LR UK Sol...- Option 3 | Word](#)]

### 4) Our own packs explicitly flag JR risk as a consequence

Our Derby starter-line brief lists "Challenges including a possible Judicial Review" among risks if NEE/AQ issues are unmanaged and not properly captured in the economic case. [[Draft Copy...for Derby | Outlook](#)], [[Investor\\_D...rt\\_Updated | PowerPoint](#)]

**So: we do have internal documentation that already articulates JR-style arguments** (incomplete EIA/air quality scope; NEE omission; failure to consider reasonable alternatives; appraisal asymmetry). [[Re: Warrin...d by HTaaS | Outlook](#)], [[LR UK Sol...Dec 2025 | Word](#)], [[Draft Copy...for Derby | Outlook](#)]



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## C) What's missing to say anything about “winnable”

*To assess prospects, a public law solicitor would typically need project-specific facts, not just general arguments, such as:*

1. **The exact WECA decision being challenged** (what decision, when, what legal power). [[instituteof...ent.org.uk](#)]
2. The **actual published evidence base**: the ES/EIA scope, air quality model, whether NEE is quantified, and the alternatives assessment. (Your own FOI roadmap is aimed at obtaining precisely this.) [[WECA\\_Lobby...ng\\_Roadmap | PowerPoint](#)]
3. A clear record showing **the omission is material for that corridor** (not just in principle). [[Re: Warrin...d by HTaaS | Outlook](#)], [[WECA\\_Lobby...ng\\_Roadmap | PowerPoint](#)]
4. Timing and standing (JR is time-limited and claimant must have sufficient interest) — again, solicitor territory. [[lawteacher.net](#)], [[instituteof...ent.org.uk](#)]

### BCR comparison, ISO 14001 framing

- **We do have a complete, ISO-explicit 30-year BCR comparison for BRT vs VLR/HTaaS in the Derby pack** (2.6–2.7 vs 3.1–4.8). [[LR UK Sol...Draft \(1\) | PDF](#)], [[LR UK Sol...2026 v.12 | Word](#)]
- **For Bristol, we have VLR BCR (Gloucester Road 2.5–4.0) but no stated bus/BRT BCR** in the retrieved material, so I can't do a numeric Bristol BRT vs VLR BCR comparison from sources currently in hand. [[Warrington...CA Review | Outlook](#)], [[LR UK LRU...Feb 2026 | Word](#)]

### “Winnable JR?”

- We *can* confirm our documents identify potential JR-type vulnerabilities: **incomplete EIA if NEE is omitted, failure to assess alternatives**, and **appraisal asymmetry / corridor lock-in**. [[Re: Warrin...d by HTaaS | Outlook](#)], [[LR UK Sol...Dec 2025 | Word](#)], [[Draft Copy...for Derby | Outlook](#)]



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## Corridor B — Gloucester Road (Starter Line)

Below are the BCR figures we can state on the record for both corridors, using only figures that are explicitly stated in your enterprise documents. Where a figure is not stated, we say so clearly.

### Very Light Rail (VLR)

- **30-year Full BCR: 2.5 – 4.0**

This range is explicitly stated in the *Gloucester Road Revisited Feb 2026* business-case material as “High Value for Money.” [[Focus time | Meeting](#)], [[Fwd: We’re...ng started | Outlook](#)]

### Bus / BRT

- **30-year BCR: Not stated in the Gloucester Road documents retrieved**

The same option appraisal describes “Bus-only improvements” qualitatively (capacity and reliability constraints), but **does not publish a numeric BCR** for a bus/BRT option for Gloucester Road.

[[Fwd: We’re...ng started | Outlook](#)]

### Gloucester Road summary

Mode	30-year BCR
VLR	2.5 – 4.0
Bus / BRT	Not stated



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## Corridor C — A4 Bristol–Bath

### Very Light Rail (VLR)

- **30-year BCR: Not explicitly stated in the retrieved A4 corridor documents**

The A4 consultation response and supporting files present extensive **30-year health, environmental, and economic impact comparisons** (e.g., deaths, illness, NHS costs), but **do not publish a single BCR value** in the material retrieved here. [[JH Copy of...Nottingham | Word](#)], [[Re: \[WETA\]...= Bristol | Outlook](#)]

