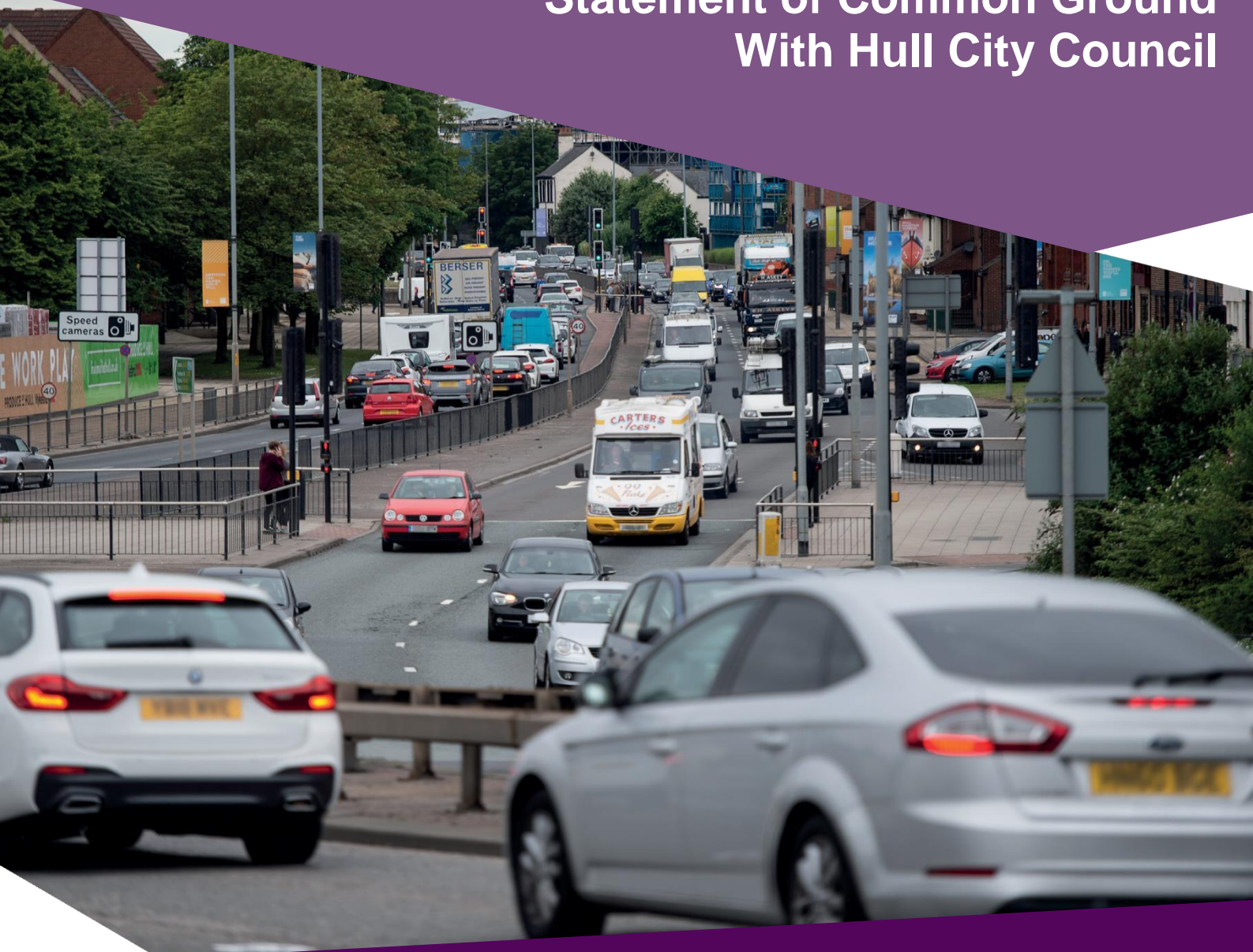


A63 Castle Street Improvement, Hull

TR010016

Statement of Common Ground
With Hull City Council



A63 Castle Street Improvement, Hull Development Consent Order 20[**x**]

STATEMENT OF COMMON GROUND

Regulation Number:	Regulation 5(2)(q)
Planning Inspectorate Scheme Reference	TR010016
Author:	A63 Castle Street Improvement Project Team, Highways England

Version	Date	Status of Version
Rev 0	23 April 2019	Draft

STATEMENT OF COMMON GROUND

This Statement of Common Ground has been prepared and agreed by (1) Highways England Company Limited and (2) Hull City Council.

Signed.....

Bernice Beckley
Project Manager
on behalf of Highways England
Date: **[DATE]**

Signed.....

[NAME]
[POSITION]
on behalf of **[STAKEHOLDER]**
Date: **[DATE]**

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1 Introduction

1.1 Purpose of this document

- 1.1.1 This Statement of Common Ground ("SoCG") has been prepared in respect of the proposed A63 Castle Street Improvement ("the Application") made by Highways England Company Limited ("Highways England") to the Secretary of State for Transport ("Secretary of State") for a Development Consent Order ("the Order") under section 37 of the Planning Act 2008 ("PA 2008").
- 1.1.2 This SoCG does not seek to replicate information which is available elsewhere within the Application documents. All documents are available in the deposit locations and/or the Planning Inspectorate website.
- 1.1.3 The SoCG has been produced to confirm to the Examining Authority where agreement has been reached between the parties to it, and where agreement has not (yet) been reached. SoCGs are an established means in the planning process of allowing all parties to identify and so focus on specific issues that may need to be addressed during the examination.

1.2 Parties to this Statement of Common Ground

- 1.2.1 This SoCG has been prepared by (1) Highways England as the Applicant and (2) Hull City Council.
- 1.2.2 Highways England became the Government-owned Strategic Highways Company on 1 April 2015. It is the highway authority in England for the strategic road network and has the necessary powers and duties to operate, manage, maintain and enhance the network. Regulatory powers remain with the Secretary of State. The legislation establishing Highways England made provision for all legal rights and obligations of the Highways Agency, including in respect of the Application, to be conferred upon or assumed by Highways England.
- 1.2.3 Hull City Council is the local authority for land within the DCO boundary of the scheme.

1.3 Terminology

- 1.3.1 In the tables in the Issues chapter of this SoCG, "Not Agreed" indicates a final position, and "Under discussion" where these points will be the subject of on-going discussion wherever possible to resolve, or refine, the extent of disagreement between the parties. "Agreed" indicates where the issue has been resolved.
- 1.3.2 It can be taken that any matters not specifically referred to in the Issues chapter of this SoCG are not of material interest or relevance to Hull City Council, and therefore have not been the subject of any discussions between the parties. As such, those matters can be read as agreed, only to the extent that they are either not of material interest or relevance to Hull City Council.

2 Record of Engagement

2.1.1 A summary of the meetings and correspondence that has taken place between Highways England and Hull City Council in relation to the Application is outlined in table 2.1.

