

From: [REDACTED]
To: [Great Yarmouth Third River Crossing](#)
Subject: RYA's Submissions
Date: 08 October 2019 00:49:08
Attachments: [2-SoCG-table.pdf](#)
[3-RYA-PrelimHearing.pdf](#)
[4-RYA's-OpenForumStatement.pdf](#)
[5-GYTRC_7.5-RYA-SoCG-DRAFT3-07-Oct-2019.docx](#)

Hi Liam,

1. You already possess RYA's **Relevant Representation** (published as Number-24 out-of-33).

2. On 20-Sep-2019 I copied you a **SoCG-Table** which summarised common issues to RYA's that I had discerned from the 33 various Representations.

I made mention of this at the Preliminary Hearing with ExA's response of, "... *that's helpful ...*"

This appears has not yet been published.

Re-sent here as **Adobe•pdf** and [referenced #2](#)

3. RYA's intended **statement at Preliminary Hearing** did not happen quite as anticipated.

Attached is the intended statement as **Adobe•pdf**, [referenced #3](#);

it is available in 3-forms (Mac•pages, Adobe•pdf, MS•word); please let me know if you prefer one of these different versions ?

4. RYA's **Open Floor statement** again though prepared, was presented not in the intended order because of Goodchild's™ precipitating one item first.

Attached is the intended statement, as **Adobe•pdf**, [referenced #4](#);

again available in different forms (•pages, •pdf & •word), please indicate if you wish it differently ?

5. RYA is actively working up an **SoCG** with the Applicant.

The permitted delay for submission of a final version at Deadline-2 is appreciated.

At risk of duplication if the Applicant has already forwarded the **Draft SoCG**, it is attached here also, as **MS•word**, [referenced #5](#).

Hoping that I am sending you all you require thus far.

If you need me to alter titles, format or whatever, please let me know (TeleCon would do nicely to alert me since I'll be on-the-road much of the day, Tuesday) ?

Best regards,
Ben FALAT

[in car/mobile: [REDACTED]]

RYA's Preliminary Meeting Statement (*intended*) – **[Gt.Yarmouth Third River Crossing]**

1. Thank you for having me: I represent Royal Yachting Association (RYA);

While there exists a strong team of support at RYA-HQ near Southampton, the way we are operating here is through a cascaded network of Regional volunteers reporting back on issues and calling for help if it becomes necessary.

Commonly grey-haired cohort I am a volunteer and fairly amateur when I compare myself with some of the staff, lawyer and accountant supported teams here;

Please be understanding that you are perhaps dealing with a wide range of populations from the fully fledged Applicant's professional team, to the individual amateur (myself).

2. I was not in receipt of the calling letter to this event and only by chance last week picked up a day late that this event was upon us. I also discovered that some others had likewise not received the information.

Nevertheless, with a bit of remedial liaison we are here, so all good !

3. In digging for contacts, when I asked of your team if there was a point of contact, there was a 'Yes', then the line went tellingly quiet for a few moments before the response of, "... oh yes, we seem on-site not to list contacts, rather just the generic organisational names of key players (EA, NE, e.t.c.).

It therefore took some drilling into an online document or five, to find contacts.

I am now happy that I have an afternoon appointment here, with a representative of the Applicant to work up our SoCG.

What I would say, is that the Applicant has, by the Port Users Group (Leisure & small boats), been singularly difficult over a period of 3-years to address concerns directly by inviting to meetings, but not turning up.

4. It would appear that through one of our concerns, EA have recognised some failing in their advice and have asked for additional time to undertake further modelling.

Original statements from EA were picked up by the Applicant, NE and BA verbatim and this chain of responding to previous statements has not necessarily picked up on the recent potential change ...

This results in potentially some organisations not registering as Interested Parties when indeed they latterly would have.

I am hopeful that some clarity can be brought through my meeting this afternoon and either I shall be shouting loudly, or shall go quiet later today.

Representation-(i) (**Weir-Effect**):

RYA states

Regarding Leisure and Small-Boat users:-

(i). Any structure built into the waterway will restrict natural water flow-rate (akin to a 'weir-effect'); for upper-reaches of the whole Broads basin, this is highly likely to exacerbate risk of fluvial and pluvial (non-tidal) flooding up to ~20miles distant due to the system being less able to empty particularly after strong rain or after a 'Tidal Gate' standstill of waters. Flood Risk has been conducted for the immediate surrounds of Works, but there is no evidence of such study having been effected yet for Upper Reaches of the Broads (issue discussed with and registered by Environment Agency).

EA states

[TR010023 EA representation]

1.4 Our modelling reviews have identified concerns with the model as presented.

1.5 Our concerns include:

- That the model boundary is too small and needs to be enlarged
- Accurate representation of some of the flood defences
- Inconsistencies in how structures have been represented in the applicant's model and the Environment Agency's 2011 model

1.6 As presented the model is not sufficient to understand the offsite impacts likely to arise from the proposed development.

1.7 Due to the uncertainties surrounding the hydraulic model, we are unable to place reliance on the Flood Risk Assessment because the evidence on which it relies cannot be regarded as sound.

1.8 Due to the issues outlined our position is to register a holding objection on the basis of insufficient information.

1.9 We expect to continue to discuss this issue with the applicant to resolve the concerns that we have raised and welcome further engagement.

1.10 Once the issues related to the hydraulic model are resolved we will be pleased to review a revised Flood Risk Assessment.

