

SOUTH WEST OFFICE

Mr Steve Penaluna North Somerset Council Town Hall

Weston Super Mare

Direct Dial:

Our ref: PL00198843

15 November 2017

Dear Mr Penaluna

Portishead Branch Line (MetroWest Phase 1) Development Consent Order.

Thank you for consulting Historic England on the above proposals.

We previously advised that the local authority requested an EIA in relation to the historic environment, as we identified a number designated heritage assets along the route of the Portishead Branch Line that may be affected. These included a concentration of several highly-graded assets in the area where the Floating Harbour meets the River Avon (to include the Clifton Suspension Bridge, listed Grade I), the Registered Park and Garden at Ashton Court (Grade II*) and three Scheduled Monuments to include Clifton Down Camp, Stokeleigh Camp, and part of the Roman settlement in Abonae. A comprehensive list of the identified heritage assets is included within the Preliminary Environmental Information Report (PEIR). Many of these assets are designated as grade I and II*, and as such are in the top 8% of listed buildings. Therefore, greater weight should be given to their conservation. The National Planning Policy Framework (NPPF) defines 'conservation' as 'the process of maintaining and managing change to a heritage asset in a way that sustains and, where appropriate, enhances its significance'.

In addition to highly-graded heritage assets, there are many additional identified designated and undesignated heritage assets that may be impacted by the proposals. We are aware that you have consulted with the conservation specialists of the relevant local authorities, and the PEIR examines the cumulative impacts in section 8.8. This includes the impact of the proposed removal of existing historic railway infrastructure as part of the construction phase. As those assets identified are undesignated, we would defer to the local authority in respect to the demolition of key historic structures and a programme of recording should removal be accepted.



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With regard to potential impacts upon the setting of highly-graded assets, Registered Parks and Gardens and Scheduled Monuments, there are varying degrees of intervisibility with the DCO scheme. In terms of the construction phase, the potential impacts identified in the PEIR include the clearance of vegetation along the route of the existing line. At present the visibility of the line and its route is low (but varied) as a result of the density of undergrowth and extending tree crowns over the line. The extent of clearance has potential to change the appearance of the western side of the Avon Gorge, particularly when viewed from elevated historic areas and heritage assets on the Clifton side of the gorge. We understand that the clearance in this area as outlined in section 8.6.29 of PEIR will be limited, and on the basis that this will be confined to essential removal, we do not consider that a greater visibility of the railway will impact adversely on aspects of setting of assets that contribute to their significance.

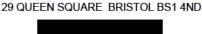
We believe that the most visual impact upon setting would be as a result from the proposed security fencing on both sides of the railway. The cumulative impact of fencing, the proposed communications mast and new signals would draw attention to the operating railway, together with the projected frequency of passenger trains (20 per day, Monday to Saturday). We advise that the impact of new equipment and design/finishes of fencing is carefully considered. We acknowledge that further engineering designs will be prepared as minuted at a stakeholders meeting on 24th October 2017. We understand that a 3-5m clearance from each of the running rails will be required, and following further design work it would beneficial for us to see some visuals to appreciate the levels of impact. This should also include details and locations of the proposed lighting associated with signalling etc.

With regard to the proposed GSM-R repeater mast, it would useful to have confirmation of exactly where these are to be positioned in the vicinity of the Clifton Suspension Bridge.

We support the principle of this infrastructure project and recognise the benefits of reopening the disused line to expand upon Bristol's sustainable transport provision. There is likely to be some impact upon the historic environment, but from the information submitted, it seems unlikely that this will be considered harmful. We would be happy to attend any future stakeholders meetings and comment upon the proposals as they develop.

Central to our consultation advice is the requirement of the Planning (Listed Buildings









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and Conservation Areas) Act 1990 in Section 66(1) for the local authority to "have special regard to the desirability of preserving the building or its setting or any features of architectural or historic interest which it possesses". Section 72 of the act refers to the council's need to pay special attention to the desirability of preserving or enhancing the character or appearance of the conservation area in the exercise of their duties. When considering the current proposals, in line with Para 128 of the NPPF, the significance of the asset's setting requires consideration. Para 132 states that in considering the impact of proposed development on significance great weight should be given to the asset's conservation and that the more important the asset the greater the weight should be. It goes on to say that clear and convincing justification is needed if there is loss or harm.

Yours sincerely,

Stephen Guy

Inspector of Historic Buildings and Areas @historicengland.org.uk



