

THE SIZEWELL C PROJECT

(EN010012)

DEADLINE 2

SUMMARY OF WRITTEN REPRESENTATION SUBMITTED BY THE HEVENINGHAM HALL ESTATE (THE HHE)

(INTERESTED PARTY NUMBER: 20026675)

- 1.1 The HHE's objection to NNB Generation Company (SZC) Limited's (**the Applicant's**) application concerns ecology, transport and heritage. Key issues identified in its Written Representation are summarised below.
- 1.2 Transport
- (a) The HHE's principal concerns in respect of the Northern Park and Ride (**NPR**) relate to (1) the site selection and location for the NPR; (2) the risks associated with increased use of Darsham level crossing; and, (3) the size of the NPR.
 - (b) Given the known highway risks associated with the existing level crossing, the high increase in PCUs and the fact no construction workers are now predicted to travel by train, the Applicant's decision to locate the NPR at Darsham seems incongruous.
 - (c) The HHE's primary concerns in respect of the Yoxford Roundabout (**YR**) relate to (1) the Applicant's junction capacity modelling for the YR; (2) the traffic modelling for Yoxford and Darsham; and, (3) the design of the YR.
 - (d) In summary, due to flaws in the Applicant's assessment, there is a risk that the modelling produced as part of the Transport Assessment/Addendum underestimates the capacity of the YR and overestimates queues and delays. This means that there is a concrete possibility that the YR is over-engineered.
- 1.3 Ecology
- (a) There are several flaws with the Applicant's approach to identifying the baseline position at the NPR and Little Nursery Wood, which immediately adjoins the NPR to the west. Most of the survey data relied on is inadequate and out of date. There are also issues with the assessments undertaken. Given the critical importance of establishing the baseline position, if potential effects are to be properly assessed, these types of issues and inconsistencies undermine confidence in the Applicant's overall assessment.
 - (b) With regard to the YR, the Applicant seems to have effectively ignored the close proximity of Roadside Nature Reserve 197, which is a non-statutory designated site of ecological importance because of the presence of the rare and protected Sandy Stilt Puffball fungus. The Applicant has also failed to properly survey for roosting bats and reptiles. These omissions undermine a proper understanding of the baseline position and the Applicant's ultimate findings.
- 1.4 Heritage

- (a) While the HHE accepts that the completed nuclear power station is unlikely to have a material impact on the significance of heritage assets forming part of the HHE, there is a very real risk that the construction phase (including additional HGV and bus movements) and associated development, such as the YR and NPR, will cause such harm. Permanent harm may also be caused by the YR post construction.
- (b) The Applicant has failed to adequately assess: the significance of heritage assets located on the HHE, including (i) the Cockfield Hall complex of buildings which have significant group value; (ii) the significance of heritage assets within the Yoxford Conservation Area, which includes the Cockfield Hall complex; and (iii) the contribution of setting, being the surroundings in which a heritage asset is experienced.
- (c) The Applicant's determination of harm has therefore not been properly made and, in most instances, impacts have been grossly underestimated. In particular, the impact of the 12 year construction phase on heritage assets and their settings has not been properly assessed.

Norton Rose Fulbright LLP

2 June 2021