RYA awaits outcome of the EA revised Flood Risk Assessment

It may be that, should a revised Flood Risk Assessment alter the basic premise upon which other Interested Parties have made consequent statements, that various of these statements will alter and indeed draw-in new unregistered parties for making Representations.

EA review —> consequences on **RYA**, NE, BA (un-registered),
NSBA (un-registered), (+ others ?)

Representation-(ii) (Waiting Pontoons):

RYA states

(ii). Small-boat "Waiting Pontoons" [Not potentially inappropriate large-vessel fenderings] are requested both within the inter-bridges pool (inside) and below the new bridge (outside). Norfolk & Suffolk Boating Association (NSBA) recommends waiting pontoons at all-four quadrants of any bridge to accommodate any small vessels which may have difficulty berthing in unfavourable conditions. Thus far within the Project only one location has been proposed below the new bridge; proposal for inter-bridges pontoon has been side-stepped.

[TR010043-000372 DCO Document 2.2 General Arrangement Plans Sheet 1-of-7]

Applicant has shown the intended new Vessel Waiting Facilities at two quadrants of the new bridge;

it has been indicated that these are in effect the "waiting pontoons".

RYA has stated that these should Not be potentially inappropriate large-vessel fenderings.

Waiting pontoons for small-boats are welcomed;
however there has been muddying between

"Waiting Pontoons for small-boats"

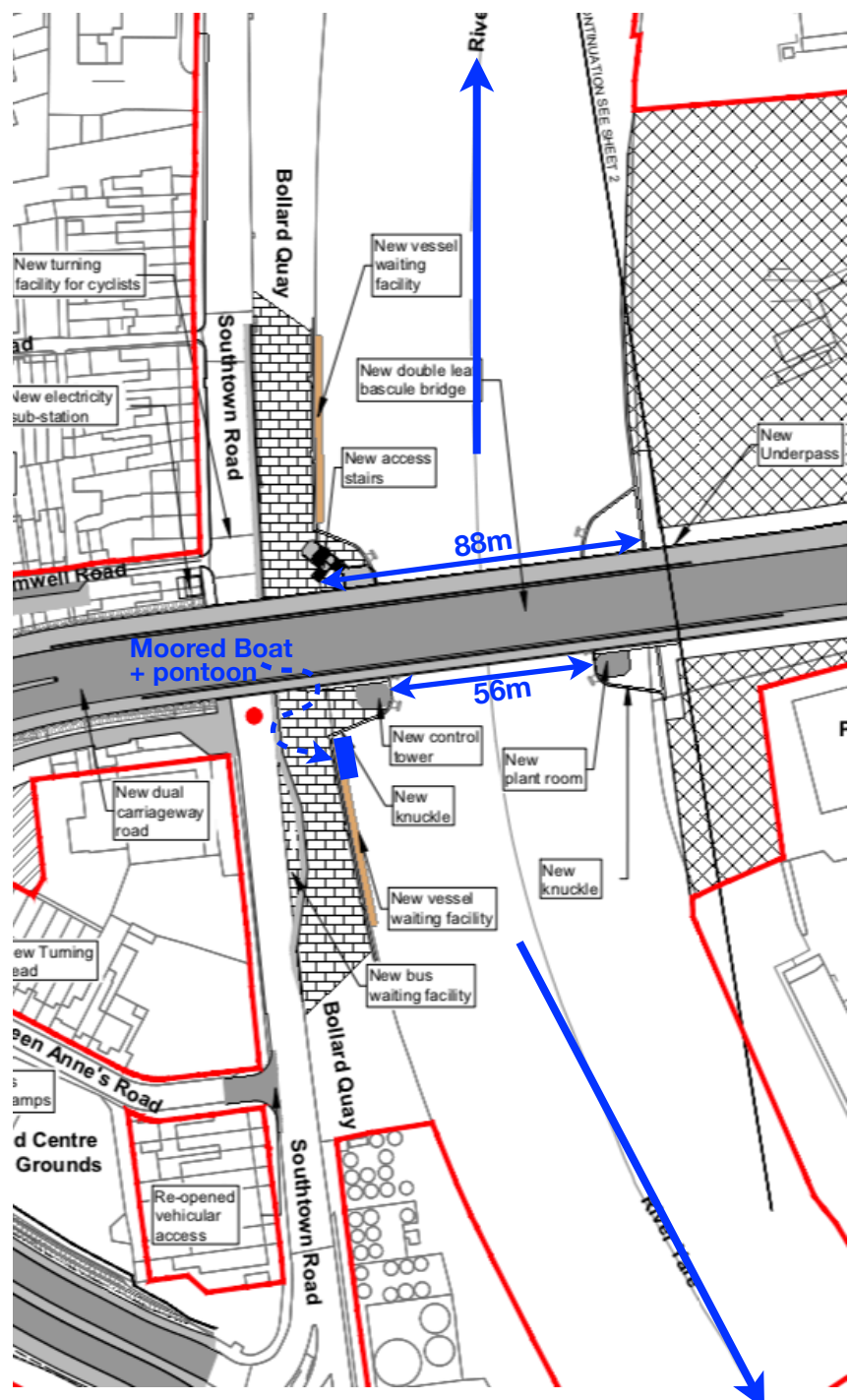
and **"Waiting Berths for large-ships"**

To expect small boats to moor and wait adjacent to the new bridge, on the outside of a bend at times when large vessel movements might be expected is at very least foolhardy, if not wholly dangerous.

Any boat placed alongside at these two positions partially covers the impact-protection-zone along the piers and places the boat at risk of being crushed should the ship veer off-course.