### Bus / BRT

- **30-year BCR: Not explicitly stated in the retrieved A4 corridor documents**

As above, the A4 material does not include a numeric BCR for a bus/BRT option. [[JH Copy of...Nottingham | Word](#)]

### A4 Bristol–Bath summary

Mode	30-year BCR
VLR	Not stated
Bus / BRT	Not stated

## What this means (strictly factual)

- **Only one corridor has a published BCR figure in our files: Gloucester Road (VLR: 2.5–4.0).** [[Focus time | Meeting](#)]
- **No numeric BCR is published** (in the retrieved materials) for:
  - Bus/BRT on Gloucester Road, or

**Mode on the A4 Bristol–Bath corridor.** [[Fwd: We're...ng started | Outlook](#)], [[JH Copy of...Nottingham | Word](#)]



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# Gloucester Road — Missing Evidence for a JR Case

## 1) Decision Record (the “what is being challenged”)

- The **formal WECA decision** (cabinet/committee/officer delegated decision) that:
  - selects or effectively locks in **Bus/BRT** over **VLR**, or
  - excludes VLR from further development.
- The **date**, **statutory power relied upon**, and **decision-maker**.

**Without this, there is nothing legally challengeable.**

## 2) Environmental Assessment Scope

- The **EIA Screening/Scoping Opinion** for Gloucester Road.
- Confirmation whether **Non-Exhaust Emissions (NEE)** are:
  - scoped **in** or **out**, and
  - if out, the **reasoned justification** for exclusion.
- Evidence of **receptor-level assessment** (schools, homes, healthcare).

Your ISO-framed memos argue omission of NEE is material; you need the official scope to prove omission.

## 3) Air Quality Assessment (AQA) Inputs

- The **Air Quality model** used (methodology + assumptions).
- Whether it quantifies:
  - $PM_{2.5}$  /  $PM_{10}$  from **tyre, brake, road wear** (NEE),
  - or only tailpipe  $NO_2$ /PM.
- Any **sensitivity tests** comparing bus vs rail modal shift.

This is critical to show “failure to take relevant considerations into account.”



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#### 4) Alternatives Appraisal

- The **options long-list and short-list** for Gloucester Road.
- Evidence showing:
  - whether **VLR was appraised on equal footing**, or
  - whether it was excluded early (and why).
- The **appraisal horizon** used for each mode (e.g. 15 vs 30 years).

***Appraisal asymmetry is a core procedural fairness issue you've already identified.***

#### 5) Economic Case Parity

- The **Bus/BRT BCR** for Gloucester Road (currently not published).
- Evidence of whether **NEE, runoff, health externalities** were monetised for bus.

***Without a published bus BCR, parity of comparison cannot be demonstrated.***

#### 6) Consultation Handling

- The **consultation report** showing:
  - how submissions advocating VLR/NEE were logged,
  - how they were **considered**, not merely acknowledged.
- Any officer responses addressing (or failing to address) NEE arguments.

***JR risk arises if material representations were ignored or misunderstood.***

#### 7) Equality & Health Duties

- **EqIA / HIA** for Gloucester Road (if produced).
- Evidence that **air-quality health impacts** on vulnerable groups were assessed.

***Absence can support an illegality/procedural flaw argument.***



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## C) A4 Bristol–Bath — Missing Evidence for a JR Case

### 1) Decision Record

- The **formal WECA decision** endorsing a **bus/BRT-led scheme** for the A4.
- Any decision that **rules out VLR** or commits corridor geometry that prevents rail conversion.

### 2) Environmental Statement / AQA

- The **Air Quality Assessment** used for the A4 scheme:
  - confirmation whether **NEE is quantified** (despite your documents showing 180–240 t/year NEE baseline),
  - or whether buses are treated as “zero-emission” without NEE correction.
- Evidence of **population-weighted exposure modelling**.

*This is central given your own A4 material quantifies large NEE burdens.*

### 3) Alternatives Assessment

- The **formal alternatives chapter** (or equivalent):
  - Was **VLR assessed as a reasonable alternative**?
  - If excluded, what was the **documented rationale**?
- Evidence of **corridor lock-in analysis** (geometry, gradients, junctions).

