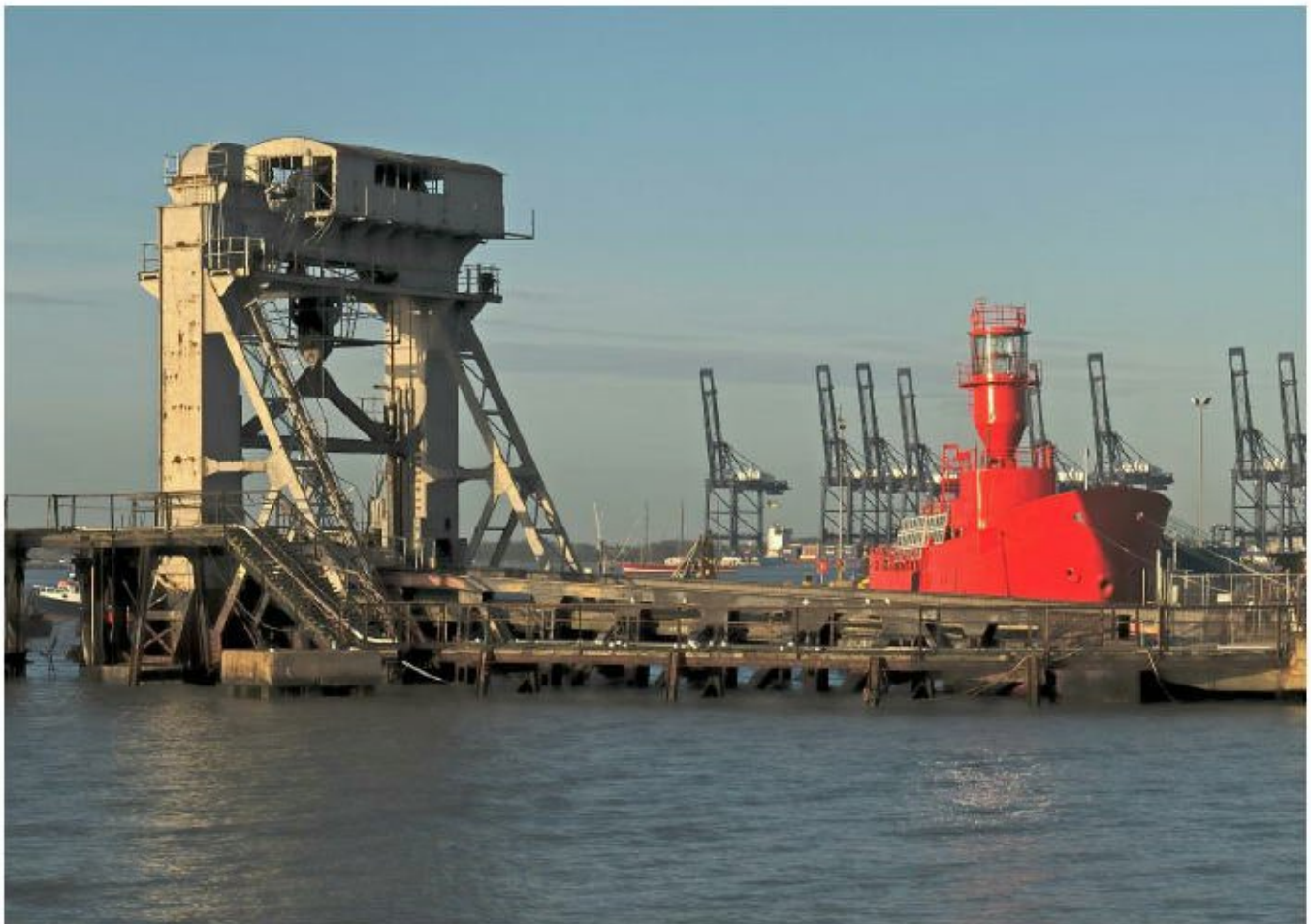


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# Planning Statement – Listed Building Consent Application

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Train Ferry Gantry, George Street, Harwich CO12 3JW



# Planning Statement

Train Ferry Gantry, George Street, Harwich CO12 3JW

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## Contents

1.	Introduction	1
2.	Background And Description Of Application	2
3.	Statutory Duties and Policy Context	5
4.	Planning Assessment	9
5.	Conclusion	13

