

# A63 Castle Street Improvement, Hull

TR010016

Written Submission of Applicant's case put orally at Issue Specific Hearing (3)  
Historic Environment  
on 6 June 2019



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## A63 Castle Street Improvement, Hull Development Consent Order 20[xx]

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## 1 Introduction

### 1.1 Purpose of this document

- 1.1.1 This document summarises the case put by Highways England (the Applicant), at the Issue Specific Hearing (ISH 3) regarding Historic Environment that took place at the KCOM Stadium, Hull on 6 June 2019.
- 1.1.2 In what follows, the Applicant's submissions on the points raised broadly follow the Agenda for ISH 3 set out in the Examining Authority's (ExA) letter which was published on the Planning Inspectorate's website on 28 May 2019.
- 1.1.3 The following members of the Applicant's team spoke during this ISH:
- Stephen Whale, Counsel to the Applicant (**SW**)
  - Katie Persaud, Associate, BDB Pitmans (**KP**)
  - James Leeming, Senior Project Manager, Highways England (**JDL**)
  - Frances Oliver, Assistant Project Manager, Highways England (**FO**)
  - Chris Hewitson, Principal Heritage Consultant, Mott MacDonald Sweco (**CH**)
  - Blaise Vyner, Heritage Consultant, Mott MacDonald Sweco (**BV**)
  - Matthew Twiss, Design Manager, Balfour Beatty (**MT**)

## 2 ExA Agenda Item 1 - Welcome, introductions and arrangements for the hearing

- 2.1.1 The ExA welcomed all parties to the hearing and discussed the agenda and format for the day.
- 2.1.2 The ExA explained the process for recording of the hearings and noted that they would be available on the Planning Inspectorate website for a period of five years post hearing.
- 2.1.3 **SW** confirmed that DCO Plans have been revised to take account of changes arising from the removal of the Staples compound Option B. In addition, an ES Addendum 1 "Assessment of changes to effects arising from removing the Staples site compound from the DCO" has been produced. All documents were issued to the ExA on 7<sup>th</sup> June 2019.

## 3 ExA Agenda Item 2 – The Earl de Grey

### 3.1 Update on the proposals for this listed building

- 3.1.1 ExA noted the proposed works to Earl de Grey and Castle Buildings as detailed in the DCO application.
- 3.1.2 **MT** noted that the DCO submission states that the buildings would be rebuilt 3m back from their current location on the line of the A63 Castle Street.

- 3.1.3 **CH** clarified that the assessment within the ES Chapter 8 Cultural Heritage, Section 8.8.17 (APP-023) reflects a worst-case scenario based on the dismantling of the Earl de Grey and the buildings not being rebuilt as no proposals had been put forward at the time of assessment. This is considered substantial harm under the terms of the NPPF 2012, section 132, 133 and 134 (NPPF 2018, section 194, 195 and 196).
- 3.1.4 HCC subsequently confirmed the planning application and listed building consent referred to as Land to the North of Castle Street and South-East of Waterhouse Lane including Castle Buildings and the Earl de Grey Public House (19/00333/FULL and 19/00334/LBC) has been approved. The planning committee granted conditional approval for the movement of the Earl de Grey to a position on Waterhouse Lane and development (including a nine-storey hotel) of the surrounding area on Wednesday 5 June 2019.

### 3.2 Effect on special interest

- 3.2.1 **SW** iterated that the assessment was undertaken with the Earl de Grey dismantled. The two other scenarios, that in the DCO application where the Earl de Grey was rebuilt 3m back from the A63 Castle Street or in line with the planning application where it was rebuilt on Waterhouse Lane would be less than the impact of the entire loss of the Earl de Grey.
- 3.2.2 **CH** agreed with SW comments. The retention of the Earl de Grey is likely to be an improvement on the assessment. The moving of the Earl de Grey to Waterhouse Lane would represent a change to the setting but would not necessarily be detrimental to the setting of the Castle Buildings. This has not been formally assessed at the current time.

