

**Written Representation for Deadline 2, on behalf of N J Bacon Farms (SIZE-AFP153), Ward Farming Ltd (SIZE-AFP 242), A W Bacon Will Trust (20026375) and Nat and India Bacon (SIZE-AFP 154 and SIZE-AFP 155 respectively).**

Points (1 - 3), have also been submitted separately as responses to questions raised by the Examining Authority.

## **1. Effect on Business Operations**

The development will affect our business in the following ways:

### **1.1. Land Take**

The impacts of land take, severance and lost rented land will mean that we have around 67 acres less land available for the production of cereal and vegetable crops including onions, potatoes and peas. This will affect our profitability considerably because the land taken is some of our most productive land and is also within 1 mile of our main operating centre at Theberton. It will not be possible for us to reduce our overhead and as such the lost net margins of this area of cropping will cause our profitability to be reduced accordingly.

### **1.2. Logistics**

Difficulties with logistics arising from increased levels of traffic in the area, in particular on the B1125 which we use to access land to the north and east of Westleton are likely to increase operating times for works involving access to land in these areas.

### **1.3. Cost of Accommodation**

It is anticipated that rental values and potentially capital values for properties in the area are likely to increase as a result of demand arising from the need for housing for workers employed as part of the Sizewell C development. This is likely to increase the cost of employment to local business who are either renting properties for employees or paying employees who are themselves renting properties.

### **1.4. Impact on shooting**

The farm business includes a small shooting enterprise which sells sporting days annually. The land take resulting from the SLR development around Theberton will reduce the land available for shooting by around 25%. It cannot be said for certain what impact this will have on the shoot, but it may be that it is no longer a viable enterprise.

### **1.5. Impact on cost of local trades**

We are concerned that the ability for SZC Ltd to pay higher rates for local trades, albeit in the medium term, will adversely affect other local businesses (and households) who are forced to pay more for trades such as plumbers and electricians. The impact of this should not be underestimated.

### **1.6. Impact on drainage of inland water**

The Minsmere New Cut carries water from as far inland as Sibton and Peasenhall. It is fed by a network of ditches, drainage channels and small rivers, including the Minsmere River. It takes this water out to sea at the Minsemere Sluice to the east of Eastbridge.

The New Cut passes through the Minsmere Levels and, as the main channel, its level will impact on water levels on the marshes and surrounding areas.

The increased impermeable areas resulting from the construction of roads, compounds, car parks, and the main facility at Sizewell will all potentially result in water levels in the New Cut and Minsmere Levels drainage system increasing more rapidly following periods of rainfall.

The Minsmere Levels drainage system is finely balanced and relies on a sluice which lets water through the sea wall during low tide, to release inland water into the sea.

Increased pressure on this sluice could increase water levels on the marshes. This could affect our ability to manage the habitat in line with Natural England prescriptions for the area, much of which is designated as a Site of Special Scientific Interest (SSSI), please see maps showing the extents of the SSSI area on the Minsmere Levels as well as SSSI areas on our farm at Theberton in Appendix 1.

Arable areas also rely on this drainage system to take water away and increased pressure on these systems and increased water levels would impact on their effectiveness in doing so.

There are a number of low-lying houses in Eastbridge, Theberton and Middleton, the residents of which would also be concerned with negative impacts on this drainage system.

### **1.7. Saltwater Intrusion and Irrigation**

We have major concerns over the potential impacts of the project on coastal erosion and the ensuing impacts of saltwater intrusion onto the Minsmere Levels.

If this system was to fail, SSSI marshes, providing rare habitat and used for grazing livestock, which are not only part of our farming enterprise, but also essential to the ongoing management of this habitat, would be lost.

The New Cut, which is a large drainage channel, is also an essential source of water used for irrigation. In line with Environment Agency guidance, we have built winter storage facilities to harvest peak flows of winter water which flow through the Minsmere Levels.

It is absolutely essential to the ongoing viability of our farming business that we are able to abstract fresh water from the Minsmere New Cut.

It is also possible that salt intrusion into the marshes would impact on ground water also used for irrigation and again, essential to the business.

## **2. Water Supply**

We rely on well points for the irrigation of land for the growing of 600 acres of cereals and vegetable crops at Theberton Hall Farm. These well points are shown on Map showing abstractions points at Theberton Hall Farm, included in Appendix 2 of this document. If this were to be affected by saline intrusion the viability of the farming business would be affected catastrophically.

It is essential that management of coastal defences are carried out such that salt water is not allowed to enter the irrigation abstraction points within the Minsmere Levels. This irrigation water is essential to the production of cereals and vegetables on a further 650 acres around Westleton. The location of the new cut abstraction point is shown on the map New Cut Abstraction Point included in Appendix 3 of this document.

### **3. Land Ownership and Severance**

The scheme causes significant severance and although the land required for the SLR is 33 acres, the impact on the area of arable land available to us is reduced by 67.95 acres. EDF have recently worked with us to mitigate the impact of this situation which is very important to the ongoing viability of our business.

Maps showing the severed land and irrigation mains at Theberton (Theberton Hall Farm and Valley Farm) have been included in Appendix 4.

### **4. Transport and Logistics**

We have concerns over the impact of the increased traffic volumes on the local area. This will inevitably affect businesses, including ours. We rely on being able to move fresh produce such as salad potatoes, peas for freezing and baby leaf salads around in a timely manner.

The east coast of Suffolk has a great tourist economy and we are very concerned that logistical issues and traffic chaos could do real long-term damage to this sector if not properly managed.

Weekend visitors and day visitors are attracted to the Suffolk Coast in part because of its accessibility and it is very important that the area does not become strangled in traffic chaos.

These effects should be carefully considered and mitigated to preserve an important long-term part of Suffolk's economy.

### **5. Routing choice for the Sizewell Link Road or Route Z**

In an effort to reduce the impact of road freight and construction traffic on the local area to a level essential for their operations, EDF have proposed to construct the Sizewell Link Road (SLR).

Of the four routes considered prior to the release of consultation 3, EDF have chosen to proceed with Route Z, known as the SLR.

Having lived in Suffolk all my life and knowing and understanding how people live and operate in the area I still believe that route W provides a better option for road freight and transport access to Sizewell C.

I go into more detail on this option in a moment, but first I would like to raise my concerns over the existing proposals for Route Z.

### **6. The B1125 / B1122 Link.**

I have serious concerns over EDF's proposal to directly connect the B1125 with the SLR.

The B1125 is a local road linking the A12 at Blythburgh to the point where it joins up with the B1122 just to the North East of Theberton.

This route is already heavily constrained through the villages of Blythburgh, Westleton and Middleton. There are currently weight restrictions in place (excepting local traffic).

As farmers, we operate to the north around Blythburgh and as far north as Beccles. We do not permit our machine operators to use the B1125 to cut through from our farm at Theberton to Blythburgh for the carting of produce – the road is simply too narrow and interacts heavily in the villages of Westleton and Middleton, where pubs and shops open out onto narrow pavements adjacent to the carriageway.

Existing Sizewell traffic is already locally known to be a problem on this route.

We now have a situation where the Applicant plans to create a new direct connection from the B1125 to the SLR with the realignment of the current B1122, making the B1125 the priority route to join the SLR.

The Applicant's own traffic numbers suggest more Sizewell traffic on the B1125 than the SLR itself, during specific periods of the construction and operational phase.

Sizewell traffic should be positively encouraged to make use of the new SLR from the Yoxford. As such it seems illogical to effectively improve access onto the SLR from the B1125, encouraging road users to cut through this already heavily constrained route.

EDF have argued that this link is to discourage the local B1125 traffic from cutting through Theberton on the B1122. This would not be an issue if this traffic was encouraged to use the SLR. I believe local traders would like to continue to see local traffic continuing to use the B1122.

The link from the B1125 onto the SLR should be removed from the scheme, presumably providing a cost saving, some of which can be put towards highway intervention schemes to slow / reduce and make the B1125 as unattractive as possible for all construction and operational traffic.

This will force Sizewell traffic to use the A12 strategic network and the SLR as designed.

A technical note prepared by Create Consulting Engineers Ltd which further analyses the issues associated with the link from the B1125 to the SLR and in particular looks at associated traffic volumes during the various phases of the development has been included in Appendix 5.

## **7. Fordley Road**

We believe the purpose of the SLR should be to carry Sizewell Construction traffic and freight, directly to the site, whilst avoiding interaction with local communities and transport links.

The proposed developments at Pretty Road, where the option to remove the proposed junction with the SLR and instead install a bridge over the SLR is very welcome. This will allow local traffic to continue to enjoy their quiet use of Pretty Road – an essential link to Saxmundham and beyond.



I also believe Fordley road would benefit from the same interaction with the SLR. It is not desirable to link Fordley Road to the SLR – this will encourage Sizewell traffic to cut through on this route. But it is desirable to maintain local access from Middleton through to Saxmundham and beyond along Fordley Road.

As such it is necessary to install a way for Fordley Road to pass over or under the SLR. This is essential in allowing communities to continue to function around the development of Sizewell.

## **8. Route W**

Between stages 2 and 3 of the consultation process, EDF considered four routes for a link road from the A12 to the main development site.

We have spent a lot of time considering these proposals because as farmers, we would stand to lose land under both of these alignments.

Of the four routes originally proposed by EDF, Suffolk County Council has stated that it would prefer Route W, because it provides significantly more tangible legacy benefits in comparison to Route Z.

Importantly, it would reduce the distance travelled for traffic from the south (approximately 80% of traffic according to EDF), by 6 kms for each vehicle, each way. Given the volumes of HGV, LGV and Bus movements projected by EDF, this extra distance becomes significant.

Route W would also be of true value to the local communities providing an improved route between the A12 and Leiston, Friston, Aldringham, and Thorpeness.

The new route would also offer relief to congestion in Saxmundham, arising from traffic associated with two supermarkets and new housing developments to the east of the town.

Route W could also provide access from the A12 to the proposed Saxmundham Garden Village development of over 800 houses to the south of Saxmundham town.

The alignment of Route W would provide Scottish Power with a safer and more efficient means of access to their proposed site at Friston, an example of the benefits of shared infrastructure proposed in the Joint East Anglian MPs Response to National Grid consultation in October 2020.

For the reasons stated above, the legacy benefits to the local community, tourism, the wider economy and access for Scottish Power, provided by Route W, significantly outweigh those associated with Route Z.

I still don't feel that any real reason to choose Route Z over Route W has been given by the Applicant.

In their assessment of options at Consultation 3, EDF have cited engineering challenges along the Fromus Valley as well as the presence of heritage assets along route W as the reasons not to choose this alignment.

I struggle to see any greater engineering challenges along this route than that of route Z, certainly none which prohibit further investigation in this option.

The Applicant's Heritage Impact refers specifically to Hurts Hall which EDF described as a "Designated Heritage Asset". No other Listed Buildings on either Routes W or Z have been given this designation.

In reviewing EDF's assessment of the heritage impacts, Dr. Richard Hoggett, the former Suffolk County Council Archaeologist, assessed the relative impacts on heritage assets of both routes and prepared his "*Heritage Assessment Report*" of March 2019. This document has been included within Appendix 6.

