

# A47 North Tuddenham to Easton Dualling

**Scheme Number: TR010038**

## **Volume 8**

### **8.3 Statement of Common Ground with Historic England**

Planning Act 2008

Rule 8(1)(e)

Infrastructure Planning (Applications: Prescribed  
Forms and Procedure) Regulations 2009

February 2022 ~~September 2021~~

~~Deadline 4~~

Infrastructure Planning

Planning Act 2008

**The Infrastructure Planning  
(Applications: Prescribed Forms and  
Procedure) Regulations 2009**

The A47 North Tuddenham to Easton  
Development Consent Order 202[x]

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**STATEMENT OF COMMON GROUND – HISTORIC ENGLAND**

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Rev.0	September 2021	Deadline 1
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## STATEMENT OF COMMON GROUND

This statement of Common Ground has been prepared and agreed by (1) Highways England Company Limited and (2) Historic England.

Signed .....

~~Glen Owner~~ Chris Griffin

~~Senior Project Manager~~ Programme Leader

On behalf of National Highways Limited (Formerly Highways England)

Date: ~~31-08-21-07~~ February 2022

Signed .....

~~NAME~~ David Eve

~~POSITION~~ Inspector of Historic Buildings and Areas

On behalf of Historic England

Date: 26<sup>th</sup> August 2021 ~~INSERT DATE~~

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## 1 INTRODUCTION

### 1.1 Purpose of this document

- 1.1.1 This Statement of Common Ground ("SoCG") has been prepared in respect of the proposed A47 North Tuddenham to Easton dualling ("the Application") made by Highways England Company Limited ("Highways England") to the Secretary of State for Transport ("Secretary of State") for a Development Consent Order ("the Order") under section 37 of the Planning Act 2008 ("PA 2008").
- 1.1.2 This SoCG does not seek to replicate information which is available elsewhere within the Application documents. All documents are available in the deposit locations and/or the Planning Inspectorate website.
- 1.1.3 The SoCG has been produced to confirm to the Examining Authority where agreement has been reached between the parties to it, and where agreement has not (yet) been reached. SoCGs are an established means in the planning process of allowing all parties to identify and so focus on specific issues that may need to be addressed during the examination.

### 1.2 Parties to this Statement of Common Ground

- 1.2.1 This SoCG has been prepared by (1) Highways England as the Applicant and (2) Historic England.

1.2.2 Highways England became the Government-owned Strategic Highways Company on 1 April 2015. It is the highway authority in England for the strategic road network and has the necessary powers and duties to operate, manage, maintain and enhance the network. Regulatory powers remain with the Secretary of State. The legislation establishing Highways England made provision for all legal rights and obligations of the Highways Agency, including in respect of the Application, to be conferred upon or assumed by Highways England.

1.2.3 As per the notification to the Examining Authority in the Applicant's Deadline 5 submission cover letter (REP5-001), on 8 September 2021 (during the course of the Examination) Highways England Company Limited changed its name to National Highways Limited. The Applicant's company number and registered office remains the same.

1.2.2.4 The Applicant has amended the dDCO (and Explanatory Memorandum) to reflect the change of name, but the Applicant continues to use Highways England branding where appropriate. This is to ensure consistency within the application and to avoid the need for a wasteful and unnecessary exercise of arranging to have all documentation re-issued and re-branded in the new company name.

1.2.31.2.5 Historic England is the public body that advises central and local government on England's historic environment: The Historic Buildings and Monuments Commission for England is generally known as Historic England. However due to the potential for confusion in relation to "HE" (Highways England and Historic England), we have used "HBMCE" in our formal submissions to the examination to avoid confusion. HBMCE was established with effect from 1 April 1984 under Section 32 of the National Heritage Act 1983. The general duties of HBMCE under Section 33 are as follows:

“ ... so far as is practicable:

- To secure the preservation of ancient monuments and historic buildings situate in England;
- To promote the preservation and enhancement of the character and appearance of conservation areas situated in England; and
- To Promote the public's enjoyment of, and advance their knowledge of, ancient monuments and historic buildings situated in England and their preservation”

[1.2.41.2.6](#) HBMCE is a statutory consultee providing advice to local planning authorities on certain categories of applications for planning permission and listed building consent and is also a statutory consultee on all Nationally Significant Infrastructure Projects. Similarly, HBMCE advises the Secretary of State on those applications, subsequent appeals and on other matters generally affecting the historic environment. It is the lead body for the heritage sector and is the Government's principle adviser on the historic environment.

