From:
To: Metrowest1

**Subject:** Portishead Branch Line - MetroWest Phase 1 with the Planning Inspectorate - Planning Act 2008:

Submission of Representation

**Date:** 21 September 2020 16:08:36

Attachments: The Portishead Branch Line Representation.pdf

Your Reference 20025029

TO: Planning Inspectorate, Temple Quay House, Temple Quay, Bristol, BS1 6PN SUBJECT: Application for development consent by North Somerset Council for Portishead Branch Line - MetroWest Phase 1.

Dear Sirs

We submitted our interest in commenting on the above application; confirmation of receipt was received by us on Fri 14/02/2020.

The process we should follow is not entirely clear and the deadline today is for a <u>procedural meeting</u> which provides an opportunity for representations to be made about <u>how the application should be examined</u>. It will <u>not deal with the merits</u> of the Proposed Development. All Interested Parties will have further opportunities in the course of the Examination to make detailed Written Representations and oral representations at any hearings that are held.

The form for registration for this procedural meeting is for those with an interest in attending etc. and suggests that if you wish to make a submission regarding the merits or otherwise of this application for development it should be <u>submitted directly to yourselves before the expiratory of a later deadline</u>.

We have no particular interest in the details of how this application should be examined but do wish to ensure that the comments we have made are considered. It appears that the current process allows for us to submit these comments in full and therefore we attach these as "The Portishead Branch Line Representation" in a pdf file format.

I should be grateful if you would confirm receipt and that these will be included for consideration by the Inspector.

Regards

Mike Richards Cert Arch, Dip Arch, RIBA (retd.), RWA On behalf of a further - Nine of Bristol

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## Summary of details:

Nine of Bristol



Nine of Bristol & (Mike Richards)



Your Representation:

- 1) We support the application to reuse an existing route and provide energy efficient, public transport. But the time line to completion considering the climate crisis should dictate electrification of rolling stock.
- 2) The frequency of service is too low and more passing places should be accommodated 3) A station at Ashton Gate should be provided to accommodate the needs of local residents, Bower Ashton Campus of University of the West of England
- i) Ashton Park School
- ii) The Create Centre
- iii) Ashton Court conference, visitors centre, events and theatre
- iv) Ashton Park (leisure and festivals)
- v) Bristol City, and Bristol Rugby Club football ground

Transport routes also converge on Ashton Gate with the potential for interchange:-

- *vi)* Guided bus fast route
- vii) Bristol ferry
- viii) Airport bus service
- ix) South Bristol outer circular route and Portway to Avonmouth
- x) Festival Way and other cycle routes
- 4) The Ashton Gate station, road, pedestrian and cycle access should be integrated with the proposed removal of the Plimsoll Bridge and new road, pedestrian and cycle routes
- 5) Objection to provision of additional rolling stock and upgrading of the whole line to accommodate peaks in demand at Ashton Gate run contrary to the stated aim of application
- 6) The the additional costs should be in part or all offset by the improved functionally, access and service resulting in extra revenue and capital cost offsets by joint improvements associated with the Plimsoll Bridge works.
- 7) It is a false economy to not fully plan new transport infrastructure without anticipation of a low carbon future.

## The Portishead Branch Line (Metrowest Phase 1) Order Phase 1 – app.ref. TRO40011

The reopening of passenger services of the railway branch line between Portishead and Pill, and improvement the existing railway line between Pill and Ashton Junction.

Joint Representations from 10 Bristol Citizens

We the undersigned wish to respond to the above and have our representations considered in respect to this application for development.

We request that in determining this application the Planning Inspectorate consider the following:-