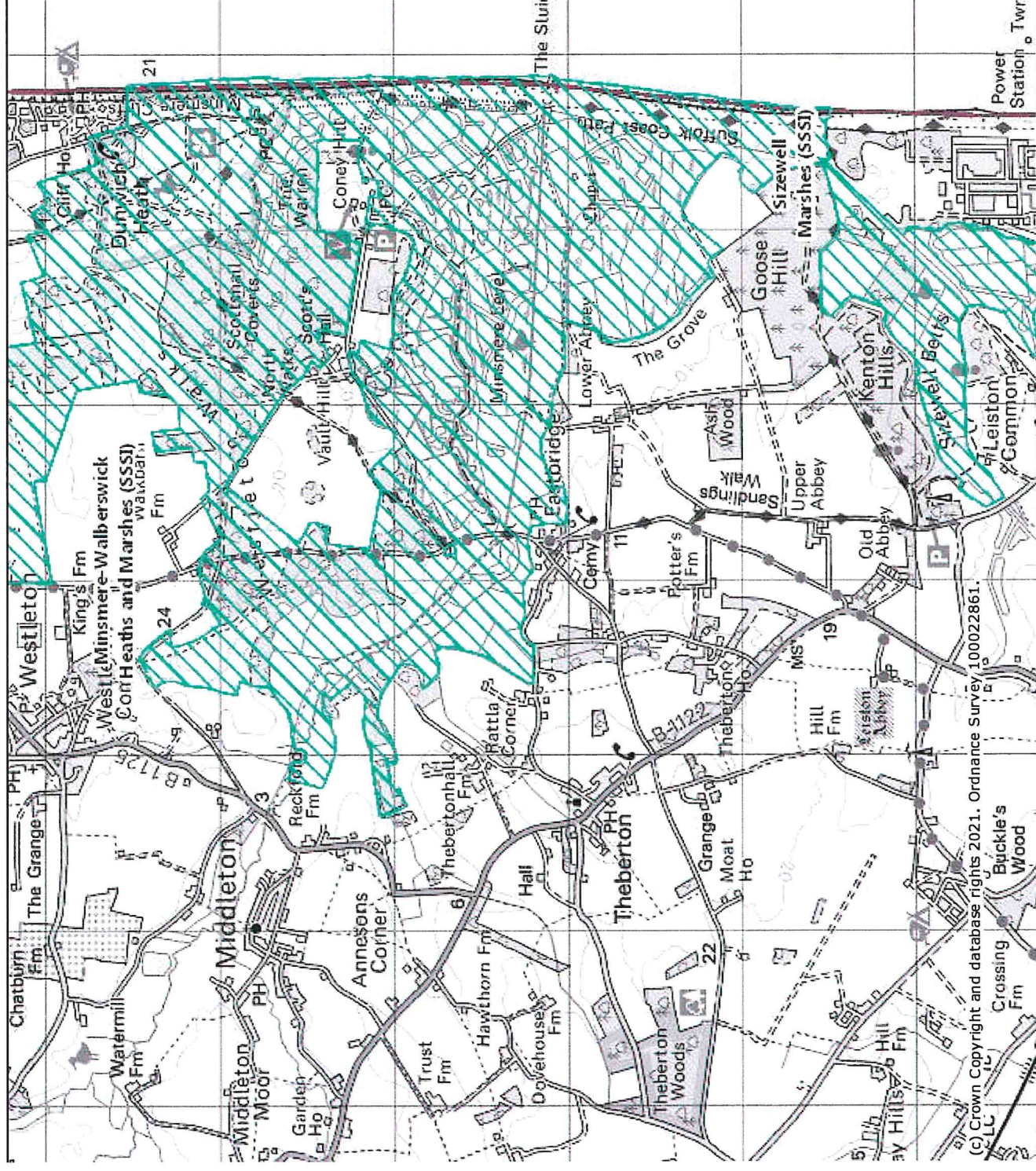
Dr. Hoggett analysed the number of Listed Buildings within a distance of 375m of the two routes. He found that there are 9 listed properties on Route W and 18 properties on the SLR.

This would indicate that the Heritage Impacts of Route Z are greater than that of Route W.


The transport and logistics for this project are a major concern locally and a sound and justified plan is essential in minimising local impact at all levels during the construction process and beyond.

Please see attached as Appendix 7 a report prepared by Create Consulting Engineers Ltd, which compares Sizewell Link Road (SLR) Route Z and Route W from a transport and logistics viewpoint.

## **Appendix 1: Minsmere Levels and Theberton Hall Farm SSSI Maps**



## Legend

-  Sites of Special Scientific Interest (England)

Projection = OSGB36

xmin = 636400

ymin = 262200

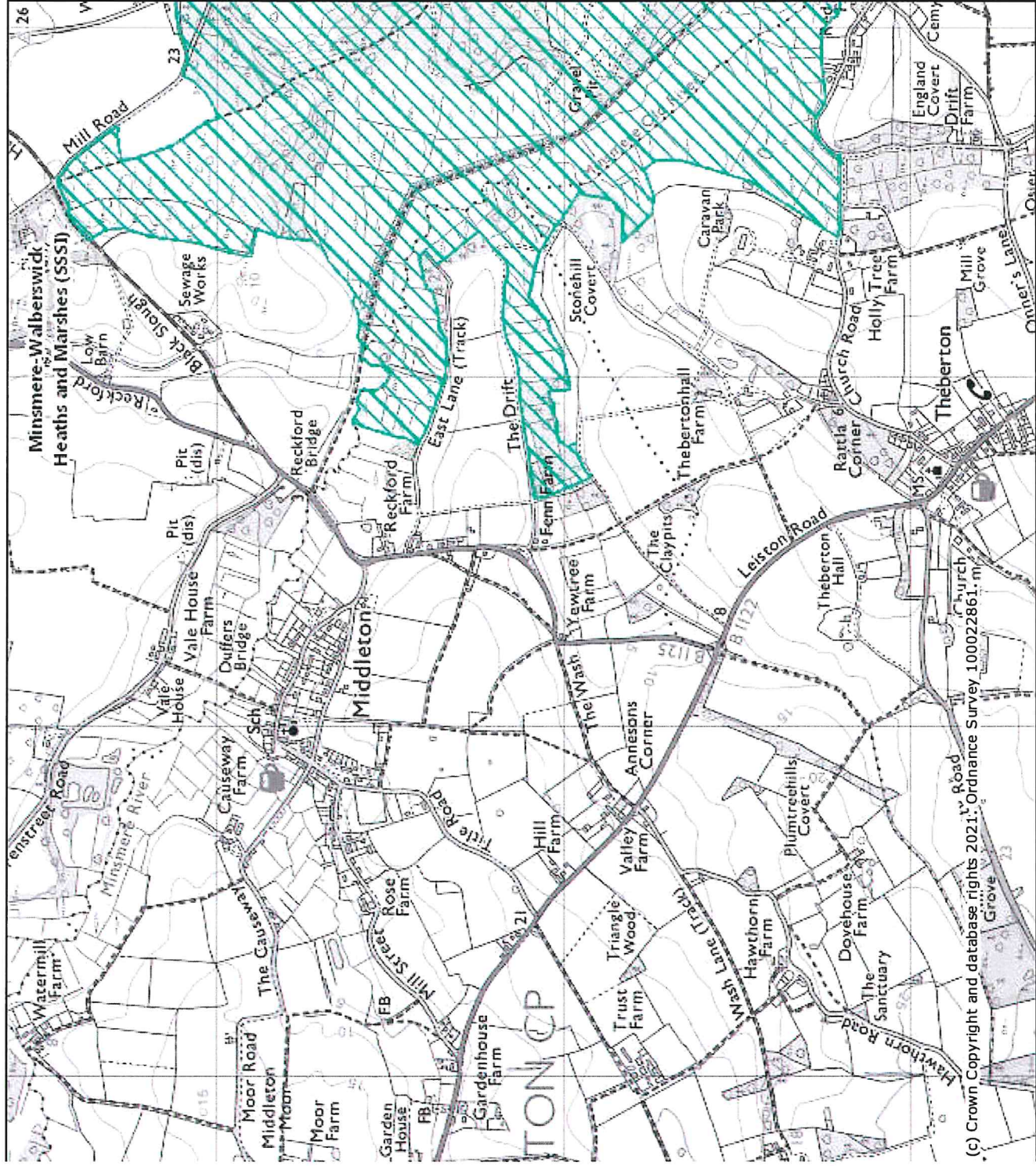
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ymax = 270300

Map produced by MAGiC on 2 June, 2021.

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## Legend

 Sites of Special Scientific Interest (England)

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ymin = 265800

xmax = 646200

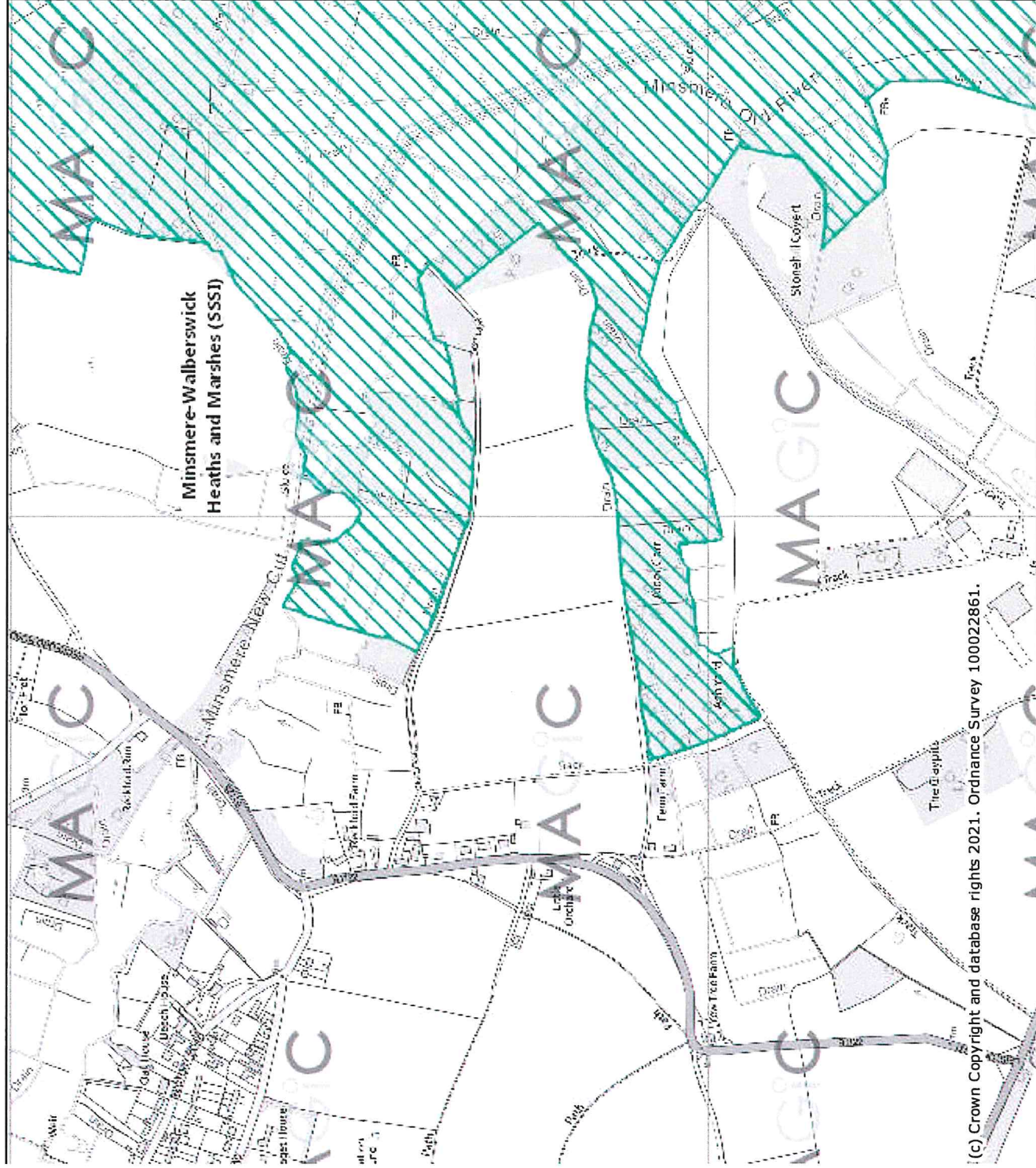
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# MAGiC SSSI area around Theberton Hall Farm



