



ENGLISH HERITAGE

NORTH WEST

The Secretary of State for Transport,
c/o Transport and Works Act Orders Unit,
General Counsel's Office,
Department for Transport,
Zone 1/18,
Great Minster House,
33 Horseferry Road,
London,
SW1P 4DR.

Direct dial 0161-242-1412

Your ref:

Our ref: NSIP/0038/00

28 October, 2013

Dear Sir,

Transport and Works Act 1992

The Transport and Works (Applications and Objections Procedure) (England and Wales) Rules 2006

THE NETWORK RAIL (ORDSALL CHORD) ORDER

APPLICATION TO THE SECRETARY OF STATE UNDER SECTION 6 OF THE TRANSPORT AND WORKS ACT 1992 FOR AN ORDER UNDER SECTIONS 1 AND 5 OF THAT ACT

I refer to the letter of 16 September 2013 from Network Rail consulting English Heritage on the application for an Order under sections 1 and 5 of the Transport and Works Act 1992 for the construction of a new chord railway.

English Heritage is an Executive Non-Departmental Public Body sponsored by the Department for Culture, Media and Sport, with our funding agreement also signed by CLG and DEFRA. We are the UK Government's statutory adviser and a statutory consultee on all aspects of the historic environment and its heritage assets. This includes archaeology on land and underwater, historic buildings, sites and areas, designated landscapes and the historic elements of the wider landscape. We work in partnership with central government departments, local authorities, voluntary bodies and the private sector to conserve and enhance the historic environment, broaden public access to our cultural heritage, and increase people's understanding and appreciation of the past.

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Summary

The object of the proposed Order is to authorise the construction of a new railway, linking Manchester Piccadilly and Manchester Victoria stations, crossing the River Irwell and Trinity Way to the west of Manchester city centre. At its southern end, it will pass close to the western end of the former Liverpool Road station, the earliest passenger railway terminus in the world (and listed at Grade I), causing substantial harm to numerous designated heritage assets and their settings, and to the historic environment in general. The heritage assets comprise the Grade I listed Liverpool Road Station Building, 1830 Warehouse and Stephenson's Bridge¹, all of whose settings would be seriously affected, and a related group of Grade II listed bridges and viaducts, several of which will be completely or partially demolished. Whilst the application proposes a range of measures for the mitigation of the impact of the proposed railway, the applicants concede that it will cause substantial harm to the historic environment.

The National Planning Policy Framework requires in paragraph 133 that "*where a proposed development will lead to substantial harm to or total loss of significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh the harm or loss*" (my underlining). Whilst not disputing that a new link between Manchester Piccadilly and Manchester Victoria would bring substantial public benefits, English Heritage does not accept that the substantial harm to designated heritage assets and their settings which will be caused by the proposed Ordsall Chord is *necessary* to provide those substantial public benefits. The scheme proposed is not the only one which could provide a new link between Manchester Piccadilly and Manchester Victoria. 'Option 15', an alternative route running to the west of the one proposed, although longer, would be technically and operationally viable. Further material is being produced regarding aspects of this scheme which we are currently waiting for. However, given the existence of this alternative technically and operationally viable route the pursuit of an application route which causes substantial harm does not appear to be necessary or justified.

English Heritage therefore **objects** to the granting of the proposed order, on the grounds that:

- (a) as proposed, the construction of the Ordsall Chord will cause substantial harm to individual designated heritage assets and to the historic environment in general.

¹ In this letter, designated heritage assets are referred to by the names used by Network Rail in the application and the related listed building consent and conservation area consent applications. For ease of reference, a table listing the principal designated heritage assets, their list entry numbers, their formal names as per the list entry, and the names used by Network Rail in the application(s) is appended as Annex A.

- (b) the necessity of causing substantial harm to individual designated heritage assets and to the historic environment in general has not been demonstrated, as there is an alternative route which is technically and operationally viable.

The draft Order: the proposed route

The object of the proposed order is to authorise the construction of a new railway in the metropolitan districts of the City of Manchester and the City of Salford comprising an elevated chord linking the Bolton Lines railway with the Chat Moss Lines, running from the existing Castlefield (Manchester South Junction & Altrincham Railway [MSJ&AR]) viaduct, passing north-west over Water Lane, the River Irwell and Trinity Way, and tying into the existing Middlewood Liverpool & Manchester Railway [L&MR] viaduct, and related works including the replacement of Prince's Bridge and the construction of a bridge to carry public utilities together with a footpath and a cycle track over the River Irwell.