Table 2-1 - Record of Engagement

Date	Form of correspondence	Key topics discussed and key outcomes (the topics should align with the Issues tables)
11 January 2013	Cultural Heritage Liaison Group meeting	The impacted area of TBG might contain 500 - 1000 burials. The archaeology of the Old Town and the Old Town defences are considered of national significance. Humber Archaeology Partnership (HAP) indicated that TBG, by comparison and bearing in mind the limited range of evidence it afforded, was of less importance than archaeology of the Old Town. Principal concerns of Hull City Council (HCC) are potential impacts on two listed buildings (Earl de Grey public house and Castle Buildings) and the Old Town conservation area. For the Earl de Grey public house, HCC Principal Conservation Officer suggested that one approach might be to re-site the architectural details on one of the gable ends
8 February 2013	Cultural Heritage Liaison Group meeting	Update on progress of the appraisal of impacts on TBG and other assets. A Deposit Model (desk-based study) to be undertaken by the Archaeological Contractor once appointed, to inform and advise on approaches to the archaeology. Confirmation that three grade II listed buildings were affected by the Scheme (former Earl de Grey public house, Castle Buildings and north wall of the Humber Dock). Historic England raised concern at the potential loss of or damage to listed buildings and require options appraisal to explore potential mitigation.
8 March 2013	Cultural Heritage Liaison Group meeting	Update on progress, including issue of the Scoping Report and planned appointment of Architectural History Practice (AHP) to undertake townscape assessment. Historic England circulated English Heritage Guidance note on the importance of historic burial grounds.

3 May 2013	Cultural Heritage Liaison Group meeting	TBG was described as being 'in a very sad state', with little sign of any recent maintenance. HCC suggested proposal to include surplus gates and gate piers from Holy Trinity Church into reinstated burial ground walls. Option to be explored. Access gained to Castle Buildings and the Earl de Grey public house. Interim draft summary on historic townscapes and buildings received from AHP which reports poor interior state for both buildings. Road alignment options are being explored in the area of the listed buildings.
26 June 2013	Cultural Heritage Liaison Group meeting	Highways England mitigation proposals for TBG to include resurfacing paths, relocating the boundary wall and adding railings, possibly the relocated gates from Holy Trinity churchyard. Further review of TBG will be undertaken by Oxford Archaeology (Archaeological Contractor) to estimate number of burials and resultant excavation duration time and risk to the programme. A Method Statement will be developed for review by Historic England. The alignment has been revised and moved south to avoid the need to demolish the grade II listed Earl de Grey public house and Castle Buildings.
13 September 2013	Cultural Heritage Liaison Group meeting	Potential mitigation measures for the TBG have been developed further by Highways England and outlined, including a renewed entrance at the south-west corner, improved boundaries and walling including reduction of wall heights at the east end, reduced vegetation, lighting and interpretation. Oxford Archaeology review almost complete. Burials register had been checked and proved to contain a record of 43,933 interments over the period of its use. This informs the scale of the clearance works required. The grade II listed Earl de Grey public house and Castle Buildings are both managed by Wykeland. HCC is currently considering issues with both buildings and working on a development brief for the area.
27 November 2013	Cultural Heritage Liaison Group meeting	Oxford Archaeology developing the methodology for excavating and clearing TBG [Historic England to review the methodology as a statutory consultee]. Following consultation with the Diocese of York, Highways England consider that a Faculty3 is the best way to progress permissions for excavation and clearance of the burial ground. The AHP report concluded that a loss of approximately a third of the burial ground is considered to be a significant impact which will need to be balanced by public / heritage gain.

<p>24 January 2014</p>	<p>Cultural Heritage Liaison Group meeting</p>	<p>Highways England outlined some of the potential problems and procedures to excavate burial ground if remains are waterlogged. All agreed that a TBG working group be set up ancillary to the Cultural Heritage Liaison group - membership to vary according to business to be discussed but key attendees to include Highways England, Historic England, HAP and Hull Minster. Envisaged that one contractor would be involved in the excavation of TBG and other areas. The developed methodology for TBG to be circulated shortly</p>
<p>20 March 2014</p>	<p>Cultural Heritage Liaison Group meeting</p>	<p>Meetings with Hull Minster (Vicar and Parochial Church Council representatives) continued and no difficulty with the proposed Faculty was anticipated. A draft methodology for TBG had been circulated and comments received from Historic England. Historic England were concerned at the stated maximum number of burials to be analysed (1000). Historic England would prefer a percentage statement. Explained by project team that the affordability also have an influence on the extent of the sample. Agreed that an explanatory note be prepared by Highways England on why 1000 might reasonably be considered to be an appropriate sample size.</p> <p>Historic England raised possibility of retaining some of the exhumed sample of burials. Highways England noted potential problem of finding an appropriate store and possibly requiring relative's permission (can be noted in the Faculty application). Highways England suggested an alternative might be to secure a digital record in the form of laser scanning. Highways England requested confirmation on status of grade II listed buildings which are seen by Design Manual for Roads and Bridges as of medium importance. Historic England considered them to be of high importance (i.e. nationally important).</p>
<p>26 March 2014</p>	<p>Memo to Historic England</p>	<p>Explanatory note prepared on behalf of Highways England, detailing the assumptions for selecting sample size for the archaeological recovery and analysis of human remains. Explanatory note provided to Historic England for information.</p>

25 June 2014	Cultural Heritage Liaison Group meeting	Methodology for archaeological excavation and exhumation of burials sent by Highways England to the Diocese for consideration. As agreed by Hull Minster, evaluation for geotechnical works and archaeology would be undertaken under a Faculty and the main clearance may also be undertaken under the Faculty process
12 August 2014	Workshop on TBG	<p>Given range of issues and interested parties, a workshop held to discuss clearance and archaeology methodology for TBG, with assumption on ground conditions prior to site investigation. Workshop attendees included Highways England, Diocese of York, HAP, Historic England and other archaeological specialists in human remains invited by Historic England. Workshop reviewed the impact of increasing sample size from baseline (1000 burials) to 1500 and 5000. Historic England outlined the possibilities for analysis of the exhumed remains (potential 10-year research horizon) although recognised the potential issues associated with reburial requirements.</p> <p>Highways England agreed to continue to engage with stakeholders during development of the methodology which shall be progressed following completion of the evaluation trenching.</p>
2 September 2014	Cultural Heritage Liaison Group meeting	Following workshop on 12 August 2014 all agreed that main clearance proposal would be developed following evaluation investigation. A Faculty for evaluation excavation work had been applied for by Highways England. HCC stated that there were now developing proposals for areas adjacent to the A63, including a Conference Centre (by HCC) and a hotel (private developer), which might impact on the listed buildings
18 November 2014	Cultural Heritage Liaison Group meeting	Highways England has reviewed the impacts on programme and cost for varying sample sizes between 1000 and 5000, as agreed at the workshop on 12 August 2014. Current proposals highlight space constraints. Historic England will need to put a case to their internal working group to seek approval to support an approach based on a smaller than desired sample size. Highways England to provide a summary note including indicative figures for excavation numbers, cost and duration of works to support these discussions.

