

From: [Eve, David](#)
To: [Great Yarmouth Third River Crossing](#)
Subject: Great Yarmouth Third River Crossing (ref TR010043)
Date: 03 October 2019 16:10:01
Attachments: [7.5\(d\) - GYTRC SoCG - Historic England.pdf](#)
[Third River Crossing Great Yarmouth HE reps 10.19.pdf](#)

Dear Mr Young,

Please find attached written representations from Historic England on the above application and a Statement of Common Ground agreed between ourselves and the applicant.

Historic England advised the applicant on assessment of the impact of the proposed development on the historic environment prior to the submission of the application and we have been in discussion with them about the assessment documents submitted since then. Because of this pre-application process we consider the applicants have produced sufficient information to allow us to come to a view on this matter. As you will see from the attached documents we have accepted the applicant's assessment and agree that there would be limited impact on heritage assets on the site and in the vicinity of the development. We have discussed the methodology for investigating the archaeological potential of the site through ground works. We have now agreed the methodology with the applicant. The detail of our advice on this is set out in the Representations and our agreement with the applicant reflected in the Matters Agreed in the Statement of Common Ground. Similarly, we have discussed and agreed with the applicant the level of impact on the listed building the setting of which we consider could be harmed by the development. The detail of our view on this is set out in the Representations and our agreement with the applicant reflected in the Matters Agreed in the Statement of Common Ground.

If required we would be happy to assist the Examining Authority further in whatever way we can. However, we hope it will be helpful in your deliberations to state at this point that we are content with the proposals, do not have any further observations to make and would not wish to be present at the examination.

Please do not hesitate to contact me if you would like any further information.

Yours Sincerely

David Eve



Historic England

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**PLANNING ACT 2008 (AS AMENDED) – SECTION 89 AND THE
INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES 2010 (AS
AMENDED) - RULE 8**

**APPLICATION BY NORFOLK COUNTY COUNCIL FOR AN ORDER GRANTING
DEVELOPMENT CONSENT FOR THE PROPOSED THIRD RIVER CROSSING,
GREAT YARMOUTH**

APPLICATION REF: TR010043

**REPRESENTATIONS OF THE HISTORIC BUILDINGS AND MONUMENTS
COMMISSION FOR ENGLAND (HISTORIC ENGLAND)**

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1. Summary

- 1.1 The project would comprise the construction, operation and maintenance of a new bridge across the River Yare in Great Yarmouth, Norfolk. The proposed scheme would include a new dual carriageway road crossing of the river, an opening bridge and a range of associated works including embankments, remodelled access junctions, a new five arm roundabout to the western side of the bridge and provision for cyclists and pedestrians.
- 1.2 The development has the potential to harm archaeological deposits of interest, both directly and indirectly. A mitigation strategy has been presented in the application documents, which includes a programme of archaeological evaluation and the collection of dedicated geoarchaeological boreholes that will inform preservation strategies, either preserving remains in situ or by record. This work should be undertaken to ensure that the significance of the impacted remains/deposits is not lost. We are in agreement with the applicant that these matters are adequately covered in the proposed methodology.
- 1.3 From the applicant's initial assessment the built heritage within 1 kilometre of the bridge that could be affected by the proposed development includes four scheduled monuments, four grade I listed buildings, eight grade II* listed buildings, 102 grade II listed buildings, six conservation areas along with 119 undesignated assets. Due to the scale of the development there is potential for visual impact on these assets which could harm their historic significance. The significance of these assets and the impact on them has been assessed and we



accept the applicants' assessment that no significant harm would result from the development, with the exception of the grade II listed Dolphin Public House. We have agreed with the applicant that there would be a measure of harm to the historic significance of the Dolphin Public House due to a change in its setting. We agree that this would be less than substantial harm in terms of the National Networks National Policy Statement and National Planning Policy Framework