## **Appendix 2: Theberton Hall Farm Well Points Abstraction Points**





**ENVIRONMENT  
AGENCY**

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**Key**



Abstraction Points



Area of Land

Scale: **1:15,000**

Licence No: 7/35/03/\*G/0052

Date 3 April 2008

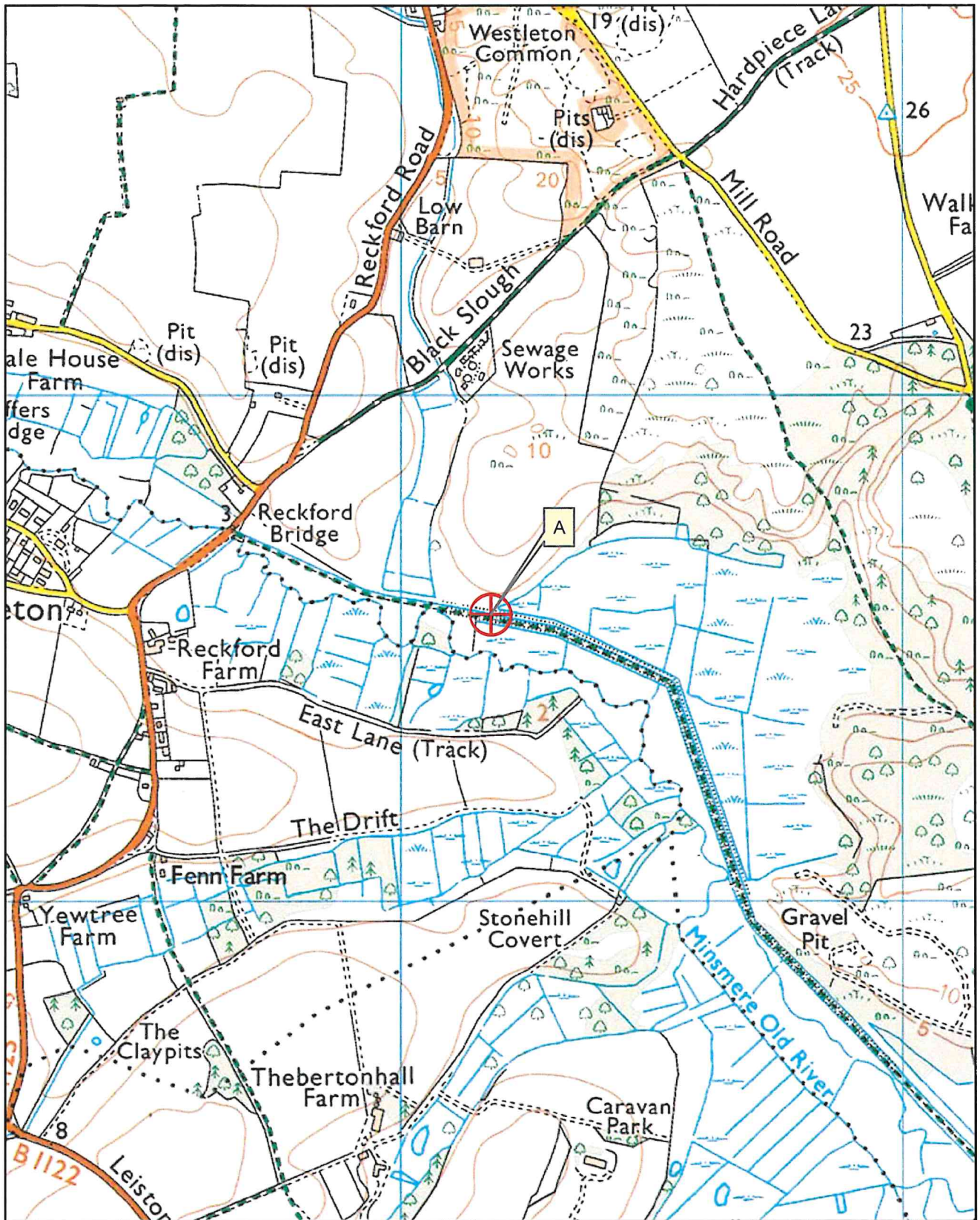
Signed



Team Leader  
Regulatory (Water Resources)

### **Appendix 3: Minsmere New Cut Abstraction Point**





0 0.5 1 km



Environment  
Agency

MAP ACCOMPANYING LICENCE NUMBER  
AN/035/0003/014

Scale: 1:10,000

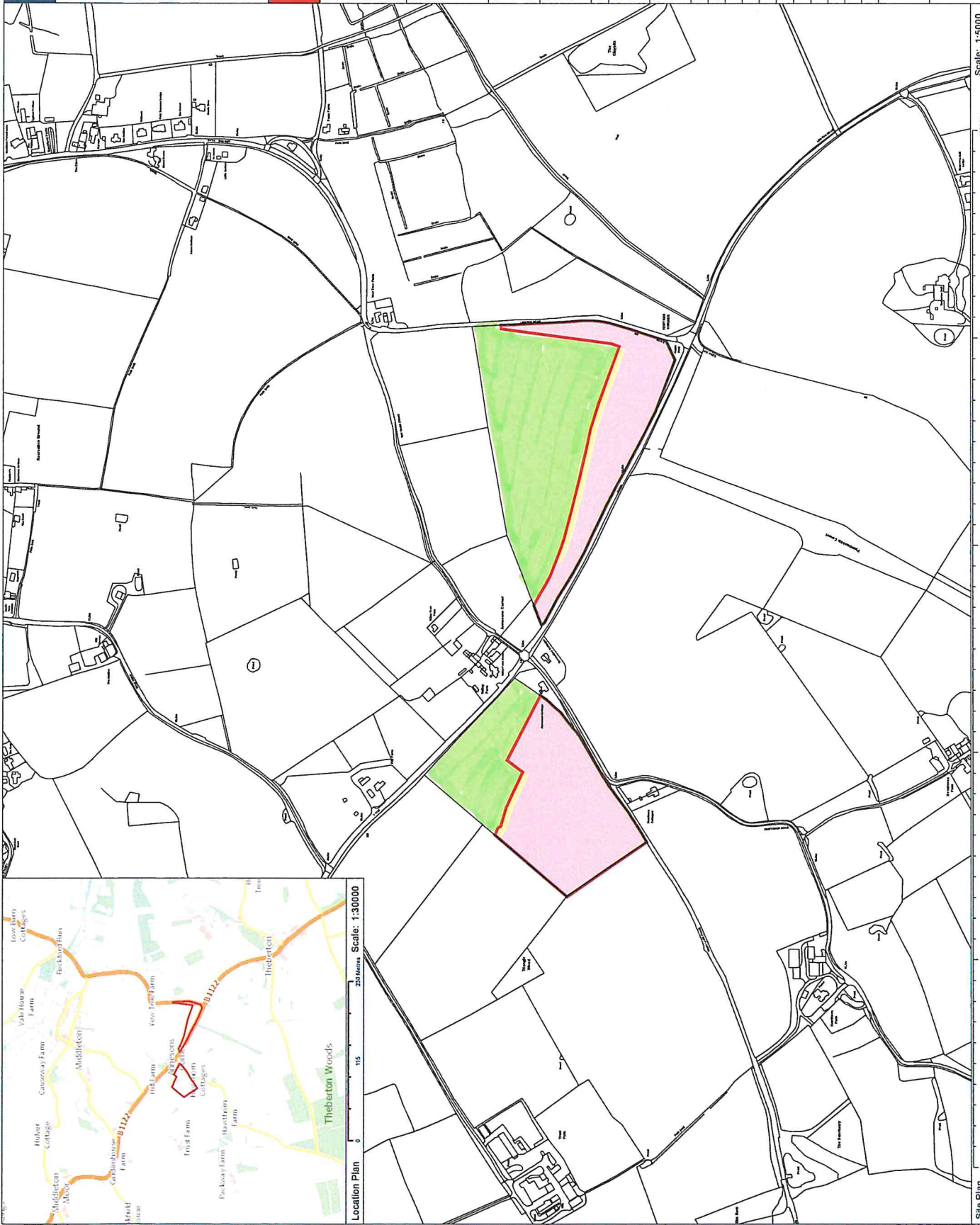
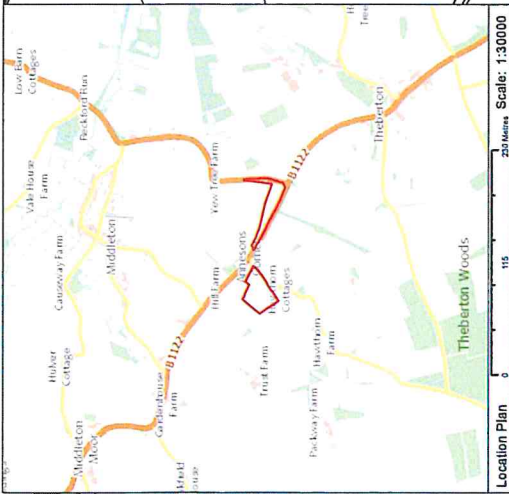


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**Appendix 4: Maps showing severed land at Theberton Hall Farm and Valley Farm and irrigation mains at Theberton Hall Farm**







**DALCOUR MACLAREN**

Key:

- Temporary Working Area
- Indicative Purchase Area - 14.25 Acres
- Option Land - 15.41 Acres

**SEVEN LAND**

Title Number - SK309496

**TITLE BOUNDARIES BASED ON THE NATIONAL POLYGON DATASET**

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Notes:

Coordinate System: British National Grid  
Datum: OSGB 1936

Grantor:  
Margaret Anne Bacon & James John  
Skellern

Signed:

Date:

Location:  
Land at Valley Farm, Middleton,  
Saxmundham

Coords: 642,827 266,844

Scheme Name:  
Sizewell C NNB

Drawing Name:  
Option Plan - Sizewell Link Road

Rev	Date	Description
-	03.12.2019	First Issue
A	02.09.2020	Property and site boundary amendment
B	23.10.2020	Property and site boundary amendment
C	04.01.2021	Property and site boundary amendment
D	28.01.2021	Property and site boundary amendment

Drawn: LM

Approved: JCD

Sheet No: 1 of 1

Sheet Size: A3

**Sizewell C**  
Energy solutions for a better world

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# Theberton Hall Farm Irrigation Mains

Scale: 1:10,000

Ward Farming Ltd  
Leadenhall Farm  
E-mail office@wardfarming.co.uk







## TECHNICAL NOTE

Date: 1<sup>st</sup> June 2021

File Ref: NP/VL/P20-2187/04TN

Subject: Bacon Family – Deadline 2 Response

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### 1.0 DEADLINE 2 - SUBMISSION

1.1 Create Consulting Engineers have been appointed by the Bacon family to provide a written response at Deadline 2 in line with the Planning Inspectorate timescale.

1.2 The purpose of this submission is to make the Inspector Panel aware of the following;

- Consider the issues raised by Mr. P Zanna at the open floor hearing (OFH) on Wednesday 19<sup>th</sup> May;
- Highlight the issues associated with the Sizewell Link Road (SLR) and in particular the B1125/B1122 junction which directly influences my Client's land interests;
- Highlight fundamental concerns regarding the strategy employed by the Applicant over the use of the B1125.

1.3 Reference is made to the SLR Plans for Approval Parts 1 and 2, along with the associated Technical Documents provided by the Applicant and all necessary updates as of 31<sup>st</sup> May 2021.

1.4 These include:

- SZC\_Bk2\_2.10\_SLR Plans For Approval Part 1 of 3
- SZC\_Bk2\_2.10\_SLR Plans For Approval Part 2 of 3
- Transport Assessment EN10012-002581 and Appendices / Updates

1.5 There are a number of other topic areas which the Bacon family have highlighted as concerns with the SLR.

1.6 However, Create are aware that other parties, specifically Suffolk Council, as the Highway Authority, will be addressing the following and therefore, at this stage, no further comments are made;

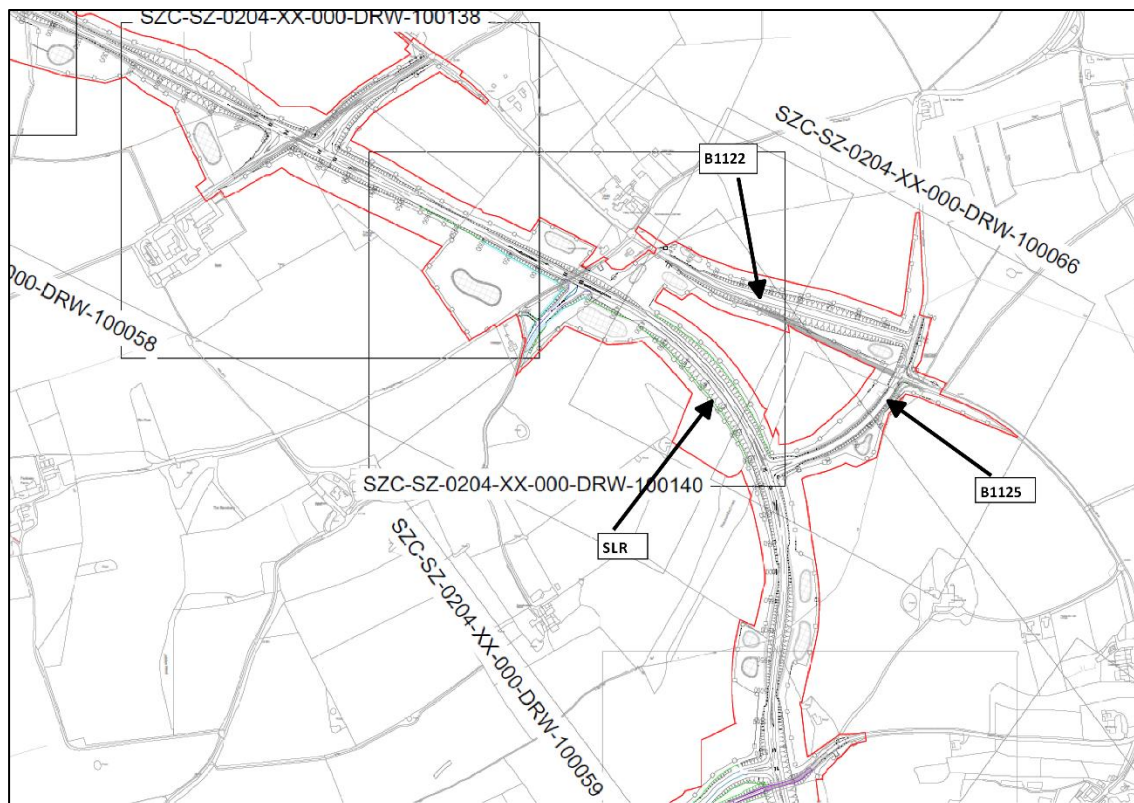
- SLR Route alternatives and the lack of transparency for choosing the current SLR alignment;
- SLR alignment and technical shortfalls; and
- SLR legacy benefit.