Waiting Pontoons for small-boats must be placed ...

- (i) safely away from the risk-zone of the bridge passage channel and**
- (ii) out-of-line of an ambient steering-direction.**



RYA states

Representation-(iii)/(iv) (**Opening Regimes & Control**)

The eventual **regime of openings** (timing, signals, access) needs to accede to limitations of potentially slow moving and restricted manoeuvrability of smaller vessels, especially under sail.

The intended **Control Tower** should in interests of efficiency operate both existing old and new bridges, particularly for through-passage of vessels accessing or exiting The Broads.

This is not addressed by the Applicant and is considered an operational matter for consideration down-line.

RYA believes that this is an important consideration to be addressed at this stage such that there is a binding requirement on the harbour/river operation.

Operating Regimes should have attendant carefully managed opening routines for all three bridges (New, Haven and Breydon) in succession.

- The need for waiting at set pontoons should be minimised (though this recognised as wholly necessary for some), since each coming alongside manoeuvre is a time of increased personal risk.
- It has to be recognised pragmatically that it cannot be anticipated that all small-boat users have access to onboard operable marine VHF radios, therefore systems of communication need to be versatile.
- It is perceived that a new meritorious opportunity arises with the New Bridge in potentially providing an effective Control point for transits.
- Yachts should not be required to de-mast for many reasons, not least that
 - (i) incoming visitors may be unable and
 - (ii) a de-masted yacht carrying significant overhangs brings with it additional dangers to navigation and to crew.

Important Operational consideration to be addressed at this stage

- **Minimise need for repeated coming alongsides/departures**
- **Versatile systems (VHF radio; Traffic lights; Electronic Visual Signs)**
- **Single control point for efficacious through-transfers**
- **Nil requirement for dismastsings**

RYA states

Representation-(v) (**Air-Draught**)

The reduced proposed height of the new bridge impacts on all of #i, #ii and #iii above; the trade-off from previous ~12.5m clearance could have seen substantial mitigation in all of these effects.

Great Yarmouth Third River Crossing Application for Development Consent Order

Document 7.5(??): Royal Yachting Association (RYA)

Planning Act 2008

The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (as amended) ("APFP")

APFP regulation Number: 5(2)(q)

Planning Inspectorate Reference Number: TR010043

Author: Norfolk County Council

Document Reference: 7.5?? (RYA)

Version Number: 3

Date: ?? 2019

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DRAFT-3

Glossary of Abbreviations and Defined Terms

The Applicant	Norfolk County Council (in its capacity as Highway Authority and promoter of the Scheme)
DCO	Development Consent Order
RYA	Royal Yachting Association
The Planning Act	The Planning Act 2008
Scheme	The Great Yarmouth Third River Crossing project for which the Applicant seeks development consent
SoCG	Statement of Common Ground
SoS	Secretary of State

1 Introduction

1.1 Purpose of this Document

- 1.1.1 This Statement of Common Ground ('SoCG') has been prepared in relation to the application by Norfolk County Council ('the Applicant') of an order granting development consent ('DCO') under the Planning Act 2008 ('the Planning Act 2008') for the construction, operation and maintenance of a new bridge over the River Yare in Great Yarmouth, Norfolk ('the Scheme').
- 1.1.2 The application was submitted on 30 April 2019 and accepted on 28 May 2019 by the Planning Inspectorate on behalf of the Secretary of State.

1.2 Aim of this document

- 1.2.1 The aim of this SoCG, between the Applicant and the Royal Yachting Association (RYA), is to provide a record of engagement between the parties, including the issues discussed between the parties and the current status of those discussions.

1.3 Terminology

1.3.1 In this SoCG:

- Where a table is entitled 'Matters Agreed', this signifies matters that have been stated as agreed between the parties;
- Where a table is entitled 'Matters under Discussion', this signifies matters still under discussion;
- Where a table is entitled 'Matters not Agreed', this specifies that both parties are confident that no agreement can be reached.

2 Record of Engagement

2.1.1 A summary of the key meetings and correspondence that have taken place between the Applicant and the RYA in relation to the Scheme is outlined in Table 2.1.

Table 2.1: Record of Engagement

Date	Form of Correspondence	Key Topics / Outcomes (if any)
<u>20/09/2019</u>	<u>Telephone Discussion</u>	<u>Telephone discussion with agreement to enter into a SoCG</u>
<u>20/09/2019</u>	<u>Email</u>	<u>Email to the Applicant, where RYA provided details of the key issues to be included in a SoCG</u>
<u>24/09/2019</u>	<u>Meeting</u>	<u>Meeting between Applicant and RYA to produce initial draft of SoCG</u>
<u>24/09/2019</u>	<u>Email</u>	<u>Initial draft of SoCG sent to RYA by Applicant</u>
<u>4/09/2019</u>	<u>Email</u>	<u>Revised SoCG to Applicant by RYA</u>
<u>7/09/2019</u>	<u>Email</u>	<u>Revised SoCG sent to RYA by Applicant</u>
<u>04-Oct-2019</u>	<u>eMail</u>	<u>SoCG; re-sent (lost?) Draft-2</u>
<u>02-Oct-2019</u>	<u>eMail</u>	<u>SoCG; chaser from NCC to RYA</u>
<u>01-Oct-2019</u>	<u>eMail</u>	<u>SoCG; Draft-2</u>
<u>25-Sep-2019</u>	<u>eMail</u>	<u>SoCG; Draft-1 proforma</u>
<u>24-Sep-2019</u>	<u>Discussion RYA/NCC</u>	<u>SoCG; initial-Draft</u>
<u>13-Jun-2019</u>	<u>Port Stakeholder mtg. (Leisure)</u>	<u>General Progress: NCC failed to attend</u>
<u>25-Jan-2018</u>	<u>Port Stakeholder mtg. (Leisure)</u>	<u>General Progress: NCC failed to attend</u>
<u>07-Feb-2017</u>	<u>NCC Consultation</u>	<u>"Waiting Pontoon" accepted; proposed by NSBA, Port Users, RYA</u>
<u>26-Jan-2017</u>	<u>Port Stakeholder mtg. (Leisure)</u>	<u>J.Childs (NCC) apology non-attendance (Item-8 / Action-2: "Waiting Pontoon")</u>