The proposed route is set out in detail on the Planning Drawings accompanying the application, which are listed in Schedule 2 to the Rule 10(6) request for planning permission. It will entail the widening and partial removal of parapets from the Grade II listed Castlefield (MSJ&AR) Viaduct & Cast Iron Bridge (the cast iron bridge itself being completely demolished and replaced by a new bridge), and the construction of new piers to the north west elevation of the viaduct which will be physically attached to the existing brick piers. New piers will be placed between the Castlefield (MSJ&AR) Viaduct and the Grade II listed 1830 Viaduct, which will be crossed at an angle by the new line, resulting in the partial removal of parapets and the removal of platform structures which sit upon the viaduct, which will be strengthened to support the new structure.

Construction of the new Network Arch over the River Irwell will require the removal of four of the vaults of the Grade II listed Zig Zag Viaduct and Water Street Bridge, and the demolition of the majority of the Grade II listed Girder Bridge (only the central pier and stone pier base in the River Irwell being retained). Removal of the Girder Bridge will necessitate reinstatement of the parapet of the Grade I Stephenson's Bridge at the point at which the two bridges join. It will also require the demolition of the unlisted Prince's Bridge, which will be replaced by a new bridge for pedestrians and cyclists. After crossing Trinity Way, the junction of the new route with the Chat Moss Lines will require the removal of a length of parapet from the undesignated Middlewood Viaduct.

Also included in the application are strengthening works and fabric repairs to the Grade II* listed Southern Railway Viaduct and Colonnade, and to the Grade II listed Central Railway Viaduct, which will carry additional lines into Salford Central and Manchester Victoria stations from the junction with the Middlewood Viaduct.

In addition to the application for a Transport and Works Act Order, applications have been made to Manchester City Council and Salford City Council for Listed Building Consent and Conservation Area Consent for the various works (as the proposal

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would cross these two administrative areas). I set out the applications for the authorities below.

Manchester City Council

Conservation Area Consent application to demolish two unlisted industrial buildings to enable the widening of the Grade II listed Castlefield (MSJ&AR) Viaduct, and the demolition of the unlisted Prince's Bridge.

Listed Building Consent applications:

- (1) fabric repairs and reinstatement works to the parapet of the Grade I Stephenson's Bridge;
- (2) demolition of the Grade II listed Girder Bridge;
- (3) works to the Grade II listed 1830s Viaduct and Water Street Bridge including removal of a section of the parapet and platform, and strengthening works;
- (4) works to the Grade II listed Zig Zag Viaduct and Water Street Bridge, including demolition of four of the Zig Zag Viaduct's vaults (including the Manchester abutment of the Girder Bridge) and construction of a buttress wall and three new vaults to reflect the stagger of the existing vaults and the Manchester abutment of the Network Arch Bridge;
- (5) widening of the Grade II listed Castlefield (MSJ&AR) Viaduct, involving the removal of the existing parapet, removal of the Cast Iron Bridge and its replacement with new bridge structures, and repairs to the 1845 Brick Bridge.

Salford City Council

Listed Building Consent applications:

- (1) fabric repairs etc to Stephenson's Bridge;
- (2) demolition of the Grade II listed Girder Bridge;
- (3) widening of the Grade II listed Castlefield (MSJ&AR) Viaduct (these three being equivalent to applications 1, 2 and 5 to Manchester City Council);
- (4) strengthening works to the Grade II* listed Southern Railway Viaduct and Colonnade;
- (5) strengthening works to the Grade II listed Central Railway Viaduct.

Consideration of the application

In determining the application, the provisions in section 16 and 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended apply:

s16 (2) In considering whether to grant listed building consent for any works the local planning authority or the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

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s 66 (1) In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

s72 (1) In the exercise, with respect to any buildings or other land in a conservation area, of any functions under or by virtue of any of the provisions mentioned in subsection (2), special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.