## 1. Introduction

- 1.1. This Planning Statement has been prepared on behalf of Hutchison Ports (UK) Limited ('HPUK') to support an application for listed building consent that is submitted to Tendring District Council (hereafter 'TDC') in respect of the works to the Grade II listed Train Ferry Gantry.
- 1.2. This is a replacement application to the consent granted on 14 February 2013 under application reference 10/00204/LBC "*Application for replacement listed building consent (in respect of listed building consent 03/00602/LBC) subject to a new time limit (to 2021) for the partial demolition of the long berthing arm attached to the listed Train Ferry Gantry and associated remedial works*". Consent was granted subject to 5 conditions.
- 1.3. This application relates to the consented Bathside Bay Container Terminal development (hereafter 'BBCT') that is being implemented pursuant to planning permission 10/00202/FUL, granted by TDC on 14 February 2013. This planning permission authorises the reclamation of Bathside Bay and the construction and subsequent operation of a new 122ha deep sea container port facility (1.4km length quay) with associated rail terminal and buildings. The development includes the creation of a Small Boat Harbour (the 'SBH') to provide a sheltered marine environment with facilities for both fishing and recreational boats (planning permission 10/00203/FUL also dated 14 February 2013). HPUK intends to start work in January 2022.
- 1.4. The grant of the aforementioned planning permissions and listed building consent were unsuccessfully challenged by way of a judicial review filed in May 2013. Section 91(3B) of the Town and Country Planning Act 1990 and Section 18 of the Planning (Listed Buildings and Conservation Areas) Act 1968 provide for an extension of time limiting conditions by a year where the validity of a planning permissions and listed building consents have been challenged in this way. Therefore, the requirements are now that the developments must be begun on or before 29 March 2022.
- 1.5. Partial demolition of the long-berthing arm to the Train Ferry Gantry is required to enable marine access into the SBH.
- 1.6. This Planning Statement describes the application and the planning context. Consideration is given to the principle of the development and the impact of the proposed development, which is assessed against the relevant development plan policies and other material considerations.
- 1.7. This Statement is structured under the following headings:
  - Section 2 - Application Description
  - Section 3 - Statutory Duties and Policy Context
  - Section 4 - Assessment
  - Section 5 - Conclusions
- 1.8. In the next section we set out the background and context for this application.



## 2. Background And Description Of Application

### 2.1. Harwich Train Ferry Gantry

- 2.1.1. The Train Ferry Gantry is identified at Figure 1 below and is Grade II listed under 'Harwich Train Ferry Berth' and entry number '1187897', first listed on 17 June 1987 and most recently amended on 16 April 2021. It was entered on Essex County Council's Buildings at Risk Register in 1995, with a priority E rating, indicating it is 'under repair or in fair to good repair but no uses identified'.
- 2.1.2. The Harwich train ferry was operational until 1987, when the facility became redundant, along with the railway sidings and marshalling yard to the south and west of the site. The train ferry berth is significant for its associations with the First World War and because it served the first Cross-Channel train ferry service. None of the original ferries are believed to survive.
- 2.1.3. The Train Ferry Gantry is located at George Street and is within the Harwich Conservation Area and Harwich Historic Towns. It is owned by HPUK, but is situated in an operation yard with no public access.



Figure 1: List Entry Map (Historic England)

- 2.1.4. The Train Ferry Gantry is made-up of several component parts, which are described in the Heritage Statement prepared by Alan Baxter Associates. Technically the 'gantry' relates to the steel tower that straddles the linkspan, but it is generally used to refer to the whole structure and is the description provided in the statutory list.







## Planning Statement

Train Ferry Gantry, George Street, Harwich CO12 3JW



2.2.3. The permission for BBCT, SBH and the Train Ferry Gantry are bound together by a Section 106 Legal Agreement between HPUK and TDC and Essex County Council dated 15 October 2004 (as subsequently amended). This requires:

- 11.2 - The Owner shall not Implement the Container Terminal Development or the Small Boat Harbour Development unless and until the Maintenance Scheme set out in Annex 1 to this deed has been updated to reflect changes in the condition of the Train Ferry Gantry from November 2003 and such updated Maintenance Scheme has been submitted to and approved in writing by the Council
- 11.3 - Prior to carrying out any works for the demolition or alterations of the Train Ferry Gantry the Owner shall submit a scheme and programme for its illumination to the Council for approval and following completion of the Small Boat Harbour Development shall implement and maintain the approved scheme and programme.
- 11.4 - Prior to making the Small Boat Harbour Development available for use the Owner shall install and thereafter maintain an interpretation board within the Small Boat Harbour Development which shall relate to the Train Ferry Gantry.

