

The Rt Hon Grant Shapps MP
Secretary of State for Transport
Great Minster House
London
SW1P 4 DR

Via The Planning Inspectorate
Temple Quay House
Bristol
BS1 6PN

2nd August 2021

Dear Secretary of State

TR040011: Portishead Branch Line – MetroWest Phase 1: Pill Tunnel Eastern Portal

I would draw the Secretary of State's attention to ISH 6 and 7 submissions to the Planning Inspectorate examining authority and associated email correspondence¹ with Womble Bond Dickinson, the Applicant's (North Somerset Council) legal representatives for the MetroWest project, concerning the access arrangements to the Pill Tunnel Eastern Portal (construction and maintenance compound and rail safety emergency access).

The correspondence is driven by concerns over North Somerset Council proposals to share the site entrance, access and service road with a fifteen-unit affordable housing development which is the subject of a planning application 21/P/1234/FUL submitted by the Pill and District Community Land Trust in partnership with the Alliance Homes housing association with the support of the council's housing department.

As the Principal Transport Policy Officer for the MetroWest project in a twelve-point internal memorandum to the planning case officer dated 5th July 2021 makes clear, these concerns centre on the incompatibility of the housing development with the MetroWest project on site entrance and service road accessibility, restricted shared access, site encroachment and deliverability grounds (notwithstanding the cumulative detrimental impacts of the combined projects on green belt, heritage assets and the Ham Green Lake SSSI on which other contributors have commented). Moreover, a Highways and Transport Internal Memorandum dated 6th July points to a lack of understanding and an under-estimate of the cumulative highways and traffic impacts of the housing development on Chapel Pill Lane, e.g. footways, passing places and visibility splays, that will result in further detrimental damage to verges and ancient hedgerows in a tranquil rural country lane setting that is part of the Avon Cycleway to meet minimum road safety requirements.

¹ Correspondence from Womble Bond Dickinson to the Planning Inspectorate dated 21st July 2021 concerning "exchanges of emails regarding Mr Stuart Tarr's post examination representation to the Planning Inspectorate."

Both memorandums point to the potential for the housing development to delay or compromise the delivery of the MetroWest project, which must take priority as a major infrastructure project of national importance, the protection of which the Principal Transport Officer proposes to secure in a Section 106 agreement managed by North Somerset Council as a condition for granting planning consent. But NSC is conflicted, both as the applicant for the MetroWest project and as a strongly influential champion of the housing development, and so it is doubtful that a S106 agreement monitored and implemented by the council would be managed in such a way as to prevent the housing development from impinging on the delivery of the MetroWest project.

In consideration of which (the Planning Inspectorate's public examination having closed on 19th April and the ExA's Recommendation Report having been issued on 19th July) the Secretary of State may wish to intervene to add a Direction, Condition or Requirement, to the MetroWest Development Consent Order, restricting site access to the landowner of the field, the beneficiary of the fishing lakes Right of Way over the field, Network Rail and their contractors, statutory undertakers and emergency service providers. The intention of which would be to reserve the site entrance, access and service road solely for the exclusive use of the MetroWest project.

In respect of which, in support of this request, I would refer departmental officials advising the Secretary of State to the following documents:

1. Planning application 21/P/1234/FUL and supporting documents comprising:

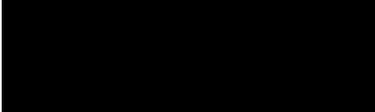
- Design and Access Statement - 23 Apr 2021
- 5 July email and letter (Principal Transport Officer: MetroWest Phase 1) – 6 Jul 2021
- Highways and Transport Internal Memorandum 6th July – 15 Jul 2021
- Public Comments (Ham Green residents and supporters) – 20 Jul 2021

2. Responses to Planning Inspectorate ExA Issue Specific Hearings, comprising:

- Ham Green Residents and their Supporters Deadline 7 submission published 15/04/2021
- Womble Bond Dickinson Deadline 7 submissions of 15 and 20/04/2021 responding to written representations including ISH 6 and earlier hearings.

It is recognised that the Applicant, North Somerset Council, will resist any attempt to impose restrictions on site access, the effect of which would prevent the housing development from going ahead, but equally a S106 agreement, managed and implemented by the council which the Principal Transport Officer has proposed, risks compromising the delivery of the MetroWest project.

The Secretary of State is therefore urged to intervene in these arrangements to secure the prompt implementation and delivery of the MetroWest project.



Stuart Tarr

On behalf of Ham Green Residents and their Supporters