2. Introduction

- 2.1 The Historic Buildings and Monuments Commission for England (HBMCE), known as Historic England, are the Government's adviser on all aspects of the historic environment in England - including historic buildings and areas, archaeology and historic landscape – and have a duty to promote public understanding and enjoyment. HBMCE are an executive Non-Departmental Public body sponsored by the Department for Digital Culture, Media and Sport (DCMS) and we answer to Parliament through the Secretary of State for Digital Culture, Media and Sport. Our remit in conservation matters intersects with the policy responsibilities of a number of other government departments – particularly the Ministry of Housing, Communities and Local Government, with their responsibilities for land use planning matters. The National Heritage Act (2002) gave HBMCE responsibility for maritime archaeology in the English area of the UK Territorial Sea.
- 2.2 In our written advice to Norfolk County Council contained in our letter of 7th December 2018 on the PEIR report we noted that it identified the components of the built heritage that could be affected by the proposed development. In chapter 9 (paragraph 9.4.4): four scheduled monuments, four grade I listed buildings, eight grade II* listed buildings, 102 grade II listed buildings, six conservation areas and 119 undesignated assets were listed as being within 1 kilometre of the bridge. The construction also has potential to impact on undesignated archaeological deposits. Our particular interest was focussed on this aspect and the two highly designated assets that could be affected by the proposed new bridge, Nelson's Monument and St Nicholas' Hospital.

Historic Buildings and Areas

- 2.3 The proposed crossing lies not far from Nelson's Monument and to the south of the conservation area. The Nelson Monument a prominent landmark, listed grade I. Dating from 1817-19 it reflects Nelson's achievements and associations with the town and was a precursor to the more famous monument in Trafalgar Square. The design reflects the predominance of the classical style in this period and its functional role as a seamount. Its location was deliberately exposed to enhance its value as the latter. The proposed bridge crosses the River Yare to the west of the Camperdown Conservation Area which includes the St Nicholas Hospital, listed grade II*. St Nicholas' Hospital was built as a naval hospital by William Pilkington under supervision of Edward Holl who was architect to the Navy Board. It was built to a quadrangle plan of single-depth wards with a west chapel. In 1818 it became a naval barracks and then subsequently converted to a general hospital. It was a purpose built hospital for the casualties from the North Sea squadron in the Napoleonic War and was still admired by hospital reformers in the 1860s for



its well-lit and ventilated design. It is an impressive and original instance of hospital planning and military architecture. Both Nelson's Monument and St Nicholas' Hospital contribute to the understanding of Great Yarmouth's Naval history.

2.4 The construction of the proposed bridge would introduce new elements into the setting of a number of heritage assets and the impact of the bridge structure, lighting, signage and traffic movements on the setting and significance of these heritage assets needs to be fully assessed. The potential visual impact on listed buildings and conservation areas from the proposed bridge would vary depending on the design of the bridge and road network. As a tall structure, the setting of Nelson's Monument extends over a wide area. The impact of the height of the bridge (in both a closed and open position) on the significance of the monument is therefore particularly important.

2.5 The bridge could become a new focal point in views westwards from the existing crossing area. We acknowledge the area includes maritime and industrial elements and has a working character. In this respect a new bridge would potentially fit with the industrial and maritime character of the place. However, the scale and size of the proposed bridge and associated work are important as they could give it a greater prominence. We therefore suggested that a number of viewpoint images were produced by the applicant to illustrate the visual impact of the bridge.

Archaeology

2.6 As regards archaeology we noted that the design of the development had not yet been finalised and any changes would need to take into account the impact on the historic environment. The construction requirements of the proposed development (piling, levelling and the excavation of foundations) could have a significant impact on any buried archaeological remains present, including reclamation deposits and natural deposits of palaeoenvironmental interest such as peat.

2.7 The remains of boats dating to the Medieval period were found approximately 3m below the current ground level, indicating that there is potential for buried medieval deposits to survive within the area of the proposed development. It is important to note that geophysical survey techniques cannot readily identify buried wooden remains such as boats.

2.8 While minerogenic alluvial deposits are of low palaeoenvironmental potential for organic remains these deposits can preserve micro-remains such as foraminifera and ostracods that can help to place the changes in the landscape into context by providing information about past water temperatures, water quality and salinity. We consider it would be useful to establish if this information is of value for the deposits in question.