### 3.3 Justification

- 3.3.1 **MT** outlined how the Applicant has made a commitment to retain two lanes of traffic on the A63 Castle Street in each direction during the construction of the scheme. The vehicular traffic on the A63 will use two narrowed lanes as it travels through the works. The lane widths will be 3.25m on the nearside and 2.75m on the offside are the most probable.
- 3.3.2 **MT** described how, without movement of the Earl de Grey, the passing traffic runs too close to the structure and the frontage to the building would become unusable. This places the building at risk of vehicle impact damage and vibration damage. Preliminary Traffic Management phasing also indicates that traffic is too close to offer the appropriate containment level and sufficient working space for the extents of the underpass.
- 3.3.3 To facilitate the movement of traffic and to ensure safe working room for construction and Statutory Undertaker diversions and enough space for the safe passage of the travelling general public and operational working room in the area the Earl de Grey building must be dismantled and moved. This is due to the swept path of the vehicles heading east.
- 3.3.4 Historic England previously asked for a delayed phasing of the demolition and the movement of the Earl de Grey with reference to 5.1.6 of the NPS. **MT** explained how this is not appropriate as due to the fragility of the building it will

remain at risk if it is not dismantled. This is due to statutory undertaker diversions and enabling works that will take place in close proximity and the unknown effect that this may have on the structure.

### 3.4 Mitigation measures

- 3.4.1 **MT** stated that due to the proximity of running traffic, the required containment levels and the protruding sections of the structure the building continues to be at risk of vehicle impact damage if it remains in the current position.

## 4 ExA Agenda Item 3 – The Castle Buildings

### 4.1 Update on the proposals for this listed building

- 4.1.1 **SW** confirmed that the official listed name is Castle Buildings.

- 4.1.2 *[Post Hearing Note: The buildings formerly referred to as the Castle Street Chambers have seen non-significant elements de-listed in 2017 and dismantled in 2018. They are referred to in the ES as the Castle Buildings in line with their legal listed name amended on the 26 July 2017 on the National Historic List for England. There is no partial demolition of the Castle Buildings proposed. All references within the ES to the demolition of the Castle Street Chambers refer to historic dismantling of the building that occurred after de-listing of the non-significant parts of the buildings (13-14 Castle Street) that were unsafe and fire damaged in 2018. The dismantling of 13-14 Castle Street and remedial works to the Castle Buildings was undertaken on a separate listed building consent (18/00029/LBC) and is not considered as part of the proposed Scheme.]*

- 4.1.3 **MT** stated that following the removal of the annex (13-14 Castle Street) in 2018, the A63 Castle Street Improvement would no longer need to move the Castle Buildings. The building will be protected throughout construction.

### 4.2 Effect on special interest

- 4.2.1 **CH** stated that the assessment of the setting of Castle Buildings (ES Chapter 8 Cultural Heritage Section 8.9.16 (APP-023) and ES Appendix 8.3 Cultural Heritage Section 1.2, Table 1.5, reference MMS603 (APP-048)) was based on the scenario above i.e. that the Earl de Grey was to be dismantled and wasn't being re-built.
- 4.2.2 This states that the dismantling of the Earl de Grey public house and changes to the layout of the Mytongate Junction would change the setting of the Castle Buildings and further degrade the historic street layout of Castle Street in particular removing a former building on Castle Street.
- 4.2.3 The assessment was not based on the rebuilding of the Earl de Grey 3m back as stated in the DCO application but was based on its total loss. In both these scenarios the assessment would be considered harm but less than substantial harm to the setting of the Castle Buildings under the NPPF 2012, section 132, 133 and 134 (NPPF 2018, section 194, 195 and 196).
- 4.2.4 **CH** stated that the subsequent successful planning application and listed building consent referred to as Land to the North of Castle Street and South-East of Waterhouse Lane including Castle Buildings and the Earl de Grey Public

House (19/00333/FULL and 19/00334/LBC) by Wykeland Development changes the assessment of impact to the Castle Buildings.

#### **4.3 Justification**

4.3.1 **MT** explained how in the original phasing of the traffic management the diverted traffic clashed with an annex to the side of the building.

4.3.2 **MT** stated that following the removal of the modern annex in 2018 the swept path for the structure does not appear to cause an issue on the east bound lane 1 traffic running too close to the building.