Paragraph 6 of the National Planning Policy Framework states that “The purpose of the planning system is to contribute to the achievement of sustainable development”, and this is explained in paragraph 7 with the three dimensions of sustainable development as; an economic role, a social role, and an environmental role. An ‘environmental role’ is described as “contributing to protecting and enhancing our natural, built, and historic environment.” Paragraph 8 states “Economic growth can secure higher social and environmental standards, and well-designed buildings and places can improve the lives of people and communities. Therefore, to achieve sustainable development, economic, social and environmental gains should be sought jointly and simultaneously through the planning system. The planning system should play an active role in guiding development to sustainable solutions.” Furthermore, “Pursuing sustainable development involves seeking positive improvements in the quality of the built, natural and historic environment” (paragraph 9).

Paragraph 17 sets out the ‘Core Planning Principles’ which should underpin decision-taking. It states that planning should “conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations”.

Section 12 of the NPPF sets out policy in regards to preserving and enhancing the historic environment.

Paragraph 131 of the NPPF states that *“In determining planning applications, local planning authorities should take account of the desirability of sustaining and enhancing the significance of heritage assets and putting them to 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 132 states that “when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation. The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. As heritage assets are irreplaceable,

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any harm or loss should require clear and convincing justification. Substantial harm to or loss of a Grade II listed building...should be exceptional. Substantial harm to or loss of designated heritage assets of the highest significance...should be wholly exceptional”.

Paragraph 133 states that where an application will lead to substantial harm to or total loss of significance of a designated heritage asset, consent should be refused “unless it can be demonstrated that the substantial harm to or loss of significance is necessary in order to deliver substantial public benefits that outweigh that harm or loss”.

Paragraph 137 of the NPPF is also of relevance, noting 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. Proposals that preserve those elements of the setting that make a positive contribution to or better reveal the significance of the asset should be treated favourably.*”

The ‘Setting of a heritage asset’ is defined in Annex 2 of the NPPF as “The surroundings in which a heritage asset is experienced.” *The Setting of Heritage Assets: English Heritage Guidance* expands on the guidance of the NPPF, and sets out key principles for understanding setting. It explains that “Although views of or from an asset will play an important part, the way in which we experience an asset in its setting is also influenced by other environmental factors such as noise, dust and vibration; by spatial associations; and by our understanding of the historic relationship between places.” Furthermore, “The contribution that setting makes to the significance does not depend on there being public rights or an ability to access or experience that setting.”

The significance of the heritage assets affected

The route of the proposed railway passes close to the western end of the Grade I listed former Liverpool Road station, now part of the Museum of Science and Industry (MOSI), which is the earliest surviving passenger railway terminus in the world. The Liverpool Road station complex, and the area of land to the west of it, includes buildings and structures constructed for the opening of the world’s first inter-city passenger railway in 1830, together with a succession of later bridges and viaducts.

It is a complex of the highest significance in heritage terms, given the importance of the L&MR as the world’s first passenger railway, its influence on railway development world-wide, and the presence of additional phases of railway infrastructure which contribute significantly to the understanding of railway development in Manchester, across the North West, and nationally.

The significance of the complex is recognised by the designation of the individual components. The original Liverpool Road station buildings (which include the Station Master’s house and the station building itself), and the 1830 Warehouse, are listed in

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Grade I, as is the stone bridge which carried the L&MR westwards over the River Irwell ('Stephenson's Bridge'). The brick viaduct (the '1830 Viaduct') which linked the station with Stephenson's Bridge is listed in Grade II.

The rapid development of railways as the result of the success of the L&MR saw additional lines constructed around Manchester. The opening of Victoria station in 1844 led to Liverpool Road station being used solely for goods traffic. Shortly afterwards, the Castlefield (MSJ&AR) Viaduct and 1845 Brick Bridge (jointly listed in Grade II) were constructed to the south of Liverpool Road, giving enhanced access between the L&MR line and new rail facilities on the southern side of Manchester city centre. Continued development of the goods facilities at Liverpool Road station in the 1860s saw the construction of the Girder Bridge, which abuts Stephenson's Bridge, and the Zig Zag Viaduct and Water Street Bridge linking it to enhanced facilities for goods handling on the northern side of the station site. Access to facilities at the eastern end of the site was provided by the Colonnaded Viaduct. The Girder Bridge, the Zig Zag Viaduct and Water Street Bridge, and the Colonnaded Viaduct are all listed in Grade II.

The impact of the proposed railway on the historic environment

Chapter 7 of the Environmental Statement ('Historic Environment') identifies a range of impacts upon heritage assets (buried archaeological sites and individual structures and buildings, both designated and undesignated), whilst Chapter 8 ('Townscape and Visual Amenity') identifies impacts on the settings of groups of buildings and on conservation areas. The impacts range from removal of buried archaeological remains to physical impacts on listed buildings and structures, and intrusion into views within conservation areas.