1.7 However, Create do reserve the right to provide additional information on these points should the Highway Authority fail to adequately challenge these points.

## 2.0 OPEN FLOOR HEARING – LAND IMPACT

2.1 Following the presentation by Mr. P Zanna at the OFH, the Inspector Panel requested plans which highlight the areas of concerns. These are provided in the following sections.

2.2 Figure 2.1 highlights the works proposed by the Applicant and the interface of the SLR, B1122 and B1125. My Client's land, directly north of the B1122, is required to deliver a diversion of the B1122 changing the current priority with the B1125 connecting direct to the SLR with a ghosted right turn Lane.



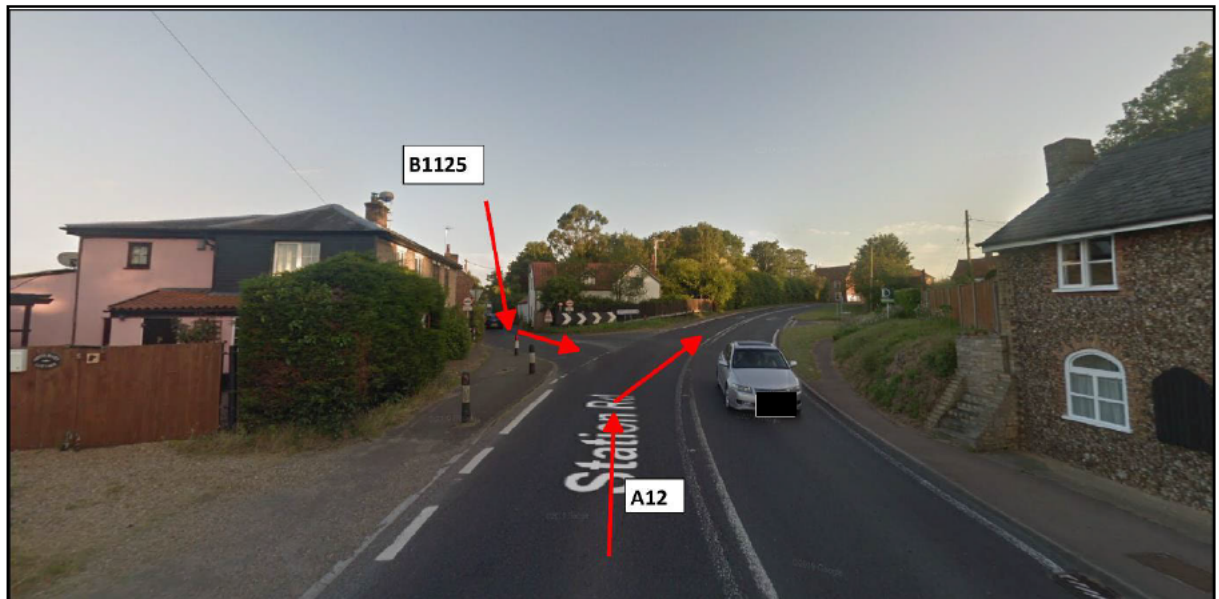
**Figure 2.1 – Site Context**

- 2.3 Considering my Client's operations and the Applicants commitment to remove construction and operational traffic from the local highway network it is difficult to see how the B1125 proposals can benefit the local community and offer any lasting legacy benefit.
- 2.4 The Applicant's current proposals require land which is currently farmed by my Client and therefore future farming operations will ultimately be influence by the strategy adopted for the B1125.
- 2.5 Create have reviewed the technical information supplied as part of the DCO submission and would make the following comments:
- The Traffic Flow Figures are split into three periods, Early Years, Construction & Operational. The flows estimated for each period along the B1122, B1125 & SLR are shown below:
    - Early years two-way traffic on the B1122  
AM 0700-0800 = 70 Eastbound + 31 Westbound (west of junction with B1125)  
AM 0700-0800 = 170 Eastbound + 66 Westbound (east of junction with B1125)  
  
PM 1700-1800 = 9 Eastbound + 62 Westbound (west of junction with B1125)  
PM 1700-1800 = 14 Eastbound + 141 Westbound (east of junction with B1125)
    - Early years two-way traffic on the B1125  
AM 0700-0800 = 100 Southbound + 34 Northbound  
  
PM 1700-1800 = 0 Southbound + 79 Northbound
    - Construction years (busiest day) two-way traffic on the B1122  
AM 0800-0900 = 26 Eastbound + 15 Westbound (west of junction with SLR)  
  
PM 1700-1800 = 25 Eastbound + 35 Westbound (west of junction with SLR)
    - Construction years (busiest day) two-way traffic on the B1125  
AM 0800-0900 = 9 Southbound + 0 Northbound  
  
PM 1700-1800 = 10 Southbound + 21 Northbound
    - Construction years (busiest day) two-way traffic on the SLR  
AM 0800-0900 = 67 Eastbound + 21 Westbound (west of junction with B1122)  
  
PM 1700-1800 = 33 Eastbound + 69 Westbound (west of junction with B1122)

- Operational years two-way traffic on the B1122  
AM 0800-0900 = 8 Eastbound + 0 Westbound (west of junction with SLR)  
  
PM 1700-1800 = 0 Eastbound + 8 Westbound (west of junction with SLR)
  - Operational two-way traffic on the B1125  
AM 0800-0900 = 96 Southbound + 5 Northbound  
  
PM 1700-1800 = 0 Southbound + 88 Northbound
  - Operational years two-way traffic on the SLR  
AM 0800-0900 = 50 Eastbound + 0 Westbound (west of junction with B1122)  
  
PM 1700-1800 = 0 Eastbound + 46 Westbound (west of junction with B1122)
  - Therefore, in the Early Years scenario there are 33 more movements on the B1125 in the AM peak than on the B1122. In the PM peak there are 8 more movements assigned to the B1125 than the B1122.
  - in the Operational Phase scenario there are 93 more movements on the B1125 in the AM peak than on the B1122 and 51 more movements on the B1125 than the SLR. In the PM peak there are 80 more movements assigned to the B1125 than the B1122 and 42 more movements on the B1125 than on the SLR.
  - Ultimately the implications of this are in conflict with the strategy of the Applicant to remove Sizewell traffic from the local highway network, in fact the polar opposite is proposed by increasing traffic in part on the B1125.
  - The Applicant's B1125 / B1122 junction design will actively encourage Sizewell traffic to use the local highway network.
- 2.6 Taking account of the points described above, Create consider the strategy adopted by the Applicant as fundamentally flawed, leading to Sizewell traffic increases on the local highway network. All of which fails to deliver the legacy promoted by the Applicant.
- 2.7 As a result, Create request the Applicant reconsiders the B1125 strategy.

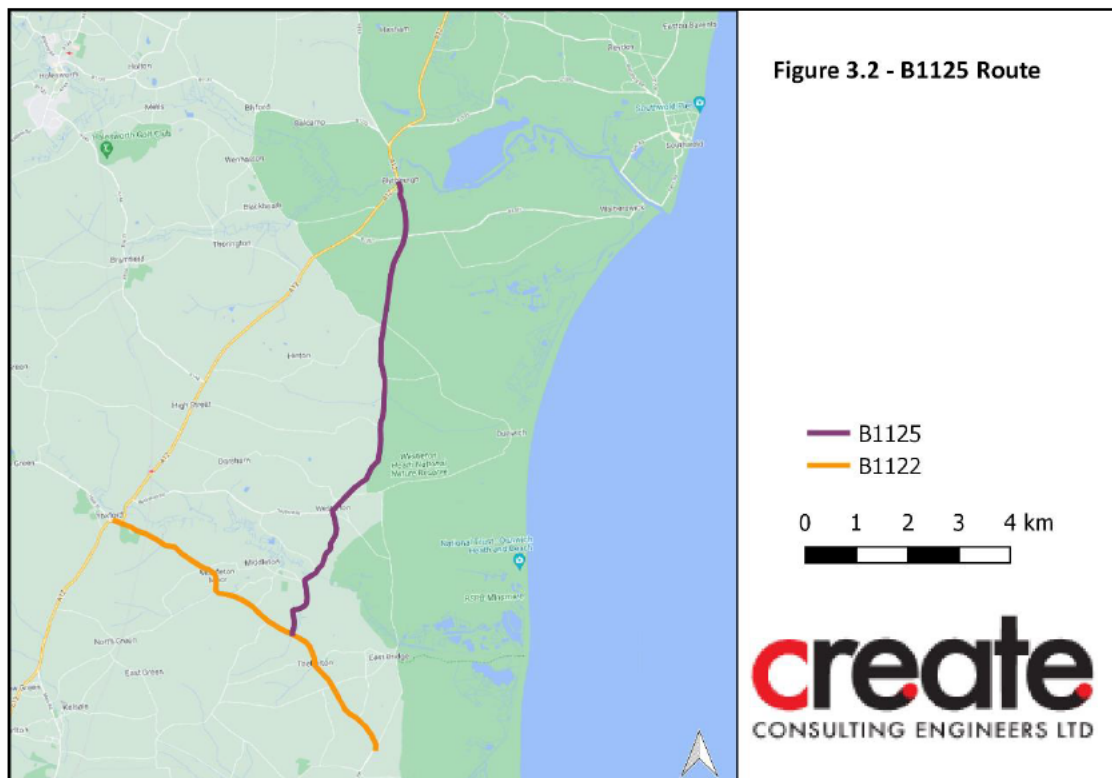
### 3.0 OPEN FLOOR HEARING – B1125

- 3.1 The B1125 is a local road linking the A12 at Blythburgh to the B1122. The route is already heavily constrained through the villages of Blythburgh and Westleton, to such an extent that weight restrictions are in place, except for local access at the A12 junction, as shown in Figure 3.1.



**Figure 3.1 – A12 / B1125 junction**

- 3.2 The B1125 continues south through the villages of Blythburgh, Westleton and Middleton and are all heavily constrained with limited pedestrian amenity typical of the local road network. The route is shown on Figure 3.2.

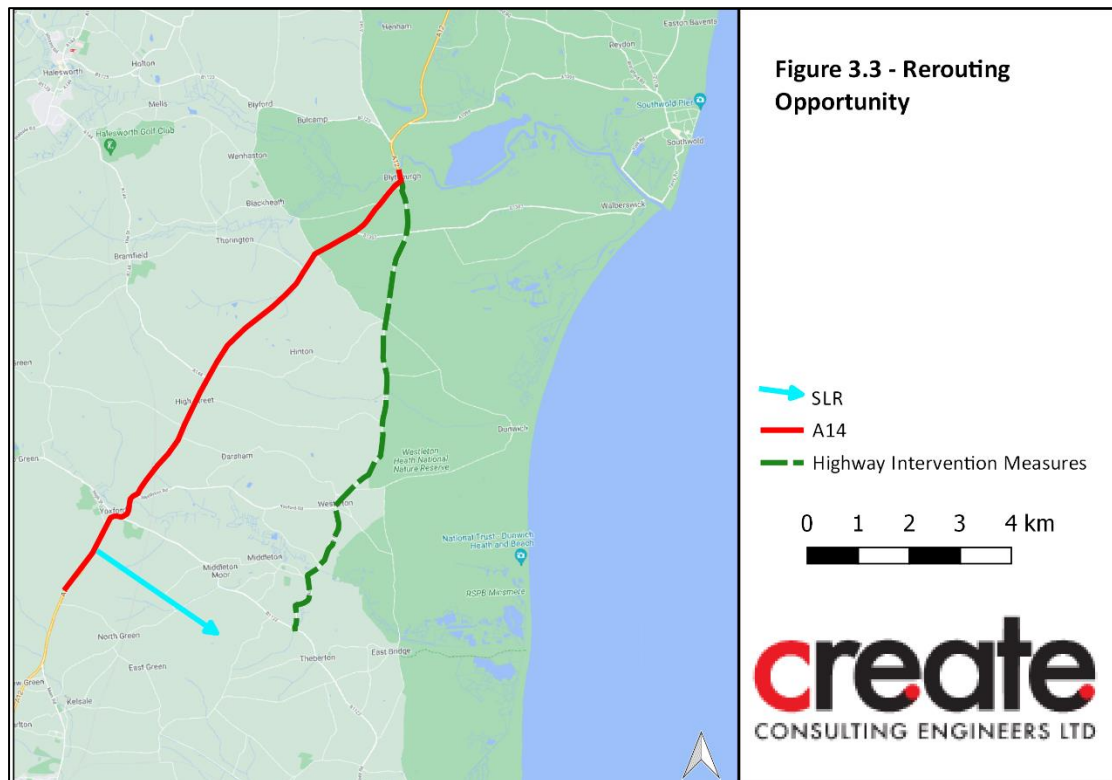


**Figure 3.2 – B1125 Route**

- 3.3 Whilst there has been some limited engagement with the Applicant over the use of the B1125, Create consider the current strategy goes completely against the legacy potential which the Applicant has offered.