4.3.3 The impact of working alongside the Castle Buildings which border the traffic routes has been investigated in the preliminary design and resulted in reduced lane sizes through the area. As detailed design progresses clarity on detailed widths will become more apparent.

#### **4.4 Mitigation measures**

4.4.1 Protection of the structure will be done with the installation of barriers and speed restrictions as outlined with comments made by **MT** during the ISH for Traffic and movement (Hearing 1).

## 5 ExA Agenda Item 4 – Old Town Conservation Area and King William III statue

### 5.1 Effects of the scheme on character and appearance/setting

- 5.1.1 **CH** confirmed that the assessment of the impact to the Old Town conservation area has been considered in the ES Chapter 8 Cultural Heritage, paragraphs 8.9.12, 8.9.18 and 8.9.22 (APP-023) and considered the whole Scheme through the Conservation Area.
- 5.1.2 **CH** stated that where the Scheme passes through the Old Town Conservation Area the baseline environment is one of the weakest elements of the conservation area. There is limited historic building stock and the grain of the street pattern has been disrupted by the existing A63 Castle Street. This is reflected in the assessment of significance for the individual components of the Old Town conservation area outlined in Appendix 8.2, Table 2.2, section B2, B3, and C2 Docklands (APP-048) where the assessment is that it is medium value in comparison with other areas of the Old Town Conservation Area which are of high value.
- 5.1.3 **CH** stated with regards the area by Market Place the civil construction work extents for the Scheme stop prior to the Statue of King William III and Flanking Lamps. There would be no physical impact on the statue. The impact will be to the setting of the Statue of King William III and Flanking Lamps due to the construction of the Scheme. The construction of the A63 Castle Street Improvements would result in the movement of the road slightly to the north closer to the Statue of King William III and Flanking Lamps. However, its setting would be largely unchanged as the road would still be present and surrounded by railings. The temporary negative impact on the setting of the asset is identified in ES, Chapter 8, section 8.9.10 (APP-023). This would result in temporary moderate adverse effect for the duration of the proposed Scheme. Permanent construction and operation impacts would result in slight adverse effects and are not considered significant. These are detailed for assessment of the permanent construction impacts in Appendix 8.3, Table 1.2, reference MMS600 (APP-048); and for assessment of operational impacts in Appendix 8.3, Table 1.3, reference MMS600 (APP-048).
- 5.1.4 **CH** stated severance between the northern and southern sides of the conservation area has been ongoing since the construction of the A63 Castle Street in the 1970s. Severance issues have been addressed by the construction of the Porter Street pedestrian, cycle and disabled user bridge (referred to as Porter Street Bridge), the Mytongate overbridge, the Princes Quay Bridge and improvements to the underpass beneath Myton Bridge adjacent to High Street, which would replace a series of four at-grade crossings which respond slowly and change infrequently due to traffic volume. Although this would change the nature of the crossings this would be an enhancement in the case of the Princes Quay Bridge and would result in a neutral effect to the crossing at Queen Street.
- 5.1.5 **CH** stated that there is limited areas and scope within the Conservation Area to improve the public realm. The boundaries of the proposed Scheme are close to the buildings in the conservation area and public space is limited to a few



parcels of land at Market Place, Princes and Humber Dock and the Trinity Burial Ground. This limits the areas for landscape design.

5.1.6 **[Post Hearing note:** *The mitigation improvements to the Old Town are discussed in the ES Chapter 9, paragraph 9.7.17 (APP-023) and shown on ES Figure 9.8 Landscape Proposals (APP-035). The following areas have included positive improvement in the design.*

- *Natural stone paving to areas within the Old Town Conservation Area;*
- *Market Place improvements to the High Street Underpass. New tree planting has been proposed at the eastern end of the Scheme close to the Magistrates Court and the changes to the underpass.*
- *Princes and Humber Dock - The construction of the Princes Quay Bridge and associated public realm works around the grade II listed Warehouse No. 6, grade II listed Humber Dock and Grade II listed Princes Dock would have positive impacts on the Old Town Conservation Area as detailed in Appendix 8.3, Table 1.6 and 1.9 (detailed section C2 Zone 2 Docklands) (APP-048). These are supported by Hull City Council in their Local Impact Report, Section 5.3.1.*
- *Trinity Burial Ground - The landscape improvements to the Trinity Burial Ground are discussed in the ES Chapter 7 Section 9.7.8 (APP-023) and shown in ES Figure 9.8 Landscape Proposals (APP-048).*