Commented [BG1]: I have updated this table so that it is in the same format as the other SoCGs. Also removed some of the correspondence as this table is for correspondence between the party and NCC as the Applicant rather than NCC

3 Summary of Topics Covered by the Statement of Common Ground

3.1 Covered in the Statement of Common Ground

3.1.1 The following topics discussed between the Applicant and the RYA are commented on further in this SOCG:

- Need for the Scheme;
- Air Draft of Bridge;
- Adequacy of Waiting Pontoons;
- Bridge Operating Regime;
- Impact of Knuckles.

3.2 Not Covered in the Statement of Common Ground

3.2.1 For the avoidance of doubt, matters not covered in this SOCG have not been discussed between the parties as they have not been raised by the RYA.

4 Matters Agreed

Table 4.1: Matters Agreed

Ref.	Description of matter	Details of Agreement
Need for the Scheme		
1	Need for Scheme	The RYA appreciates the economic needs for the Third Crossing and does not object to the Scheme. Rather the RYA seeks clear and explicit addressing of its concerns regarding recreational and small boat users. These are detailed in Section 5 below.

5 Matters under Discussion

Table 5.1: Matters under Discussion

Ref.	Description of matter	Current Position
Air Draft of Bridge		
1	Air draft of bridge	<p>The RYA considers that the air-draught is an issue and without reference to data it is felt that at an air-draught of only 4.5m, most craft will require an opening. RYA considers that yachts should not be required to de-mast for any reason, not least that:</p> <ul style="list-style-type: none"> (i) <u>B</u>oats may be unable to de-mast because of the mast size and weight; (ii) <u>W</u>hen a yacht de-masts then it will carry a significant overhang, which brings with it additional dangers to navigation and to crew. <p><u>The Applicant will discuss this matter further with RYA and an updated SoCG provided at the appropriate Examination Deadline.</u></p>
Adequacy of Waiting Pontoons		
2	Suitability of mooring pontoons	<p>The RYA considers the form of pontoons immediately either side of the bridge should be suitable for small boats rather than large ships, which have different mooring needs and characteristics.</p> <ul style="list-style-type: none"> (i) Stepping on/off boats onto pontoons must be a 'safe' operation (immediacy of harbour walls present unsafe environment); (ii) Fendering for ships may be steep D-rubber with Bollards on quayside, while for boats this needs to be horizontal water-level fenders with on pontoon cleats. <p><u>The Applicant will discuss this matter further with RYA and an updated SoCG provided at the appropriate Examination Deadline.</u></p>
3	Mooring of small boats close the bridge knuckles	<p>The RYA is concerned that small boats moored close to the knuckles (impact zone) on the bridge-pier creates additional risk to themselves:</p> <ul style="list-style-type: none"> (i) Because the boats could lie within the impact protection zone of the piers; (ii) The proposed position of pontoons lies on 'outside' of a 28° bend of the river; this increases likelihood of ships impacting the adjacent pier and moored boats. <p><u>The Applicant will discuss this matter further with RYA and an updated SoCG provided at the</u></p>

Ref.	Description of matter	Current Position
		<u>appropriate Examination Deadline.</u>
4	Mooring pontoon facilities elsewhere	<p>The RYA requests the provision of small boat mooring pontoons on both up-steam and down-steam sides of all bridges. RYA suggests that pontoons are needed:</p> <p>(i) _a<u>A</u>bove Breydon <u>Bridge</u>,</p> <p>(ii) _b<u>B</u>etween Breydon and Haven <u>Bridges</u>,</p> <p>(iii) _b<u>B</u>etween Haven and <u>the Newnew bridge</u>,</p> <p>(iv) <u>B</u>elow New<u>the new</u> bridge;</p> <p><u>The RYA consider</u> such 4-part provision would provide for smoothest passage in either direction without impeding other harbour movements.</p> <p><u>The Applicant will discuss this matter further with RYA and an updated SoCG provided at the appropriate Examination Deadline.</u></p>
Bridge Opening Regime		
5	Bridge opening regimes should be managed so that all three bridges are coordinated.	<p>The RYA request that the opening regimes for all three bridge (Breydon Bridge, Haven Bridge and the Third River Crossing) should be carefully managed to allow smooth passage through all three bridges in succession. This would minimise the need for waiting at the pontoons, since each coming alongside a pontoon manoeuvre is a time of increased personal risk; it is recognised that some waiting will be a necessity particularly when boats or ships may be moving in opposing directions. <u>The</u> RYA suggests there exists an inherent opportunity of a single overarching control point from the New<u>new</u> bridge.</p> <p><u>The Applicant will discuss this matter further with RYA and an updated SoCG provided at the appropriate Examination Deadline.</u></p>
6	Use of VHF radios for communication	<p>The RYA considers that it cannot be anticipated that all small boat users have access to onboard operable marine VHF radios. Therefore, other systems of communication need to be considered, including the use of Variable Message Signs and traffic lights.</p> <p><u>The Applicant will discuss this matter further with RYA and an updated SoCG provided at the appropriate Examination Deadline.</u></p>