[1.2.51.2.7](#) In the context of this Application, Historic England's statutory responsibilities relate primarily to applications for development which affects:

- Undesignated assets considered to be of national importance
- Assets that can contribute significantly to acknowledged national research objectives
- Conservation Areas and their settings
- Relevant works in respect of designated heritage assets
- Grade II listed buildings.

[1.2.61.2.8](#) Historic England advised Highways England during a telephone meeting held on the 15 October 2020 and in their relevant representation to the Planning Inspectorate in June 2021, that in the context of this Application, they will comment on the assessment of and impact on the grade I and II\* listed buildings where there is potential for impact on their setting. Historic England will defer advice on grade II listed buildings and undesignated heritage assets to the local planning authorities.

### **1.3 Terminology**

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

## 2 RECORD OF ENGAGEMENT

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

Table 2-1 - Record of Engagement

Date	Form of correspondence	Key topics discussed and key outcomes
06/04/2020	Letter response to Statutory Consultation from Historic England	<p><u>Parish church of St Michael at Hockering</u></p> <p>The new road could increase the traffic noise heard from the vicinity of the church and it is unclear how visible the road and proposed landscaping would be.</p>
		<p><u>Church of St Andrew at Honingham</u></p> <p>Currently the volume and speed of traffic on the A47 detracts from the quiet, contemplative qualities of the church and churchyard. The Proposed Scheme could significantly increase this and provide a greater visual impact.</p> <p>The Norwich Road junction to the east of the churchyard would affect the churchyard as would be illuminated at night. The road linking the two new roundabouts would pass under the main A47 carriageway so would be raised on embankments to clear it.</p> <p>The immediate visual impact of the church could be increased, particularly by the retaining wall.</p> <p>The church would be affected by noise and lighting from the complex of roads, affected visitor experience to the church and churchyard.</p> <p>There is potential for archaeological deposits due to the proximity of the Proposed Scheme to the churchyard- these should be investigated (local authority to look into).</p>
		<p><u>Church of St Peter at Easton</u></p> <p>Noise of road and lights on roundabout are apparent from the churchyard but currently screened to a degree.</p> <p>The placement of the link road between the northern edge of the churchyard and the present A47 would remove a belt of planting to the north and the west, bringing development closer to the church.</p> <p>The development could result in harm to the historic significance of the church.</p> <p>More detailed plans are required for the new road to the north of the church.</p> <p>There is potential for archaeological deposits due to the proximity of the Proposed Scheme to the churchyard- these should be investigated (local authority to look into).</p>