## 6 ExA Agenda Item 5 – Trinity Burial Ground

### 6.1 Update on the proposals

- 6.1.1 **FO** advised that through consultation with Hull Minster (formally Holy Trinity Church) and the Diocese of York it was identified that a Faculty was the best process to gain permission for works to Trinity Burial Ground. The permission for the works in Trinity Burial Ground was approved in 2018 through two separate faculties, one for the exhumation and reintering of human remains and one for the landscaping the remaining area of the burial ground. The Applicant does not intend to start the works at Trinity Burial Ground until the DCO has been approved.
- 6.1.2 **FO** outlined previous evaluation work completed in Trinity Burial Ground in 2015 which was conducted under a Faculty. This work included undertaking trial trenching to understand the conditions of remains in the burial ground.
- 6.1.3 **BV** stated that the Applicant's current proposals are to excavate all the burials from the area that will be impacted by the road and thereafter to analyse a sample of 10% or thereabouts of burials which was believed to be proportionate and reasonable in terms of expenditure and programme to understand the burial ground. The number of burials were unknown and more than 25% of the burial was required to have a sampleable remain. Historic England did not agree with this position in terms of sample size for analysis.
- 6.1.4 The ExA suggested Historic England noted that guidelines would generally require a higher sample size than 10%. **BV** responded that was the case but one had to have regard for the context of the burials. Evaluations had been

undertaken. When work on the Scheme started in 2012 little was known about the burial ground. It was known that there were in excess of 40,000 records in the death register, with the cemetery in use for 80 years and the burial ground for the majority of the population of Hull between 1783 and 1858. Many burials were successive interfering with the lower burials. The Applicant do not know how well preserved the bodies are and exact numbers as Holy Trinity Churchyard was still in use at the time. Some of the 44,000 people over that period will subsequently not be in the Trinity Burial Ground. The evaluation excavations revealed that just the bones remained however the evidence was not particularly strong in relation to the history of the burial ground and Hull with only a very few number of burial monuments (390 no. in relation to approximately 40,000 burials with only around 300 recognisable names). This there is very little to help identify the skeletons. During the evaluation excavations, even when a headstone was found with a name on it, it was difficult to determine which headstone related to which body due to the amount of burials in the vicinity. The limitations on the evidence and the conclusions that can be drawn.

- 6.1.5 **BV** stated that to counter the Applicant's 10% sample, an outreach programme was proposed, which includes potentially transcribing the 44,000 names from 18th and 19th century handwriting. The Applicant is interested the population of Hull but without determining the details of those in the burial ground it is rather difficult to provide any more detail. Nothing is buried with the burials to help distinguish between the wealthy and poor part of the cemetery. Therefore, a lot of shortcomings in the evidence were found.
- 6.1.6 The ExA queried what would happen to the 10% sample. BV stated that in line with Faculty conditions The Applicant has a short time-frame (2 to 3 years) to excavate and examine the burials and re-inter as part of a rolling programme in the burial ground. The Applicant is not allowed to remove burials for analysis and is proposing to undertake the analysis on site, with arrangements and a methodology in place for this. The analysis will involve specialists measuring and examining the bones for disease, dental analysis to determine diet and where people have come from.
- 6.1.7 The ExA noted that Historic England were not present but the concern was the sample size and constraints on analysis. BV stated that there were time constraints due to programme and the Church has indicated that they do not wish to see long term storage of the burials, but prefer burials excavated, analysed and re-interred. The Applicant's proposals were reasonable taking this into account and there didn't seem to be a public benefit to a large sample size as the remains cannot be identified.
- 6.1.8 The ExA stated that Historic England seem to consider the burial ground as an important site. **BV** stated that he was less inclined to agree with this since the evaluation results revealed the lack of identity of the burials and lack of original walling. It was important on an historical basis as it was a civic improvement built at the same time as the gaol as part of the 18th century town planning and is so located as the town had outgrown its churchyard. Whilst interesting, The Applicant feel that the sample size proposed is reasonable.

