



Historic England

MMO Case officer: Emmanuel Mulenga
Date notification email received: 23/12/2020
Response deadline: 22/01/2021

Our ref: PL00732782 &
PL00732802

MMO ref: MLA/2020/00506 &
MLA/2020/00507

Historic England Business Officer: Aisling Parrish

Telephone: 07774-331-422

Project outline: South Bank Quay - Phase 1 and Phase 2
Advice provided by Science Advisor: Yes

Response made by: Lee McFarlane, Inspector of Ancient
Monuments

Marine and Coastal Access Act (MCAA) 2009

Date response submitted:

22nd January 2021

Decision:

Advice - Concerns

Advice

This advice covers both application MLA/2020/00506 (Phase 1) and MLA/2020/00507 (Phase 2) of the proposed development at South Bank Quay, Teesside. The proposed development has been subject to an Environmental Impact Assessment which included assessment of the potential impacts to Cultural Heritage within the defined study area around the development proposal.

The EIA assessment has included both direct physical impacts and indirect visual or setting impacts on heritage assets. The baseline data has been collected from industry standard sources and is acceptable to inform the assessment and therefore meets the needs of the UK Marine Policy Statement.

Impacts

The key issue is the potential for c. 400 32m long piles across the c 1.2km length of new quayside to impact on early Holocene, and then late Pleistocene drift deposits before driving into the solid mudstone. The peats in this area are important indicators of former land surfaces where early humans may have foraged, hunted or camped prior to rising sea levels in the late Holocene period and may be buried intact below existing reclaimed land.

Section 16.4.2 of the EIA states “...[g]iven this potential, geoarchaeological assessment of geotechnical vibrocores/boreholes, planned as part of a marine ground investigation to be undertaken in November 2020 will be carried out...” We agree that this is a reasonable and proportionate way to evaluate the potential for early Holocene deposits to exist here. However, we are concerned there hasn’t been any involvement of Don O’Meara, the Regional Science Advisor (RSA), in the development of a geoarchaeological survey tied into the geotechnical testing work. It is best practice for an appointed geoarchaeologist to make contact with the regional RSA to discuss a proposed geoarchaeological survey to ensure that it will meet the requirements to inform the Planning and/or MMO processes.

We assume that the works have not yet been carried out probably for reasons related to COVID-19 restrictions. Presuming that is the case, the applicant is advised to ensure that contact is made the RSA, and that the results of the assessment are submitted to support the MMO applications, i.e. pre-determination.

As with the advice we gave in relation to the Regent Cinema at Redcar, the earlier this assessment can be done to inform our understanding the better. It may be that it shows that there are no peats or Holocene deposits we need to be concerned about so no further detailed monitoring work during construction would be required.

The aim is to identify if there are areas of potential through the production of a simple deposit model for this area of the Tees. If possible, it would also date these deposits. In addition, it could provide a reasonable and proportionate study of the soft deposits if it is believed they contain relevant information for understanding the prehistoric development of the region. This would be done with the understanding this would mitigate for the impact of the c.400 piles and would not be seen as a route to prevent or alter the existing construction schedule.

The EIA highlights that the dredging for the Turning Circle and the Berth Pocket along the new quay(s) have the potential to disturb unrecorded or potential heritage assets. In particular, the remains of a WWI Seaplane the location of which is not fixed but is recorded just outside the development area.

The setting of heritage assets has been assessed – specifically several designated listed structures within the study area. The setting of the Gr. II* Transporter Bridge will not be adversely impacted. Its current setting is generally industrial and whilst the potential wind turbines and the associated cranes on the quayside will be visible in View 12, we accept that the turbines are temporary and that the impact therefore is low. The cranes will be permanent, but their open lattice design makes them less visible in long views which does not materially change the setting.

There is no harm during the disposal of the dredged material as the area is an agreed (licenced) disposal area.



Historic England

In NPPF terms, and based on the evidence submitted to date, there is potential harm to heritage assets, but this is less than substantial overall. It is proposed in EIA section 16.5 that an archaeological protocol is submitted to the MMO as an archaeological WSI to mitigate the potential impacts from dredging and piling. This is an acceptable means of mitigating the identified impacts for the dredging.

Position

There is an outstanding vital piece of data and that is the missing report on the geoarchaeological assessment of the boreholes and vibrocores. This means that we are unable to advise if the archaeological protocol is the correct means of mitigating the impact and we advise that the methodology for the assessment is agreed with the RSA as soon as possible and the report is submitted to the MMO to inform the decision.

Conclusion

The MMO are advised not to determine the application until all assessment reporting has been submitted as there is a need to understand the impact of the proposed works before determination.

An archaeological protocol will likely need to be agreed as a condition of a future licence which has been informed by the results of the geoarchaeological assessment, and to ensure that any features located during dredging are recorded and reported. We believe this approach is reasonable and proportionate to mitigate the impact of the development and is in line with both the stated policies of the UK Marine Policy Statement (Section 2.6.6.3) and the draft NE Marine Plan (Policy NE-HER-1).

Historic England is the Government's advisor on all aspects of the historic environment in England. Historic England's general powers under section 33 of the National Heritage Act 1983 were extended (via the National Heritage Act 2002) to modify our functions to include securing the preservation of monuments in, on, or under the seabed within the seaward limits of the UK Territorial Sea adjacent to England.

Yours sincerely

Lee McFarlane

Lee McFarlane
Inspector of Ancient Monuments
Lee.mcfarlane@historicengland.org.uk