2.2.4. This application does not alter the obligations of the existing Section 106 Agreement (2004) and HPUK will be submitting a Maintenance Schedule shortly in accordance with the terms of this obligation.

### 2.3. Application Content

2.3.1. To the seaward end of the gantry are 2 berthing arms, which were used for the docking of train ferries. The southern arm is some 106m long and is required to be shortened to facilitate marine access to the SBH.

2.3.2. This is a repeat application to that approved previously. Listed building Consent is sought for: "*Partial demolition of the ling berthing arm attached to the listed Train Ferry Gantry and associated remedial works*".

2.3.3. The application comprises the following information:

- Application form and Certificate A
- Planning Statement (Savills)
- Heritage Statement (Alan Baxter Associates)
- Design and Access Statement (Alan Baxter Associates)
- OS Site Location Plan
- Block Plan
- Existing Train Ferry Pier Plans, sections & Details (ref: H1002/04)
- Existing Tram Ferry Pier Gantry & Adjustable Bridge Details (ref: H1002/05)
- Train Ferry Pier Extents of Demolition (ref: H1002/06)

2.3.4. The next section sets out the planning policy context.



### 3. Statutory Duties and Policy Context

#### 3.1. Planning (Listed Buildings and Conservation Areas) Act 1990

- 3.1.1. Listed building consent is required for any works for the demolition, alteration or extension of the structure in any manner which would affect its character as a building of special architectural or historic interest.
- 3.1.2. Under Section's 16 and 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990, it is a statutory duty when considering works/development that affect a listed structure or its setting that special regard should be had to the desirability of preserving the building or its setting or any features of special architectural or historic interest
- 3.1.3. Under Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990, within a conservation area that the local planning authority should pay special attention to the desirability of preserving or enhancing the character or appearance of that area.

#### 3.2. National Planning Policy Framework (2021)

- 3.2.1. Planning law requires that where regard is to be had to the development plan for the purpose of any determination made under the Planning Acts, the determination must be made in accordance with the plan unless material considerations indicate otherwise<sup>1</sup>.
- 3.2.2. The NPPF requires an application to describe the significance of any heritage assets affected (paragraph 194) and requires local planning authorities to identify and assess the particular significance of any heritage asset that may be affected by a proposal, including development affecting the setting of a heritage asset (paragraph 195).
- 3.2.3. In determining applications, local planning authorities are required to take into account whether proposals are sustaining and enhancing the significance of heritage assets and putting them into viable uses consistent with their conservation; the "*positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality*"; and the "*desirability of new development making a positive contribution to local character and distinctiveness*" (paragraph 197). When considering the impact of a proposed development on the significance of a designated heritage asset, paragraph 199 states that great weight should be given to the asset's conservation. Any harm to a designated heritage asset should require clear and convincing justification (paragraph 200).
- 3.2.4. Paragraph 202 states that where a development proposal will lead to a less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.
- 3.2.5. Paragraph 206 advises that local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets to enhance or better reveal their significance.

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<sup>1</sup> Section 38(6) of the Planning & Compulsory Purchase Act 2008 and Section 70(2) of the Town and Country Planning Act 1990



3.2.6. Paragraph 207 addresses harm to the significance of conservation areas. It states that not all elements of a conservation area will necessarily contribute to its significance.

### 3.3. Development Plan

3.3.1. The development plan comprises Tendring District Local Plan (2007) and the North Essex Authorities' Shared Strategic Section 1 Plan (2021).