*Courts focus heavily on whether reasonable alternatives were lawfully considered.*

### 4) Economic Appraisal Transparency

- **Published BCRs** for:
  - Bus/BRT (A4),
  - VLR (A4).
- Evidence showing:
  - consistent **30-year appraisal horizons**,
  - inclusion/exclusion of **health, NEE, runoff** externalities.

*Right now, A4 has impact tables but no stated BCRs—this is a material gap.*



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## 5) Health Evidence Integration

- Evidence showing how your **30-year health figures** (deaths, illness, NHS costs) were:
  - incorporated into the decision, or
  - discounted/ignored (and why).

*If acknowledged but not evaluated, that strengthens a procedural challenge.*

## 6) Consultation & Representations

- The **consultation decision statement** explaining:
  - how submissions advocating VLR/HTaaS were weighed,
  - whether contrary evidence was addressed with reasons.

*A failure to give reasons for rejecting material evidence is a classic JR vulnerability.*

## 7) Climate / Clean Air Duties

- Evidence of compliance with:
  - WHO PM<sub>2.5</sub> guidance,
  - Clean Air statutory obligations,
  - WECA climate commitments.
- Any internal advice acknowledging **risk of non-compliance**.

*This supports an “illegality / misdirection in law” argument if duties were misunderstood.*

## Cross-Corridor Evidence Still Needed

- **FOI responses confirming:**
  - *whether WECA applies ISO-style lifecycle assessment (or any equivalent),*
  - *what standards govern environmental scoping.*
- **Internal officer advice on:**
  - *NEE relevance,*
  - *rail vs bus appraisal parity,*
  - *legal risk.*

## Plain-English Summary



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*We already have the theory (NEE is material; appraisal asymmetry exists; corridor lock-in risks illegality).*

*What you are missing is the hard administrative record showing that:*

- *these issues were not properly assessed, and*
- *the decision nevertheless proceeded.*

## Missing Evidence for a JR Case BOTH CORRIDORS

### 1) Challengeable Decision (Mandatory for JR)

For each corridor:

- The **formal WECA decision** (Cabinet / Committee / delegated officer) that:
  - selects or locks-in **Bus/BRT**, or
  - excludes **VLR** from further development.
- The **decision date**, **decision-maker**, and **statutory power** relied upon.

*Without an identifiable decision, there is nothing the court can review.*

### 2) Environmental Assessment Scope (EIA / Screening)

For each corridor:

- The **EIA Screening Opinion** and, if applicable, **Scoping Opinion**.
- Explicit confirmation whether **Non-Exhaust Emissions (NEE)** are:
  - scoped **in**, or
  - scoped **out** (with written justification).
- Evidence of **receptor-level scope** (schools, housing, hospitals).

*Our ISO/NEE argument depends on proving that NEE is a material effect that was omitted or inadequately scoped.*

### 3) Air Quality Assessment (AQA) Evidence

For each corridor:

- The **AQA methodology and model** used.
- Proof of whether it quantifies:



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- PM<sub>2.5</sub> / PM<sub>10</sub> from **tyre wear, brake wear, road abrasion, resuspension (NEE)**,
- or only tailpipe NO<sub>2</sub>/PM.
- Any **modal-shift sensitivity testing** (bus vs rail).

*This goes directly to “failure to take relevant considerations into account”.*

## 4) Alternatives Assessment (Critical)

For each corridor:

- The **options long-list and short-list**.
- Documentary evidence showing:
  - whether **VLR was treated as a reasonable alternative**, or
  - whether it was excluded early (and why).
- The **appraisal horizon** used for each mode (e.g. 15-year bus vs 30-year rail).

*Unequal appraisal or premature exclusion is a classic JR vulnerability.*

## 5) Economic Appraisal Parity

For each corridor:

- The **published BCR for Bus/BRT** (currently missing for both corridors).
- The **published BCR for VLR** (present for Gloucester Road only).
- Evidence showing whether **health, NEE, runoff, and pollution externalities** were monetised for *both* modes.

*Absence of a bus/BRT BCR or unequal treatment undermines lawful comparison.*

## 6) Consultation Handling

For each corridor:

- The **consultation report / decision statement**.
- Evidence showing:
  - VLR / NEE submissions were **considered**, not merely logged,
  - and reasons were given for rejecting them (if rejected).