Ref.	Description of matter	Current Position
Impact of Knuckles		
7	Impact of knuckles on local adjacent river flow	<p>The RYA considers that narrowing of the river between the bridge knuckles, by approximately 36%, will have a knock-on effect to local river flows with the resulting impacts of:</p> <ul style="list-style-type: none"> (i) The increased speed-of-flow could prove at times to be an insurmountable barrier to small boats with limited available engine power; (ii) Aadjacent currents and eddies could provide unpredictable dangers to small boats which would otherwise expect relatively uniform safe progress; (iii) Any back-eddies may be collection points for sediment causing shallows; (iv) Proximity of moored boats particularly close to passing ships may create considerable surge and yaw on the moored boats putting unwarranted strain on mooring lines and fixing points. <p><u>The Applicant will discuss this matter further with RYA and an updated SoCG provided at the appropriate Examination Deadline.</u>Applicant to respond.</p>
8	Impact of knuckles on Broads Basin hinterland Flood Risk	<p>The RYA considers that the narrowing of the river between the bridge knuckles, by approximately 36%, will have a knock-on effect to the ability of the Broads system to empty into the North Sea.</p> <p>Upstream raised water-levels may exacerbate the risk of flooding within the Broads basin as well as restrict navigation beneath low bridges of which there are many.</p> <p>In consideration of small-boats within the Broads basin, some surety is sought by RYA that potential risk of flooding on higher points of the navigation has been duly considered (EA's improved study?).</p> <p>The frequency of Environment Agency Warnings* for flooding of upper reaches as far as Potter Heigham and Geldeston due to "Tidal Gate" at Great Yarmouth has increased over most recent years; and RYA anticipates that the frequency of Tidal-Gate type of pluvial and fluvial flooding can only be increased if the 'gateway' river flow is restricted (effective 36% damming of the river).</p> <p>[*note: Latest such warning issued Tues 01-12-01-Oct-2019 at https://flood-warning-information.service.gov.uk/target-area/054WATBT3; "... restricts the normal drainage out to sea of the Broads river system ..."]</p> <p>Any changes to the underlying Flood Risk model (promised by EA with request for additional time) could result in additional Interested Parties wishing to make Representation to the</p>

Ref.	Description of matter	Current Position
		<p>Examining Authority, or existing parties modifying their response. Such parties could include the Broads Authority, Norfolk and Suffolk Boating Association, Goodchild Marine, Natural England, and RYA.</p> <p><u>The Applicant will discuss this matter further with RYA and an updated SoCG provided at the appropriate Examination Deadline. Applicant to respond.</u></p>

6 Signatures

	[Stakeholder Name]	Norfolk County Council (the Applicant)
Signature		
Printed Name	B.A. FALAT	<u>Gavin Broad</u>
Title		<u>Project Engineer</u>
On behalf of	Royal Yachting Association (RYA)	Norfolk County Council
Date	30 Sep 2019	

DRAFT-3

From: [REDACTED]
To: gavin.broad@norfolk.gov.uk
Cc: [Great Yarmouth Third River Crossing](#)
Subject: Great Yarmouth Third River Crossing: RYA's SoCG
Date: 20 September 2019 11:21:43
Attachments: [SoCG-table.pdf](#)

Hi Gavin,

Thanks very much for the TeleCon just a few minutes ago; very happy to have 'found' you.

In summary, to reiterate what I talked [about:-](#)

I represent locally the Royal Yachting Association (HQ based at Hamble, Hampshire); I live in [REDACTED] and am active within [RYA](#)(East) committee, also appointed by [RYA](#) to the Gt.Yarmouth Port User Group (Leisure Craft).

Regarding HM Inspectorate Examination of the Great Yarmouth Third River Crossing, we have made Representation on the NSIP site [here](#) ([hyperlink](#)).

We have requested a speaking slot at the Preliminary Meeting, basically procedural to register that [RYA](#) exists, but was omitted (apparently) from the invitation letter, so our request came in some 9-hours late.

As regards ExA's Deadline-1 for **Statements of Common Ground (SoCGs)**, the Annex-F, Art.2 to the invitation letter indicates that only SoCG between **Applicant** and other parties is called for;

In-my-innocence I had taken the call at face value for any issues of Common Ground ... between any parties and had therefore prepared the attached document.

I should perhaps have scrutinised Annex-F more closely before digging around for information into my document !

Nevertheless as we discussed, the table may be helpful in identifying where you might already have prepared SoCGs which could easily also parallel with [RYA](#).

Please, would you take an overview of my attachment and perhaps we can come to agreement (*or highlight differences*, as Annex-F states) on [RYA](#)'s four issues.

I should be very happy to talk by phone if necessary, and I look forward very much to meeting you on Tuesday, perhaps for an extended chat and active joint preparation of SoCG.

As said in my document, [RYA](#) appreciates the economic needs for the Third Crossing and does not object;

rather [RYA](#) seeks clear and explicit addressing of its four Representations for recreational and small boat users.