3.3.2. There is an emerging plan called the 'Tendring District Local Plan 2013-2033 and Beyond – Publication Draft' (2017) that has been submitted for examination. Main modifications to the Plan have been consulted on. The emerging Plan holds material weight in planning decisions. NPPF paragraph 48 states that local planning authorities may give weight to relevant policies in emerging plans subject to the stage of preparation of the emerging plan, extent to which there are unresolved objections to relevant policies and the degree of consistency of the relevant policies with the Framework. The emerging Plan is considered to hold material weight in planning decisions

3.3.3. The key policies of relevance to this application are adopted Policies QL9 'Design of New Development', QL11 'Environmental Impacts and Compatibility of Uses', EN17 'Conservation Areas', EN20 'Demolition within Conservation Areas', EN21 'Demolition of a Listed Building', EN22 'Extensions or Alterations to a Listed Building', EN30 'Historic Towns' and SP7 'Planning Shaping Principles' and emerging Policies SPL 3 'Sustainable Design', PP 14 'Priority Areas for Regeneration', PPL 8 'Conservation Areas' and PPL 9 'Listed Buildings'.

3.3.4. Paragraph 9.81 of the Tendring District Local Plan (2007) notes that the train ferry service from Harwich was discontinued in 1987, but the Grade II listed train gantry and "linkspan" remains. Proposals for Bathside Bay and the small boat harbour involve removing the long arm of the berthing pier that is attached to the gantry. The structure, which is a "Building at Risk", is to be retained as a local heritage attraction and properly maintained by the owner as part of the Bathside Bay development proposals.

3.3.5. Policy QL9 'Design of New Development' states that all new development should make a positive contribution to the quality of the local environment and protect or enhance local character. This corresponds with Policy QL11 'Environmental Impacts and Compatibility of Uses', which states that all new development should be compatible with surrounding land uses and minimise any adverse environmental impacts. Development will only be permitted if it will not lead to material loss or damage to important environmental assets such as buildings of architectural interest, the historic environment, water courses, important archaeological sites and monuments and areas of conservation, recreation, ecological or landscape value.

3.3.6. Policy EN17 'Conservation Areas' states that development within a Conservation Area must preserve or enhance the character or appearance of the Conservation Area. Development will be refused where:

- a) It would harm the character or appearance of the Conservation Area, including historic plan form, relationship between buildings, the arrangement of open areas and their enclosure, grain, or significant natural or heritage features;
- b) The height, siting, form, massing, proportions, elevation, design, or materials would not preserve or enhance the character of an area;
- c) for development located outside a Conservation Area it would prejudice the setting and surroundings of a Conservation Area or harm the inward or outward views;



- d) the proposed land use would not preserve or enhance the function and character of a Conservation Area; or
- e) It would involve the demolition of a building or structure positively contributing to the character or appearance of the area.

3.3.7. Policy EN20 'Demolition within Conservation Areas', states that proposals must retain buildings, structures and features that make a positive contribution to the character or appearance of a Conservation Area. The demolition of a building or structure in whole or part that makes such a contribution will only be permitted where:

- a) supporting evidence is submitted with the application which demonstrates that the building is beyond economic repair (unless caused by the deliberate neglect of the owner); or
- b) viable alternative uses cannot be found and an applicant has supplied evidence to demonstrate this to the satisfaction of the local planning authority; and
- c) the redevelopment would both preserve the area's character and would produce substantial benefits that would outweigh the loss of the building or structure in whole or part.

3.3.8. Demolition will not be approved in the absence of detailed plans for the site's redevelopment, previously submitted to and approved by the Council. Conditions will be imposed or planning obligations sought in order to:

- i. ensure the construction of the replacement building/structure(s) occurs within a reasonable and specified time period; and/or
- ii. secure the satisfactory landscaping of the site

3.3.9. Policy EN21 'Demolition of a Listed Building' states that proposals to demolish, in whole or in part, a Listed Building will only be permitted in exceptional circumstances and where the applicant demonstrates to the satisfaction of the Council that:

- a) it is not possible to continue to use the building in its current or previous use;
- b) it is clearly demonstrated that it is not possible to find another viable use for the building;
- c) demolition will not cause material harm to the structure or setting of any other Listed Building; and
- d) where relevant the character or appearance of the conservation area in which the building is situated will be preserved or enhanced.

3.3.10. Where consent is granted for the demolition of a Listed Building:

- a) demolition shall not take place until detailed proposals for the site's future use have been granted planning permission and a contractual obligation signed to undertake those works; and
- b) a suitable programme has been arranged to record those features of historic interest that would be lost in the course of the demolition works.