*Ignoring or misunderstanding material representations supports procedural unfairness.*

## 7) Health & Equality Duties



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For each corridor:

- **Health Impact Assessment (HIA)** (if any).
- **Equality Impact Assessment (EqIA)**.
- Evidence that **air-quality health impacts on vulnerable groups** were assessed.

***Missing or superficial analysis can support illegality/procedural flaw arguments.***

## 8) Climate & Clean-Air Legal Duties

For each corridor:

- Evidence of how decisions comply with:
  - WHO PM<sub>2.5</sub> guidance,
  - statutory clean-air obligations,
  - WECA climate commitments.
- Any internal advice acknowledging **non-compliance risk**.

***Misunderstanding or misapplication of duties can ground an illegality claim.***

## 9) Governance / Standards Evidence

For both corridors (cross-cutting):

- Confirmation of whether WECA applies:
  - ISO-style lifecycle assessment,
  - or any equivalent environmental management standard.
- Internal risk registers or officer advice on:
  - NEE relevance,
  - rail vs bus appraisal parity,
  - legal or audit risk.

***This is where our ISO-14001 framing becomes evidential rather than rhetorical.***

## Plain-English Bottom Line



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- You already have a **coherent JR theory** (NEE is material; appraisal asymmetry; alternatives not properly assessed).
- What is missing is the **administrative record** proving those failures **actually occurred** for **Gloucester Road and A4**.
- ***Once those documents are obtained (FOI or disclosure), a public-law solicitor can assess prospects.***



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# A) A4 Bristol–Bath — Missing Evidence Needed for a JR Case

- **A = A4 Bristol–Bath corridor**
- **B = Gloucester Road starter line**

The **missing evidence we need** to assemble a credible JR bundle for **each corridor**, based on what our own materials say is procedurally/legally “material” (NEE scope, appraisal parity, alternatives, consultation trail).

We are listing **evidence gaps**, not giving legal advice or predicting outcomes. [\[LR UK Sol...- Option 3 | Word\]](#), [\[LR UK Sol...Dec 2025 | Word\]](#), [\[LR UK CGT...v 2025 v.2 | Word\]](#)

## 1) The challengeable decision (the “decision under review”)

- The **formal WECA decision** that selects/locks-in a bus/BRT approach for A4 **or** excludes VLR as a reasonable alternative (cabinet/committee/delegated officer).
- The **date, decision maker, and legal power** relied upon.  
*Why:* without a specific decision, there’s nothing to JR. [\[Re: WSP | Outlook\]](#), [\[Re: WSP | Outlook\]](#)

## 2) EIA / Screening / Scoping documents for the A4 scheme

- The A4 corridor’s **EIA screening opinion** and (if applicable) **scoping opinion**.
- Evidence showing whether **Non-Exhaust Emissions (NEE)** were explicitly **scoped in or out**, and the written reasons.  
*Why:* your technical case treats NEE as a “material environmental effect requiring full assessment.” [\[LR UK Sol...Dec 2025 | Word\]](#), [\[LR UK Sol...- Option 3 | Word\]](#)

## 3) Air Quality Assessment (AQA) + NEE methodology

- The A4 scheme’s **Air Quality Assessment report** (method + assumptions).
- Proof of whether it quantifies:
  - PM<sub>2.5</sub>/PM<sub>10</sub> from **tyre/brake/road wear + resuspension (NEE)**, or
  - only tailpipe pollutants.  
*Why:* your A4 corridor work states NEE is large and persistent (even with electrification), so omission would be a key factual issue. [\[LR UK Solu...v 2025 v.2 | Word\]](#)



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#### 4) Alternatives appraisal (and appraisal parity)

- The A4 **options longlist/shortlist** and the written rationale for selection/exclusion.
- Evidence of appraisal horizon parity (e.g., whether BRT is appraised at 10–15 years while rail is 25–30 years — our correspondence flags this as a procedural vulnerability). [\[Re: WSP | Outlook\]](#), [\[Re: WSP | Outlook\]](#)

#### 5) Economic case outputs (BCR tables)

- The published **bus/BRT BCR** for the A4 package.
- Any **VLR BCR** for A4, if it was assessed.  
*Why:* our A4 material includes extensive benefits and a strong compliance narrative, but the JR bundle needs the authority's own VfM tables to test parity and relevant considerations. [\[Response t...nsultation | Outlook\]](#), [\[LR UK Solu...v 2025 v.2 | Word\]](#)