Date	Form of correspondence	Key topics discussed and key outcomes
08/10/2020	Email	Email to Historic England with information on Listed Buildings to be discussed from QGIS files (St Andrew's Church and St Peter's Church). Information to be reviewed by Historic England prior to meeting on 15/10/2020.
13/10/2020	Email	Response from Historic England to explain upcoming meeting would be to discuss impact on churches, not to identify receptors.  Requested impact on churches to be agreed within Statement of Common Ground.
15/10/2020	Microsoft Teams Meeting with Historic England (HBMCE) and Sweco  Purpose of meeting was to provide Historic England with an overview of the scheme and highlight changes following Statutory consultation and ongoing design development	<u>Discussed Church of St Andrew Honingham</u>  The Norwich Road junction has been moved south east ~100m, further from St Andrew's Church. The retaining wall which featured in the previous design iteration is now removed as part of the scheme.  Landscaping could be placed between slip road and A47 mainline, however not recommended to plant up whole area as would change landmark of the church. Some screening planting would be beneficial to the setting.  HBMCE to agree SOCG following review of ES chapter.  Walking, cycling and horse-riding ("WCHR") underpass more preferable than overbridge.  Noise and vibration effects to be assessed in assessment of the church. Ground monitoring suggested as mitigation.  The approach to be taken in the ES is to note that harm is anticipated to the setting of the church, with design changes post statutory consultation noted to mitigate the scale of harm.  <u>Discussed: Church of St Peter at Easton</u>  Suggested by HBMCE in meeting to ensure as much planting as possible to screen views, as side road moving closer to the church boundary, removing screening layer of trees.  Also raised during meeting that there is a potential opportunity to screen using a planted noise barrier to provide visual and noise reducing benefit.  HBMCE queries if it is possible for the WCHR footbridge to be moved to the east to reduce any setting impacts.
16/10/2020	Email	Email to Historic England to follow-up from meeting, with minutes and cross sections: <ul style="list-style-type: none"> <li>St Andrew's Church (Cross Section 1 - Direction north to south, looking east) (Cross Section 2 - Direction north west to south east, with view looking north east)</li> <li>St Peter's Church (Cross Section 1 - Direction south west to north east, with view looking north west)</li> </ul>

Date	Form of correspondence	Key topics discussed and key outcomes
23/11/2020	Email	<p>Response from Historic England, to add to the meeting minutes that the impact of the retaining wall was the 'worst' one on the church as we do not yet have the full picture of impact.</p> <p>Questions on the cross sections as to whether for St. Andrews church the section would go through both the A47 main carriageway and the over pass bridge. Requested the height of the footbridge at the St Peter's section.</p>
03/12/2020	Email	Email to Historic England to confirm proposed footbridge to east of St Peter's Church will be 5.7m high.
03/12/2020	Email	Response from Historic England to request further information regarding footbridge and confirm whether an underpass or flyover at Norwich Road junction.
04/12/2020	Email	Email to Historic England with drawing of proposed Easton footbridge, explanation that the option chosen has the least impact on the landscape. Clarification on Norwich Road junction provided.
20/07/21	Telephone call	Telephone discussion with Historic England to finalise the SoCG. Historic England provided positive comments in relation to their review and assessment of the Cultural Heritage Assessment for the Application and agreement to the draft Statement of Common Ground.

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

### 3 ISSUES

#### 3.1 Introduction

- 3.1.1 This section summarises the key issues explored between Historic England and Highways England. It is acknowledged that Highways England has carried out an assessment of the historic environment within a defined study area that contains three grade I, three grade II\* and 19 grade II listed buildings along with 244 undesignated heritage assets.
- 3.1.2 The development has the potential to harm archaeological deposits of interest, both directly and indirectly. A mitigation strategy has been presented by Highways England, which includes a programme of archaeological works that will inform preservation strategies, either preserving remains in situ or by record. Historic England will not comment on this strategy and associated documents and are content for Norfolk County Council's Historic Environment Service to comment on this.
- 3.1.3 The following sub-sections demonstrate that Historic England and Highways England have agreed all the current issues.

#### 3.2 Issues addressed in the Environmental Statement (ES)

Issue	Document Reference (if relevant)	Historic England Comment	Highways England Response	Status
Church of St Andrew at Honingham (Grade II* Listed Building) – Effects on setting	Statutory Consultation	Concerned about impact on the setting of the Grade II* listed church due to the close proximity of the new A47 dual carriageway with a retaining wall south of the church.	The alignment of the proposed A47 dual carriageway was moved 150m south from St Andrew's Church and a proposed north facing retaining wall replaced with landscaped earth embankment. This reduced the intrusion of the new A47 dual carriageway on the setting the church.  This design change was developed in consultation with Historic England to ensure the Scheme design has done all it can to avoid or reduce harm to the heritage assets.	Agreed
Church of St Andrew at Honingham (Grade II*)	Statutory Consultation	WCHR underpass recognised as beneficial connection to	Historic England in agreement with Highways England that an underpass is preferable to an overbridge connecting to St Andrew's Church.	Agreed