6.1.9 The ExA stated that Historic England had suggested a sample size of 3,000 and asked if this was reasonable. **BV** responded that it was no more reasonable than the 1500 proposed. The problem of identifying named individuals would remain and agreed with the ExA that it would be more of the same.

## 6.2 Historic interest and importance

6.2.1 Discussed at agenda item 6.1.

## 6.3 Justification for the proposals

6.3.1 The ExA queried the necessity to affect the burial ground. In this Scheme proposal it was unavoidable. He queried if other proposals missed the burial ground.

6.3.2 **BV** talked about the optioneering for the proposals and that consideration was made to reduce the impacts as much as possible. The Applicant had kept the required area to the minimum necessary to construct the road and the new junction and its slip-roads.

## 6.4 Mitigation measures

6.4.1 Discussed at agenda item 6.1.

## 6.5 Buried remains, sampling and analysis

6.5.1 Discussed at agenda item 6.1.

6.5.2 *[Post Hearing note: The Applicant has undertaken excavations (ES Appendices 8.6 and 8.7 (APP-048)) in the burial ground and much information has been recovered. The burial horizon is confirmed at between 0.7 – 0.8 m and 1.85 m below current ground surface, skeletal survival is good and in the absence of waterlogging, there is no surviving body tissue and little survival of coffins. Repeated deposition of burials has displaced pre-existing burials and there is a considerable amount of charnel in the burial ground.*

6.5.3 *Evaluation has involved the examination of three areas of the burial ground, revealing a number of problems with the archaeological evidence.*

- There are fewer than 300 in situ monuments within the burial ground, of which 112 lie within the affected area. It is estimated that, on a best-case basis, no more than 1.4% of the buried population could be identified by name.*
- Evaluation showed that even where a burial monument is present, it is frequently not placed close enough to a burial to be sure that they are associated. Although name-plates are occasionally present, these have corroded and none of those found survives sufficiently to be legible. Since much of the value of a burial lies in identifying the individual involved, and their place in the history and growth of the town, the absence of this information severely reduces its importance.*
- The importance of the burial ground as a piece of civic planning is also reduced by the very limited survival of burial monuments, by the fact that*

*railings to the burial ground have been removed and the walls have been reduced in height. Only part of the party wall with the gaol survives, while the northern side of the burial ground has been encroached upon by 1970s improvements to the A63.*

- *In light of the results of evaluation the Applicant considers that the proposal to analyse a sample of around 10% of the excavated and examinable burials was proportionate and reasonable and that little public benefit would accrue from examination of a larger sample. Analysis of the burials would take place on site, as had successfully been undertaken during the evaluation programme.*
- *Because of the limited information regarding the below-ground population the Applicant proposes to digitise the burial record and make it publicly available which would be a significant and lengthy task.*

## **7 ExA Agenda Item 6 – Archaeology and the Beverley Gate Scheduled Monument**

### **7.1 Likely effect of the scheme on the scheduled monument**

- 7.1.1 **MT** outlined the planned statutory undertaker diversions in the area of the Scheduled Monument. As the statutory authorities preliminary enquiries are at the feasibility and route options stage the Applicant has only identified the diversion routes required by KCOM for the scheme. This stage has identified an option for diverting the existing cables running along the northern footway of the A63 in the vicinity of the Princes Quay Bridge. This option identifies the diversion of the cables via Anlaby Road and Beverley Gate.
- 7.1.2 This route would require a new cable being pulled along the existing network in Anlaby Road, around Beverley Gate and into Princes Dock Street. A new duct run would be required for reconnection the network with the existing cables running from Princes Dock Street towards Market Place. It is believed, following discussions with KCOM, that there is adequate spare capacity in the existing duct network in Anlaby Road and round Beverley Gate to accommodate the cables required.
- 7.1.3 During the detailed estimates stage these works will be finalised and confirmation on any works required in this area will be agreed. This will therefore minimise any excavation works required in the vicinity of Beverley Gate, apart from the connection in Princes Dock street to the existing network. The most likely outcome is two way ducts if required to divert the service. A 450mm wide trench would be the most likely solution if this is the case which would not interact with the monument.
- 7.1.4 The National Joint Utilities Group guidelines on the “Positioning and Colour Coding of Underground Utilities Apparatus” gives a recommended depth of Comms as 250-350mm depth in footways and 450-600mm in carriageways giving a depth distribution of 250-600mm.