2.9 There is potential for palaeoenvironmental remains of interest to be impacted by the proposed development. It is stated that where necessary, archaeological recording of selected retained or new core samples will be undertaken following



the desk-based assessment. As intrusive investigations will be challenging in and around the River Yare due to the waterlogged conditions and depths of deposits we have suggested a programme of borehole collection/assessment and deposit modelling combined with the palaeoenvironmental mitigation would provide useful information to investigate the archaeological potential in this area. Additional geotechnical cores may be required to fill in the gaps in the understanding of archaeological deposits to ensure that the impact of the proposed development is mitigated and a method statement for dealing with any deposits of archaeological interest encountered.

3. Historic England Advice: Historic Buildings and Areas

Comments in Regard to Environmental Statement Chapter 9, Cultural Heritage (document 6.1), Historic Environmental Desk-Based Assessment (Appendix 9B, document 6.2), Environmental Statement Volume III: Figures, Chapters 9 and 10 (document 6.3) and Photomontages (document 6.12)

- 3.1 As noted in the introduction above the proposed bridge would introduce new elements into the setting of a number of heritage assets and the impact of the bridge structure, lighting, signage and traffic movements on the setting and significance of these heritage assets needs to be fully assessed. The potential visual impact on listed buildings and conservation areas by the proposed bridge would vary depending on the design of the bridge and road network but we are pleased to note that a design has been adopted that would limit this impact. We consider the submitted documents to be acceptable in their coverage of heritage assets, the assessment of their significance and the assessment of the physical and visual impact of the proposed development.
- 3.2 The Environmental Statement (ES) Chapter 9 (paragraph 9.4.6) summarises the assessment of visual impact on listed buildings and conservation areas in the vicinity and we would accept the findings. The submitted photomontages support this by providing helpful information on the visual impact of the bridge and the bridge deck when raised. We do not have specific comments to make on the majority of the historic buildings assessed in these documents or on the works proposed on the satellite sites. However, we would like to comment on some of the more significant aspects and those we have raised before.
- 3.3 Because of its height the setting of Nelson's Monument extends over a wide area in which it can be seen. The impact of the height of the bridge (in both a closed and open position) on the significance of the monument is therefore particularly important but we do not consider the proposed bridge would have a harmful impact on the historic significance of the Monument when the bridge deck is lowered. When raised the deck would be more prominent and might be seen in combination with the Monument in some views but we would not consider this harmful.
- 3.4 The grade II* Scenic Railway is at 600 meters distance from the development site. This and the buildings between it would limit the visual impact of the bridge works and limit the visibility of the raised bridge deck. This is also the case with



the Royal Naval Hospital where the raised bridge might be visible during operation but would not have a significant effect.

- 3.5 Long views down the River Yare from the South Quay conservation area could be affected by the new bridge and road and this is acknowledged in the ES (9.4.6). We would agree that this is unlikely to have a harmful impact and that the main part of the conservation area and listed buildings within it would not be affected.
- 3.6 The grade II listed Dolphin public house is close to the development site and in the early 20th century was part of the Fish Wharf area. It stood at the northern end of the Wharf with a quayside area and line of warehouses between it and the river. Its setting has been considerably changed by the demolition of the Fish Wharf buildings but it still stands in an industrial area with relatively modest sheds and open storage areas which give something of the character of its original setting. While the proposed development would not have a physical impact on the Dolphin the bridge structure and approach road would be far larger than any historic or modern building in the building's immediately setting and in certain views is likely to be the dominant built form.
- 3.7 The Environmental Statement Chapter 9 (paragraph 9.4.6) concludes that the development would not have a harmful effect on the significance of the Dolphin public house. We consider that there would be harm because of the scale of the development relative to the public house. This is a matter we have discussed with the applicants and it is agreed that there would be a measure of harm to the historic significance of the Dolphin Public House due to a change in its setting. Given that the setting provides a limited contribution to the overall value of the Dolphin, we agree this would be less than substantial harm in terms of the National Networks National Policy Statement (paragraphs 5.131 to 5.136). This agreement is consistent with the conclusions presented in Appendix 9B: Historic Environmental Desk-Based Assessment of the ES (document reference 6.2), notably paragraph 8.5.5 to 8.5.6. Our agreement on this issue is reflected in our joint Statement of Common Ground. As the level of harm would, in our view, be less than substantial in terms of the National Planning Policy Framework, the public benefits of the proposed development should be weighed against this harm by the Examining Authority (as stated in paragraph 196).