#### 6) Consultation handling + reasons

- WECA's **consultation report/decision statement** showing how representations were handled and what reasons were given.
- Evidence showing our submission (VLR+HTaaS, SuDS/NEE, compliance mapping) was **considered**, not just acknowledged. [\[Response t...nsultation | Outlook\]](#), [\[Re: WSP | Outlook\]](#)

#### 7) Health / equality assessments

- Any A4 **Health Impact Assessment (HIA)** and **Equality Impact Assessment (EqIA)** for the corridor package.
- Evidence of **sensitive receptor** treatment (schools, care homes, hospitals).  
*Why:* your own “good practice / defensible scope” template puts receptor scoping and health pathway treatment front-and-centre. [\[LR UK CGT...v 2025 v.2 | Word\]](#), [\[LR UK CGT...ummary v.1 | Word\]](#)



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## B) Gloucester Road — Missing Evidence Needed for a JR Case

### 1) The challengeable decision

- The **formal WECA decision** that selects/locks-in bus/BRT for Gloucester Road (or effectively excludes VLR).
- The **date, decision-maker, and legal basis**.  
*Your own Gloucester Road JR checklist starts here.* [\[LR UK LRUK...Feb 2026 | Word\]](#)

### 2) EIA screening/scoping (and whether NEE is treated as material)

- The Gloucester Road scheme's **EIA screening/scoping opinions** (if any).
- Explicit evidence that **NEE was scoped in/out**, with justification and receptor coverage. [\[LR UK LRUK...Feb 2026 | Word\]](#), [\[LR UK Sol...Dec 2025 | Word\]](#)

### 3) Air Quality Assessment (NEE included or omitted)

- The Gloucester Road **AQA report**, including whether it quantifies tyre/brake/road wear/resuspension  $PM_{2.5}/PM_{10}$ .
- Any dispersion/receptor modelling outputs (schools, housing, high street).  
*Why:* your ISO/EIA memo treats omission of NEE quantification and receptor modelling as “material,” making the assessment vulnerable. [\[LR UK Sol...- Option 3 | Word\]](#), [\[LR UK Sol...Dec 2025 | Word\]](#)

### 4) Alternatives appraisal + “reasonable alternatives” record

- The Gloucester Road **options longlist/shortlist** and why options were excluded.
- Proof that VLR was assessed as a reasonable alternative (or evidence it was screened out early).  
*Why:* your correspondence and TM suite emphasise the legal vulnerability of not “considering trams properly.” [\[Final pack..., Defcon 5 | Outlook\]](#), [\[Gloucester Road | Outlook\]](#), [\[Re: WSP | Outlook\]](#)

### 5) Economic case parity (bus/BRT BCR missing)

- The **bus/BRT BCR** for Gloucester Road (our VLR BCR is stated in your VLR OBC pack, but the bus/BRT comparator BCR is not published in what we've retrieved). [\[LR UK LRUK...Feb 2026 | Word\]](#), [\[LR UK LRUK...Feb 2026 | Word\]](#)
- Evidence of whether bus/BRT appraisals monetise **NEE and rainwash/runoff** externalities. [\[LR UK LRUK...Feb 2026 | Word\]](#), [\[LR UK CGT...v 2025 v.2 | Word\]](#)

### 6) Consultation trail + officer consideration



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- WECA/BCC logs showing receipt of the Gloucester Road submissions (e.g., technical memoranda, OBC extracts) and how they were considered. [[Bristol Gl...Road RSVP | Outlook](#)], [[Final pack..., Defcon 5 | Outlook](#)], [[Irrta-deve...Authority | Outlook](#)]

## 7) Governance / risk register / monitoring commitments

- The scheme's risk register showing treatment of:
  - NEE (air),
  - rainwash/runoff (water),
  - monitoring and adaptive management.

*Why:* your “defensible EIA addendum” template explicitly calls these out as needed for a robust decision record. [[LR UK CGT...v 2025 v.2 | Word](#)], [[LR UK CGT...summary v.1 | Word](#)]

## The “most useful” missing items (if we only chase 5 documents per corridor)

If you're prioritising:

**A4 (A):** Decision record; EIA screening/scoping; AQA (NEE included?); alternatives appraisal; consultation decision statement.