- 3.4 Create consider there is an opportunity to revisit the B1125/B1122/SLR junction returning the priority to the B1122. Create then propose a number of highway intervention schemes are introduced along the B1125 to slow/ reduce traffic along this route. Ultimately seeking to discourage the majority of Sizewell construction and operational traffic on the B1125 and rerouting to the A12 as shown on Figure 3.3.



**Figure 3.3 – Rerouting opportunity**

- 3.5 Measures along the B1125 alongside the Applicant’s own enforcement measures could then include:

- 20mph zones;
- Village gateway features;
- Village gateway signage i.e. “Please drive carefully in the village”;
- Flashing Speed Limit Signs;
- Sections of Carriageway Narrowing;
- Build outs with give way to oncoming vehicles;
- Raised tables at junctions;
- Speed attenuation bumps; and
- Footways & pedestrian margin strips etc.

- 3.6 Taking the above into account Create believe the Applicant could provide a lasting legacy along the B1125 by changing the current strategy, deliver highway intervention measures to actively discourage Sizewell traffic along the B1125 and promote the A12 / SLR.

## **4.0 CONCLUSIONS**

- 4.1 The purpose of this note is to consider the direct effects of the B1125/B1122/SLR on the Bacon family's land interests.
- 4.2 Create have shown that Applicant's proposals for the B1125 /B1122 altered priority arrangements are not safe and will lead to a increase in Sizewell traffic along a route already prone to accidents, constrained and lacking pedestrian amenity.
- 4.3 Create requests the Applicant revisits the B1125/B1122 strategy and offer a permanent legacy benefit to the local area.
- 4.4 Create have provided the basis for a solution to reduce traffic speeds and ultimately discourage use of the B1125 in favour of the A12 and SLR and would welcome further dialogue on this matter.

**Note By:** Paul Zanna - Technical Director



# Heritage Assessment

The Proposed Sizewell Link Road, Theberton  
Bypass and Yoxford Roundabout,  
Suffolk

prepared for  
Middleton and Theberton Landowners

March 2019

# Richard Hoggett Heritage

██████████, New Buckenham, Norwich, ██████████  
██████████ ██████████@richard-hoggett.co.uk

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# 1 Introduction

This Heritage Assessment has been prepared by Dr Richard Hoggett MCIfA FSA at the request of the Middleton and Theberton Landowners group. It has been produced in response to development proposals put forward in the Sizewell C Stage 3 Pre-Application Consultation documents published by EDF Energy in January 2019 (EDF 2019a, 2019b, 2019c, 2019d). While the published consultation documents relate to all aspects of the proposed development of the Sizewell C complex and supporting infrastructure, this heritage assessment focusses specifically on the likely heritage impacts of two main elements of the proposed scheme:

- the Sizewell Link Road between the A12 and the construction site (including the route of the proposed Theberton Bypass), which has been introduced to the scheme since the Stage 2 consultation, including a comparative assessment of an alternative route further to the south; and
- the upgrading of the existing ghost-island junction between the A12 and the B1122 at Yoxford to a roundabout.

The content of this assessment has been informed by a data extract obtained from the Suffolk Historic Environment Record on 6 March 2019, designations data current to 15 February 2019 obtained from Historic England on 3 March 2019, and a site visit and client meeting undertaken on 14 March 2019. In preparing this heritage assessment, due regard has been paid to the professional guidance set out in the Chartered Institute for Archaeologists' *Standard and Guidance for Historic Environment Desk-based Assessment* (CIFA 2017).

Section 1 of this report sets out the legislative framework and planning policies under which the Sizewell C scheme is due to be determined and highlights the approaches to managing impact on the historic environment which are contained therein.

Section 2 describes the background to the Sizewell C project and sets out the wider context within which the two main elements of the proposals examined here sit.

Section 3 presents a critical appraisal of the approach to heritage impact taken to the proposed route of the Sizewell Link Road/Theberton Bypass, as set out in the consultation documents, and compares and contrasts this with the alternative Route W, which has not been taken forward as part of the proposal.

Section 4 presents a critical appraisal of the approach to heritage impact taken to the proposed new Yoxford roundabout at the junction of the A12 and B1122.



## 2 Legislation and Planning Policy

Under the terms of the Planning Act 2008, as a Nationally Significant Infrastructure Project (NSIP) the planning application for the development of the Sizewell C site and associated infrastructure will be determined at a national level by the Secretary of State, following examination by the Planning Inspectorate. Applications are determined within the context of the relevant National Policy Statements (NPSs), with the primary policy basis for nuclear projects being informed by the Overarching NPS for Energy (NPS EN-1) and the NPS for Nuclear Power Generation (NPS EN-6).

With specific regard to Designated Heritage Assets, reference also needs to be made to the terms of the Ancient Monuments and Archaeological Areas Act (1979) and the Planning (Listed Buildings and Conservation Areas) Act 1990. Summary details of the relevant legislations and policies as they pertain to the issues considered here are set out below.

### 2.1 Ancient Monuments and Archaeological Areas Act (1979)

Under the terms of the act, an archaeological site or historic building of national importance can be designated as a Scheduled Monument under the terms of the Ancient Monuments and Archaeological Areas Act (1979). Any works, including development, which might affect a Scheduled Monument are subject to the granting of Scheduled Monument Consent alongside any planning permission which may be required.

### 2.2 Planning (Listed Buildings and Conservation Areas) Act 1990

Legislation pertaining to buildings and areas of special architectural and historic interest is contained within the Planning (Listed Buildings and Conservation Areas) Act 1990. Section 66 of the 1990 Act states that 'in considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority ... shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.'

## 2.3 NPS EN-1

Policies pertaining to the historic environment are contained within Section 5.8 of the NPS EN-1, and they mirror the then-current approach to heritage planning which was contained within Planning Policy Statement 5, published by the Department for Communities and Local Government in 2010 (DCLG 2010). PPS5 has since been superseded by the National Planning Policy Framework published in 2012 and revised in 2018 (MCLG 2019). For reference, a summary of the heritage planning approach contained within the NPPF is included in the next section.

In addition to Designated Heritage Assets, NPS EN-1 recognises that Non-Designated Heritage Assets may have equivalent significance in the decision-making process. This is set out in the following paragraphs:

- Para. 5.8.4: There are heritage assets with archaeological interest that are not currently designated as scheduled monuments, but which are demonstrably of equivalent significance.
- Para. 5.8.5: The absence of designation for such heritage assets does not indicate lower significance. If the evidence before the Infrastructure Planning Commission (IPC) indicates to it that a non-designated heritage asset of the type described in 5.8.4 may be affected by the proposed development then the heritage asset should be considered subject to the same policy considerations as those that apply to designated heritage assets.
- Para. 5.8.6: The IPC should also consider the impacts on other non-designated heritage assets, as identified either through the development plan making process (local listing) or through the IPC's decision making process on the basis of clear evidence that the assets have a heritage significance that merits consideration in its decisions, even though those assets are of lesser value than designated heritage assets.

With regard to the level of information required to be provide by the applicant in order to enable an informed decision to be made, NPS EN-1 states the following:

- Para. 5.8.8: As part of the Environmental Statement the applicant should provide a description of the significance of the heritage assets affected by the proposed development and the contribution of their setting to that significance.
- Para. 5.8.9: Where a development site includes, or the available evidence suggests it has the potential to include, heritage assets with an archaeological interest, the applicant should carry out appropriate desk-based assessment

and, where such desk-based research is insufficient to properly assess the interest, a field evaluation. Where proposed development will affect the setting of a heritage asset, representative visualisations may be necessary to explain the impact.

- Para. 5.8.10: The applicant should ensure that the extent of the impact of the proposed development on the significance of any heritage assets affected can be adequately understood from the application and supporting documents.
- Para. 5.8.11: In considering applications, the IPC should seek to identify and assess the particular significance of any heritage asset that may be affected by the proposed development, including by development affecting the setting of a heritage asset.
- Para. 5.8.12: In considering the impact of a proposed development on any heritage assets, the IPC should take into account the particular nature of the significance of the heritage assets and the value that they hold for this and future generations. This understanding should be used to avoid or minimise conflict between conservation of that significance and proposals for development.
- Para. 5.8.13: The IPC should take into account the desirability of sustaining and, where appropriate, enhancing the significance of heritage assets, the contribution of their settings and the positive contribution they can make to sustainable communities and economic vitality. The IPC should take into account the desirability of new development making a positive contribution to the character and local distinctiveness of the historic environment. The consideration of design should include scale, height, massing, alignment, materials and use.
- Para. 5.8.14: There should be a presumption in favour of the conservation of designated heritage assets and the more significant the designated heritage asset, the greater the presumption in favour of its conservation should be. ... Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. Loss affecting any designated heritage asset should require clear and convincing justification.
- Para. 5.8.15: Any harmful impact on the significance of a designated heritage asset should be weighed against the public benefit of development, recognising that the greater the harm to the significance of the heritage asset the greater the justification will be needed for any loss.
- Para. 5.8.18: When considering applications for development affecting the setting of a designated heritage asset, the IPC should treat favourably applications that preserve those elements of the setting that make a positive contribution to, or better reveal the significance of, the asset. When considering applications that do not do this, the IPC should weigh any

negative effects against the wider benefits of the application. The greater the negative impact on the significance of the designated heritage asset, the greater the benefits that will be needed to justify approval.

## 2.4 The National Planning Policy Framework

Although the primary policy basis for determining the Sizewell C application contained within NPS EN-1 and NPS EN-2, the extent to which the NPPF is deemed a material consideration is a matter for the examining authority and the Secretary of State.

Provision for the historic environment is considered in Section 16 of the NPPF, which directs Local Planning Authorities to set out 'a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats' (NPPF para. 185). The aim is to ensure that Local Planning Authorities, developers and owners of heritage assets adopt a consistent approach to their conservation and to reduce complexity in planning policy relating to proposals that affect them.

- Para. 189: In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance.
- Para. 190: Requires the applicant to 'identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise'.
- Para. 193: 'When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance'.
- Para. 194: 'Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification' (NPPF para. 194) and as a corollary, paragraph 196 states that 'Where a development proposal will lead to less than substantial harm to the significance of a designated heritage

asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use'.

- Para. 196: Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.
- Para. 197: The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

### 3 Project Background

NNB Generation Company (SZC) Limited is proposing to build and operate a new nuclear power station, Sizewell C, on land immediately to the north of the existing Sizewell B power station, located on the Suffolk Coast, approximately half way between Felixstowe and Lowestoft, to the north-east of the town of Leiston. Details of the latest development proposals are put forward in the Sizewell C Stage 3 Pre-Application Consultation documents published by EDF Energy in January 2019 (EDF 2019a, 2019b, 2019c, 2019d). The Stage 3 consultation seeks further views on those proposals and on issues where different options for elements of the project are still being considered. It is intended that the consultation responses received will subsequently inform the preparation of an application for development consent.