4. Historic England Advice: Archaeology

Comments in Relation to Environment Statement Chapter 9, Cultural Heritage (document 6.1) and Historic Environmental Desk Based Assessment (Appendix 9B, Document 6.2)

- 4.1 The potential impacts of the proposed Scheme have been summarised in Sections 9.4.6, 9.4.7, 9.8.2, 9.8.4 of the Environmental Statement (ES). We agree that there will be both direct and indirect impacts on the heritage assets, and that the direct impacts are likely to be significant for any below ground heritage assets located within the footprint of the proposed works as well as throughout the entire Principal Application Site (ES Section 9.8.1). The construction phase may result



in permanent and irreversible damage to archaeological remains (ES Section 9.8.2), or the degradation of archaeological remains following changes to the local hydrology (ES Section 9.8.4).

- 4.2 It is noted that the Scheme is located outside of the known medieval settlements of Great Yarmouth and Southtown, and that there is potential for remains associated with agricultural and maritime activity to be found, including remains of quaysides, wharfs and potential vessels (ES Section 9.5.24; Historic England Desk-Based Assessment (HEDBA) Section 5.7.3). If waterlogged organic remains are preserved within these locations then they have the potential to be significant, but we note that it is not clear if or how later developments may have impacted on the area in the past (ES: Section 9.9.2 & 9.9.29; HEDBA Section 5.7.1, 5.7.16 and 6.2.4).
- 4.3 We are pleased that the project has considered the impacts that the works may have on deposits of palaeoenvironmental interest (ES Section 9.4.7; HEDBA Section 6.2.2). It is stated that if deposits of palaeoenvironmental interest are present, that they have the potential to be of medium to high value depending on the preservation and extent of the remains (ES Section 9.5.23; HEDBA Section 6.2.3), and that deposits could be adversely impacted by the proposed Scheme (ES Section 9.8.1). We note that a review of relevant boreholes has been completed (Appendix 9C) and that a summary of the findings have been included in the main ES document. It is stated that the Breydon Formation (Holocene alluvium and peat) has the greatest geoarchaeological potential, with peat being recorded in a number of boreholes (ES Section 9.5.33-9.5.34). It is noted that the Breydon Formation is expected to be formed of three distinct peat bodies separated by estuarine alluvium (Upper, Middle and Lower peat), and that without further assessments it is not possible to establish which of the peats are present within the footprint of the Scheme (ES Section 9.5.35-9.5.36). At present, the peat accumulations are expected to date to between the Neolithic to the Iron Age based on their depth and their thickness, but additional work is required to confirm this (ES Section 9.5.36).
- 4.4 It has been stated that the proposed Scheme has the potential to alter the local hydrology, which may result in the compaction, desiccation or waterlogging of below ground remains (ES Section 9.8.4). An assessment of ground water levels has also indicated that there will be no change and neutral effects to the groundwater quality, recharge and flow but that further work is required what the impact would be on the archaeological value of the superficial geological deposits, such as the Breydon Peats and Alluvium (ES Section 9.8.5).
- 4.5 It is noted that the other units identified following the borehole log review have all been assigned a low geoarchaeological potential (Table 9.9). However, we are pleased to see that it has been acknowledged that if remains were found then they could be significant. For example, there is the potential for remains associated with maritime or agricultural activity to be present, including waterlogged or organic remains such as wooden vessels, but that the sensitivity of the remains cannot be quantified without excavation and as such could range from being of negligible to high sensitivity and significance (ES Section 9.9.2 &



9.11.12). Any Palaeolithic remains identified could be of international significance and therefore be classed as being of Very High Sensitivity depending of the preservation and extent of the remains (ES Section 9.9.2 & 9.9.29).