17 February 2015	Cultural Heritage Liaison Group meeting	Following consultation, relatives of over 70 of those buried had come forward. One objection on the grounds of general principal and disturbance of graves. A summary paper from Highways England detailing the cost and programme impacts of excavation / exhumation of varied numbers of burials had been issued to Historic England.
15 May 2015	Cultural Heritage Liaison Group meeting	TBG geotechnical and archaeological works had been proceeding. No key issues raised regarding these on-going works. Gates and gate piers from Holy Trinity Church available for inclusion in the re-built TBG boundary during the main works. These will be stored securely by HCC at the Fruit Market site.
24 July 2015	Cultural Heritage & TBG Liaison Group meeting	Evaluation excavations underway and site visit undertaken (attendees included Historic England, Hull Minster, HAP). No key issued raised regarding these on-going works.
12 August 2014	Workshop on TBG	<p>Given range of issues and interested parties, a workshop held to discuss clearance and archaeology methodology for TBG, with assumption on ground conditions prior to site investigation. Workshop attendees included Highways England, Diocese of York, HAP, Historic England and other archaeological specialists in human remains invited by Historic England. Workshop reviewed the impact of increasing sample size from baseline (1000 burials) to 1500 and 5000. Historic England outlined the possibilities for analysis of the exhumed remains (potential 10-year research horizon) although recognised the potential issues associated with reburial requirements.</p> <p>Highways England agreed to continue to engage with stakeholders during development of the methodology which shall be progressed following completion of the evaluation trenching.</p>
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24 July 2015	Cultural Heritage & TBG Liaison Group meeting	Evaluation excavations underway and site visit undertaken (attendees included Historic England, Hull Minster, HAP). No key issued raised regarding these on-going works.
7 October 2015	Cultural Heritage & TBG Liaison Group meeting	Highways England presented a summary of the findings of the evaluation works, including the number of burials encountered and the water-table. The final report will consider potential total population in the burial ground, percentage of complete skeletons etc., to progress development of the methodology for the main clearance works. Historic England raised no concerns with the methodology used for the evaluation works.
19 November 2015	Cultural Heritage & TBG Liaison Group meeting	Draft of the Evaluation Excavation report to be issued shortly. In advance of start of construction activities for Princes Quay Bridge, there would be a requirement to undertake an audit of historic features potentially at risk from construction activities (including listed dock masonry, winches, bollards and other fittings). A separate Project Design is being prepared to cover this.

27 January 2016	Cultural Heritage & TBG Liaison Group meeting	Meeting to discuss overall project updates and no specific issues regarding burial ground discussed.
22 April 2016	Cultural Heritage & TBG Liaison Group meeting	Final copies of the Evaluation Excavation report have been issued by Highways England to HAP, Historic England, the Diocese and Hull Minster. Highways England agreed that a simple questionnaire regarding the excavation of burials will be provided at public consultation. Questions drafted by Historic England were included in the public consultation questionnaire.
15 July 2016	Cultural Heritage Liaison Group meeting	Historic England comments on Evaluation Excavation Report queried methodology used to estimate number of burials predicted for the impacted area. Highways England has prepared a memo on estimated numbers using a range of methodologies which will be provided to Historic England. Date for next workshop to discuss clearance methodology to be arranged.
29 November 2016	Issue of report	Update and issue of Methodology for Clearance of Trinity Burial Ground and Archaeological works by Highways England following receipt of comments from Historic England and HAP.
10 January 2017	Meeting with Historic England	<p>Development of the temporary traffic management arrangements during construction identified that the Earl de Grey public house and Castle Buildings are now at risk of demolition. Historic England highlighted that it is important to know any future plans for the buildings and they are not able to support demolition of listed Earl de Grey public house due to the temporary works.</p> <p>Highways England plan to look for opportunities to remove risk but the potential for the demolition of both the Earl de Grey public house and Castle Buildings have been included in the 2017 statutory consultation information. Agreed that key issue is to identify long term plans for both buildings.</p>
27 January 2017 & 28 January 2017	Public exhibitions	Historic England attended and contributed to the public exhibitions for the 2017 statutory consultation held by Highways England at the Mercure Royal Station Hotel, Hull.

<p>22 February 2017</p>	<p>Cultural Heritage Liaison Group meeting</p>	<p>Historic England comments on the updated Methodology for Clearance of Trinity Burial Ground and Archaeological Works (dated 29 November 2016) received. Historic England remain concerned that the proposed burial sample size (10%) is too small. Noted that the Diocesan Advisory Committee (DAC) view was that 10% was the maximum sample size envisaged and that less would be preferred. Storage (e.g. up to 10 years as suggested by Historic England) of skeletal material was also not acceptable to the DAC. The Methodology had been prepared in the light of the DAC views. Second workshop to be arranged.</p> <p>Detailed letter from Historic England received regarding the listed Castle Buildings and the Earl de Grey public house. Historic England require justification for adverse impacts. Problems highlighted, in particular the pinch-point created by the proximity of the Earl de Grey public house to the carriageway. Recognised that there was a necessity for on-going discussion about listed buildings required involving HCC, Historic England and Wykeland.</p>
<p>13 March 2017</p>	<p>Letter</p>	<p>Response to Historic England comments on the Methodology for Clearance of TBG and Archaeological Works stating no proposed revision to the methodology.</p>

