

THE SIZEWELL C PROJECT

(EN010012)

DEADLINE 1

COMMENTS ON DRAFT ITINERARY FOR ASI AND SUGGESTED LOCATIONS FOR SITE INSPECTIONS SUBMITTED BY THE HEVENINGHAM HALL ESTATE (THE HHE)

(INTERESTED PARTY NUMBER: 20026675)

1 Draft itinerary

- 1.1 The HHE agrees with the inclusion of the Northern Park and Ride (**NPR**) and Yoxford Roundabout as locations for accompanied site inspections (**ASI**), as detailed in Table 2.3 of the proposed itinerary (page 12 - **PDB-014**) prepared by NNB Generation Company (SZC) Limited (the **Applicant**). The HHE, however, makes the following comments.
- 1.2 **The NPR**
- 1.3 In visiting the NPR site, the HHE recommends that the Examining Authority (**ExA**) has particular regard to the following features:
- (a) the absence of artificial lighting, which contributes to dark skies and rich biodiversity;
 - (b) existing hedgerow, trees and shrubs (including their height), as relevant to the adequacy of future screening;
 - (c) the border of the NPR site with Little Nursery Wood (**LNW**). See comments below;
 - (d) the on-site waterbody situated within the East of the NPR site which has been confirmed to support Great Crested Newts. See comments below;
 - (e) the forty-four trees situated within the NPR site and LNW, which support features potentially suitable for roosting bats (paragraph 1.4.64 of Appendix 7A to Chapter 7 of Volume 3 of the Environmental Statement (**ES**) – **APP-364**). For the location of these trees, please see Figure 7.8 of Appendix 7A Annex 7A.1: Figures 7.1 – 7.9 to Chapter 7 of Volume 3 of the ES (**APP-365**) – extract below.



- 1.4 In addition to noting the proximity of Darsham station, the HHE strongly recommends that the ExA inspects the rail level crossing at Darsham as part of the NPR ASI. Please see further below.
- 1.5 In terms of duration, given the range to features to be considered, 45 minutes seems too limited. The timing of the NPR ASI, if intended to include a visit to the Darsham level crossing, should also be changed, as there are no scheduled trains between 8.45 am and 9.30 am and it is critical that the ExA inspects the crossing while operational. Ideally, any ASI would coincide with two trains in quick succession. See, for example, the trains scheduled for 9.49 am and 10 am or 10.49 am and 11 am.

Out Thursday 10 Jun 2021 Darsham DSM to Ipswich IPS					Out Thursday 10 Jun 2021 Darsham DSM to Lowestoft LWT				
	Earlier			Later		Earlier			Later
Depart	DSM 08:07	DSM 09:49	DSM 10:49	DSM 11:48	Depart	DSM 08:21	DSM 10:00	DSM 11:00	DSM 11:59
Arrive	IPS 08:56	IPS 10:36	IPS 11:36	IPS 12:35	Arrive	LWT 09:06	LWT 10:42	LWT 11:42	LWT 12:42
Duration	0h 49m	0h 47m	0h 47m	0h 47m	Duration	0h 45m	0h 42m	0h 42m	0h 43m
Changes	0	0	0	0	Changes	0	0	0	0
lay Single me of day.	Cheapest	Cheapest	Cheapest	Cheapest	r Single s of day.	Cheapest	Cheapest	Cheapest	Cheapest
	£11.40	£11.40	£11.40	£11.40		£9.80	£9.80	£9.80	£9.80
Trains to Ipswich					Trains to Lowestoft				

1.6 Yoxford Roundabout

1.7 With regard to the Yoxford Roundabout, the HHE agrees with the points of interest listed in Table 2.3 of the proposed itinerary, particularly the inclusion of Roadside Nature Reserve 197, given the potential presence of Stilt Puffball and Cockfield Hall. During the ASI, the ExA should also:

- (a) note the two dead trees at the proposed centre of the roundabout with potential to support roosting bats (paragraph 1.5.44 of Appendix 7A to Chapter 7 Volume 7 of the ES— **APP-495**). For the location of these trees, please see Figure 7.5 of Appendix 7A Annex 7A.1: Figures 7.1 – 7.5 to Chapter 7 of Volume 7 of the ES (**APP-496**) – extract below;



- (b) with regard to Cockfield Hall:
 - (i) visit the hall and surrounding lands, so the harm from increased traffic can be understood from the receptor itself, while also viewing the hall and its associated buildings from the highway to assess how the appearance and significance of the Cockfield Hall estate may be affected by traffic. The ExA should ensure it visits all seven listed buildings located at Cockfield Hall and appreciate their group value, not just the main building;
 - (ii) the ExA is requested to please contact Norton Rose Fulbright LLP in the first instance to arrange access to Cockfield Hall and the surrounding estate;
- (c) note the absence of artificial lighting, as well as the existing hedgerow and vegetation, as these are relevant to future planting.