- 7.1.5 It is not possible to confirm with a definitive answer until the detailed estimate stage during the detailed design which will not commence until September 2019 on the current programme as to any likely outcome.
- 7.1.6 **CH** stated that the assessment provided in the ES of the impact to the Beverley Gate Scheduled Monument was based on the scenario that the construction works would involve diversion of existing utilities. The assumption was based a worst-case scenario on deeper excavations that all utilities and utility service runs were assumed to be excavated between 0.5 and 1.5m in depth, in a trench c. 1m wide. All below ground excavation has the potential to impact the scheduled monument which may already have been disturbed by previous works with limited impacts. *[Post Hearing note: This has been assessed as a minor adverse impact on a high value asset resulting in a non-significant slight adverse effect in Appendix 8.3 Table 1.2 reference MMS494 (APP-048) and would not result in significant effect to the scheduled monument.]*
- 7.1.7 **CH** stated that there is therefore a continued requirement to dispense Scheduled Monument consent under the DCO Submission that would have been required under section 2(3) or 3 of the Ancient Monument and Archaeological Areas Act 1979 in accordance with section 33 (1f) and (1i) of the Planning Act 2008.

## 7.2 Archaeological deposits along the A63 route

- 7.2.1 Discussed at agenda item 7.3.

## 7.3 Archaeological strategy

- 7.3.1 The ExA asked for a response regarding some of the critical comments from Historic England regarding the archaeological strategy for the A63 Castle Street Improvement.
- 7.3.2 **CH** talked through the archaeological strategy for the A63 Castle Street Improvement which are contained within a number of documents. **CH** advised that Archaeological Project Designs have been completed for the Princes Quay Bridge and the Trinity Burial Ground (ES Appendix 8.7 and 8.8 (APP-048)). **CH** advised it is stated in the Outline Environmental Management Plan Appendix B CH4 Preservation by record of archaeological remains (APP-072) that an Archaeological Project Design would be produced during detailed design for the remainder of the archaeological work including the excavation at the Gaol Site and the watching brief on the remainder of the A63 Castle Street Improvement. This would be undertaken at detailed design stage but has not been completed because of the lack of clarity on utilities and other aspects at this stage.
- 7.3.3 *[Post Hearing note: Historic England suggested the approach privileges the idea of archaeology as defined by 'remains' rather than knowledge gain. In response the use of the terms archaeological remains conforms with the guidance presented in Design Manual for Roads and Bridges, Environmental Assessment, Volume 11, Section 3, Part 2, HA208/07 Cultural Heritage which is the agreed method of assessment.]*
- 7.3.4 The ExA iterated the point in the response by Historic England that archaeological assessment was not consistent.