The impact which the additional transport needs of the Sizewell C scheme will have on the local infrastructure and environment, especially during the construction phase of the new plant, have consistently been highlighted as a key issue during earlier consultation phases, and a number of different transport options have been examined. Since the Stage 2 consultation, EDF Energy have concluded that the marine-led strategy for construction traffic proposed at that stage would be too challenging to deliver, because of its impact on the marine environment and related potential to impact the project's construction programme and operational date. The Stage 3 consultation states that the marine-led transport strategy proposed in previous consultations is no longer considered to be viable. Instead, the Stage 3 consultation documents present two alternative transport options for the management of freight during the construction phase of the site: a rail-led strategy and a road-led strategy. A decision has yet to be made about whether a rail-led or road-led freight management strategy will be adopted.

The rail-led strategy would see construction materials brought straight to the main development site along an upgraded version of the existing Saxmundham to Leiston branch line and the East Suffolk main line. If the rail-led strategy were adopted, a bypass would be constructed on the B1122 around the village of

Theberton, to the north of the Sizewell site, to prevent construction traffic from travelling through the centre of the village.

The road-led strategy would involve the construction of a new link road, dubbed the 'Sizewell Link Road', which would connect the A12 with the development site. The proposed link road has emerged as part of the developing transport strategy for the movement of construction materials during the building and operations of Sizewell C. This route would also incorporate the route of the Theberton Bypass proposed for the rail-led strategy into its length.

Under both the rail-led and road-led transport strategies it is considered necessary to upgrade the existing ghost-island junction between the A12 and B1122 at Yoxford to a roundabout, in order to accommodate the greater volume of traffic the construction phase will generate. The route of the Theberton Bypass is also a common element of both schemes.

This report presents a heritage-based critique of the proposed Route Z of the Sizewell Link Road, which incorporates the Theberton Bypass, and comparative assessments of the northern and southern variations of alternative link-road Route W. This is followed by a separate critique of the heritage impacts of the proposed Yoxford roundabout, which are equally applicable to the rail- and road-led transport strategies, but which may not be necessary for either of the variations of Route W.



**Figure 10.1** Sizewell link road potential route options

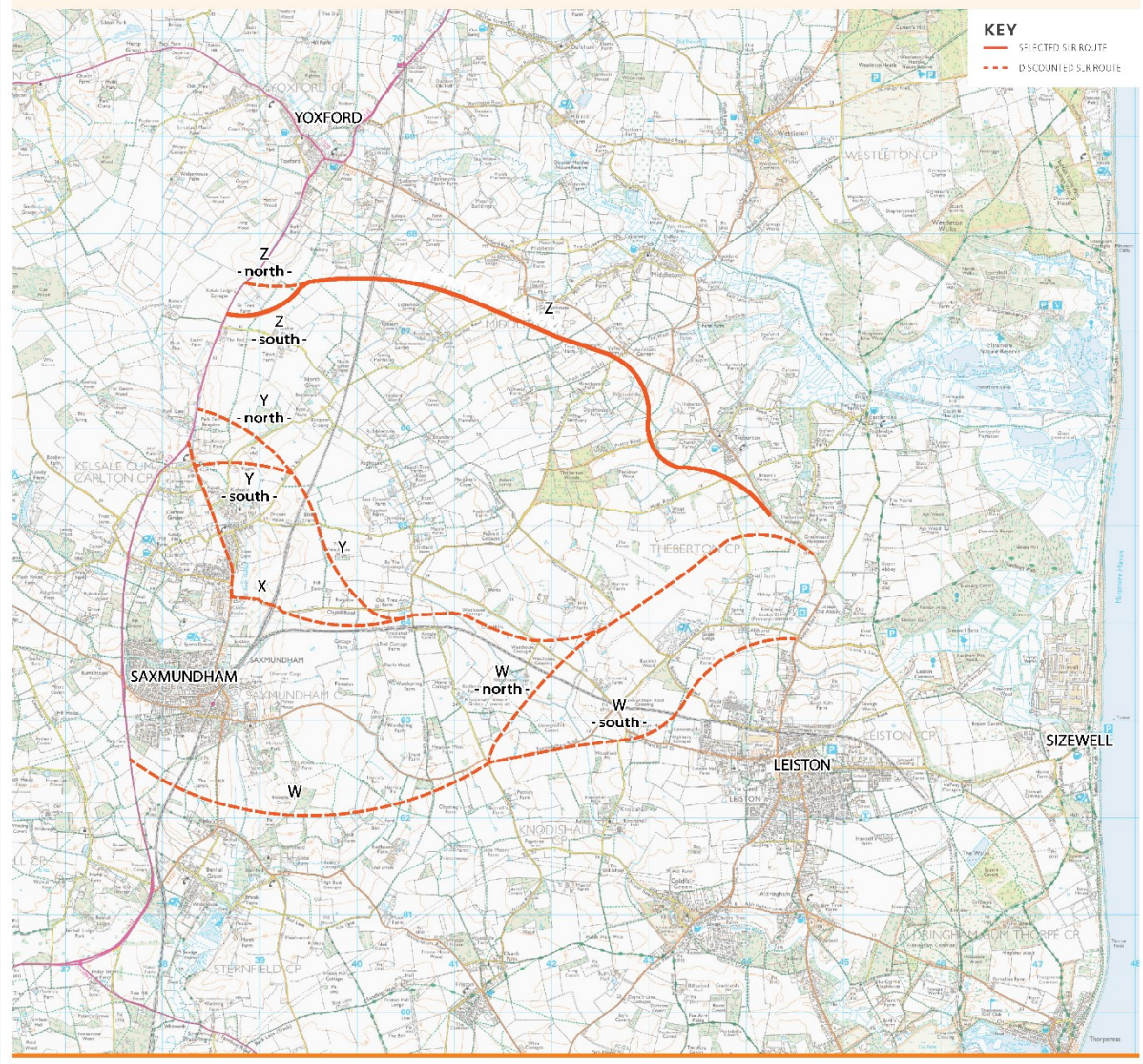


Figure 1. The alternative routes for the Sizewell Link Road considered by EDF Energy (EDF Energy 2019 Vol. 1, p.312, Fig. 10.1)



## 4 Sizewell Link Road / Theberton Bypass

One of the key subjects on which comment is invited during the Phase 3 consultation process is the decision which needs to be made between a road-led and a rail-led transport strategy for construction traffic (EDF Energy 2019 Vol. 1, Chapter 5). As currently proposed, the road-led strategy would involve the construction of a new link road, dubbed the 'Sizewell Link Road', which would connect the A12 with the development site (EDF Energy 2019 Vol. 1, Chapter 10). The proposed link road has emerged as part of the developing transport strategy for the movement of construction materials during the building and operations of Sizewell C.

### 4.1 Route Selection

As is set out in the consultation documents, four alternative routes for the Sizewell Link Road have been considered, with a high-level environmental appraisals conducted for each to aid decision-making. These appraisals summarised the potential effects of the proposed routes on a number of different environmental factors, including Designated Heritage Assets, i.e. Scheduled Monuments, Listed Buildings and Conservation Areas (EDF Energy 2019 Vol. 1, p. 314–16, paras 10.5.1–7). The four potential route options considered – referred to as Routes W, X, Y and Z – are illustrated in Figure 10.1 of the consultation documents (EDF Energy 2019 Vol. 1, p.312, Fig. 10.1, reproduced here as Figure 1). The route selected by EDF Energy is referred to as Route Z, the alternative route considered as part of this assessment is referred to as Route W.

### 4.2 Route Z

Details of the proposed Sizewell Link Road are set out in Chapter 10 of the Development Proposals consultation document (EDF Energy 2019 Vol. 1, pp. 311–23, paras 10.1.1–10.9.2), with supporting in-depth assessments given in Chapter 5 of the Preliminary Environmental Information document (EDF Energy 2019 Vol. 2a, pp. 259–308, paras 5.1.1–5.14.4). The assessment of the terrestrial Historic Environment examined here is presented in section 5.5 of the Preliminary Environmental Information (EDF Energy 2019 Vol 2a, pp. 274–81, paras 5.5.1–5.5.55).

The proposed new road would originate south of Yoxford and bypass Middleton Moor and Theberton. (EDF Energy 2019 Vol. 1, p. 311, para. 10.1.4). Route Z joins the A12 just north of Town Farm Lane then turns north past Buskie Farm and crosses the East Suffolk railway before heading east, crossing Littlemoor Road and Fordley Road. The route continues to the south of Gardenhouse Farm, broadly parallel to the B1122, past Valley Farm near Anneson's Corner. It then joins the alignment of the Theberton Bypass, passes through Plumtreehills Covert, crosses Pretty Road and continues to the south-west of Theberton. After crossing Moat Road, the route joins the B1122 alongside Brown's Plantation, to the north of the development site entrance (EDF Energy 2019 Vol. 1, p. 314, paras 10.4.7–8).

The western section of the link road, the 4.2km length between the A12 and the western edge of Theberton, would only be built under the road-led strategy. However, the element of the Sizewell Link Road which comprises a bypass around Theberton, effectively the eastern section of the link road, would be similar under the road- and rail-led strategies (EDF Energy 2019 Vol. 2a, p. 308, paras 5.14.1–2). The critique of the approach to assessing heritage impact presented here therefore applies to both the full length of the Sizewell Link Road and the shorter element which it shares with the Theberton Bypass.

In terms of the heritage impact of the selected Sizewell Link Road Route Z, the high-level environmental appraisals identified that 'whilst the proposed alignment gives consideration to Theberton Hall and the listed buildings within Theberton village, there is potential for the significance of several heritage assets to be affected adversely due to changes in their setting resulting from the route albeit to a limited extent' (EDF Energy 2019 Vol. 1, p. 316, para. 10.5.7). The conclusions summarised in the table of benefits and constraints, which described Route Z as having 'potential effects on the setting of a number of historic assets (Grade II) along each route. Key assets to consider include Dovehouse Farmhouse, Theberton Hall and The Gates/Walls at Theberton Hall.' (EDF Energy 2019 Vol. 1, p. 315, Table 10.1).

An archaeological desk-based assessment of the full length of the Sizewell Link Road (Route Z) was undertaken in April 2018, the results of which inform the

assessment of the terrestrial historic environment presented in the consultation documents (EDF Energy 2019 Vol 2a, pp. 274–8, paras 5.5.1–55). For heritage impact purposes, a study area comprising a 750m buffer zone around the proposed road corridor was agreed with the Suffolk County Council Archaeological Service as providing an appropriate context for the route. The proposed road corridor, which at approximately 30m is wide enough to accommodate all of the necessary roadside verges, earthworks and berms, and the extent of the buffer, are illustrated in Volume 3 of the EDF Energy consultation documents (EDF Energy 2019 Vol. 3, pp. 69–70, figs 5.5.1–2) and these figures are reproduced here as Appendix 1.

It should be noted that in generating their 750m buffer zone, EDF Energy have worked from the edges of the road line itself (shown in black on the plan in Appendix 1) rather than the edges of the working corridor (shown in red in Appendix 1). While for much of the route this approach makes little difference in terms of area, it does have significant implications for the assessment of Designated Heritage Assets at the eastern end of the route, as it effectively stops the study area buffer some 250m short of the recommended full 750m and therefore does not include the complex of Listed Buildings within the Leiston Abbey complex. This discrepancy is clearly illustrated in Figure 2, in which the scalebar from the EDF plans has been copied onto the buffer zone (Figure 2).

#### 4.2.1 Designated Heritage Assets

The desk-based assessment identified that no Scheduled Monuments lie within the working width of the road corridor, but the scheduled area of Leiston Abbey (Second Site) extends into the very eastern end of the 750m study area buffer zone (SM 1014520) (EDF Energy 2019 Vol. 2a, p. 274, para. 5.5.4). This relationship is also illustrated in the maps reproduced in Appendix 1, but as discussed above, there is a marked shortfall in the coverage of this end of the study area. The distance between the end of the proposed new link road and the Leiston Abbey site is considered sufficient to minimise any direct impact which the construction of the road itself may have on the setting of the Abbey (EDF Energy 2019 Vol. 2a, p. 277, para. 5.5.43 and 47). However, the proximity of the Abbey complex to the proposed entrance to the Sizewell C construction site means that the effects on its setting

are a material consideration in many different aspects of the development proposal. Leiston Abbey sits high on the hillside, and its open southern aspect, on which side the monastic cloister was located, contributes more to its significance than the more closed and cloister-free setting to the north.