Best regards,
Ben FALAT

(at home: [REDACTED] Suffolk)
home: [REDACTED]
mobile [REDACTED]

HM Inspector's Examination of Great Yarmouth Third River Crossing Project

RYA's Statements of Common Ground (SoCG)

In preparation for **Deadline-1** (Tue-08-Sep-2019) of the Examination **RYA** identifies SoCGs with other Representing organisations. All published Representations to date (33-of) have been skimmed for commonality and are summarised on the attached Table only against the **RYA**'s own published Representations.

RYA appreciates the economic needs for the Third Crossing and does not object; rather **RYA** seeks clear and explicit addressing of its four Representations for recreational and small boat users. The term '*small boat*' refers to the broadest spectrum of vessels not necessarily employed in commercial activities and could include the range from small one-person dinghy under sail or power, to ocean-capable yacht likewise powered by either sail or motor. **RYA** also supports shared needs and interests for space, manoeuvrability and access of their craft with other inland, coastal and offshore vessels which may be engaged in non-leisure activity such as fishermen, ferries and day-trip providers.

In particular for Great Yarmouth at this location, **RYA** seeks to support the needs both of boats visiting the town and port (*incoming*) from abroad and elsewhere along the UK coastline as well as transiting vessels wishing to enter or depart from The Broads basin which comprises the UK's largest wetland and 3rd largest inland waterway catering for some 7.6m annual visitors creating an economic tourism impact of ~£570m.

The New Bridge and infrastructure must be user-friendly for everyone and enable a safe-haven:

The New Bridge should not impede unduly the passage of through-craft or to incoming/departing visitors.

Air-Draught is seen as an issue and without reference to data it is *felt* that at an air-draught of only 4.5m *most* craft will require an opening.

- Mitigation is envisaged in form of Waiting Pontoons which should be available at the very least at 3 points (below the new bridge, between bridges and above the Breydon bridge).
- It has to be recognised that there are many and various propulsion (*and stopping*) abilities so that pontoons provided at only one side of the river may in certain weather or current-flow circumstances and to certain boats become quite inaccessible.
- It should also be recognised that emergency or temporary 'berths' with fendering intended for large vessels may be quite incompatible and dangerous for smaller boats; the need for crew to be able to 'step-off' their boat to make fast in knowledge of safety and not a slippery obstacle-course is paramount.

Operating Regimes should have attendant carefully managed opening routines for all three bridges (New, Haven and Breydon) in succession.

- The need for waiting at set pontoons should be minimised (though this recognised as wholly necessary for some), since each coming alongside manoeuvre is a time of increased personal risk.
- It has to be recognised pragmatically that it cannot be anticipated that all small-boat users have access to onboard operable marine VHF radios, therefore systems of communication need to be versatile.
- It is perceived that a new meritorious opportunity arises with the New Bridge in potentially providing an effective Control point for transits.
- Yachts should not be required to de-mast for many reasons, not least that (i) incoming visitors may be unable and (ii) a de-masted yacht carrying significant overhangs brings with it additional dangers to navigation and to crew.

The “Weir-effect” at pinch-point between supporting piers of the New Bridge which is estimated to restrict the river-width by ~50% will raise upstream water level, with attendant increased through-currents and eddies; in this particular case at Great Yarmouth this is now seen as an issue for four considerations:

- (a) the increased speed-of-flow could prove to be a barrier to small boats with limited available engine power;
- (b) adjacent currents could provide unpredictable dangers to small boats which would otherwise expect relatively uniform safe progress;
- (c) any back-eddies may be collection points for sediment causing shallows [*addressed at Document-6, but since deemed unsatisfactory*];
- (d) upstream raised water-levels may exacerbate the risk of flooding within the Broads basin as well as restrict navigation beneath low bridges of which there are many.

In consideration therefore of small-boats within The Broads basin, some surety is sought by **RYA** that potential risk of flooding on higher points of the navigation has been duly considered.

The frequency of EA’s warnings for flooding of upper reaches as far as Potter Heigham and Geldeston due to “Tidal Gate” at Great Yarmouth has increased over most recent years; it is anticipated that the frequency of Tidal-Gate type of fluvial and pluvial flooding can only be increased if the ‘gateway’ river flow is restricted.

If probable frequency of warnings is determined as significant then the consequence would appear to be only to remove the proposed bridge piers from the river and place them on land, thereby increasing the bridge’s unsupported span, with consequent additional cost.

Below a Table of perceived scope for **SoCG** with **RYA**:-

Additionally **RYA**’s Representations (#i to #iv, on grey background);

also precise extracts of other organisations published Representations to support and compare the perceived **SoCGs**.

Royal Yachting Association Representations to HM-Inspectorate for Gt.Yarmouth 3rd Crossing
seeking **Statements-of-Common-Ground (SoCG)**

<i>Common Ground</i>				
RYA's Representation	(i) Fluvial/Pluvial Flood-Risk to Broad's Basin	(ii) Waiting Pontoons Upstream, In-Pool & Downstream	(iii)/(iv) Opening Regimes and coordinated control	(v) Air-Draught Considerations
Goodchild Marine Services Ltd		Lay-by pontoons for small-craft	Synchronise openings of all-3 bridges; Existing marine business impacts	
Alicat Workboats Ltd			Require operational assurances for business	Air-draught too low but with assurances
GY Port Company (GYPC)	Insufficient Hydrological input for modelling	Lay-by berth for shipping is vital	Sever operations, particularly upstream of new bridge	Air-draught too low
ASCO UK Ltd	Changes to water flow due to ~50% pinch-point narrowing of channel	River congestion	Adverse business operational impacts	Air-draught too low
Environment Agency	Modelling reviews identified concerns; holding objection ... looking for more time to complete assessment. Disagreement with N.E. regarding Document 6.2 Sediment Transport Assessment (arts 6 & 7)			
GYPA		Lay-by berth for shipping is vital	Sever operations, particularly upstream of new bridge	
MMO	Seeks evidence of addressing & mitigation for all environmental impacts			
Perenco UK Ltd			Sever operations, particularly upstream of new bridge; operator is forced to depart to another port	
GY Port Users Association		Already existing problems without adequate waiting areas	Synchronise openings of all-3 bridges; Existing marine business impacts	Air-draught too low
<i>Opposed Grounds</i>				
Natural England	Believe negligible change in water levels			
Cllr. Wainright			Flagship visitor economy overrides hinterland water access issues	
GYBC			Flagship visitor economy overrides hinterland water access issues	