2 Suggested locations

2.1 Accompanied inspections

2.2 Either as part of the NPR ASI or separately, the HHE recommends that the ExA inspects (1) LNW; (2) the waterbodies to the East of the A12 opposite the NPR site; and (3) the Darsham level crossing.

(a) LNW

- (i) Trees in LNW, which borders the NPR site to the West, have been confirmed to support roosting bats (paragraph 1.4.65, Appendix 7A - **APP-364**). It is therefore important that the ExA gains a clear understanding of how artificial light from the NPR may impact on this group and how any adverse impacts might be mitigated.
- (ii) While not identified as Ancient Semi-natural Woodland on the Ancient Woodland Inventory, LNW supports ancient woodland indicator species (paragraph 1.4.21, Appendix 7A - **APP-364**). In its 2011 Phase 1 survey (Annex 7A.3 - **APP-365**), Amec advised that LNW *“is thought to be a remnant of ancient semi natural woodland, due to the mature broadleaved tree stands and varied ancient woodland indicator ground flora”*. Yet, paragraph 15.12 of Appendix 7.A advises: *“Little Nursery Wood is not recorded on the ancient woodland inventory and is therefore likely to be recently relative origin”*. The HHE also notes that there are significant discrepancies between the description of the woodland within Appendix 7A (paragraph 1.4.20) and the 2020 Ecology Survey report (**AS-036**, paragraph 4.1.2). Accordingly, there is a lack of clarity in terms of the value of the woodland as attributed by the Applicant. We believe that it would therefore be helpful for IPs and technical experts (ecologists) to point out salient features to the ExA during an ASI.
- (iii) If an ASI is not possible, the HHE notes that the Applicant holds an option over LNW and anticipates that it could arrange access.

(b) Waterbodies opposite the NPR

- (i) As detailed in paragraphs 1.4.33-1.4.34 of Appendix 7A (**APP-364**), the A12 was considered by the Applicant to represent a substantial barrier to the movement of Great Crested Newts. Accordingly, surveys of ponds 88-95 (see Figure 7.4, **APP-365**) were scoped out. The HHE notes, however, that the A12 to the East of the NPR comprises a single carriageway road, with shallow, sloping kerbs. While a challenge, the A12 does not possess characteristics that represent a complete, fundamental barrier to movement, particularly in a location where Great Crested Newts are known to be present from surveys completed by the Applicant. The HHE is of the view that additional survey works should have been undertaken and considers it important that the ExA inspects this stretch of road and, if possible, the eight ponds to the East of the A12 at an ASI.
- (ii) If an ASI is not possible, the A12 may be inspected from within the public highway boundary.

(c) Darsham level crossing

- (i) The rail level crossing at Darsham should be viewed in conjunction with the ExA's ASI of the NPR or at a separate ASI. This location has been suggested as traffic flow data included in the diagrams in Appendix A to the Yoxford Microsimulation Modelling Technical Note (Appendix 9B, Transport Addendum – **AS-269-AS-270**) show that traffic at the crossing is predicted to increase by up to +10.3% - a substantial increase, given its existing “Very High” Network Rail Collective Risk rating of 2 (one below the maximum). The increase in HGVs and buses using the crossing is very likely to exacerbate existing problems. The HHE regards this as a fundamental highway safety issue that the Applicant has overlooked in preparing its transport evidence base and believes the ExA would benefit from having salient features drawn to its attention by the HHE's technical experts (highway engineers) during an ASI.
- (ii) If an ASI is not possible, the Darsham level crossing may be viewed from the public highway.

- 2.3 As part of the Yoxford Roundabout ASI, the HHE recommends that the ExA visits the level crossing at Middleton, which is located 600 metres from the roundabout.
- (a) While not classed as dangerous as the Darsham crossing by Network Rail, the Middleton crossing is still characterised by a High risk (risk score F4, only two steps lower than Darsham) and will also be impacted by additional traffic, including HGV traffic and AILs.
 - (b) If an ASI is not possible, the Middleton level crossing may be viewed from the public highway.
- 2.4 The HHE recommends an ASI to the area around the junctions of the A12 with the B1387 and of the B1387 with Dunwich Road, south of Blythburgh.
- (a) The HHE regards this as a better location for the NPR, as it is closer to the North catchment area for construction worker concentrations and would negate increased use of the Darsham rail crossing.
 - (b) If an ASI is not possible, the junctions and surrounding area may be viewed by the ExA from the public highway.
- 2.5 **Unaccompanied inspections**
- 2.6 The HHE recommends that the Applicant prepares an overlay that depicts the location of designated and, if possible, non-designated heritage assets along the proposed HGV (pre and post the Sizewell Link Road) and AIL routes. This will allow the ExA to better understand the likely impact of 12 years' construction traffic on these assets. The HHE suggests that it would assist the ExA to drive these routes unaccompanied.

Norton Rose Fulbright LLP

12 May 2021