3.3.11. Policy EN22 'Extensions or Alterations to a Listed Building' states that development involving proposals to extend or alter a Listed Building will only be permitted where:

- a) it would not result in the damage or loss of features special architectural or historic interest; and



- b) the special character and appearance or setting of the building would be preserved or enhanced.
- 3.3.12. Policy EN30 'Historic Towns' states that any proposals for development within the Historic Centres of Harwich, Manningtree and St. Osyth will require an appropriate level of archaeological mitigation prior to development.
- 3.3.13. Policy SP 7 'Place Shaping Principles' states that all new development must meet high standards of urban and architectural design and must protect and enhance assets of historical or natural value.
- 3.3.14. Draft Policy SPL 3 'Sustainable Design' states that all new development (including changes of use) should make a positive contribution to the quality of the local environment and protect or enhance local character. The design and layout of the development should maintain or enhance important existing site features of landscape, ecological, heritage or amenity value.
- 3.3.15. Draft Policy PP 14 'Priority Areas for Regeneration' identifies Harwich Old Town as a priority area. The Council will seek to preserve or enhance the heritage historic assets of these areas.
- 3.3.16. Draft Policy PPL 8 'Conservation Areas' states that new development within a designated Conservation Area, or which affects its setting, will only be permitted where it has regard to the desirability of preserving or enhancing the special character and appearance of the area, especially in terms of:
- a) scale and design, particularly in relation to neighbouring buildings and spaces;
  - b) materials and finishes, including boundary treatments appropriate to the context;
  - c) hard and soft landscaping;
  - d) the importance of spaces and trees to the character and or appearance; and
  - e) any important views into, out of, or within the Conservation Area
- 3.3.17. Draft Policy PPL 9 'Listed Buildings' states that proposals for new development affecting a listed building will only be permitted where they will protect its special architectural or historic interest, its character, appearance, fabric, and:
- a) are explained and justified through an informed assessment and understanding of the significance of the heritage asset and its setting; and
  - b) are of a scale, design and use materials and finishes that respect that respect the listed building and its setting.
- 3.3.18. Also material is the Harwich Conservation Area Review undertaken by TDC in 2006, which identifies the quay as being in the heart of Harwich and the importance of the medieval street plan and vistas of the Stour and the Orwell. The 'Regeneration of the Old Harwich' Masterplan (2005) is classed as an interim Supplementary Planning Document and identifies the Train Ferry Gantry as a landmark.
- 3.3.19. The next section assesses the application proposal against relevant planning policy.



## 4. Planning Assessment

4.1.1. This section assesses the application proposal in the context of the planning context provided in earlier sections of this Statement. In determining applications for listed building consent, there is a legal requirement that Councils have special regard to the desirability for preserving the building or its setting or any features of special architectural or historic interest it possesses. TDC have previously discharged this duty when granting listed building consent for the same development as the current application proposal.

### 4.2. Principle of Development

4.2.1. By explicitly referencing the proposed scheme in paragraph 9.81 of the Tendring District Local Plan (2007), it is clear that the Council are strongly supportive of the proposals.

4.2.2. In implementing the BBCT and SBH permissions, HPUK is not seeking to alter any of its obligations under the consents, but a new consent is listed building consent is required for the approved works to be undertaken to the Train Ferry Gantry.

4.2.3. The works to the long berthing arm will take place over water and a marine licence will be required from the MMO both for the demolition works and for refurbishment of the retained structure. The nature of the works is such that it is envisaged that these will be undertaken in a single contract/phase, but means that that listed building consent 10/00204/LBC is likely to time expire before works can commence on the Train Ferry Gantry and long berthing arm.