**Gloucester Road (B):** Decision record; EIA screening/scoping; AQA (NEE + receptors); options appraisal parity; bus/BRT BCR table. [[Response I. Consultation | Outlook](#)], [[LR UK Solu...v 2025 v.2 | Word](#)], [[Re: WSP | Outlook](#)] [[LR UK LRU...Feb 2026 | Word](#)], [[LR UK LRU...Feb 2026 | Word](#)], [[LR UK Sol...Dec 2025 | Word](#)]



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## A) FOI Request Draft — A4 Bristol–Bath Corridor (WECA / BathtoBristol team)

Written in an **officer-safe, technical tone** and aligned to the evidence gaps we identified (decision record, EIA scope, AQA incl. NEE, alternatives appraisal parity, BCR tables, consultation handling, EqIA/HIA, and risk registers).

They also mirror the kind of “NEE technical addendum / legal sign-off checklist” structure we already use elsewhere. [[LR Solution...cation v.2 | Outlook](#)]

**Subject:** FOI request — A4 Bristol–Bath corridor scheme: option appraisal, air quality (incl. NEE), EIA scope, and decision records

**To:** Freedom of Information Officer / Information Governance

**Organisation:** West of England Combined Authority (WECA)

**CC (optional):** Democratic Services / Programme Team

Dear FOI Officer,

I am requesting information under the Freedom of Information Act 2000 relating to WECA’s work on the **A4 Bristol–Bath corridor** transport proposals and associated decision-making, appraisal, and environmental assessment. This request is made to obtain the documents needed to understand how options have been assessed and how environmental and public-health impacts—particularly **non-exhaust emissions (NEE)**—have been treated. [[Automatic...d by HTaaS | Outlook](#)]

### 1) Decision record(s)

Please provide copies of any **formal decisions** (cabinet/committee/combined authority meeting decisions, delegated officer decisions, programme board decisions, or equivalent approvals) that:

- select, endorse, or lock-in the A4 corridor’s preferred option(s), or
- exclude any rail-based options (e.g., VLR/tram) from further development, or
- approve the appraisal approach/horizon for comparing bus/BRT and rail options. [[LR Solution...cation v.2 | Outlook](#)]

For each decision, please include decision date, decision-maker, the report/agenda item, and any appendices.



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## 2) Options appraisal and business case materials

Please provide the latest versions of:

- the **options longlist/shortlist** and rationale for shortlisting/exclusion.
- any Strategic Outline Case / Outline Business Case materials.
- the **benefit-cost working papers** including present value (PV) benefits/costs, optimism bias treatment, and **BCR tables** for all appraised modes. [[LR Solution...cation v.2 | Outlook](#)], [[Automatic...d by HTaaS | Outlook](#)]

## 3) Environmental assessment scope (EIA screening/scoping)

Please provide:

- any **EIA screening opinions**, screening requests, and screening determinations.
- any **EIA scoping opinions**, scoping requests, and scoping determinations.
- the list of environmental topics scoped in/out, including the written reasons.

## 4) Air Quality Assessment (AQA) including NEE

Please provide:

- the A4 **Air Quality Assessment report(s)** and supporting technical appendices.
- the modelling methodology and assumptions.
- confirmation whether the assessment includes **non-exhaust emissions (NEE)** (tyre wear, brake wear, road surface abrasion, resuspension), and if not, the reasoned justification for exclusion.
- any receptor-level outputs (schools, hospitals, residential areas) and any cumulative impact assessments.

## 5) Water/runoff and SuDS evidence (where relevant)

Please provide:

- drainage strategy documents and any SuDS/separator plans for the A4 proposals.
- any assessments that quantify particulate runoff impacts or treatment node assumptions (if used in appraisal). [[Automatic...d by HTaaS | Outlook](#)]



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## 6) Consultation handling and reporting

Please provide:

- the **consultation report** and/or decision statement summarising feedback and WECA's response.
- logs or summaries showing how submissions were recorded and considered (including technical evidence submissions).
- any officer briefing notes prepared for decision-makers summarising consultation inputs.  
[\[Automatic...d by HTaaS | Outlook\]](#)

## 7) Health and equality assessments

Please provide:

- any **Health Impact Assessment (HIA)** and **Equality Impact Assessment (EqIA)** (or equivalent public-health/equalities analyses) prepared for the A4 corridor proposals.

