



Historic England

Peter Jones  
City Centre Development Management Team Leader  
Liverpool City Council  
Municipal Buildings  
Dale Street  
Liverpool  
L2 2DH

Our ref:  
PL00100485  
Your ref:

Telephone 0161 242 1430  
Fax

15 June 2017

Dear Peter

**Re: EVERTON FC STADIUM BRAMLEY-MOORE DOCK ENVIRONMENTAL  
IMPACT ASSESSMENT (EIA) SCOPING REPORT**

Thank you for your letter of 26<sup>TH</sup> May 2017 consulting us about the above EIA Scoping Report, the purpose of which is to outline the key considerations of the EIA process, to establish the additional information which is to be collected to characterize the baseline environment of the application site, and detail the methods for predicting and assessing the anticipated effect of the development.

Development on this site could, potentially, have an impact upon a number of designated heritage assets<sup>1</sup> and their settings in the area around the site. In line with the advice in the National Planning Policy Framework (NPPF), the Environmental Statement (ES) should contain a thorough assessment of the likely effects which the proposed development might have upon those elements which contribute to the significance of these assets.

Our initial assessment shows a number of designated heritage assets within the proximity of the proposed development. We would draw your attention, in particular, to the following:

- Liverpool Maritime Mercantile City World Heritage Site
- Stanley Dock Conservation Area
- Stanley Warehouse (GII\*)

---

<sup>1</sup> A Designated Heritage Asset is defined in the National Planning Policy Framework as 'A World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area designated under the relevant legislation'.



Historic England, Suite 3.3, Canada House, 3 Chepstow Street, Manchester M1 5FW  
Telephone 0161 242 1416 [HistoricEngland.org.uk](http://HistoricEngland.org.uk)

Please note that Historic England operates an access to information policy.  
Correspondence or information which you send us may therefore become publicly available.





- Bramley Moore Dock Retaining Walls (GII)
- Dock wall from opposite Sandhills Lane to Collingwood dock with entrances (GII)

An Environmental Statement should also consider the potential impacts on non-designated features of historic, architectural, archaeological or artistic interest, since these can also be of national importance and make an important contribution to the character and local distinctiveness of an area and its sense of place. This information is available via the local authority Historic Environment Record ([www.heritagegateway.org.uk](http://www.heritagegateway.org.uk)) and relevant local authority staff.

We would recommend that you involve the Conservation Officer of Liverpool City Council and the archaeological staff at Merseyside Environmental Advisory Service in the development of this assessment. They are best placed to advise on: local historic environment issues and priorities; how the proposal can be tailored to avoid and minimise potential adverse impacts on the historic environment; the nature and design of any required mitigation measures; and opportunities for securing wider benefits for the future conservation and management of heritage assets.

Given the heights of the structures associated with the proposed development and the surrounding landscape character, this development is likely to be visible across a very large area and could, as a result, affect the significance of heritage assets at some distance from this site itself, including across the river. The assessment should clearly demonstrate that the extent of the proposed study area is of the appropriate size to ensure that all heritage assets likely to be affected by this development have been included and can be properly assessed.

It is important that the assessment is designed to ensure that all impacts are fully understood. Section drawings and techniques such as verified photomontages are a vital part of this.

The assessment should also take account of the potential impact which associated activities (such as construction, servicing and maintenance, and associated traffic) might have upon perceptions, understanding and appreciation of the heritage assets in the area. The assessment should also consider, where appropriate, the likelihood of alterations to drainage patterns that might lead to *in situ* decomposition or destruction of below ground archaeological remains and deposits, and can also lead to subsidence of buildings and monuments.

We have the following comments to make regarding the specific content of the Scoping Report:

The site is situated within the Liverpool Maritime Mercantile World Heritage Site and whilst the scoping report makes reference to the need to consider the potential impacts of the proposed development on the Outstanding Universal Value of the designation, we advise that this analysis should be carried out in a Heritage Impact Assessment (HIA), with the main findings incorporated into the body of the ES.





The HIA will need to comply with the guidance set out in appendix four of the ICOMOS Guidance on Heritage Impact Assessments for Cultural World Heritage Properties and be included, in full, as a technical appendix of the ES.

In the consideration of the potential impacts on the identified heritage assets it is vital that the contribution the assets setting makes to their significance is established and appropriately weighed into the considerations, in line with paragraph 127 of the NPPF. Section 6.11 of the scoping report does not explicitly state that this will be undertaken as part of the ES chapter on Heritage; this requires addressing and reference should be made to our document Good Practice Advice Note: The Setting of Heritage Assets (GPA3) - <https://content.historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/gpa3.pdf/>.

The production of verified views would be a fundamental part of the evidence base for ES. A number of representative views are included within appendix D of the scoping report, however, it is unclear how these views have been identified, or their exact location. We would welcome further discussions regarding the location of the views points to be used to provide the necessary visualisations, and reference should again be made to our document GPA3, as well as the Liverpool Maritime Mercantile World Heritage Site SPD.

Section 3.9 of the scoping report discusses the consideration of alternatives for the provision of a new football stadium. It sets out the process which has been undertaken to assess potential development sites, and concludes that Bramley Moore was identified as the most appropriate location for the development. The chapter further states that the background information will be provided as an overview within the technical appendices, but will not feature within the individual technical assessments. In order for the document to be credible, the consideration of alternative sites should form an integral part of the ES.

Reference is made within the scoping report of partial demolition of listed buildings, and as a result paragraph 133 of the NPPF could be a relevant consideration. 133 states that a local planning authority should refuse consent, unless it can be demonstrated that the substantial harm or loss to a designated asset is **necessary** to achieve the identified substantial public benefits. Paragraph 132 of the NPPF also states that as heritage assets are irreplaceable, any harm or loss should require clear and convincing justification. We advise that the consideration of alternatives is a fundamental part of the justification required to begin to address paragraph 133 and 132 of the NPPF and should be scoped into the ES.

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





Historic England

Yours Sincerely

*Marie Smallwood*

Marie Smallwood

Inspector of Historic Buildings and Areas

[Marie.Smallwood@Historicengland.org.uk](mailto:Marie.Smallwood@Historicengland.org.uk)



Historic England, Suite 3.3, Canada House, 3 Chepstow Street, Manchester M1 5FW

Telephone 0161 242 1416 [HistoricEngland.org.uk](http://HistoricEngland.org.uk)

Please note that Historic England operates an access to information policy.

Correspondence or information which you send us may therefore become publicly available.