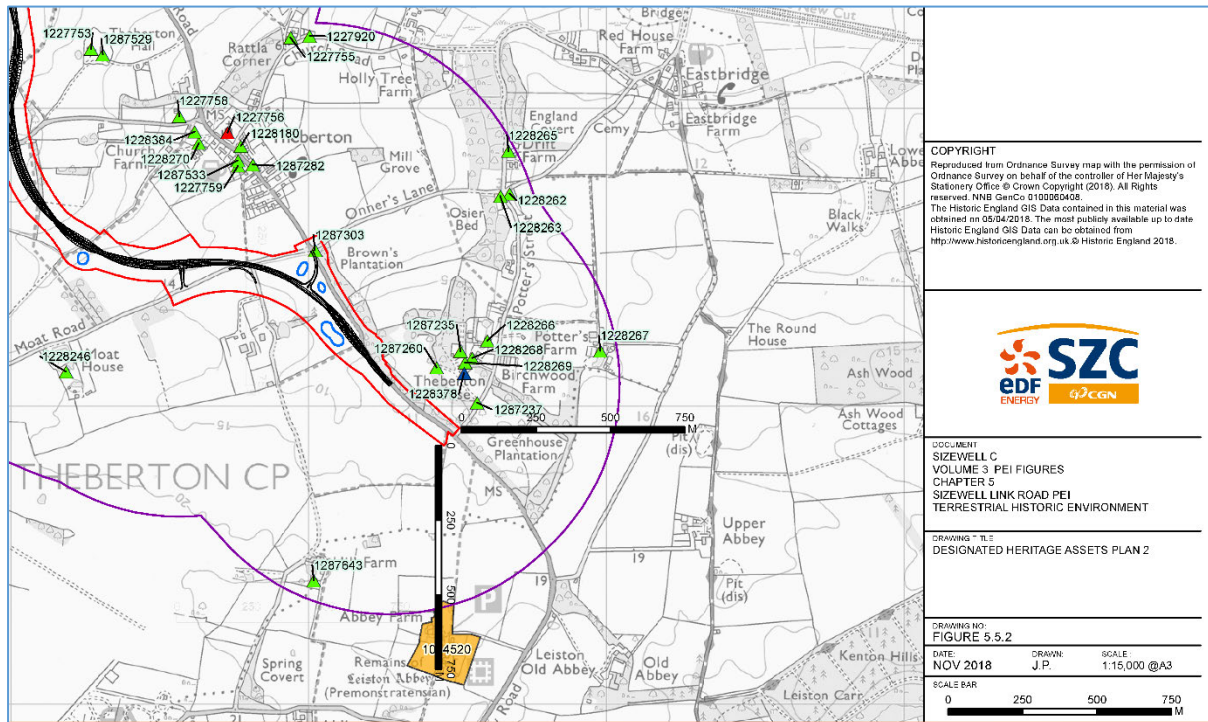


Figure 2. The misapplication of the 750m buffer zone to the Route Z corridor, effectively excluding Leiston Abbey from the reckoning. Copied scalebars indicate the extent of the shortfall.

The desk-based assessment identified that there is one Listed Building which stands within the proposed width of the road, the Grade II-listed Gate and Gate Piers of Theberton House (LB 1287303), while an additional 45 Listed Buildings stand within the 750m buffer zone around the road. Of these, one is the Grade I listed church of St Peter, Theberton (LB 1227756) and one the Grade II\* listed Theberton House (LB 1228378). The remaining 43 buildings are listed at Grade II and comprise buildings associated with Theberton House and within the village of Theberton itself, as well as farmhouses and associated buildings and cottage (EDF Energy 2019 Vol. 2a, p. 274, paras 5.5.3–4). The locations of these buildings are illustrated in the maps reproduced in Appendix 1, and many of them would be affected by both the construction of the full length of the Sizewell Link Road and the shorter Theberton Bypass.



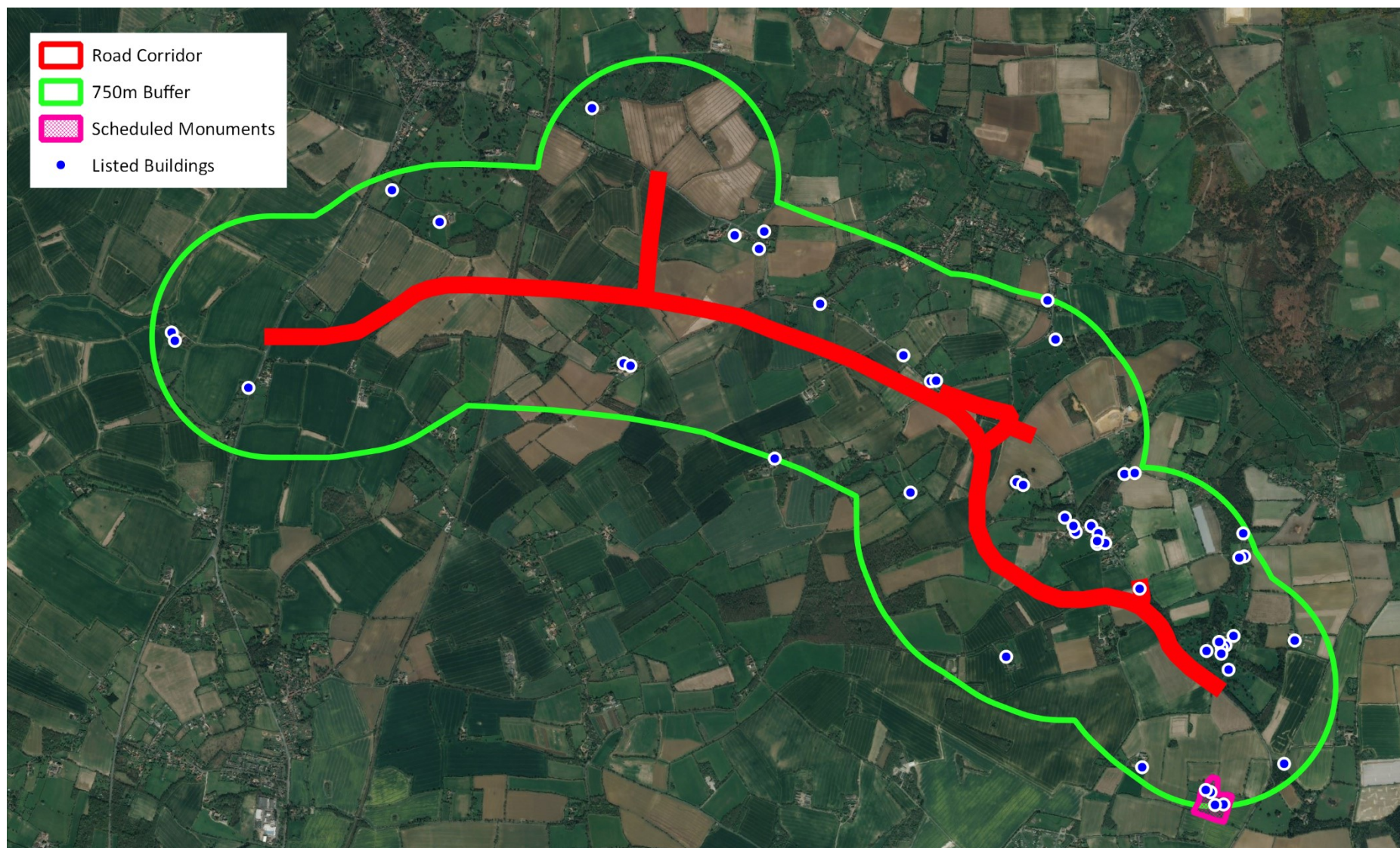


Figure 3. Route Z, showing the Listed Buildings and Scheduled Monument which lie within the recalculated 750m of the proposed road line. Compare Appendix 1, and note the inclusion of Listed Buildings in the Leiston Abbey complex.

For the purposes of this assessment, an alternative map of the proposed route has been created applying the 750m buffer to the working corridor of Route Z, and this is reproduced here as Figure 3. As can be seen, this recalculated study area includes all of the Listed Buildings and Scheduled Monument described above, but crucially also includes an additional five Listed Buildings in and around the Leiston Abbey site. These additional buildings include the Grade I-listed ruins of the Abbey, the Grade II\*-Listed Moor Farmhouse and three more Grade II-listed buildings. As can also be seen, the majority of these buildings lie at the eastern end of the proposed and would therefore be equally affected by the full Sizewell Link Road and the reduced length of the Theberton Bypass. The full list of Designated Heritage Assets identified in this recalculation is given in Appendix 2, which should be compared to the list in the EDF Energy consultation documents (EDF Energy 2019 Vol. 2a, pp. 280–1, tables 5.5.3 and 4)

The EDF Energy consultation documents state that change to the setting of Designated Heritage Assets arising from visibility of the proposed link road, and construction noise or changes to air quality, could give rise to loss of or harm to heritage assets (EDF Energy 2019 Vol. 2a, p. 276, para. 5.5.34). The use of the phrase 'loss of' in this paragraph is a cause for alarm, and in the absence of more detailed information it is difficult to be sure which Designated Heritage Assets are being referred to as likely to be being lost.

EDF Energy acknowledge that construction could potentially affect the settings of Designated Heritage Assets within and beyond the proposed route, and that persistent visibility of the completed road will remain a factor. In particular, they anticipate that the Gate and Gate Piers of Theberton House (LB 1287303) and the listed buildings at Anneson's corner (LB 1283470; LB 1377245) are likely to be most affected by the construction phase, but that the effect will diminish after that. Change to setting of Hill Farmhouse (LB 1030643), Moat Farmhouse (LB 1287643) and the listed buildings at Theberton House (LB 1228378) and Theberton Hall (LB 1287529) is expected to reduce on completion of construction activities. Theberton Hall may retain some visibility of the new road in views to the south, but these are not anticipated to result in a significant effect (EDF Energy 2019 Vol. 2a, p. 277,

5.5.38–9 and 45–7). Many of these impacts apply equally to both the proposed Sizewell Link Road and the Theberton Bypass.

It is suggested that detailed design would seek to minimise perceptual change, for example, existing hedgerow planting would be retained where practicable, and new planting and landscaping used to tie the road into the existing landscape and maximise screening; treatment of the road verges would be aimed at minimising the perceptibility of the proposed route as a new road where this can be achieved consistently with requirements for highways design (EDF Energy 2019 Vol. 2a, p. 276, para. 5.5.34).

However, it needs to be stressed that all of these assertions are speculative at this stage, as to date only an initial study has been undertaken to identify designated assets which have the potential to be affected by the construction of the proposed link road, in accordance with Step 1 of Historic England's (2017) guidance on the setting of heritage assets (EDF Energy 2019 Vol. 2a, p. 277, para. 5.5.37). In the light of the discussion presented above, even the presented numbers of affected Designated Heritage Assets in this preliminary assessment cannot be considered to be accurate, and the deliberate exclusion of a significant Grade 1-listed structure from the reckoning suggests that data have been presented selectively. For both of these reasons, the need to complete a full settings assessment is highlighted as a task to be undertaken in consultation with Historic England and the Suffolk Coastal District Council Conservation Officer before the application stage (EDF Energy 2019 Vol. 2a, p. 278, paras. 5.5.52–55).

#### 4.2.2 Non-Designated Heritage Assets

In addition to Designated Heritage Assets, due consideration also needs to be given to the impact which any development might have on Non-Designated Heritage Assets. Non-Designated Heritage Assets can include buried archaeological features, deposits or finds, historic buildings and structures, and landscape features, and they and their settings are given similar protection to Designated Heritage Assets under paragraphs 5.8.4–6 of the NPS EN–1 and paragraph 197 of the National Planning Policy Framework (MCLG 2019).

The archaeological desk-based assessment identified two entries recorded in the Suffolk Historic Environment Record (SHER) lying within the road corridor, the first being the line of the East Suffolk railway (SHER SUF 067 (MSF34987)) and the other the findspot of a bronze spout from a medieval cauldron (SHER THB 002 (MSF2059)). A further 38 entries from the Suffolk HER are recorded within the 750m study area buffer zone (EDF Energy 2019 Vol. 2a, p. 274, paras 5.5.2–5 and 7). These are used to present a brief chronological overview of the known archaeology of the immediate environs of the site and present an assessment of the likelihood of archaeological remains lying within the development site.

In the absence of any archaeological fieldwork, it is not yet possible to characterise the buried archaeology of the road corridor, but the archaeological desk-based assessment concluded that there is potential for archaeological remains dating from the prehistoric to modern periods to lie within the development area (EDF Energy 2019 Vol. 2a, p. 274–6, paras 11.5.9–32). The consultation documents recognise that the groundworks associated with the construction of the new road, including topsoil stripping, sub-soil disturbance, and the creation of cut and fill earthworks, could have an adverse effect on any surviving sub-surface archaeological remains, reducing or removing their ability to be further interpreted, resulting in the loss of archaeological interest (EDF Energy 2019 Vol. 2a, p. 276, para. 5.5.35).