- 7.3.5 **CH** stated that the approach had been consistent with guidance Chartered Institute for Archaeologists (CIfA) to the point that had been currently reached. The normal approach is to undertake a desk-based assessment and evaluation work [**Post Hearing note:** *To inform the decision-making process in line with paragraph 128 of the NPPF 2012 (updated in the NPPF 2018 to paragraph 189)*] which is provided in the application. There are limitations to excavation due to the A63 being a working road so evaluation has been completed where possible in the Trinity Burial Ground and off-route works at Humber Dock Street and Princes Dock Street. The off-route works were designed to investigate whether the Civil War ditch and the town wall are present to understand the likely scenario in the A63. There was also work undertaken during the geo-technical investigation of ground deposits which helped an understanding of the depths to which archaeology might survive. This has indicated that archaeology is not likely to survive in the initial 700 – 800mm depth below the existing road surface, although there may be high value surviving archaeology at depth.
- 7.3.6 **CH** stated that one of the important areas for archaeology was a wetland area on the edge of the Humber Estuary and there may be prehistoric remains associated with this at around 6 to 8m depth. Where the Scheme impacts on this is very limited and the potential for impacting such deeper deposits would only occur around sewer diversions and the Mytongate Junction where works would be at depth. The rest of the Scheme would involve formation works at up to 1m depth and as such impacts on remains would be fairly minimal along the route of the A63. [**Post Hearing note:** *These have been assessed in the ES, Appendix 8.3 MMS486 which refers to the course of the Old Hull, River Bank, Streams and Ditches (APP-048)*]. **CH** stated that a watching brief during the works would be the only practical method to record these deposits, the methodology for which would be developed at detailed design with consultation with Hull City Council.
- 7.3.7 **CH** believes Historic England are supportive of the watching brief approach. [**Post hearing note:** *The details of the Archaeological Project Design remain an outstanding element of the draft Statement of Common Ground with Historic England.*]
- 7.3.8 **CH** stated that this would be main point of difference with Historic England was that the Archaeological Project Design had not been produced for the outstanding work. **CH** explained that Historic England had noted that the current approach lacked scientific study and analysis of organic deposits. **CH** iterated that the Archaeological Project Design would include this analysis and be produced during detailed design when greater understanding of the nature of utilities had been established.
- 7.3.9 [**Post hearing note:** *Archaeology methodology and approach - On consultation with Historic England and Hull City Council a full desk-based assessment was undertaken and every opportunity has been made to evaluate the route. Given that the proposed Scheme involves expansion of an existing working highway and excavation within an urban setting the opportunity for field evaluation has been limited by the nature of the Scheme.*]
- 7.3.10 *Desk-based assessment and evaluation are detailed in:*

- *Appendix 8.4 Cultural Heritage Assessment Mitigation and Deposit Modelling (APP-048)*
- *Appendix 8.5 Cultural Heritage - Advance Works Report - Site Investigation Works and the Town Defences (APP-048)*
- *Appendix 8.6 Cultural Heritage Holy Trinity Burial Ground Advance Archaeological Works Report (please note the report number is mis-numbered in the submission and appears as 8.7) (APP-048).*

7.3.11 *The potential for archaeological deposits based on this was assessed along the route of the A63 Castle Street and within the Old Town Conservation Area are detailed in the ES, Chapter 8, paragraphs 8.6.12 to 8.6.28 and Table 8.5 (APP-023) which summarises the potential for archaeological remains. It highlights that the potential for remains is highest in:*

- *Zone 1 associated with the medieval and post-medieval town*
- *Zone 2 associated with the former defences and docks*
- *Zone 3 where the Trinity Burial Ground is located*
- *Zone 6 and Zone 7 associated with the old town*

7.3.12 *Historic England referenced ES Appendix 8.4 OAN-HFA Assessment, 2014, Watching Brief and Deposit Model (APP-048) which refers to high potential for geoarchaeological deposits of national importance. These are deposits associated with a wetland area on the edge of the Humber Estuary with the potential for prehistoric remains. The deposit modelling undertaken during geotechnical investigation supported by archaeological analysis suggests these deposits are located below current ground level at depth of greater than c. 5-8m below current ground level (c. -13.5m OD to -5m OD, ground level is c. 2.5 to 3.5m OD as stated in the summary of the ES, Appendix 8.4 and illustrated in Figures 26-33, APP-048).*

7.3.13 *The assessment of potential outlined in the ES Chapter 8 Sections 8.6.12 to 8.6.28 and Table 8.5 (APP-023) takes account of the proposed Scheme and its impacts. The proposed Scheme impacts below ground deposits at varying depths.*

- *Mytongate Junction and work on the associated underpass c. 8.0m below present ground level*
- *Diversion of deeper utilities including Yorkshire Water Sewer Diversions around the Trinity Burial Ground along Castle Street c. 6.0m below present ground level*
- *Formation depth of the road surface between 0.8m and 1.0m below present ground level*
- *Utilities to 1.2m below present ground level*