<p>21 March 2017</p>	<p>Listed Building meeting</p>	<p>Current Highways England position regarding the listed buildings is that they may need to be demolished due to safety and buildability constraints. Historic England view these listed buildings as nationally important – based on fabric of both buildings and how these add to the streetscape. Historic England starting point will be for both to be retained. If this is not an option, need to identify what can be retained and how buildings can be re-used. Priorities are adapt, re-use or move. Ideally 1) keep building where it is, 2) rebuild, 3) retain significant elements of the building for re-use including the tiled faience on the southern and western elevations and architectural features (as detailed in the National Historic List for England entry reference 1297037⁴, in particular exterior). Historic England welcome the opportunity to provide pre-application advice for the Earl de Grey site. HCC agree to get Historic England advice and share current design. Apart from the east wing of Castle Buildings which has fire damage and is a later edition, both the Earl de Grey public house and Castle Buildings are considered structurally sound and have no significant structural issues.</p> <p>Current outline proposal for the Earl de Grey site has existing Earl de Grey public house integrated into new hotel development but no plans for the current Castle Buildings.</p> <p>Historic England recognises that moving Earl de Grey public house back would be an advantage to the development and use as a hotel is appropriate. A Heritage Impact Assessment would be required for any redevelopment proposal by HCC / Wykeland.</p>
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<p>29 March 2017</p>	<p>Workshop on TBG</p>	<p>Attendees included representatives from the Church and Historic England. The proposed clearance and excavation methodology tabled had been developed in the light of Historic England comments and the requirements of the Church. The views of the Church had taken precedence. Historic England tabled no major concerns with the approach for the construction and physical works within the burial ground. The position of the Church / DAC remains supportive of the general approach but wanted a maximum sample of 10% burials analysed on site and all remains to be reburied within four years (i.e. the projected life of the Faculty). Position of Historic England has not changed, including the need for remains to be removed from site for analysis. Historic England have concerns on the sample proportion (10% not deemed to be statistically valid) and the limited retention time for skeletal material. The suggested four years retention of parts is not considered realistic by Historic England in terms of the complexity of constructing research funding.</p> <p>Historic England confirmed that the outline for the outreach and community engagement programme provided in the methodology was acceptable at this stage.</p>
<p>27 April 2017</p>	<p>Listed Building meeting</p>	<p>Options Report for both listed buildings has been prepared by Highways England and to be issued shortly. The Options Report details requirements to set back the Earl de Grey public house by 3m due to minimum lane widths required for temporary traffic management, working areas and deflection zones. This also provides a reasonable service corridor in front of the Earl de Grey public house and 5m clearance from the operational A63, rather than 2m which only allows for a non-compliant pathway. The Options Report assumes that the scaffolding for the Castle Buildings will be removed and the east wing demolished. An enhanced listing survey has been commissioned from Historic England.</p> <p>Wykeland have held a meeting with Historic England regarding development of the Earl de Grey site and plans have been provided. HCC reported that planning application for hotel at Earl de Grey site is going forward and discussions taking place with potential hotel operator and funder. No formal planning application for the Earl de Grey site hotel has been submitted to date.</p>

27 April 2017	Cultural Heritage Liaison Group meeting	Position of the DAC on the sample size and long term storage has not changed. All agreed that a point has been reached where it is sensible to develop a Statement of Common Ground between Highways England and Historic England.
9 June 2017	Meeting	Monthly progress meeting to progress with the DCO application and closer working between the organisations.
16 June 2017	Listed Building meeting	Report from the enhanced survey for Earl De Grey and Castle Buildings indicates that the demolition of the fire damaged east wing of Castle Buildings is unlikely to raise concerns and interior of the Earl de Grey public house has no features of interest. Wykeland reported that they propose to bring the hotel planning application for the Earl de Grey site forward but no details available at this time.
16 June 2017	Cultural Heritage Liaison Group meeting	Draft text for the Statement of Common Ground discussed.
17 July 2017	Meeting	Monthly progress meeting to discuss the progress of the scheme.
31 August 2017	Meeting	Monthly progress meeting to discuss the progress of the scheme.
11 September 2017	Meeting	Agreement and issue of uncertainty log to be used for traffic assessments of the scheme.
09 October 2017	Meeting	Monthly progress meeting to discuss the progress of the scheme.
19 October 2017	Workshop	Designated Funds workshop to discuss opportunities to enhance the scheme with additional funding.
7 November 2017	Meeting	Monthly progress meeting to discuss the progress of the scheme.

9 November 2017	Cultural Heritage & TBG Liaison Group meeting	<p>Agreement between Highways England, HAP and Historic England on potential opportunities for archaeological mitigation works as part of the Scheme. Archaeology investigations as a form of mitigation prior to the DCO submission or decision is not anticipated since this may be seen to pre-empt the DCO decision.</p> <p>Planning application discussions for the Earl de Grey site understood to be on-going. Highways England will have to make assumption that the application is not progressed before the A63 Castle Street Improvement DCO submission. HCC are preparing a Draft Development Brief which details options for this area.</p>
04 December 2017	Workshop	Discussion of value management on the scheme.
07 December 2017	Meeting	Monthly progress meeting to discuss the progress of the scheme.
19 December 2017	Meeting	With Hull City Council and Northern Divers to discuss the Spurn Lightship move.
10 January 2018	Meeting	Monthly progress meeting to discuss the progress of the scheme.
10 January 2018	Meeting	Meeting to discuss traffic management and VISSIM modelling.
12 January 2018	Meeting	Meeting with Northern Divers to discuss the Spurn Lightship move
24 January 2018	Meeting	Discussion of designated Funding to support enhancement of the Spurn Lightship.
26 January 2018	Site Visit	Joint visit to Transport for London to look at urban road design in relation to discussion of central reservation barriers on the A63.
14 February 2018	Meeting	Monthly progress meeting to discuss the progress of the scheme.
16 February 2018	Meeting	Discussion of the temporary relocation of the Spurn Lightship.
8 March 2018	Meeting	Monthly progress meeting to discuss the progress of the scheme.
9 March 2018	Meeting	Meet with the local Member of Parliament to update her on the progress with the scheme.
23 March 2018	Meeting	Meet with the local Member of Parliament to update her on the progress with the scheme.

5 April 2018	Meeting	Meeting with Hull City Council and Historic England to discuss a report on options for relocation of the Earl de Grey public house.
10 April 2018	Meeting	Meeting to discuss the Spurn Lightship's temporary location.
20 April 2018	Meeting	Meet with Hull City Council about traffic management
25 April 2018	Meeting	Monthly progress meeting to discuss the progress of the scheme.
3 May 2018	Meeting	Discussion of Habitats Regulations in relation to the construction of Princes Quay Bridge.
14 May 2018	Workshop	Workshop to discuss and record lessons learnt for the scheme.
17 May 2018	Meeting	Site walk of the Old Town area to agree changes to the area including signage and priority working.
21 May 2018	Meeting	Discussion of the impact of the Castle Street scheme on flood risk.
25 May 2018	Meeting	Meet emergency services with Hull City Council to agree evacuation procedure for the underpass.
30 May 2018	Meeting	Monthly progress meeting to discuss the progress of the scheme.
1 June 2018	Meeting	Meet with the local MP to update her on progress with the scheme.
27 June 2018	Meeting	Monthly progress meeting to discuss the progress of the scheme.
4 July 2018	Meeting	Discussion of Habitats Regulations in relation to the construction of Princes Quay Bridge.
25 July 2018	Meeting	Monthly progress meeting to discuss the progress of the scheme.