4.2.4. This new application should be determined in accordance with the Planning (Listed Buildings and Conservation Areas) Act 1990, in which S16(2) requires special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses. This is a positive duty but also allows the consideration of other matters. The Inspector's Report on the original applications (dated 29 March 2006) assessed the proposed works to the Train Ferry Gantry as an integral part of the development and states (paragraph 18.136):

*"In the context of examining IROPI, I place little weight on arguments that the separate specific elements of the overall proposals do not themselves benefit from any imperative reasons in support of the container terminal. For example, the SBH is clearly an integral element of the total development, as are the TFG partial demolition and the Little Oakley managed realignment compensation scheme, the latter being a requirement under regulation 53 of the Habitats Regulations to protect the overall coherence of Natura 2000. Also, although separate applications are involved, the BBCT and SBH proposals, and the BBCT and Little Oakley proposals would be united by S106 Agreements."*

4.2.5. The Inspector continues at paragraph 18.348 *"There would be some loss of the functional context of the gantry, and the berthing arm is clearly seen by some as an important element of what is a significant feature of the Harwich's history and development. However, this is not a crucial feature and enough of the structure would remain to show how it functioned. The proposals for the TFG's interpretation and maintenance would compensate for its loss"*.



- 4.2.6. Partial removal of the long berthing arm has therefore been found as necessary to support the substantial regeneration effects of BBCT. This assessment is further reinforced when considering the 'overriding public interest' required under the Habitats Regulations.
- 4.2.7. There are no other impediments to a new grant of listed building consent. There is no requirement for Environmental Impact Assessment (EIA) as part of this application, but it should be noted that the Train Ferry Gantry is covered, in any event, in the Environmental Statement prepared by Royal HaskoningDHV (2021) that is submitted in support of applications for BBCT and SBH (application reference nos. 21/01792/VOC and 21/01810/VOC).

### 4.3. Planning Assessment

#### Train Ferry Gantry

- 4.3.1. The last train ferry service to use the TFG was in 1987 since when there has been no significant maintenance of the gantry.
- 4.3.2. Alan Baxter Associates assess the long berthing arm as being of limited architectural or historic interest as a later, utilitarian addition. The only contribution to the significance of the listed structure is to partially illustrate how the mechanism functioned while in operation and its removal is assessed as being at the "*lower end of the scale of less than substantial*" (Heritage Statement, section 4.2.1).
- 4.3.3. Removal of the long berthing arm would have a negligible impact on the special interest of the listed structure and should be supported in accordance with the NPPF and Local Plan policy EN21 'Demolition of a Listed Building'.
- 4.3.4. A significant level of maintenance is required to preserve the Train Ferry Gantry. A Maintenance Schedule is being prepared by Alan Baxter Associates and will include a proposed programme of remedial works for the long-term survival of the Train Ferry Gantry. This presents a heritage benefit.

#### Harwich Conservation Area

- 4.3.5. Under S.72 of the Planning (Listed Buildings and Conservation Areas) Act 1990, within a conservation area, the local planning authority is required pay special attention to the desirability of preserving or enhancing the character or appearance of that area.
- 4.3.6. Alan Baxter Associates assess the impact of the removal of the longer berthing arm on the Conservation Area. The most visually prominent elements of the Train Ferry Gantry are the most significant elements in heritage terms and would be retained and refurbished by the application proposal. The contribution made by the Train Ferry Gantry to views in the Conservation Area would not be affected.
- 4.3.7. In addition, it is considered that the area closest to the Train Ferry Gantry is the Trinity House Buoy Yard, which has become increasingly dominant and interrupts views of the Train Ferry Gantry from the historic quayside and railway approach.
- 4.3.8. The impact of the application proposal is assessed by Alan Baxter Associates as being neutral.



## Harwich Historic Town

- 4.3.9. The Harwich Historic Town boundary includes the Main Gantry. Given that the application only proposes remedial works to the part of the site that lies within the Historic Town boundary without breaking ground, it is considered that archaeological mitigation is not required.

## 4.4. Planning Conditions and Obligations

- 4.4.1. It is expected that should TDC be minded to grant listed building consent, the same conditions are attached as those on the existing consent, as follows:

- Standard time limit
- Approved plans
- A scheme that requires the method and execution of the proposed demolition works
- Details of any navigation marks or lights
- Programme of repairs, painting works, lighting works and maintenance

- 4.4.2. The application does not alter HPUK's obligation under the Section 106 Agreement for BBCT and the SBH to submit to TDC for approval an updated Maintenance Scheme to reflect changes in the condition of the Train Ferry Gantry (schedule 1, paragraph 11.2).

## 4.5. Planning Assessment

- 4.5.1. Removal of the long berthing arm is assessed to be at the lowest end of the scale of less than substantial harm and will not impact on the parts of the Train Ferry Gantry that are assessed as having the greatest significance. As such, it is required for us to weigh this harm against the public benefits of the proposal, including securing its optimum viable use.