- 1) The climate crisis places an imperative on all decisions we all now make to ensure the reduction or elimination of carbon in the realising, constructing, and operation (plus disposal) of our developments.
  - a) The upgrading and reuse of an existing rail line fulfils many of the objectives to decarbonise our future and we fully support the intention of this development.
  - b) The future energy source that will replace most of our carbon based energy is sustainably generated electricity. This is the case for transport generally and railways in particular.
  - c) We appreciate that the clearance under the new overbridge at Portishead is designed to accommodate future electrification of the line. The existing tunnels and bridges may not accommodate overhead electrification, but nothing should now be done that will hinder the future electrification of this railway line in full or part.
  - d) We understand the proposed rolling stock is diesel electric. This means of transport replaces much more carbon intensive alternatives by road and is welcome. But diesel electric rolling stock by passenger kilometre is not as efficient as fully electric rolling stock which should be used.
  - e) Considering that if this application is approved, the earliest date for operation of the service is in 2024/25; this is half way through the 9 years left of our estimated expenditure of the carbon budget to stay within 1.5degs. As a consequence we believe diesel will not be an option in 5 years time and the need for electrification will be unassailable.
  - f) The railway line between Pill and Ashton Gate runs through an exceptional landscape, the gorge and below the Clifton suspension bridge, and is of international significance. If full future electrification is undertaken only the least visually intrusive single post and cantilever arm support should be considered.
  - g) If part electrification of the line is the most economic and practical solution, rolling stock would run using either battery power or overhead line. Such stock is available now and is in demand elsewhere. Before the line is opened it is not unreasonable to expect design and technical development of this mixed powered rolling stock and therefore in this development should be constructed now to run electric rolling stock..
- 2) The frequency of service, as well as the journey time, is key to the success of any railway
  - a) "A second stage may be promoted separately in the future, to upgrade to a half hourly service. This second stage would require separate statutory processes, business case and funding package. There is currently no programme for the second stage". PORTISHEAD BRANCH LINE DCO SCHEME ENVIRONMENTAL STATEMENT, VOLUME 1, NON TECHNICAL SUMMARY 2.1.1.

- We consider that this should be implemented now to help mitigate the climate crisis, to accommodate the new demand at Ashton Gate, and as stated below.
- b) The journey from Portishead to Temple Meads is predicted to take about 23 minutes, and the proposed service at 1 hour intervals.
  - "The service between Portishead and Bristol Temple Meads would take 23 minutes and stop at Pill, Parson Street, and Bedminster.
  - "The alternative 'hourly plus' service involves passenger trains operating every 45 minutes during peak period." PORTISHEAD BRANCH LINE DCO SCHEME ENVIRONMENTAL STATEMENT, VOLUME 1, NON TECHNICAL SUMMARY 2.4.1, 2.4.2
- c) We think that most people would consider the proposed 1 hour service frequency limiting and the hourly plus frequency of 45 minutes inadequate. Considering the urgent need to develop public transport alternatives, and encourage the use of this railway in particular; this service frequency is too low.
- d) In the worst case, to make a connection with half hourly trains to London, a journey from Portishead might include 40 minute wait to leave Portishead, plus 23 minute journey followed by a wait of 25minutes at Temple Meads – a total of 1hr 27mins. If train departing times were co-ordinated at both ends of this journey, the best case, the time would be about 25 minutes but realistically many would consider they would need to plan connections and leave at least 1 hour. If the perception of a connection time is this long, other means of transport begin to compete.
- e) The number of passing places should be increased to ensure that the frequency of service can be improved in the future.
- 3) The application for the proposed development does not include a station at Ashton Gate. We consider a station should be included for the following reasons:
  - a) The potential to increase service frequency is improved if a station and passing place are located at Ashton Gate.
  - b) Bedminster station is about 0.9 mile from Temple Meads, Parson Street a similar distance further away from this important terminal. The next station is at Pill, about 5.7miles beyond the city boundary, Of this section of line about 1.1miles are in the built-up area of the city to Ashton Gate. We suggest the spacing of urban stations should not be more than 0.5 mile apart (15minute walk). This would place a new station at Ashton Gate. It should be noted that to the north, on the other existing branch line from Temple Meads to Sea Mills, the stations (Clifton Down, Redland, Montpelier, Stapleton Road, Lawrence Hill). are spaced at 0.5 miles, half of that on the proposed new passenger line.
  - c) Historically there was a railway station located at Ashton Gate, at the request of and, to serve Ashton Court Mansion.
  - d) In addition to the existing and recent residential area developments in the area, there are currently important uses and institutions that an Ashton Gate station would serve:
    - i) Bower Ashton Campus of University of the West of England
    - ii) Ashton Park School
    - iii) The Create Centre
    - iv) Ashton Court conference, visitors centre, events and theatre
    - v) Ashton Park (leisure and festivals)