31 July 2018	Listed Building meeting	<p>Presentation of the options discussed in the feasibility report for the Earl De Grey. Historic England noted lack of mention of a further option, the reconstruction of the body of the building principally retaining the facade and front elevation. This was reported as technically challenging but shall be included in the updated report and the reasons for its rejection stated.</p> <p>HCC provided an update on revised development proposals which were currently being worked up by Wykeland. These envisage the Earl de Grey public house being re-sited and a new hotel intended to be, in design terms, a 'good neighbour' of the listed buildings.</p>
29 August 2018	Meeting	Monthly progress meeting to discuss the progress of the scheme.
5 September 2018	Email	Historic England raised the point that mitigation relating to Beverley Gate had not been specifically discussed at previous Cultural Heritage Liaison Group meetings. Provision for mitigation and watching brief already included in the Environmental Statement and this has been added to the SoCG.
17 September 2018	Presentation	Presentation of scheme details and programme at Hull City Council Cabinet meeting.
18 October 2018	Meeting	Meeting to discuss a section 61 for construction of Princes Quay Bridge.
31 October 2018	Meeting	Monthly progress meeting to discuss the progress of the scheme.
14 November 2018	Workshop	Discussion of the benefits of the A63 Castle Street Scheme.
15 November 2018	Meeting	Meeting to begin drafting of the Statement of Common Ground.
21 November 2018	Workshop	Presentation of the DCO examination process with attendance Hull City Council
22 November 2018	Workshop	Collaborative Planning to discuss the construction programme for Princes Quay Bridge.
28 November 2018	Meeting	Monthly progress meeting to discuss the scheme. Discussion of progress of the DCO, cultural heritage and HE's acquisition of the Myton Centre and relocation of Hull City Council staff based in the building. Discussion of agreements for use of the Arco Compound and progress on construction of Princes Quay Bridge.

4 December 2018	Meeting	Meeting to discuss the impact of traffic management on the local network and possible mitigation solutions.
19 December 2018	Meeting	Monthly progress meeting to discuss the progress of the scheme.
30 January 2019	Meeting	Monthly progress meeting to discuss the progress of the scheme.
8 February 2019	Meeting	Meeting to continue drafting of Statement of Common Ground. Discussion of response to Hull City Council's Relevant Representations
13 February 2019	Meeting	Joint Meeting with the owners of the Castle Buildings and Earl de Grey to review proposals for new development incorporating the building on an adjacent plot.
27 February 2019	Meeting	Monthly progress meeting to discuss the scheme and progress with the DCO and construction of Princes Quay Bridge.
27 February 2019	Meeting	Meeting to discuss the programme for the detailed design and agree how Hull City Council will be consulted through the design process.
27 March 2019	Meeting	Monthly progress meeting to discuss the scheme and progress with the DCO and construction of Princes Quay Bridge.
27 March 2019	Meeting	Monthly detailed design meeting, plans presented and discussed including the upgraded High Street route, Myton centre, William Street Turning Head, Cogan Street and James Street. Also discussion of the Old Town area and parking on Blanket Row.

2.1.2 It is agreed that this is an accurate record of the key meetings and consultation undertaken between (1) Highways England and (2) Hull City Council in relation to the issues addressed in this SoCG.

3 ISSUES

3.1.1 A summary of issues identified within the ES in relation to the Application is outlined in Table 3.1.

Topic	Sub-section	Hull City Council Comment	Highways England Response	Status
The Scheme Considerations of alternatives	Environmental Statement chapter 3 Paragraph 3.3.4	Hull City Council consider that the underpass solution is an appropriate and acceptable solution for the existing traffic problems on the A63 Castle Street	Highways England announced the underpass solution as the preferred route for this scheme.	Agreed
	Environmental Statement chapter 3 paragraph 3.2	Hull City Council are content that alternative options for the scheme have been considered.	Alternative options were considered and discounted prior to the Preferred Route Announcement.	Agreed
Consultation	Environmental Statement chapter 4 paragraph 6.2.6	Hull City Council are content that they have been adequately consulted by Highways England throughout the scheme development.	Highways England have consulted Hull City Council throughout development of the scheme.	Agreed

Draft DCO	Part 2 Article 6(b)	<p>A vertical deviation of up to 500mm has the potential to have significant impacts upon matters such as surface and flood water drainage flows, equitable access, and the physical integrity and settings of heritage assets, and could therefore give rise to materially worse or materially new adverse environmental effects.</p> <p>Recommend that article 6(b) be amended to read 'provided such deviation would not give rise to any materially new or materially worse adverse environmental effects in comparison with those reported in the Environmental Statement.'</p>	<p>A vertical deviation has been included to allow some flexibility during the detailed design of the scheme.</p> <p>Hull City Council will be consulted during the detailed design process with regards to use of the vertical deviation.</p> <p>Highways England are confident that the limits of deviation for this scheme are appropriate.</p>	Under discussion
		<p>Hull City Council seeks clarity on what constitutes consultation with the local planning authority? Who consults the local planning authority and at what stage? How long does the local planning authority have to respond? How is the local planning authority's response handled and considered? Hull City Council suggests that the terms of consultation are set out within the Draft DCO under 'PART 2 Procedure for discharge of requirements'</p>	<p>Highways England would allow a period of up to 8 weeks for consultation with the Local Planning Authority. Highways England would be expected by the Secretary of State to demonstrate how comments received from this consultation have been addressed.</p>	Under discussion.

		<p>Hull City Council queries why the local planning authority is not a discharging authority for some matters.</p> <p>Hull City Council suggests that the terms of consultation are set out within the Draft DCO under 'PART 2 Procedure for discharge of requirements'</p>	<p>The current process for Highways England is that the Secretary of State discharges the requirement – however they will only be discharged following full consultation with Hull City Council. This consultation must be demonstrated to the Secretary of State.</p>	<p>Under discussion</p>
Air Quality	<p>Environmental Statement chapter 6 paragraph 6.2.6</p>	<p>Hull City Council are content with the assessment of air quality for the scheme.</p>	<p>The methodology used to assess air quality chapter 6 of the Environmental Statement is in accordance with HA207/07</p>	<p>Agreed</p>
	<p>Environmental Statement chapter 6 paragraph 6.7.1</p>	<p>Hull City Council will be consulted on the Construction Environmental Management Plan (CEMP) as the relevant planning authority.</p>	<p>The Construction Environmental Management Plan (CEMP) will be produced in and include a dust, noise and nuisance management plan.</p>	<p>Agreed</p>
Noise and Vibration	<p>Environmental Statement Chapter 7 paragraph 7.2.3 and 7.5.16</p>	<p>Hull City Council are content with the assessment of Noise and Vibration for the scheme.</p>	<p>The methodology used in the Environmental Statement is in accordance with HD 213/11 in determining the noise impacts of construction vibration, construction and operational noise.</p>	<p>Agreed</p>

	<p>Draft Development Consent Order Schedule 2, Part 1 paragraph 4.1</p>	<p>It is agreed that exception to standard operating times shall be agreed in consultation between Highways England and Hull City Council.</p>	<p>Highways England will adhere to working hours of 07:30 to 18:00 Mondays to Fridays and 08:00–13:00 on Saturday with the exception of</p> <ul style="list-style-type: none"> (i) night-time closures for bridge demolition and installation; (ii) any oversize deliveries or deliveries where daytime working would be excessively disruptive to normal traffic operation; (iii) junction tie-in works; (iv) removal of overhead power lines; (v) overnight traffic management measures; (vi) cases of emergency; and (vii) as otherwise agreed with Hull City Council as the local authority in advance. 	<p>Agreed</p>
		<p>Hull City Council will agree to provide a section 61 agreement for the construction of the scheme as legally required to do so if requested. However Hull City Council recommends subdividing the works into phases or sections for those purposes.</p>	<p>Highways England considers that a Section 61 agreement is required to ensure the programme can be delivered on time. There is a large number of driven and bored piles to facilitate the scheme.</p>	<p>Agreed</p>