- 4.6 The mitigation strategy proposed for the Scheme has been summarised in Section 9.9.5 (ES) and relates to a programme of archaeological evaluation that will determine the archaeological potential of the impacted deposits (ES Section 9.9.5; HEDBA Section 10.1.3). It is stated that Norfolk County Council have agreed that the evaluation work will take place post-decision due to the constraints of the Principle Application Site, and this work would aim to determine the importance, extent, data, and level of survival of the assets and to inform the mitigation strategy which would be implemented either prior to or during the construction phase (ES Section 9.9.5). The scope of this work has been presented in the appended Written Scheme of Investigation (WSI) presented in Document 6.9, which is discussed below, and it is noted that following the evaluation phase, the mitigation strategy will be updated and additional WSIs and method statements will be prepared in consultation with Norfolk County Council (ES Section 9.9.7, 9.9.33, 9.11, 2).
- 4.7 It is noted that two main mitigation strategies have been identified at this stage: preservation in situ or preservation by record (ES Section 9.9.6). The choice of strategies will largely relate to the significance of the individual remains but also the risks/impacts to them from the proposed Scheme. It is also noted that the magnitude of residual effects is dependent upon the mitigation measure applied: it is stated that there will be neutral (not significant) effect for currently unknown below ground heritage assets that are preserved in situ, or slight (not significant) to moderate (significant) for remains preserved by record depending on the sensitivity of the heritage assets (ES Section 9.9.10). We broadly agree with these statements, but recommend that they are reviewed following the programme of archaeological evaluation.
- 4.8 We also agree with that the deposits of palaeoenvironmental interest (peat and alluvial deposits of the Breydon Formation) are of medium to high sensitivity, and that there is likely to be a moderate to large (significant) effect on the deposits if a mitigation strategy is not implemented (ES Section 9.9.11 & 9.11.4). Further evaluation work has been proposed to inform the development of a mitigation strategy, which will include the collection of dedicated geoarchaeological boreholes (ES Section 9.9.12 & 9.11.4). The details of the proposed work have been presented in the WSI (Document 6.9), which has been discussed below, but will involve the splitting and recording of the collected cores, as well the collection of samples for palaeoenvironmental assessment. It is stated that this may include the assessment of pollen, diatoms and foraminifera, but the need to scientifically date the deposits has not been mentioned. It should be noted that dating the deposits is central to their assessment, allowing the findings to be placed into context and to be directly compared to other contemporary sites/sequences. It is concluded that following the implementation of the proposed mitigation strategy that there is likely to be a moderate (significant) effect on the deposits of palaeoenvironmental interest. However, it is stated that if the deposits can be preserved in situ then there will be neutral (not significant) effects (ES Section



9.9.14 & 9.9.15); this appears to be in contradiction to (ES) Sections 9.8.5 and 9.9.31 that state that the full impact that any changes to hydrology may have on the archaeological value of the Breydon Peats and Alluvium cannot be determined without further work.

Comments in Relation to Appendix 9C Borehole Log Review and Deposit Modelling.

4.9 Wessex Archaeology were commissioned to carry out a review of geotechnical borehole data collected as part of the ground investigations works. The geoarchaeological investigations will follow a five-staged process, which has been summarised in Table 1. The report presented in Appendix 9C represents the Stage 1 report, the geoarchaeological review, which aims to identify deposits of archaeological potential. The cores were collected using either a cable percussion rig or a window sampling rig (Section 4.1.3 & 4.1.4). Only the window samples allowed for continuous, undisturbed samples to be collected, but subsequent geotechnical assessments mean they are no longer undisturbed and therefore not suitable for geoarchaeological recording and subsampling (Sections 4.1.4 & 7.1.2). A total of 48 geotechnical logs were reviewed and a deposit was produced (Section 4.3 & Figure 2).