The associated Heritage Assessment includes a more detailed assessment of the impact of the proposed railway (section 6, pp 93-101) upon heritage assets. It shows that the proposed railway will impact directly upon a number of heritage assets, both designated and undesignated, including demolition of two listed structures and one undesignated heritage asset, and removal of historic fabric from others. It also identifies a number of impacts on the settings of designated heritage assets.

Widening of the Grade II listed Castlefield (MSJ&AR) Viaduct and Cast Iron Bridge will involve the partial removal of parapets and the construction of new piers to the north west elevation of the viaduct which will be physically attached to the existing brick piers. The Cast Iron Bridge itself will be demolished and replaced by a new structure. New piers will be placed between the Castlefield (MSJ&AR) Viaduct and the Grade II listed 1830 Viaduct, which will be crossed at an angle by the new line, resulting in the partial removal of parapets and the removal of platform structures which sit upon the viaduct.

Construction of the new Network Arch bridge over the River Irwell will require the removal of four of the vaults of the Grade II listed Zig Zag Viaduct and Water Street Bridge, and the demolition of the majority of the Grade II listed Girder Bridge (only

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the central pier and stone pier base in the River Irwell being retained). It will also require the demolition of the unlisted Prince's Bridge. After crossing Trinity Way, the junction of the new route with the Chat Moss Lines will require the removal of a length of parapet from the undesignated Middlewood Viaduct.

The demolition of the Cast Iron Bridge, part of the Grade II listed Castlefield (MSJ&A) and Cast Iron Bridge complex, and of the Grade II Girder Bridge, the removal of parapets and platform structures from the Grade II listed 1830 Viaduct and of a substantial part of the Grade II listed Zig Zag Viaduct and Water Street Bridge, will cause substantial harm to those listed structures.

Additionally, not only would there be a direct impact on historic fabric through demolition, but there would also be an impact on the setting of various designated heritage assets. The construction of the proposed new line of railway, including the Network Arch Bridge, running at an angle across the River Irwell and across the Grade II listed 1830 viaduct, will cut across the historic grain of railway lines and structures at the western end of Liverpool Road station. It will have a significant impact upon the setting of the Grade I listed Stephenson's Bridge and of the Grade I listed Liverpool Road Station Buildings and 1830 Warehouse. As well as sharing a visual relationship, these three key Grade I listed structures clearly share a spatial relationship, so that it is easy to understand the historic link between them, and that trains leaving the Liverpool Road station in 1830 would have almost immediately crossed the River Irwell by Stephenson's Bridge. That link is reinforced by the operation of preserved and replica steam trains by MOSI on a line which runs over Stephenson's Bridge on the original L&MR alignment. That Stephenson's Bridge can still be appreciated as a working railway structure reinforces its significance.

The imposition of the Ordsall Chord, cutting across the 1830 Viaduct at an angle, will sever that visual relationship, and make the spatial relationship almost impossible to understand. It will cut across views westwards from the former Liverpool Road station, making it difficult for visitors to the museum to appreciate the historic layout of the railway, and the way in which the station functioned. In practical terms, it will make MOSI's operation of steam trains over Stephenson's Bridge impossible. The visitors' appreciation of the way in which the station functioned, and of the way in which it developed, will be further hampered by the removal of the Grade II listed Girder Bridge, and a significant portion of the Grade II listed Zig Zag Viaduct, which gave access to enhanced facilities on the northern side of the station. It will therefore be more difficult to appreciate the role of the Grade II listed Colonnaded Viaduct in giving access to facilities at the eastern end of the station site. The construction of the Ordsall Chord will thus cause substantial harm to the settings not only of the three key Grade I listed structures, but to the settings of the complex of Grade II listed bridges and viaducts which relate to them.

Overall, the impact of the construction of the Ordsall Chord will be to cause substantial harm to numerous Grade I and Grade II listed heritage assets and their settings; the impact on the complex as a whole, which is of the highest significance for our understanding of the development of railways in Manchester, across the North

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West, and nationally, will also be substantial. The applicants concede as much; the Heritage Assessment accompanying the application concludes that “Although a number of the impacts when considered in isolation can be considered to cause less than substantial harm, the extent of the proposals and number of impacts could be said to result in an overall **accumulative impact** which is of **substantial harm**” (para.6.13.1).