## 8) Consultant reports and instructions

Please provide:

- any consultant reports used as the basis for appraisal/environmental assessments.
- any instructions to consultants on appraisal horizons, mode inclusion/exclusion, or scope limitations relevant to bus/BRT vs rail options. [\[LR Solutio...cation v.2 | Outlook\]](#)

## 9) Risk registers and governance records

Please provide:

- programme risk registers and issue logs relating to environmental compliance, air quality, and appraisal defensibility.
- minutes/notes from relevant programme boards where appraisal scope or environmental scope were discussed.

**Timeframe:** Please provide documents covering the period **1 January 2023 to present** (or the earliest available date if earlier documents are integral to the current scheme).

**Format:** Electronic copies (PDF/Word/Excel), with appendices and working papers included.

**Refusal**



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If any part of this request is refused, please:

- specify the exemption(s) relied upon,
- provide the public interest test reasoning where applicable, and
- confirm what can be disclosed within scope (partial disclosure).

Yours faithfully,

[Your name]

[Your contact details]



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## B) FOI Request Draft — Gloucester Road (A38) Starter Line / Bristol Mass Transit (WECA)

**Subject:** FOI request — Gloucester Road (A38) mass transit: decision records, options appraisal, air quality (incl. NEE), and EIA scope

**To:** Freedom of Information Officer / Information Governance

**Organisation:** West of England Combined Authority (WECA)

Dear FOI Officer,

I am requesting information under the Freedom of Information Act 2000 relating to WECA's work on the **Gloucester Road (A38) corridor** and any mass transit proposals, including any bus/BRT and rail-based (VLR/tram/tram-train) options, and how these have been assessed over long-term appraisal horizons. [[LR Solution...cation v.2 | Outlook](#)]

### 1) Decision record(s)

Please provide copies of any **formal decisions** (cabinet/committee/delegated officer/programme board) that:

- approve a preferred mode or approach for Gloucester Road.
- exclude rail-based options from further development.
- approve the appraisal horizon used for bus/BRT vs rail options. [[LR Solution...cation v.2 | Outlook](#)]

Include decision dates, decision-maker, the report/agenda item, and appendices.

### 2) Options appraisal (longlist/shortlist and rationale)

Please provide:

- the options **longlist/shortlist** for Gloucester Road.
- the rationale for excluding any options.
- any documents showing whether VLR/tram options were assessed as “reasonable alternatives.” [[LR Solutio...cation v.2 | Outlook](#)]



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### 3) Economic case and BCR tables (mode-by-mode)

Please provide:

- PV benefits/costs working papers.
- **BCR tables** for Gloucester Road options (bus/BRT and any rail/VLR options).
- any documentation explaining appraisal horizon differences (e.g., 10–15 year bus vs 25–30 year rail). [[LR Solution...cation v.2](#) | [Outlook](#)]

### 4) Environmental assessment scope (EIA screening/scoping)

Please provide:

- EIA screening/scoping requests and determinations for Gloucester Road.
- topic scoping tables (in/out) and reasons.

### 5) Air Quality Assessment including NEE

Please provide:

- Air Quality Assessment report(s) and appendices for Gloucester Road.
- whether the assessment includes **NEE** (tyre/brake/road wear/resuspension), and if not, the written justification.
- receptor-level outputs and any cumulative impact assessments.

### 6) Consultation handling and reporting

Please provide:

- consultation reports/decision statements relating to mass transit on Gloucester Road.
- logs/summaries of technical evidence submissions and how they were considered.
- officer briefing notes to decision-makers relating to mode choice or appraisal framing.

### 7) Health and equality assessments

Please provide:

- any HIA / EqIA (or equivalent) for Gloucester Road mass transit options.



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## 8) Consultant reports and instructions

Please provide:

- consultant reports covering Gloucester Road appraisal/feasibility.
- any instructions to consultants limiting mode scope or setting appraisal horizons that differ by mode.  
[\[LR Solution...cation v.2 | Outlook\]](#)

## 9) Risk registers / governance minutes

Please provide:

- risk registers and issue logs relating to air quality compliance, appraisal defensibility, and statutory approval risks.
- minutes/notes where environmental scope, NEE, or appraisal parity were discussed.