- vi) Bristol City, and Bristol Rugby Club football ground and proposed 230 bedroom hotel, 30,000 sq ft office and 165 dwelling, 4,000 place conference centre which, subject to planning permission, will open at the same time as the proposed railway.
- e) Transport routes also converge on Ashton Gate with the potential for interchange:
  - i) Guided bus fast route
  - ii) Bristol ferry
  - iii) Airport bus service
  - iv) South Bristol outer circular route and Portway to Avonmouth
  - v) Festival Way and other cycle routes
- f) A station at Ashton Gate would also reinforce existing and new commercial activity in the immediate area.
- g) The proposed demolition of the Plimsoll Bridge and associated elevated road structures (necessitated by the excessive maintenance costs) provides the potential for the integration of a new station at Ashton Gate.
- 4) A new station at Ashton Gate should:
  - a) be planned to give primacy to pedestrian and cycle access integrated with that of the Plimsoll bridge replacements
  - b) give good pedestrian and cycle route access to all 3 d), 3 e) and 3 f) above.
- 5) Objections to creation of a new station at Ashton Gate have been cited, namely:
  - i) Cost of station construction, road improvements and access, associated parking etc.
  - ii) The need to accommodate heavy peak demand arising from:-
    - (1) Football and rugby matches at Bristol City football ground and most weekends during the season.
    - (2) Ashton Park festivals i.e. Balloon, Kite, Music, occasionally during summer.
  - iii) These peaks require longer stations and more rolling stock and better access which is needed along the whole line.
- 6) However these have to be considered in the context of the primary purpose of this railway. It does not make sense to bypass all of the public facilities at Ashton Gate because the railway is to be built with a limited capacity. The proposed railway line's design should not foreclose provision for these peak demands, limiting operational policy and a possible increase of service frequency; for instance, a shuttle service between Temple Meads and Ashton Gate. The climate crisis and carbon budget militates against anything that reduces our ability to reduce carbon based activities, reduce energy consumption; this railway has this function. Further extra capital and revenue costs will be offset by:
  - a) Additional use (ticket payments) and the facility provided
  - b) The integration of the new station access with the proposed new and simplified road layout replacing the Plimsoll Bridge should have opportunity for considerable cost savings.
- 7) We believe that new transport infrastructure should anticipate a low carbon future and serve the needs of the communities it passes through. It is a false (dangerous) economy not to properly build this into the proposals for this railway line.
  - The non-technical summary of the submission states what are considered to be the benefits of

the proposed railway line:-

"The DCO Scheme is predicted to provide:

- employment generation through additional train drivers, train managers, station and facilities managers and infrastructure maintenance;
- reduced journey times and congestion; and

TECHNICAL SUMMARY 4.8.5, 4.8.6

- wider regeneration benefits throughout Portishead, Pill and the West of England.
- "Measures incorporated into the design to promote wellbeing and improved access for vulnerable groups include:
- ensuring that the new stations are accessible by all modes of transport and facilitates walking, cycling and other public transport trips to and from the stations"

  PORTISHEAD BRANCH LINE DCO SCHEME ENVIRONMENTAL STATEMENT, VOLUME 1, NON

We applaud these but say they are partial in effect. These benefits are not equitably provided along the route of the railway line; the line runs through the Ashton Gate area with no access for vulnerable groups, potential users and employees who live and work in this area of Bristol.

8) Finally we do not wish to delay this important improvement to Bristol's transport infrastructure. We urge the Inspectorate to approve this development, conditioned as necessary, but with the proviso that nothing is done that may impede concurrent or future improvements similar to those suggested above.

## With respect

Johnny Devas AA Dip MSt Cantab RIBA, Rachel Devas, Prof J P Dunne, BSc, MA, PhD, Richard Graydon BA, Jane Hopkins, BA(Hons), Susan Kilroe BA, MA, SRN RMN, Dip Agric., Robina Mallett, BA, OBE, Shaun Murphy, Michael Richards, Cert.Arch., Dip.Arch. RIBA, RWA, Emily Ryan.

17<sup>th</sup> February 2020