		Hull City Council consider that further noise monitoring is required.	Highways England agree that noise monitoring will continue to be undertaken throughout the construction period.	Agreed.
	Environmental Statement chapter 7 Statement of Statutory Nuisance	Hull City Council will be consulted on the Construction Environmental Management Plan (CEMP) as the relevant planning authority.	The Construction Environmental Management Plan (CEMP) will be produced and include a dust, noise and nuisance management plan.	Agreed
	DCO Schedule 2 Part 1 Article 4 (4)-(6)	Hull City Council require clarification on which authority the Handover Environmental Management Plan (HEMP) is issued to for approval monitoring and enforcement	Highways England confirm that the Handover Environmental Management Plan (HEMP) is not issued to Hull City Council however issues relating to the operation and maintenance are included in the Construction Environmental Management Plan (CEMP) which is issued to Hull City Council for approval, therefore all matters Hull City Council raise in the Construction Environmental Management Plan (CEMP) will transferred to the Handover Environmental Management Plan (HEMP).	Agreed

<p>Cultural Heritage</p>	<p>Environmental Statement Chapter 8</p>	<p>Whilst recognising the validity of Historic England guidance on the subject, Hull City Council also recognise the jurisdiction of the Diocesan Advisory Committee and Parochial Church Council in this matter and Highways England's concerns over the costs and programme implications relative to the public benefit of a more extensive sample size.</p>	<p>The Highways England methodology for clearance and archaeological works in Trinity Burial Ground allows for the osteological analysis of up to 1500 burials (or an estimated ~11% of burials suitable for analysis).</p> <p>Although this is not comparable with the recommended sample size given by Historic England the sample size has been governed by views held by the Parochial Church Council (PCC) and Diocesan Advisory Committee (DAC) for the Diocese of York who have agreed a Faculty to undertake the works. Project constraints such as programme and cost against public benefit have also been considered in the sample size.</p> <p>It is the Diocesan Advisory Committee and Parochial Church Council who are responsible for agreeing the Faculty submission to undertake the clearance works.</p>	<p>Agreed</p>
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	<p>Environmental Statement chapter 9 paragraph 9.5.16</p>	<p>Hull City Council are the maintainers for Trinity Burial Ground as a closed burial ground. Consultation on maintenance and the design of the remaining burial ground is required.</p>	<p>Further discussions are required on maintenance of Trinity Burial Ground both during construction and afterwards.</p> <p>Highways England have consulted on the initial landscape design for the burial ground and will continue through detailed design.</p>	<p>Agreed</p>
	<p>Environmental Statement chapter 8 paragraph 8.8.9</p>	<p>Hull City Council are not supportive of reinstating the Earl de Grey building three metres back from its current position. This would serve to compromise the integrity of the listed building, further weakening its profile by recessing the building, and increasing the likelihood of continued vacancy and deterioration. Such an action would also sterilise the wider allocated development site and the setting of Castle Buildings due to its staggered position.</p> <p>Hull City Council support dismantling of the building and storage for incorporation into a future development, and are currently considering applications for full planning permission and listed building consent (under reference numbers 19/00333/FULL & 19/00334/LBC) which include proposals for the dismantling of the Earl de Grey and its reconstruction on Waterhouse Lane, adjacent and physically linked to Castle Buildings on land adjacent to but outwith the order limits.</p> <p>Hull City Council seeks the inclusion of a recording, dismantling, storage and reconstruction method statement requirement be considered given the limited detail included within the submission in this regard.</p>	<p>Highways England are working with the building's owners to ensure that the Earl de Grey building can be incorporated into a future development on the adjacent site.</p> <p>The planning determination for this development is expected in June 2019.</p> <p>Highways England agree with the principle of relocating the Earl de Grey within the proposed development to facilitate the provision of two lanes of traffic on the A63.</p>	<p>Under discussion</p>

		<p>Hull City Council have served a Section 215 notice upon the owners of the Castle Buildings. The roof repairs and scaffolding must be removed by August 2019 according to the Section 215 notice. The applications for planning permission and listed building consent referred to above are likely to be determined in June 2019. In the event that those applications are approved, it would be appropriate for the Council to take into account any realistic start date for development to commence and any works schedule provided by the applicant before determining the expediency and timing of any further action.</p>	<p>Highways England requires the scaffolding on the Castle Buildings to be removed by August 2020 so appropriate traffic management can be placed on the network during the construction phase and to commence the statutory undertaker diversions.</p>	<p>Agreed</p>
	<p>Draft DCO Schedule 2 Part 1 Article 12</p>	<p>Hull City Council have concerns about the impact of the proposed central barrier on the settings of listed buildings, character and appearance of the old town conservation area, and the city centre townscape generally.</p>	<p>Highways England note Hull City Council's Concerns over the central barrier. Workshops will be established during the detailed design phase to assess the options within the Design Manual for Roads and Bridges (DMRB) standards.</p>	<p>Under discussion</p>

	Draft DCO Part 4 Article 18 and Part 5 Article 29	Hull City Council are concerned about the implications for heritage assets and lack of control through Listed Building Consent. Hull City Council recommend that a requirement be added for details of any additional works to listed buildings that have not been assessed as part of the Environmental Statement to be submitted to the Secretary of State for approval following consultation with the local planning authority and Historic England.	The DCO includes listed building consent and therefore separate consent from Hull City Council will not be required. We have only carried out the environmental assessment in relation to those listed buildings that will be affected (Castle Building and Earl de Grey) and it is not proposed to extend these powers to other heritage assets.	Under discussion.
Landscaping	Environmental Statement Chapter 9	Hull City Council have been consulted regarding landscaping design.	Highways England must consult with Hull City Council as the relevant planning authority on landscaping for the scheme.	Agreed
	Environmental Statement Chapter 9 paragraph 9.7.9	Hull City Council consider the replacement public open space to be suitable with regards to distance and amenity.	Highways England propose to acquire the Myton Centre for use as replacement public open space.	Agreed
		Hull City Council agree that that the Myton Centre will be used to create new public open space. An agreement is required with Highways England on compensation for the building. Hull City Council will work to relocate the services currently located at the Myton Centre by May 2020.	Highways England will discuss an agreement with Hull City Council on compensation for the loss of the Myton Centre.	Agreed