4.10 A review of the deposits model has identified areas of archaeological potential, in particular the Breydon Formation, as well as the questions that need to be addressed. For example, it is acknowledged that it is not possible to establish which of the expected peat accumulations have been recorded on site, and that additional palaeoenvironmental analysis would be required (Section 6.1.11). It is therefore recommended that a dedicated geoarchaeological borehole surveys is undertaken to recover undisturbed core samples from the Breydon Formation deposits with the potential for further palaeoenvironmental works to take place if necessary (Section 7.1.3). We agree with these suggestions and feel that they are sensible and appropriate. We would recommend that the number of dedicated geoarchaeological boreholes that will be collected is considered carefully to ensure that they address the questions remaining about the archaeology, the impact the proposed works may have and the information needed to define a suitable mitigation strategy.

Comments in Relation to Archaeological Written Scheme of Investigation (Document 6.9)

4.11 An Archaeological Written Scheme of Investigation (WSI) has been produced that outlines the work that will be carried out in order to understand the heritage assets and mitigate the impact of the proposed Scheme. It is stated that additional method statements will be prepared by the appointed archaeological contractor for the investigative works (Section 4.3). Based on the aims and objectives cited in this document, we would recommend including the following Historic England guidance documents into Section 4.1.1:

Environmental Archaeology (2011): <https://historicengland.org.uk/images-books/publications/environmental-archaeology-2nd/>



Preservation of Archaeological Remains (2016): including Appendix 2.
<https://historicengland.org.uk/images-books/publications/preserving-archaeological-remains/>

Role of Human Osteoarchaeologist in archaeological fieldwork projects (2018):
<https://historicengland.org.uk/images-books/publications/role-of-human-osteologist-in-archaeological-fieldwork-project/>

- 4.12 Assessing the preservation and condition of any archaeological and environmental remains present may provide useful information about the archaeological potential of the remains present, which may be of value when considering the potential impacts that any changes to groundwater levels would have on deposits such as the Breydon Formation (as discussed within the Environmental Statement, Section 9.8.5).
- 4.13 It is noted that the subsequent Method Statement will include details regarding the palaeoenvironmental assessment, and will include information about the position of the dedicated geoarchaeological boreholes, and the methods and techniques used to analyse the remains (Section 4.4). It is mentioned that the assessments may include scientific dating, such as Radiocarbon or OSL dating, but it should be noted that OSL dating requires strict safe-light conditions to be maintained during their storage and assessment. We would recommend that the applicants contact a specialist laboratory in order to discuss the issues that need to be considered to ensure that suitable samples are collected.
- 4.14 It is also stated that all pottery will be washed, but it should be noted that artefacts should not be washed if they are being considered for organic residue analysis, following the advice within the Historic England guidance document 'Organic Residue analysis and Archaeology' (2016):
<https://historicengland.org.uk/images-books/publications/organic-residue-analysis-and-archaeology/>.
- 4.15 Section 4.9 summarises the techniques and approaches used to collect and assess environmental remains, referencing the Historic England 'Environmental Archaeology' (2011) guidance. The selected approaches appear to be sensible and appropriate, but we would recommend that subsequent method statements include an indication of timescales involved in this work to ensure that samples are processed efficiently following their excavation.
- 4.16 Section 4.10 discusses how human remains will be addressed if discovered. We would recommend that a reference is made to the Historic England 'Role of Human Osteologist in archaeological fieldwork projects' (2018):
<https://historicengland.org.uk/images-books/publications/role-of-human-osteologist-in-archaeological-fieldwork-project/>

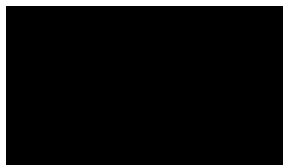
5. Conclusions

- 5.1 In terms of the potential impact on archaeology at the development site we consider that as part of the work a programme of borehole collection, assessment



and deposit modelling should be carried out combined with palaeoenvironmental mitigation to provide information to investigate the archaeological potential of the area. This would including establishing which of the peats of the Breydon Formation are present within the footprint of the scheme and investigating the value of minerogenic alluvial deposits. Work should also be undertaken to understand the impact of changes to groundwater levels would have on the archaeological value of the superficial geological deposits, such as the Breydon peats and alluvium. We have discussed these matters with the applicant and are in agreement that they are adequately covered in the proposed methodology. This agreement is reflected in our joint Statement of Common Ground.