In terms of policy, the proposal is contrary to the core principle set out in the NPPF, that planning should “*conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations*”, and to the advice contained in Section 12, including paragraphs 131 and 132. The applicants have proposed a programme of recording, repairs and interpretation as mitigation for the substantial harm which the proposed railway would cause. However, as the NPPF underlines, “*the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted*”. Liverpool Road station and the complex of related railway bridges and viaducts associated with it are irreplaceable.

Substantial public benefits are claimed for the Ordsall Chord, including increased capacity for passenger and freight traffic and faster journey times between major northern cities. English Heritage does not dispute that a new rail link between Manchester Piccadilly and Manchester Victoria would bring substantial public benefits. However, the proposed route for the Chord, although the shortest, is not the only one which could deliver these benefits.

An alternative route, ‘Option 15’, has been identified which would run to the west of the application route, and would be technically and operationally viable. We are still awaiting full details of this route, but it appears from the information which we have received to date that at the southern end it would pass to the west of Stephenson’s Bridge to tie into the Castlefield (MSJ&AR) Viaduct. Whilst there would undoubtedly be an impact on the setting of the Grade I listed Stephenson’s Bridge, and a physical impact on the Castlefield (MSJ&AR) Viaduct, taken together these appear likely to amount to less than substantial harm.

Section 3 (‘Project Alternatives’) of the Environmental Statement which accompanies the application outlines the main alternatives studied by the applicants, and gives an indication of the reasons for not proceeding with them. Option 15 was originally discounted due to the potential to compromise a potential route for High Speed 2, but was subsequently revisited. “It is discounted primarily on the overall cost being considerably more than other options considered” (para.3.4.20).

In our view, in discounting Option 15 primarily on the grounds of cost, insufficient weight has been given to the substantial harm which the application route will cause to designated heritage assets and to the historic environment in general. Given the existence of an alternative route which would deliver the substantial public benefits claimed for the Chord without causing substantial harm to designated heritage assets

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or to the historic environment in general, we do not consider that the substantial harm caused by the application route can be justified.

As noted above various listed building consent and conservation area consent applications were submitted in connection with the Transport and Works Act Order application. We have set out our responses to those applications in separate correspondence which we have attached for ease of reference.

English Heritage objection

English Heritage therefore **objects** to the granting of the proposed order, on the grounds that:

- (a) as proposed, the construction of the Ordsall Chord will cause substantial harm to individual designated heritage assets and to the historic environment in general.
- (b) the necessity of causing substantial harm to individual designated heritage assets and to the historic environment in general has not been demonstrated, as an alternative route is available which would deliver similar public benefits whilst causing less than substantial harm to individual designated heritage assets and to the historic environment in general.

Yours faithfully,



Andrew Davison

Principal Inspector of Ancient Monuments

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ANNEX A

The Ordsall Chord

Principal designated heritage assets affected by the application

List Entry No.	Grade	Listed Name	Application Name
1200805	II	Colonnaded Railway Viaduct at former Liverpool Road goods depot	Colonnaded Viaduct
1200837	II	Manchester South Junction & Altrincham Railway Viaduct	Castlefield (MSJ&AR) Viaduct & Cast Iron Bridge/1845 Brick Bridge
1254726	II	Railway Viaduct linking bridge over Irwell to Liverpool Road station	1830s Viaduct & Water St Bridge
1254829	II	Railway Viaduct over River Irwell leading to Lower Byrom Street warehouse	Girder Bridge/ Zig Zag Viaduct & Water St Bridge
1270603	I	Railway Bridge over River Irwell to former Liverpool Road station	Stephenson's Bridge
1282991	I	Old warehouse to North of former Liverpool Road station	1830 Warehouse
1291477	I	Former Liverpool Road railway station Station Master's house	Liverpool Road Station Buildings
1386160	II*	Southern Railway Viaduct and Colonnade	Southern Railway Viaduct and Colonnade
1386162	II	Central Railway Viaduct	Central Railway Viaduct
1391927	I	Railway bridge over River Irwell to former Liverpool Road station (that part in Salford)	Stephenson's Bridge
1391929	II	Girder Bridge leading to railway Viaduct over River Irwell leading to Lower Byrom Street warehouse (that part in Salford)	Girder Bridge

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