- 4.5.2. It is our opinion that the public benefits associated with the scheme outweigh the harm that has been identified, for the following reasons:

- The scheme allows for access into the Small Boat Harbour and the proposed development, which is a fundamental aspect of the Bathside Bay Container Terminal (BBCT) development. As outlined above, in paragraph 4.2.3, the Inspector identified in the context of examining IROPI that the SBH development and the TFG partial demolition were fundamental aspects of facilitating the BBCT. By facilitating the BBCT development, there are clear public benefits associated the scheme, which override the low level of harm identified.
- Commitment to installing information boards, which will inform the public about the history and importance of the Train Ferry Gantry.
- The Train Ferry Gantry is currently vulnerable and at risk. The remedial works will contribute to its long-term survival and so the programme of works will represent a heritage benefit. It is our opinion that this benefit again overrides the low level of harm identified.

- 4.5.3. As outlined in the Heritage Statement, the Train Ferry Gantry is in a poor state of repair. The Train Ferry Gantry has been disused since 1987 and its link to the operational railway has been permanently severed by later development and so its reuse is not possible. As shown in the drawings, the scheme proposes the removal of the long berthing arm to facilitate the SBH and BBCT developments and will therefore not be



rebuilt, however, given that the proposed scheme has overriding public benefits as outlined above in paragraph 4.2.3, it is our opinion that the proposal should be supported by the Council.

- 4.5.4. Given the location of the long berthing arm located out in the sea, it is not considered that its demolition will result in an 'unsightly gap site' in the historic built environment, which is a concern that is raised in the supporting text to Local Plan Policy EN20 'Demolition within Conservation Areas'. The scheme proposes remedial works that will restore and enhance the remaining part of the listed building which will result in a substantial heritage benefit.
- 4.5.5. The Train Ferry Gantry's contribution to the Conservation Area has been compromised by the Trinity Buoy Yard and the removal of the long berthing arm is assessed by Alan Baxter Associates as being neutral.
- 4.5.6. The Harwich Historic Town boundary covers the part of the application site up to the Main Gantry. Given that the application only proposes remedial works to the part of the site that lies within the Historic Town boundary without breaking ground, it isn't considered that archaeological mitigation is required.
- 4.5.7. On the basis of the above, where the scheme will make a positive contribution to the quality of the local environment and will enhance the local character, will not lead to a material loss or damage to important historical assets or features of special historical interest, will not negatively impact the conservation area, will produce substantial public benefits that provide an exceptional reason for the demolition and alteration of the existing listed building and will also not require archaeological mitigation, it is our opinion that the proposals comply with NPPF paragraphs 194-207, adopted Policies QL9 'Design of New Development', QL11 'Environmental Impacts and Compatibility of Uses', EN17 'Conservation Areas', EN20 'Demolition within Conservation Areas', EN21 'Demolition of a Listed Building', EN22 'Extensions or Alterations to a Listed Building', EN30 'Historic Towns' and SP7 'Planning Shaping Principles' and emerging Policies SPL 3 'Sustainable Design', PP 14 'Priority Areas for Regeneration', PPL 8 'Conservation Areas' and PPL 9 'Listed Buildings'.



## 5. Conclusion

- 5.1. Granting listed building consent will enable marine access to the SBH. It therefore comprises an integral part of the Bathside Bay development.
- 5.2. The Train Ferry Gantry is a significant structure, but removal of the long berthing arm is assessed to be at the lowest end of the scale of less than substantial harm. Listed building consent for the shortening of the long berthing arm should also be set against the conservation of the structure by repairs, a maintenance schedule and an improved setting, which are strong heritage benefits, and the facilitation of the BBCT and SBH developments, which will provide strong public benefits. These benefits weigh heavily against the low level of heritage harm identified with the demolition of the long berthing arm.
- 5.3. There has been no significant change in the development plan in so far as it relates to the application proposal since the grant of the 2013 consent. Given the Train Ferry Gantry currently remains vulnerable and at risk, the remedial works proposed will contribute to its long-term survival and so the programme of works will represent a heritage benefit.



Figure 3: Approach to The Train Ferry Gantry (Alan Baxter Associates, Heritage Statement)



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