		<p>Hull City Council would like to ensure that suitable materials are used in across the Urban Townscape and with particular regard to conservation areas.</p> <p>Hull City council have provided hard landscaping specifications to Highways England.</p>	<p>Highways England have consulted with Hull City Council on landscaping and urban townscape across the scheme and will continue this through the landscaping approval requirement.</p>	<p>Agreed</p>
	<p>Environmental Statement Chapter 11 Paragraph 11.4.9</p>	<p>It is agreed that Hull City Council have been consulted adequately in their role as Lead Local Flood Authority and that the Flood Risk Assessment (FRA) that has been carried out is appropriate to the scale and nature of the scheme, subject to updating of climate change allowance modelling.</p> <p>Hull City Council are interested in the emergency evacuation procedures for the underpass and wish to be fully consulted in Highways England proposals to deal with this issue.</p>	<p>Highways England have consulted with Hull City Council and the Environment Agency on flood risk throughout and will continue this through the detailed design process.</p>	<p>Under discussion.</p>
<p>Road Drainage and water environment</p>	<p>Environmental Statement Chapter 11 paragraph 11.1.7</p>	<p>Hull City Council accept Highways England's justification for avoiding the rising main outfall to the estuary on the grounds of technical feasibility and economic viability</p>	<p>Highways England have reached an agreement with Yorkshire Water to discharge water from the underpass into the existing sewer network.</p>	<p>Agreed</p>
		<p>Hull City Council support the need for a pumping station which reduces the schemes impact on the Hull City Council's network in a flooding event.</p>	<p>A pumping station is required by the scheme and it is to be agreed with the Environment Agency and Yorkshire Water.</p>	<p>Agreed</p>
<p>Materials</p>		<p>Hull City Council require that the CEMP be produced which will include a Site Waste Management Plan (SWMP), a</p>	<p>It is agreed that Highways England must consult with Hull</p>	<p>Agreed</p>

	Environmental Statement Chapter 13	Materials Management Plan (MMP) and a Soil Management Plan.	City Council on the CEMP as the relevant planning authority.	
	Baseline conditions	Hull City Council require that a traffic management plan be produced and that this plan will include the transportation of material and waste during construction.	It is agreed that Highways England must consult with Hull City Council as the relevant planning authority with regards to the traffic management plan.	Agreed
Traffic Management		Hull City Council are concerned about the impact on the local road network during construction of the scheme and will work with Highways England on mitigation for this.	Highways England have committed funding to make local road improvements in advance of the main construction works. A scope has been drafted to identify these improvements working with Hull City Council.	Agreed
		Hull City Council are concerned about the restriction on movements at Mytongate junction during construction of the underpass.	Highways England previously proposed to close all traffic movements onto the A63 at Mytongate. Following discussion with Hull City Council, the current proposal restricts right turns at both sides of the junction. It is agreed that the Mytongate junction be signalised during construction as it is recognised by Highways England that a give way at the junction would not work from both a safety and capacity perspective.	Agreed

		It is agreed that Hull City Council will work collaboratively with HE to produce a Traffic Management Plan (TMP)	<p>A Traffic management plan including for construction traffic will be created and consulted with Hull City Council and the Police.</p> <p>Highways England are aware that there is a pending Traffic Management Permit System likely to be introduced in 2020 and we will work with Hull City Council to ensure this is utilised for work outside of the trunk road.</p>	Agreed
Traffic Assessment	DCO Transport Assessment paragraph 2.4.22	Hull City Council agree that the methodology for the transport assessment is appropriate and has complied with relevant guidance. Hull City Council have provided updated uncertainty logs to be used in the transport assessment.	<p>Highways England have conducted sensitivity testing on the most recent changes to government guidance.</p> <p>A TUBA economic assessment will be undertaken to ensure the latest changes have had no significant impact on the previous modelling for the scheme.</p>	Agreed
		Hull City Council require details of the gating arrangements for the access to and from Grammar School Yard.	Highways England are working closely with the affected stakeholders regarding this solution and will continue to keep Hull City Council engaged.	Under discussion.

<p>Hull City Centre Network - Old Town</p>		<p>Hull City Council have worked with Highways England on development on proposals for the Old Town area and will continue to do so as the scheme design progresses.</p> <p>Areas over which amendments sought to DCO schedules and plans:</p> <ul style="list-style-type: none"> - On street parking restrictions - Weight restrictions - Priority routing 	<p>Highways England agree to consult with Hull City Council on the proposal for the Old Town including Traffic Restriction Orders, parking including disabled parking and priority working.</p>	<p>Under discussion</p>
	<p>Roads Subject to Miles per Hour Limits DCO Part 3 Article 11 (2) & (3), Schedule 3 Parts 3 & 4</p>	<p>Hull City Council considers the extent of 40mph speed limit zone between 5/24-5/25, 5/28-5/29, 5/30-5/31, and 5/26-5/27 respectively on drawing no. Traffic Regulation Plans Regulation 5(2)(o) sheet 5 of 6 need to be amended to 30mph. This would address concerns about pedestrian safety and potentially inappropriate vehicle speeds either side of the proposed uncontrolled pedestrian crossings over the north-bound and south-bound slip roads between the A63 and Queen Street and Market Place respectively, shown on drawing no. Non-Motorised User Route Plans Regulation 5(2)(o) sheet 5 of 6.</p>	<p>Highways England are working closely with Hull CC regarding this arrangement and it will continue to do so as part of the detailed design process.</p> <p>Any such amendments identified will be updated within the application.</p>	<p>Under discussion</p>
<p>Emergency Procedures</p>		<p>Hull City Council support the use of signals to provide an emergency mode to allow traffic to bypass the underpass in the event of an incident.</p>	<p>Highways England are proposing the signals on the A63 will have an emergency mode in the event of an incident in the underpass to allow traffic to use the slip roads to continue travel along the A63. This will be</p>	<p>Agreed</p>

			developed during detailed design.	
Traffic Signals Maintenance		Traffic signals are currently monitored by Hull City Council on behalf of Highways England. Hull City Council will work with Highways England to agree extent of future monitoring responsibility.	The same arrangement will continue for any remaining signals and the Area 12 Operations team will be engaged throughout.	Under discussion.
Road Safety		It is agreed that the scheme offers significant road safety improvements.	It is agreed that the scheme offers significant road safety improvements.	Agreed
		Highways England will provide Road Safety Audit reports to Hull City Council.	Hull City Council have participated in previous Road Safety Audits and will have the opportunity to be involved in future audits.	Agreed
		Sensitive methods for deterring pedestrians from crossing at grade around the Market Place / Queen Street Junction need to be identified. Solutions will need to be of a design and appearance appropriate to a city centre, the settings of listed buildings and the Old Town Conservation Area setting. Additional requirement for agreeing proposed solution is recommended.	Highways England note HCC concerns over this detail. Workshops will be established during the detailed design phase to assess options within the Design Manual for Roads and Bridges (DMRB) standards.	Under discussion
NMU routing	NMU Plans	It is not clear from the Non-Motorised Users (NMU) plans how cyclists in particular, but also pedestrians are intended to access the Princes Quay Bridge from the south side of the A63 westbound. This situation is complicated by draft plans	Highways England are working with Hull City Council to finalise the route between the recently completed Fruit	Under discussion