5.2 We are content with the assessment of the impact on historic buildings and areas carried out by the applicant and with their conclusions. We have agreed with the applicant that there would be a measure of harm to the historic significance of the grade II listed Dolphin Public House due to a change in its setting. We agree that this would be less than substantial harm in terms of the National Networks National Policy Statement (paragraphs 5.131 to 5.136) and our agreement on this issue is reflected in our joint Statement of Common Ground. As the level of harm would, in our view, be less than substantial in terms of the National Planning Policy Framework, the public benefits of the proposed development should be weighed against this harm by the Examining Authority (as stated in paragraph 196).



David Eve
Inspector of Historic Buildings and Areas



Great Yarmouth Third River Crossing Order 202[*]

Document NCC/GY3RC/EX/010 Appendix B: Statement of Common Ground with Historic England at Deadline 1

Planning Act 2008

Infrastructure Planning

The Infrastructure Planning (Examination Procedure) Rules 2010

Planning Inspectorate Reference Number: TR010043

Author: Norfolk County Council

Document Reference: NCC/GY3RC/EX/010

Date: 8 October 2019

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Glossary of Abbreviations and Defined Terms

The Applicant	Norfolk County Council (in its capacity as Highway Authority and promoter of the Scheme)
The APFP Regulations	The Infrastructure Planning (Applications - Prescribed Forms and Procedure) Regulations 2009 (SI 2009/2264)
DCO	Development Consent Order
ES	Environmental Statement
GYBC	Great Yarmouth Borough Council
HEDBA	Historic Environment Desk-Based Assessment
MMO	Marine Management Organisation
NCC	Norfolk County Council
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
WSI	Written Scheme of Investigation

1 Introduction

1.1 Purpose of this Document

- 1.1.1 This Statement of Common Ground ('SoCG') has been prepared in relation to the promotion by Norfolk County Council ('the Applicant') of an order granting development consent ('DCO') under the Planning Act 2008 ('the Planning Act') 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 29th April 2019 and accepted on 28th May 2019 by the Planning Inspectorate, on behalf of the Secretary of State for Transport ('the SoS').

1.2 Aim of this document

- 1.2.1 The aim of this SoCG between the Applicant and Historic England is to provide a record of engagement between the parties, including of 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; and
- 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 Historic England 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)
04/10/2017	Letter (pre-application advice, stage 2 consultation)	Letter from Historic England's Principal Inspector of Historic Buildings and Areas, setting out cultural and historical features for consideration as well as highlighting that previous work has suggested the potential for buried archaeological remains and deposits.
16/01/2018	Letter	In response to proposed ground investigation works, correspondence from Historic England's Inspector of Ancient Monuments, detailing the opportunity to enhance archaeological knowledge during ground investigation.
07/03/2018	Email	Request from WSP's Cultural Heritage Competent Expert to Historic England to discuss the ground investigation works and the reports to be produced, as well as the licence required from the Marine Management Organisation (MMO).
20/03/2018	Email	From Historic England's Inspector of Ancient Monuments (Bedfordshire, Norfolk and Suffolk) to WSP's Cultural Heritage Competent Expert, suggesting that the method statement should be sufficient to secure the MMO condition, and confirming that the Historic Environment Desk-Based Assessment (HEDBA) has been read.
15/05/2018	Letter (late response to Scoping Report)	Confirmation from Historic England of a broad support for the approach taken in the Scoping Report and the adequacy of the historic environment baseline, at the scoping stage.

