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Interested Party Written Representation to Planning Inspectorate, Development Consent Order for the Portishead Branch Line, MetroWest Phase 1: Summary

1: Insufficient demand

There is no evidence to indicate that many commuters would give up the point-to-point and low-cost convenience of their cars, or switch from the existing, relatively cheap and convenient bus service.

Forecasted initial passenger numbers show that even on the busiest days (midweek), initially only 15% of all the available seats will be occupied; i.e., on average, trains will run up and down the line 85% empty. For all trains, the average occupancy rate will obviously be lower: against the total number of seats p.a., the projected total number of passengers indicates 12% seat occupancy, i.e., on average the trains will be 88% empty.

Just two trains each midweek day are expected to run at anywhere near capacity, i.e., only 10 of the 224 trains up and down the line each week: the 8am from Portishead, with 220 passengers, and the 5pm from Bristol Temple Meads, with 201. Only six other trains each midweek day will carry 50 or more passengers (18.5% of capacity). Meanwhile, very few of the other 184 trains a week will carry as many as 30 passengers (11% of capacity).

Post-pandemic commuter numbers will be considerably lower than the estimates published in the ‘normal times’ of 2017, and it would be optimistic to assume that commuting by public transport will return to two-thirds of the previous level soon, or for the foreseeable future.

2: Trains are not convenient

While no extra trains are scheduled when needed (Portishead 7-8.30am and BTM 4.30-6pm), demand for the other ‘rush hour’ trains is so low as to take up less than 20% of the seats. Almost every other train will run with barely any passengers: off-peak buses are as convenient, if not more so.

Most of Portishead’s residents live near a bus stop, but only half live within 1000 metres (10-12 minute walk) from the proposed station.

3: Costs far outweigh benefits

With a capital cost of £116m and running costs much exceeding those for buses, there is no evidence for overall benefit.

Estimated running costs are up to £5m more than revenues for the first three years, and even with a slow growth in demand there is no evidence that revenues will ever cover costs. These trains will always be too costly and/or heavily subsidised.

4: Unwarranted increase in greenhouse gases

This scheme will cause an unjustified ongoing increase in greenhouse gases. Any net increase of CO2 breaches legally binding policy and the 2016 Paris Climate Agreement. The estimated 942 tonnes p.a. net increase in CO2 and 11.8 tonnes of NOx far outweighs the savings from fewer car commutes. And if car use to and from stations is not factored in (as it appears), the estimated net increases are too low.

There is also 340 kg p.a. increase in PM10. The proposal is for Portishead station to be situated 60 metres from a primary school; for 180 metres the railway runs 10 metres from the playing field boundary, and the school building is only 25 metres away. Diesel particulates cause and aggravate serious health problems, and before pulling away at full power, trains will stand at the station with engines idling.

The big net increase in emissions will be caused mainly by trains carrying very few people, and since there are already buses, without purpose.

The Environment Statement concludes '[t]he magnitude of CO2 change is negligible on the national scale...' This fails to acknowledge the climate emergency. The increase in NOx is also said to be 'negligible'. But it is no longer defensible to propose any increase in greenhouse gases not compensated by equal or greater reductions elsewhere.

WECA, North Somerset Council and Bristol City Council each declared a climate emergency and intentions to reduce carbon footprint. The contribution to global warming resulting from this scheme compromises local and national policy, legal requirements and international agreement.

None of these issues are adequately addressed.

5: Alternatives were not examined

Buses are twice as efficient as trains. There is no convincing case for not examining possible improvements to bus services rather than simply reinstating diesel-guzzling trains. E.g., invest in eco-buses (renewables-electric, biogas or hydrogen) for much higher energy-efficiency/far lower financial and carbon costs; road changes to prioritise buses (e.g., a bus lane on the A369 from Portishead and up past Pill); encourage bus use by subsidising fares; traffic bans, congestion charges, increased parking fees in Bristol.

Busways combine the ubiquity of bus routes with the unimpeded travel of trains: i.e., over whole journeys, much greater convenience and equal or greater rapidity; compared to trains, they also remove many more cars and buses from the roads.

With a Strail roadway abutting the existing railway track, buses could run onto, along and then off the line; they would re-join the roads at each end of the line, dropping-off and collecting passengers as normal. A segregated cycleway could run alongside the busway.

A small platform at Sheepway/Portbury Hundreds would serve Portbury.

A busway would have much lower capital and running costs, especially with eco-buses. Environmental costs (greenhouse gases, pollution, unnecessary land use) are unacceptably high with diesel trains, especially since *most* will be nearly empty and *most* passengers will have to get some distance to or from a station and will use a car. Environmental costs of a busway would be low.

The trains scheme fails to meet many National Policy Statement for National Networks (NPS NN) directives, but a busway would meet them. It would have substantially lower capital and running costs; be far more user-friendly; meet the requirement 'door-to-door journeys enhanced integration'; and mitigate the climate crisis, rather than aggravate it, as will trains.

6: The scheme compromises legal and policy requirements

Fourteen prima facie breaches of legal or policy requirements are detailed in the full Written Response. E.g., while a carbon impact is estimated, it is not good, and the local authority decision to go ahead ignores local, national (NPS NN and Government) obligations and the Paris Climate Agreement.