

THE SIZEWELL C PROJECT
(EN010012)

DEADLINE 2

**POST HEARING SUBMISSIONS INCLUDING WRITTEN SUBMISSIONS OF ORAL CASE
SUBMITTED BY THE HEVENINGHAM HALL ESTATE (THE HHE)**

(INTERESTED PARTY NUMBER: 20026675)

- 1 The Heveningham Hall Estate (**HHE**) owns and has restored more than 2,500 hectares of Suffolk's parkland, farmland, and woodland, with no fewer than 32 designated heritage assets, of which 11 are in Yoxford.
- 2 It is a significant local employer and conservation is a core principle which underpins its ethos. Its reputation for stewardship; protecting and enhancing the local landscape – its unique habitats, ancient buildings and dark skies has contributed to its reputation as a paradigm for modern estate management, and as a world class travel destination.
- 3 It will submit detailed written representations and intends to attend relevant issue specific hearings.
- 4 The focus of these submissions will be on associated development - the Northern Park and Ride (**NPR**) and Yoxford Roundabout (**YR**). They will address:
 - (a) Transport
 - (b) Ecology
 - (c) Heritage
- 5 Transport

Northern Park and Ride

Poor site selection

- (a) NNB Generation Company (SZC) Limited (**the Applicant**) has not justified its selection of Darsham as the location for the NPR.
- (b) Neither the Transport Assessment nor the Transport Assessment Addendum consider the risks associated with increased use of the Darsham level crossing, which is an issue of particular concern. The level crossing already carries a very high Network Rail risk rating (F2) and traffic at the level crossing is predicted to rise 10.3% - with a notable increase in HGVs and Buses. Nevertheless, no improvements have been proposed.

Size of the NPR

- (c) The NPR car park is unnecessarily large.
- (d) The HHE has serious doubts regarding the predictions relating to the use of the Northern Park and Ride – e.g. the modelling appears to assume that residents living west of Saxmundham who live closer to the Southern Park and Ride will use the Northern one.

- (e) The NPR has 1250 spaces, but the Addendum suggests 1054 spaces are necessary.
- (f) So far as the HHE is aware, the Applicant has not published any plan to ensure the effective management of the NPR once operational. This is of considerable concern, given that if not properly managed it will seriously impact local residential amenity.

Yoxford Roundabout

- (g) Even on the Applicant's modelling, the roundabout has been significantly over-engineered. The evidence does not support the need for a 55m Inscribed Circle Diameter roundabout.
- (h) That modelling itself appears to underestimate capacity on the network and therefore overestimates the impact of the development on traffic flows.

6 Ecology

- (a) HHE's Written Representations will deal with wider issues regarding Air Quality, Recreational Impacts, and Marsh Harriers.

Northern Park and Ride

- (b) The survey data relied upon is manifestly inadequate and out of date. The baseline survey data relied upon is mostly more than 5 years old and there is considerable scope for this to have changed (especially for mobile species e.g. bats and birds).
- (c) There are issues with the detail of the assessments undertaken, in particular:
 - (i) Great Crested Newts are known to be on site but have been scoped out of 8 waterbodies on the basis that the A12 presents a substantial barrier to their movement. Ecology Solutions analysis suggests this is incorrect and Great Crested Newts have been under assessed.
 - (ii) No proper consideration has been given to whether Little Nursery Wood is ancient woodland – despite the fact that it supports indicator species and the description of it in SZC's 2011 Phase 1 survey as "a remnant of ancient semi natural woodland".
 - (iii) No consideration has been given to bats and reptiles potentially present on the site.

Yoxford Roundabout

- (d) The Applicant has essentially ignored the fact that the YR site is adjacent to Roadside Nature Reserve 197 which is a designated site of national importance because of the presence of the Sandy Silt Puffball fungus.
- (e) The area within the YR site is suitable for this fungus and yet there has been no assessment of the potential impact on it. Instead, the Applicant's Dust Risk Assessment asserts (wrongly) that there are no sensitive habitats within 500m of the development.
- (f) The potential presence of roosting bats and reptiles has also been ignored.

7 Heritage

Cockfield Hall

- (a) Cockfield Hall has been ignored. It is a Grade I listed building, with an associated complex of other GII* and GII buildings.
- (b) The Applicant has inappropriately scoped out Cockfield Hall from assessment, notwithstanding that it is located within the YR 500m study area and near the boundary of

the NPR 1km study area. That is especially inappropriate (and surprising) given its high status and the fact that curtilage listed buildings within the Hall complex fall within the NPR 1km zone, and the interrelationship between these and Cockfield Hall contributes materially to Cockfield Hall's significance.

Yoxford Conservation Area

- (c) The Applicant's suggestion that the A12 is a positive contributor to the Yoxford Conservation Area is surprising and erroneous. It is directly contrary to the assessment in the statutory Conservation Area Appraisal, which is to be preferred.
- (d) The impact on the Yoxford Conservation Area has been underestimated and in particular there has been no assessment of the impact of increases in construction traffic on the Yoxford Conservation Area.

8 Conclusion

- (a) The HHE reiterates its request that the Northern Park and Ride and Yoxford Roundabout are considered at Issue Specific Hearings.
- (b) At least some of the issues identified above are, in the HHE's view, readily capable of resolution and the HHE publicly asks the Applicant and its agents to engage with it to find solutions to those issues as part of the Examination process.

Charles Streeten

Francis Taylor Building