Issue	Document Reference (if relevant)	Historic England Comment	Highways England Response	Status
Listed Building) - WCHR underpass		Honingham - an underpass would be preferable over an overbridge.	Please refer to ES Chapter 6 Cultural Heritage, paragraphs 6.4.18 - 6.4.20.	
Church of St Andrew at Honingham (Grade II* Listed Building) - Assessment methodology	Scoping Report	Effects of noise and vibration must be considered for the church. Mitigation of ground monitoring to be recommended.	<p>The noise assessment (ES Chapter 11) has assessed the noise impact for the Proposed Scheme as major adverse in the short term (scheme opening for operation) for the church and minor adverse for the churchyard. This would improve in the long term (15 years-time) to moderate adverse for the church and negligible for the churchyard. It was concluded that this impact (reported in ES chapter 11 noise and vibration) was significant adverse for the church and not significant for the church yard.</p> <p>Impact from operation of the Proposed Scheme will be reduced by use of a low noise surface on the carriageway and landscape planting either side of the carriageway.</p> <p>As a precautionary approach, the building and associated structures such as tombs and grave markers will be monitored for vibration during construction.</p> <p>Please refer to ES Chapter 6 Cultural Heritage, paragraph 6.8.28 and Tables 6.3 and 6.4.</p>	Agreed
Church of St Peter at Easton (Grade I Listed Building) – Assessment of Effects	Environmental Statement Chapter 6 'Cultural Heritage' – Section 6.10	The development could result in harm to the historic significance of the church.	The significance of effect could be concluded to be neutral or slight. Neutral has been determined in the EIA to reflect that recording and dissemination of archaeological information will add to our understanding of the archaeology of the region.	Agreed

Issue	Document Reference (if relevant)	Historic England Comment	Highways England Response	Status
			Please refer to ES Chapter 6 Cultural Heritage, Table 6.3.	
Church of St Andrew at Honingham (Grade II* Listed Building) - Design, mitigation and enhancement measures	Environmental Statement Chapter 6 'Cultural Heritage' – Section 6.9	Not recommended to plant up whole area between A47 mainline and slip road as would change landmark of the church. Some screening planting would be beneficial.	Texture screening to avoid block planting has been planned throughout the Scheme.  Please refer to ES Chapter 6 Cultural Heritage, paragraph 6.9.4.	Agreed
Church of St Peter at Easton (Grade I Listed Building) - Design, mitigation and enhancement measures	Environmental Statement Chapter 6 'Cultural Heritage' – Section 6.9	The placement of the link road between the northern edge of the churchyard and the present A47 would remove a belt of planting to the north and the west, bringing development closer to the church.  More detailed plans are required for the new road to the north of the church.	Design measures in front of the church to improve Dereham Road where it linked to the Proposed Scheme have been removed. The setting to the south and west of the church will remain unchanged. Access to the church from Easton will still be via Dereham Road as at present. Additional planting is proposed along the western and eastern sides of the churchyard to maintain the setting within the churchyard and reduce potential impact on setting from the construction of a footbridge to the east of St Peter's Church.  Please refer to ES Chapter 6 Cultural Heritage, paragraph 6.9.6.	Agreed
Church of St Peter at Easton (Grade I Listed Building) - Design,	Environmental Statement Chapter 6 'Cultural Heritage' – Section 6.9	<u>Church of St Peter at Easton</u>  Proposed Scheme would move side road closer to	Removal of the screening layer of trees along the northern boundary of St Peter's Church (NHLE1305921) will be replaced with new screening planting and a green/living noise barrier. These measures are designed to maintain	Agreed