Royal Yachting Association

Regarding Leisure and Small-Boat users:-

(i). Any structure built into the waterway will **restrict natural water flow-rate** (akin to a 'weir-effect'); for upper-reaches of the whole Broads basin, this is highly likely to exacerbate risk of fluvial and **pluvial (non-tidal) flooding up to ~20miles distant** due to the system being less able to empty particularly after strong rain or after a 'Tidal Gate' standstill of waters. Flood Risk has been conducted for the immediate surrounds of Works, but there is no evidence of such study having been effected yet for Upper Reaches of the Broads (issue discussed with and registered by Environment Agency).

(ii). **Small-boat "Waiting Pontoons"** [Not potentially inappropriate large-vessel fenderings] are requested both within the inter-bridges pool (inside) and below the new bridge (outside). Norfolk & Suffolk Boating Association (NSBA) recommends waiting pontoons at all-four quadrants of any bridge to accommodate any small vessels which may have difficulty berthing in unfavourable conditions. Thus far within the Project only one location has been proposed below the new bridge; proposal for inter-bridges pontoon has been side-stepped.

(iii). The eventual **regime of openings** (timing, signals, access) needs to accede to limitations of potentially slow moving and restricted manoeuvrability of smaller vessels, especially under sail.

(iv). The intended **Control Tower** should in interests of efficiency operate both existing old and new bridges, particularly for through-passage of vessels accessing or exiting The Broads.

(v). The reduced proposed **height** of the new bridge impacts on all of #i, #ii and #iii above; the trade-off from previous ~12.5m clearance could have seen substantial mitigation in all of these effects

Goodchild Marine Services Ltd

... questioning how this bridge shall be operated given long term issues we have with gaining access to the open sea for our business having to rely upon both Breydon and Haven bridges. This situation has been rumbling on for some years but each year the situation is becoming more unacceptable with apparent lack of maintenance or willingness to open bridges in a streamlined manner. The most recent case causing us considerable expense (which we are seeking compensation for) as the situation became untenable. Therefore we would like some written reassurances from those who shall be responsible for operating this and the existing two bridges of exactly how they plan to synchronise all three bridges for passages to and from the sea.

Equally we understand from recent communications this crossing shall include layby pontoons to allow safe mooring should there be any unforeseen delays. I attach some recent communications which details the present situation and our frustrations ...

Alicat Workboats Ltd and Richards Dry Dock and Eng Ltd

... Boat yard that relies on a freely accessible port the new placement of a bridge will impact on our operations, which may result in loss of works, in particular during construction phase of the project as the river will need to be closed for a period of time and later through life during breakdowns. Most of our works is unplanned with vessels turning up at very short notice, We currently have a berth that has 24 hour 7 days a week free access to sea and feel the bridge will have a negative impact on our business and other operational berths in the port that will be now located North of the proposed new bridge location. We have been involved the consultation stage and meetings and have registered these concerns at all times, some reassurance has been given about the operational side of the bridge but reassurances has been given to what happens during river closures in construction and the effect on business and also future life once the bridge needs maintenance and fails to open and impacts us a business ...

Gt.Yarmouth Port Authority

... concerns remain over the likely impact of the effective 'severance' of the river on the considerable commercial activity in the River Yare

... GYPA also has similar concerns to GYPC about the draft Navigational Risk Assessment. We would wish, for example, to see the risk of bridge failure or delay fully considered and the establishment of a layby berth for inbound vessels as a minimum.

GYPC

... GYPC do have significant concerns over the potential adverse impact upon the considerable commercial activity upon the River Yare. This is because the new crossing will sever GYPC's operational landholdings and a number of its tenants and operators. Of particular relevance to GYPC is the safeguarding of commercial port activity upstream of the proposed crossing. GYPC therefore wish to ensure the continued primacy of the harbour in terms of current and future shipping activity in an unfettered manner

... GYPC remain concerned that there is a disagreement between the parties in relation to the flow of the river and the hydrological effects of the construction of the new bridge. The terms of reference and scope for navigation simulation also remain outstanding. The navigational risk assessment therefore is unclear and unfinished and will remain unfinished for some time.

... At present, GYPC strongly recommend that a lay-by berth should be provided for shipping unless the navigational risk assessment can show otherwise. Particularly, the level of detail in hydrological input was insufficient and prevented adequate simulation of vessel movements.