**Timeframe:** Please provide documents covering **1 January 2023 to present** (or earliest available if earlier documents underpin current decisions).

**Format:** Electronic copies, including appendices and working papers.

If any part is refused, please provide exemptions relied upon and any public interest test reasoning.

Yours faithfully,

[Your name]

[Your contact



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## Add-On for BOTH FOI Requests (paste into A4 and Gloucester Road letters)

### 10) Lifecycle standards and environmental management frameworks

Please confirm and provide documents showing:

1. Whether WECA applies **lifecycle assessment standards** in the appraisal or environmental assessment of the scheme, including (but not limited to):
  - **ISO 14040 / ISO 14044** (Life Cycle Assessment principles and requirements), or
  - any alternative lifecycle framework used to assess whole-life environmental impacts.
2. Whether WECA applies an **Environmental Management System (EMS)** or equivalent governance framework to corridor programmes, including:
  - **ISO 14001** (Environmental Management Systems), or
  - any internal policy that performs an equivalent function (aspects/impacts register, legal compliance register, monitoring and continual improvement).
3. If ISO 14040/14044 and/or ISO 14001 are **not** applied:
  - the written **policy rationale** for non-adoption, and
  - details of any **alternative standards or guidance** used to ensure whole-life environmental impacts (including air quality and non-exhaust emissions) are identified, assessed, mitigated, and monitored.
4. Any **internal guidance, checklists, or sign-off notes** instructing officers or consultants on:
  - treatment of **non-exhaust emissions (NEE)** in appraisal and EIA/AQA,
  - appraisal **horizon parity** across modes (bus/BRT vs rail), and
  - lifecycle treatment of air, health, and runoff impacts.
5. Any **internal correspondence or briefing notes** discussing:
  - the relevance or materiality of NEE,
  - lifecycle or ISO-style assessment requirements, or
  - legal/audit risk associated with environmental scope or appraisal parity.

**Format:** Please provide electronic copies (PDF/Word/Excel), including appendices and working papers.

**If withheld:** Please specify the exemption(s) relied upon and provide the public interest test reasoning where applicable.



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## Handy add-on (optional, if we want to force clarity on lifecycle/ISO usage)

If we want to attach a short “standards clarification” question-set, you already have a WECA standards/FOI roadmap asking about ISO lifecycle standards usage (14040/14044).

### What you now have (final state)

#### 1) A4 Bristol–Bath FOI

- Complete FOI letter
- Includes **Section 10 (Lifecycle / ISO 14040–44 / ISO 14001)**
- Ready to send to **both**:
  - **WECA FOI inbox**
  - **WECA Democratic Services** (to ensure decision records are captured)

#### Use this header when sending:

To: [foi@westofengland-ca.gov.uk](mailto:foi@westofengland-ca.gov.uk)

Cc: [democratic.services@westofengland-ca.gov.uk](mailto:democratic.services@westofengland-ca.gov.uk)

Subject: FOI request – A4 Bristol–Bath corridor: decisions, appraisal, air quality (incl. NEE), lifecycle standards

#### 2) Gloucester Road (A38) FOI

- Complete FOI letter
- Includes **Section 10 (Lifecycle / ISO standards)**
- Ready to send to **both**:
  - **WECA FOI inbox**
  - **WECA Democratic Services**

#### Use this header when sending:

To: [foi@westofengland-ca.gov.uk](mailto:foi@westofengland-ca.gov.uk)

Cc: [democratic.services@westofengland-ca.gov.uk](mailto:democratic.services@westofengland-ca.gov.uk)

Subject: FOI request – Gloucester Road (A38): decisions, appraisal, air quality (incl. NEE), lifecycle standards



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## Why sending to BOTH matters

- **FOI inbox** → statutory disclosure clock starts (20 working days).
- **Democratic Services** → captures **cabinet/committee/delegated decisions**, minutes, and officer reports (often missed by FOI teams unless explicitly copied).

*This is exactly the pairing a public-law solicitor would expect to see.*

## What to do next (no extra drafting needed)

1. Send **two separate emails** (one per corridor) using the headers above.
2. Save the sent emails as **PDFs** (this preserves your JR audit trail).
3. Diary **Day 20** for responses; if partial, request **internal review** immediately.

*NB Blue references have already been submitted to WECA and predecessors*

*This document is for guidance only*