Issue	Document Reference (if relevant)	Historic England Comment	Highways England Response	Status
mitigation and enhancement measures		<p>the church boundary, therefore will remove the screening layer of trees adjacent to the road.</p> <p>As much planting as possible here is preferred.</p> <p>Further raised that there is a potential opportunity to screen in this location using a planted noise barrier to provide both visual and noise reducing benefit.</p>	<p>the setting of the churchyard and the church from within the churchyard.</p> <p>Operational impacts of the Proposed Scheme will be reduced by the following mitigation measures:</p> <ul style="list-style-type: none"> <li>• implementation of low noise surfacing on the carriage way;</li> <li>• the installation a green/living noise barrier to the north of the churchyard boundary; and</li> <li>• landscape planting along the north boundary of the churchyard to maintain the setting of the church within the churchyard.</li> </ul> <p>Please refer to ES Chapter 6 Cultural Heritage, paragraph 6.9.5 and Table 6.4.</p>	
Parish church of St Michael at Hockering (Grade I Listed Building) – Assessment of Effects	Environmental Statement Chapter 6 'Cultural Heritage' – Section 6.10 and 6.12	The new road could increase the traffic noise heard from the vicinity of the church and it is unclear how visible the road and proposed landscaping would be.	<p>Dualling of the Proposed Scheme 200m to the south of Hockering will bypass the village. This would preserve the current road layout and planting on the existing A47.</p> <p>Operation of the Proposed Scheme would result in less traffic and traffic noise on the existing A47 immediately south of the asset and result in an improvement on its setting.</p> <p>Therefore, the church would have slight beneficial effects from the Proposed Scheme during operation.</p> <p>Please refer to ES Chapter 6 Cultural Heritage, Table 6-4.</p>	Agreed

Issue	Document Reference (if relevant)	Historic England Comment	Highways England Response	Status
Church of St Andrew at Honingham (Grade II* Listed Building) – Assessment of Effects	Environmental Statement Chapter 6 ‘Cultural Heritage’ – Sections 6.8 and 6.10	ES must note that harm is anticipated to the church.	<p>At St Andrew’s Church (NHLE1170701) no physical permanent construction impact is predicted. There will be no physical impact on the church or churchyard. Due to the location of the church on the north side of the existing A47 and the Proposed Scheme alignment it is unlikely that previously unknown or deviant burials outside the current churchyard would be encountered by construction of the Proposed Scheme. Trenching to the west of the churchyard and south of the A47 opposite the church revealed little in the way of buried archaeological remains (see Appendix 6.3 of the ES).</p> <p>Construction activities are not predicted to have an impact on the building or churchyard through vibration or other ground movement. However, as the asset is located close to the construction works (less than 40m for the church and 5m for the churchyard) as a precautionary approach the building and associated structures such as tombs and grave markers will be monitored for vibration during construction.</p> <p>Please refer to ES Chapter 6 Cultural Heritage, paragraph 6.8.12 and Table 6.3.</p>	Agreed

### 3.3 Issues addressed in the Environmental Management Plan (EMP)

Issue	Sub-section	Historic England Comment	Highways England Response	Status
Church of St Peter at Easton	Table 3.1 of EMP – Action CH4 ‘Cultural Heritage’	There is potential for archaeological deposits due to the proximity of the Proposed Scheme to the churchyard- these should be investigated (local authority to look into).	<p>There is a low potential for previously unknown or deviant burials outside the current churchyard boundary. The occurrence of unexpected burials will be mitigated through archaeological monitoring during construction</p> <p>During construction, a protocol for unexpected archaeological discoveries will be developed as part of the WSI. This protocol will be agreed with Historic England and NCCES in advance and is likely to include:</p> <ul style="list-style-type: none"> <li>• Toolbox talks or other instruction methods to allow operatives to identify potential archaeological remains</li> <li>• Protocols for protection, recording, and archiving of relevant finds</li> <li>• Protocols and communications plans for temporarily halting works and consulting with the relevant stakeholders in the event of unexpected remains of high or very high value / sensitivity.</li> <li>• Monitoring of any protection measures would be undertaken during construction to ensure that they remain effective including regular inspections of temporary fencing.</li> </ul> <p>Please refer to reference CH4 of Table 3.1 in the EMP.</p>	Agreed