		for works to the north end of Humber Dock Street as part of the on-going regeneration of the Fruit Market.	Market area and the bridge in respect of the draft plans for the area.	
NMU routing	NMU Plans	The NMU plans show the removal of the existing footway to the north side of the A63 between the Earl de Grey and Princes Dock Street. This appears at odds with images submitted in support of the Landscape chapter of the ES.	This is an omission on the NMU plans, the footpath will be retained and the DCO amended to reflect.	Agreed
NMU routing	NMU Plans	Hull City Council have not seen any NMU survey info to support the design and orientation of the Porter Street Bridge, particularly with regard to journey length minimisation.	<p>The design of the bridge has been developed to take account of the surrounding environmental constraints as follows:</p> <p>The positioning of the landings has been chosen to provide the most natural desire line for the principal pedestrian movements across the A63, positioned as close as possible to end of Porter Street and equidistant between the main ARCO entrance and the stopped-up St. James Street.</p> <p>The construction of the bridge will require the removal of a number of small trees and shrubs close to both landing areas. These will be replaced by compensatory planting as</p>	Under discussion

			<p>part of the landscape proposals.</p> <p>Careful consideration has been taken to fully integrate the landing areas with the surrounding public realm and to make the bridge, including its ramps and stairs as accessible/useable as possible. This has included forming small raised platform areas with very shallow approach slopes in order to limit the amount of stairs and ramps. It has also allowed the bridge landings to be integrated with vehicle restraint barriers, particularly around the south landing.</p> <p>The structural design has been rationalised to absolutely minimise supporting substructures. This has a distinct aesthetic benefit as well as an economic benefit as it keeps the ground level views largely uncluttered by columns making the bridge appear light and airy. Limiting substructures and dark areas beneath ramps also reduces the possibility of anti-social behaviour.</p>	
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			The proposed design has minimised the use of new materials and site processes by efficient design and maximising off-site fabrication.	
NMU routing	NMU Plans	The uncontrolled crossings (east to west) across Market Place and Queen Street should be controlled as recommended in the safety audit. Hull City Council seek amendments to the NMU plans to reflect this	This was raised within the Road Safety Audit and will be addressed during detailed design and NMU plans will be updated to reflect this.	Under discussion.
NMU routing	NMU Plans	Myton Bridge to Blackfriargate route – Concerns over current specification, feasibility of improvements and reliability on designated funds for delivery. Further concerns over wider routing into the Fruit Market.	Highways England feel that the proposals in this locality represent a marked improvement to the current area and will help to aid regeneration and ensure pedestrians can cross under the A63 safely and in a fully accessible manner.	Under discussion
Programme		Hull City Council have been provided with a high-level outline of the phasing of the construction works.	Phasing of the works will be further developed during detailed design and Hull City Council will be consulted throughout the process	Agreed
Land Acquisition	Land Plans	Hull City Council have reviewed the land plans submitted with the DCO application and there is no known impediment on the Hull City Council land being used to construct the scheme.	Highways England have consulted with Hull City Council on land acquisition for the scheme.	Agreed

Compound Location		<p>Hull City Council object to the use of the ‘Staples’ site as a production compound within the DCO and wish to express a very strong preference for the ‘Arco’ site. The site is allocated as part of a City Centre Development site for mixed main town centre uses in the Hull Local Plan, with the land in question anticipated to deliver around 6000m2 net retail space, and was identified as key to the realisation of the city’s retail sector aspirations through public inquiry on a recent appeal for out of centre shopping development (reference APP/V2004/W/17/3171115 . It constitutes a visually sensitive gateway site to the city centre from the A63 western approach, and sits adjacent to a new £35m 3500 capacity mixed use performance and entertainment venue and conferencing facility, with multi-storey car park and extensive public realm works, which would be compromised by this option.</p>	<p>Highways England have supported the request from Hull City Council to look at alternative production compounds and have worked closely with them on this prior to submission of the application. Both sites currently remain in the application until the planning determination for Arco’s new site has been approved.</p> <p>Highways England anticipate confirmation of the site to be used by 17 May 2019.</p>	Under discussion.
Princes Quay Bridge		<p>Hull City Council support the early construction of Princes Quay Bridge through the local planning permission and listed building consent previously granted.</p>	<p>Highways England have progressed the construction of Princes Quay bridge prior to construction of the scheme via the Town and County Planning Act following the agreement with DfT and are building the scheme in line with approved plans.</p>	Agreed

<p>Princes Quay Bridge NW steps</p>		<p>Hull City Council harbour concerns about the townscape impact of particular detailed elements of Princes Quay Bridge structure, and legibility and quality of experience for NMU users on approach to it from the north-west.</p> <p>Prior to the submission of the improvement scheme, Hull City Council were asked to consider an application for a non-material amendment which included a reduction in landscape planters and the re-orientation of access steps at the north-west approach to the bridge from an arrangement parallel to the A63 carriageway, to one perpendicular to it.</p> <p>On the basis of known information at the time, the LPA accepted the revisions as non-material, and granted an amended permission.</p> <p>Subsequent to the submission of the improvement scheme and consequent availability of information relating to the design, including alignment, breadth, and profile of the carriageway, the alignment of NMU routing, and the extent of both permanent and temporary land acquisition in the vicinity of the bridge, Hull City Council are of the opinion that the revised design of the bridge, in the context of the design of the remainder of the improvement scheme would result in sub-optimal visual impact, and experience in terms of legibility and environment for NMUs.</p> <p>The Council are particularly concerned that the re-orientation of the steps and height of the retaining wall to the planters presents a high and austere corner of brick walling on approach from the north-west, as depicted on Figures 9.6 to Chapter 9 of the submitted Environmental Statement.</p> <p>This effect would be compounded by the fact that the NMU route along the northern side of the A63 in this location is shown running adjacent to the carriageway edge, thereby requiring NMUs to make a sharp, right-angled turn northwards</p>	<p>Highways England have progressed the construction of Princes Quay bridge prior to construction of the scheme via the plans approved by Hull City Council.</p> <p>This request seeks to alter these plans to incorporate a new stair access in this locality.</p> <p>Whilst Highways England understand the proposal and have assisted there are concerns that achieving it will leave an area of shared footway with sub-standard width.</p> <p>Discussions remain ongoing and options are being explored.</p>	<p>Under discussion</p>
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		<p>to access the bottom of the steps and lower ramp approach. The combined result would be less than ideal from a legibility perspective for NMUs in general, but especially for those with visual impairment, and potentially for cyclists and mobility scooters travelling at any pace, as well as appearing visually dominant and oppressive, particularly in the context of the settings of surrounding heritage assets, the inclusive and welcoming public realm proposed, and the high quality design of the bridge structure itself.</p>		
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