... Our requirement for an emergency lay-by berth is required to maintain safety of navigation upon the River Yare and will result in less disruption and lead to significantly shorter delays for road traffic users when the bridge is required to be open to shipping

ASCO UK LIMITED

2.3 ASCO's operations, landholdings and use of adjoining river berths will be adversely affected

2.4 The Proposed Order is significantly lacking in relation to appropriate safeguards, protective provisions and mitigation measures in relation to ASCO's landholdings, operations and use of adjoining river berths

6.3 In addition, the construction of the Proposed Development would involve the construction of two new 'knuckles' extending the quay wall into the river to support the new bridge in close proximity to the berths at Fish Wharf. The Application identifies that this will result in a narrowing of the River Yare by approximately 50% compared with its current width as it passes under the bridge and a constriction of water flows

8.2.2 The bridge: (i) Changes to water flow arising from the bridge: ASCO is concerned about potential changes in water flow in the River Yare and the impact this may have on its ability to safely berth, load and unload vessels at its quayside facilities (particularly when the tide is in ebb and/or flood status). ASCO considers that the studies which NCC have undertaken are inadequate and do not adequately demonstrate that the resulting water movements and tidal flows will not present a hazard.

(ii) River congestion arising from the bridge:

Environment Agency

1.3 We have undertaken two reviews of the hydraulic tidal modelling undertaken to support this application. However, the application was submitted before our second review was concluded.

1.4 Our modelling reviews have identified concerns with the model as presented.

1.5 Our concerns include:

- That the model boundary is too small and needs to be enlarged
- Accurate representation of some of the flood defences
- Inconsistencies in how structures have been represented in the applicant's model and the Environment Agency's 2011 model

1.6 As presented the model is not sufficient to understand the offsite impacts likely to arise from the proposed development.

1.7 Due to the uncertainties surrounding the hydraulic model, we are unable to place reliance on the Flood Risk Assessment because the evidence on which it relies cannot be regarded as sound.

1.8 Due to the issues outlined our position is to register a holding objection on the basis of insufficient information. ...

Marine Management Organisation

6.5. In order for any of the above activities to be included in the Deemed Marine Licence, the Applicant needs to clearly demonstrate through the environmental impact assessment ("EIA") process that the environmental impact of all licensable activities has been assessed and, where required, mitigated.

Perenco UK Ltd

... deeply ironic that a scheme which has an objective to support the offshore energy sector should be promoted on the basis that a leading North Sea operator should be forced to depart to another port, to its detriment and that of the local economy. Perenco now has to object to the scheme as a matter of principle, as well as questioning its justifications.

Great Yarmouth Port Users Association

... opposed the siting of the Gt Yarmouth 3rd river crossing at the selected position and not the principle of having a new crossing.

The opposition is based on the fact that the new crossing will split the river and will Create a barrier which will (and is) act as an obstacle to attracting new businesses related to the Port to the north of the crossing as well as the possibility of preventing new investment from existing businesses.

Other concerns are the difficulty created when the bridge is broken down and requiring repairs. This happens on several occasions to our haven bridge and has created difficulties for at least one business to the north of this bridge.

Also the height of the air draft planned is such that will require significant openings to allow exit and entrance.

Opposed Grounds:-

Natural England

... surveys have shown that features of interest are not present within the vicinity of works and no likely significant effect anticipated (Habitats Regulations Assessment, section 7.3). Water volume and quality The sediment Transport Assessment (sections 6.5.2 and 7.1.7) explains that there will be negligible change in the sediment regime and water levels at Breydon Water and no likely significant effect is anticipated. We advise direct contact with the Environment Agency to apply for the appropriate permit and assess water quality impacts of the proposed drainage strategy. Should the proposal change, please consult us again. Yours sincerely Victoria Wight Norfolk and Suffolk

Councillor Trevor Wainwright

... As Norfolk's top coastal resort, the bridge will also provide a link to Great Yarmouth's seafront and the heart of our flagship visitor economy which is worth over £625million annually and supports an estimated 12,000 jobs.

Gt.Yarmouth Borough Council

As Norfolk's top coastal resort, the bridge will also provide a link to Great Yarmouth's seafront and the heart of our flagship visitor economy which is worth over £625million annually and supports an estimated 12,000 jobs. The bridge will help to create thousands of jobs and unlock further business, regeneration and economic growth opportunities. The Council would be especially interested in participating in the following topic areas during the examination: economic development; public realm / landscaping; sustainable transport connectivity;

i.a.w. **Deadline-1**

References:

- Provision of suggested locations and justifications for site inspections for consideration by the ExA
- Notification of wish to attend any **ASI**

Accompanied Site Inspection (ASI) [Tue-19-Nov-2019]

It is noted that ... • the Draft itinerary to be provided by the Applicant for an **ASI** ... is not yet visible on the WebSite.

RYA suggests two points:-

(1) That **two buoys** be placed temporarily for the ASI, into the river to represent extremities of both western and eastern bridge-piers;

Justification:-

This to highlight and help everyone on the ASI to inform themselves and to put the proposed structures into best visual perspective.
This is purely a qualitative improvement of perceptions.

(2) That the ASI reviews, in passing, the “**Heritage Quay**”;

Justification:-

Because of extant question over positioning of “Mooring Pontoons”, there has been suggestion that alternative location for the upstream pontoons, not to be adjacent to the new bridge, but rather at the Heritage Quay, thereby offering multiple advantages of:-

- (i) **Project** gains advantage for a potentially cheaper location
- (ii) **Boats** gain advantage for a more safely located facility
- (iii) **Borough/Town** gains advantage for a nicer and more user-friendly facility
- (iv) **Visiting** boats gain advantage for greater convenience and access to shoreside facilities (shops, supply, parking)

This is an opportunity to perceive one possible alternative way forward, which in fullness of time may well be totally discarded.

RYA consequently notifies its wish to attend these two viewing points.