



Historic England

EAST OF ENGLAND OFFICE

The Planning Inspectorate
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Direct Dial: 01223 582738

Our ref: PL00366223

Your ref: TR010043_000013

15 May 2018

Dear Sir/Madam .

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017(the EIA Regulations) - Regulations 10 and 11

Application by Norfolk County Council for an Order granting Development Consent for the Great Yarmouth Third River Crossing (the Proposed Development)

Scoping Opinion consultation and notification of the Applicant's contact details and duty to make available information to the Applicant if requested

Thank you for your letter of 6th April 2018 notifying Historic England of the need for an Environmental Impact Assessment (EIA) Scoping Opinion for the proposed development. We have already responded directly to the applicant on a number of the individual reports and on the Scoping report for the Marine Licence. We realise that our response will now not be included in the statutory stage, however we appreciate that you have offered to forward this letter to the applicant. We also recommend this letter be read in conjunction with advice given on other aspects of the scheme.

The historic environment is a finite and non-renewable environmental resource which includes designated heritage assets, non-designated archaeology and built heritage, historic landscapes and unidentified sites of historic and/or archaeological interest. It is a rich and diverse part of England's cultural heritage and makes a valuable contribution to our cultural, social and economic life.

We can however confirm we broadly support the approach taken in this report, and the historic environment baseline is sufficient at this stage (see Chapter 6.5.1 to 6.5.17). We agree that this development has the potential to impact upon a number of non-designated heritage assets, and is likely to have an impact upon the significance of a number of designated heritage assets through a development within their setting.



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We note (see Chapter 6.5.18 to 6.5.21) sets out the list of the activities that will potentially be carried out as part of the construction phase of works; and we can confirm that these activities are likely to, or have the potential to have either a direct or indirect impact upon the historic environment. We are pleased that the developer has included desiccation of waterlogged deposits as an issue under 6.5.18, in line with our earlier comments. Non-designated but waterlogged archaeological and palaeoenvironmental deposits are likely to be a consideration in this development and it is good to see this has been identified at this stage. We also are pleased to note the applicant has made reference to the Great Yarmouth Archaeological Map, which is an important consultation resource.

Given the proximity and number of designated heritage assets within the area of the development we consider that the impact is likely to be significant in EIA terms. Having taken the report into account we have concluded that and that the ES would need to include assessment of the historic environment.

We note the Scoping Report discusses the problems of assessment and mitigation (see 6.5.22 - 6.5.28). We recognise the difficulties of mitigation in these circumstances however we will await the outcome of further studies in relation to the proposal for mitigation. We do however confirm that a programme of mitigation will be needed and recommend that the County Councils historic environment specialists are asked to comment on all mitigation proposals and are included in the conversation with regards to appropriate levels of, and approaches to mitigation. We would encourage proposals for public engagement on the historic environment either as a result of positive mitigation, or to demonstrate the outcomes of the historic environment work undertaken.

Additionally, we note Chapter 6.6 proposal the inclusion of a Townscape and Visual impact assessment. We recommend that this chapter is completed in consultation with the applicant's heritage consultant. This is to ensure that the heritage specific viewpoints are provided in the ES, and that these are fully representative of the designated heritage assets. The applicant needs to ensure that any photomontages taken to illustrate historic environment receptors are relevant, appropriate and represent as far as possible the potential impact on the significance of these assets.

Where relevant, the cultural heritage chapter needs to be cross-referenced to other chapters or technical appendices; for example TVIA, as well as noise, light, traffic and landscape. Assessment of setting should not be restricted to visual impact, but should also consider these other environmental factors. We advise that all supporting technical information (desk-based assessments, geophysical surveys, evaluation and post-excavation reports etc.) are included as appendices.

The assessment in the ES would also need to be carried out in accordance with established policy and guidance, including the National Planning Policy Framework.



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The Planning Practice Guidance contains guidance on setting, amplified by the Historic England document Historic Environment Good Practice Advice in Planning Note 3, *The Setting of Heritage Assets*, which provides a thorough discussion of setting and methods for considering the impact of development on setting, such as the use of matrices. Whilst standardised EIA matrices or are useful tools, we consider the analysis of setting (and the impact upon it) as a matter of qualitative and expert judgement which cannot be achieved solely by use of systematic matrices or scoring systems. Historic England therefore recommends that these should be seen primarily as material supporting a clearly expressed and non-technical narrative argument within the cultural heritage chapter. The EIA should use the ideas of benefit, harm and loss (as described in NPPF) to set out 'what matters and why' in terms of the heritage assets' significance and setting, together with the effects of the development upon them.

It is important that the assessment is designed to ensure that all impacts are fully understood. Given the high number of designated heritage asset within the area, we would welcome further discussions with the applicant in order to discuss and consider the setting issues which will need to be addressed within the EIA. In particular any heritage specific viewpoints should be identified by the heritage consultant and should be included in the TVIA.

Finally, we would like to note that this response is based on the information provided in this consultation. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals, which may subsequently arise, where we consider that these would have an adverse effect upon the historic environment.

If you have any queries about any of the above, or would like to discuss anything further, please contact me.

Yours faithfully,



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