Date	Form of Correspondence	Key Topics / Outcomes (if any)
23/08/2018	Email	Contact from WSP's Cultural Heritage Competent Expert to Historic England, to identify contact details for the case officer and provide details of the Scheme.
03/12/2018	Telephone call	Call from Historic England to WSP's Cultural Heritage Competent Expert to discuss the section 42 response.
03/12/2019	Email	HEDBA sent to Historic England for comment.
07/12/2018	Section 42 Response	Primary advice relates to the impact of the Scheme on scheduled monuments, listed buildings and conservation areas and their settings, and direct impacts on non-designated heritage assets.
08/03/2019	Email	Historic England gives broad support for the approach taken in the HEDBA and advice regarding impact on designated heritage assets, conservation area settings and non-designated heritage assets.
21/08/2019	Letter	Letter from the Historic England's Inspector of Historic and Buildings and Areas (Norfolk, Suffolk and Bedfordshire) with their relevant representation. Relevant representation stated Historic England's intention to review and comment regarding designated heritage assets and archaeological deposits of interest as part of the examination.

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 Historic England are commented on further in this SoCG:

- Approach to assessment;
 - Assessment methodology; and
 - Post-consent palaeoenvironmental assessment.
- Significant heritage assets;
 - Significance of key heritage assets;
 - Gazetteer contents;
 - Effects on listed buildings; and
 - Impacts on conservation areas.

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 Historic England.


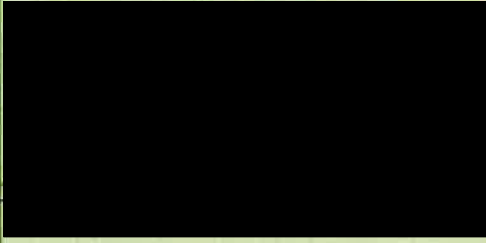
4 Matters Agreed

Table 4.1: Matters Agreed

Ref.	Description of matter	Details of Agreement
Approach to Assessment		
1	Assessment methodology	It is agreed that the broad approach taken in the assessment methodology is suitable.
2	Post-consent palaeoenvironmental assessment	It is agreed that, as part of the post-consent archaeological investigative works a palaeoenvironmental assessment will be undertaken. As outlined in Section 4.4 of the Archaeological Written Scheme of Investigation (document reference 6.9) the palaeoenvironmental assessment will include a geoarchaeological borehole survey which will enable the value of the palaeoenvironmental material within the cores to be identified.
Significant Heritage Assets		
2	Significance of key heritage assets	It is agreed that the assessment of heritage significance has been correctly assigned to those heritage assets within the remit of Historic England
3	Gazeteer contents	It is agreed that the gazeteer (Annex A to the HEDBA, an appendix of Chapter 9 of the Environmental Statement (ES): Cultural Heritage; document reference 6.1), does not omit any significant heritage assets within the remit of Historic England.
4	Effects on listed buildings	Prior to the application for the a DCO Historic England suggested further assessments of views from a number of specific listed buildings. It is agreed that the assessment of effects in the ES (document reference 6.1), as submitted, addressed these. It is now agreed that the assessment is adequate and there is no harm to historic significance of these assets.

Ref.	Description of matter	Details of Agreement
		However, the assessment of the Grade II Listed Dolphin Public House (paragraph 9.4.6 of the ES (document reference 6.1)) raised concerns by Historic England. It is agreed that there would be a measure of harm to the historic significance of the Dolphin Public House due to a change in its setting. Given that the setting provides a limited contribution to the overall value of the Dolphin, this would be less than substantial harm in terms of the National Networks National Policy Statement (paragraphs 5.131 to 5.136). This agreement is consistent with the conclusions presented in Appendix 9B: Historic Environmental Desk-Based Assessment of the ES (document reference 6.2), notably paragraph 8.5.5 to 8.5.6.
5	Impacts on conservation areas	Historic England suggested impacts on conservation areas needed further consideration. The ES (document reference 6.1), as submitted, confirmed that the Scheme will have no impacts on conservation areas. It is now agreed as such.

5 Signatures

	Historic England	Norfolk County Council (the Applicant)
Signature		
Printed Name	David Eve	Gavin Broad
Title	Inspector of Historic Buildings and Areas	Project Engineer
On behalf of	Historic England	Norfolk County Council
Date		3/10/19.