By way of mitigation, the need for a programme of archaeological investigation of the road corridor is acknowledged, in order to ensure that the archaeological interest of any significant deposits and features within the site can be investigated, recorded and disseminated. This work would be specified and monitored by the Suffolk County Council Archaeological Service and would comprise archaeological evaluation by geophysical survey and trial trenching, to be followed by an archaeological mitigation phase, i.e. excavation and preservation by record, if required (EDF Energy 2019 Vol. 2a, p. 277–8, paras 5.5.48–9 and 54–5). This is a standard approach to mitigating buried archaeological deposits, and is an appropriate strategy to be employed in this case.



### 4.3 Route W

The alternative link-road route referred to as Route W (see Figure 1) was identified by EDF Energy as a possible alternative route for the Sizewell Link Road, but had been discounted prior to the issue of the consultation documents on the basis of a high-level environmental assessment (EDF Energy 2019, Vol. 1, p. 314–6, paras 10.5.1–7). This route closely mirrors that which was referred to as Route D2 during the construction of Sizewell B in the 1980s and which was considered again by consultants working for Suffolk County Council in 2014 (EDF Energy 2019, Vol. 1, p. 316, paras 10.6.1–4). The route has two variations at its eastern end, with northern and southern branches which take the road from the A12 to the Sizewell C construction site.

As is depicted in Figure 1 (EDF Energy 2019 Vol. 1, p.312, Fig. 10.1), the southern variation of Route W joins the A12 just south of Park Farm Covert, to the south of Saxmundham, then crosses over the East Suffolk railway line to meet the B1121. Travelling east, it then crosses the River Fromus on a new bridge and passes south of Bloomfield's Covert. It continues east, running south of and parallel to the B1119 Saxmundham Road before crossing a watercourse near Woodfield Pit. It then runs south of Leiston House Farm and crosses Saxmundham Road between the farm and Highbury Cottages. Turning north, it then crosses the Saxmundham to Leiston railway line and continues north, east of Buckle's Wood. It then crosses Buckleswood Road and continues north-eastwards until it reaches Abbey Road, where Abbey Lane and Lover's Lane meet the B1122 (EDF Energy 2019 Vol. 1, p. 313, para. 10.4.2).

The northern variation of Route W shares the same western alignment as the southern variation, but the routes diverge at the junction of the B1119 Saxmundham Road and the north–south Grove Road. From here, this variation of the route runs north of Clouting's Farm, north of Osierground Covert and south of Westhouse Farm before crossing the Saxmundham to Leiston railway line and a watercourse before heading north-east and following the line of the runway of the former RAF Leiston. North of Hill Farm, the route turns east to join the B1122 at the entrance to the construction site (EDF Energy 2019 Vol. 1, p. 313–4, paras 10.4.3–4).

Although no detailed assessment of the heritage impacts of Route W is presented in the consultation documents, the summary environmental appraisals of Route W identified that 'the route also passes near to a number of existing heritage assets including Hurts Hall and Leiston Abbey. There is potential for the significance of several heritage assets to be adversely affected due to changes in their setting resulting from the route's alignments, and as such, this route is not considered suitable' (EDF Energy 2019 Vol. 1, p. 314, para. 10.5.4). Although other factors were referred to, the implication of this statement is that this route was largely disregarded because of its potential heritage impacts. The table of benefits and constraints for each of the routes presented by EDF Energy described Route W as having 'potential effects on the setting of a number of historic assets (Grade I, II and II\*) along each route. Key assets to consider include Hurts Hall and Leiston Abbey' (EDF Energy 2019 Vol. 1, p. 315, Table 10.1).

#### 4.3.1 Designated Heritage Assets

Comparative analyses of the northern and southern variations of the route of proposed link road Route W, as illustrated in EDF Energy's 2019 Vol. 1, fig. 10.1, (see Figure 1), were undertaken as part of this heritage assessment in March 2019. This assessment considered existing records of archaeological features, finds and fieldwork extracted from the Suffolk Historic Environment Record on 6 March 2019, and designations data current to 15 February 2019 obtained from Historic England on 3 March 2019. In order to produce a comparable assessment of likely heritage impact, a 30m-wide corridor was created following the line of Route W set out in the EDF consultation documents. As per the Route Z analysis presented by EDF Energy, a 750m buffer was applied to the route and this was used to retrieve relevant heritage data.

These analyses demonstrated that the southern variation of Route W contained no Designated Heritage Assets within its road corridor, with one Scheduled Monument (Leiston Abbey, SM 1014520) lying within the 750m buffer zone, together with 41 Listed Buildings (Figure 4 and Appendix 3). Of these, one building, the ruins of St Mary's Abbey, is Grade I listed (LB 1215753) and three buildings are Grade II\* listed: Leiston House Farmhouse (LB 1287646), the church of St Mary

Magdalene (LB 1278252) and Buxlow Manor (LB 1215749). The remaining 37 buildings are all listed at Grade II.

By comparison, the northern variation of Route W also contained no Designated Heritage Assets within its road corridor, with the Leiston Abbey Scheduled Monument again lying within the 750m study area, together with 49 Listed Buildings (Figure 5 and Appendix 4). These included the Grade I-listed ruins of St Mary's Abbey (LB 1215753), three Grade II\*-Listed Buildings – the church of St Mary Magdalene (LB 1278252), Buxlow Manor (LB 1215749) and Theberton House (LB 1228378) – and 45 Grade II Listed Buildings. Given the convergence of the eastern ends of Route Z and the northern variation of Route W, many of the additional Grade II buildings fall within the buffers of both schemes.

Another Designated Heritage Asset common to both routes is the southern extent of the Saxmundham Conservation Area, which protrudes into the northern edge of the western end of the 750m buffer zone and contains a number of Listed Buildings lining the southern entrance to the town. The Grade II listed Hurts Hall stands just outside the town to the south-east, and is highlighted by EDF Energy as one of the key Designated Heritage Assets affected by the proposed route (EDF Energy 2019 Vol. 1, p. 315, Table 10.1). It is not clear from the consultation documents why Hurts Hall has been singled out in this way, as it shares its Grade II listing with 36 other buildings within the southern Route W corridor and 44 other buildings within the northern Route W corridor, and stands over 450m away from the road line. None of the other Grade II listed buildings was highlighted in this way.

As can be seen in Figures 4 and 5, in both variations the majority of the Listed Buildings within the 750m buffer lie away from the line of the road corridor, a consequence of the route following the gaps between settlements rather than skirting settlements more closely. There are distinct clusters of Listed Buildings at the western end of the route, with buildings in Benhall to the south and Saxmundham to the north, which the route traverses as part of the proposed new junction with the A12. Although there is a concentration of Designated Heritage Assets in the vicinity of the proposed junction, it is significant that the area has recently been brought forward as the proposed site of the Saxmundham Garden

Neighbourhood, which would see development of up to 800 houses to the south of the town. Therefore, if Route W were to be adopted it should be ensured that its design integrates with the masterplan for the area, so that any possible heritage impacts were minimised and the overall benefit of the scheme maximised.

The central section of Route W is sparsely populated, with a consequent reduction in the number of Listed Buildings in the vicinity of the road corridor. Those buildings that do lie within the wider buffer zone are at some distance from the road and are largely screened from it by trees. At its eastern end, the southern route comes closer to the Leiston Abbey Scheduled Monument and associated Listed Buildings, and the development of the route within the southern setting of the Abbey has the potential to have an adverse impact on the Abbey complex.

By contrast, within the eastern end of the northern route, the road corridor traverses the site of the former RAF Leiston and loops around the Leiston Abbey site to the north, before arriving to the south of the proposed end of Route Z. As discussed above, the land to the north of the Abbey contributes less significantly to the setting of the Abbey and, as such, development within this context will have a lesser impact upon the Designated Heritage Assets in this area. In addition, by following the course of the runway across the former airfield, the line of Route W would be utilising a modern landscape feature which has already seen much development since the Second World War, resulting in a lesser degree of change to the western setting of the Leiston Abbey complex.

#### 4.3.2 Non-Designated Heritage Assets

As with the proposed line of the Sizewell Link Road Route Z, it is not yet possible to characterise the buried archaeology of the road corridor, but the records for the 750m study area contained within the Suffolk HER indicate that there is potential for archaeological remains dating from the prehistoric to modern periods to lie within the proposed line of Route W. Assuming a broadly similar construction method to that proposed for Route Z, the groundworks associated with the construction of the new road could have an adverse effect on any surviving sub-surface archaeological remains, reducing or removing their ability to be further interpreted, resulting in the loss of archaeological interest.



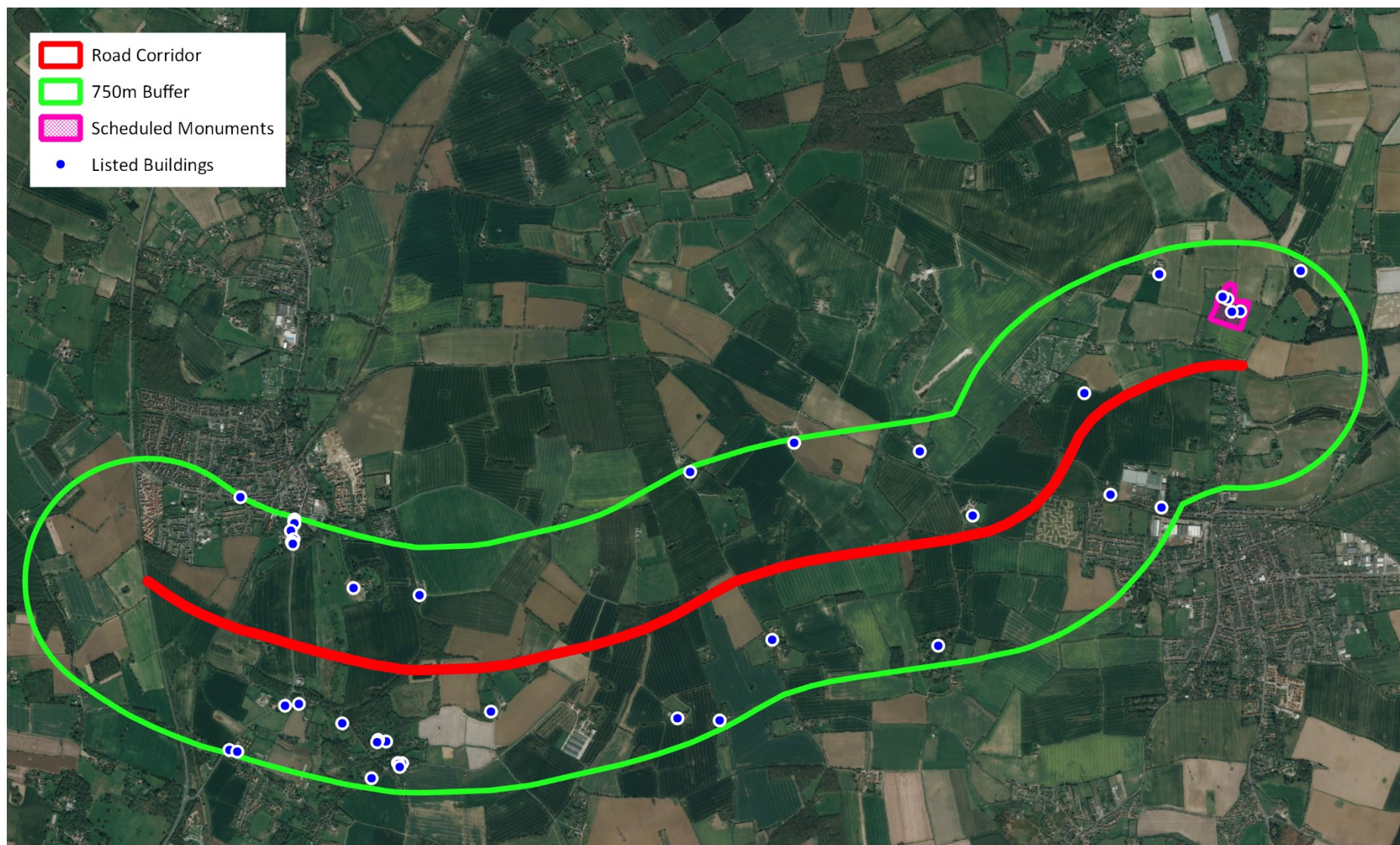


Figure 4. The southern variation of Route W, showing the Listed Buildings and Scheduled Monument which lie within 750m of the proposed road line.



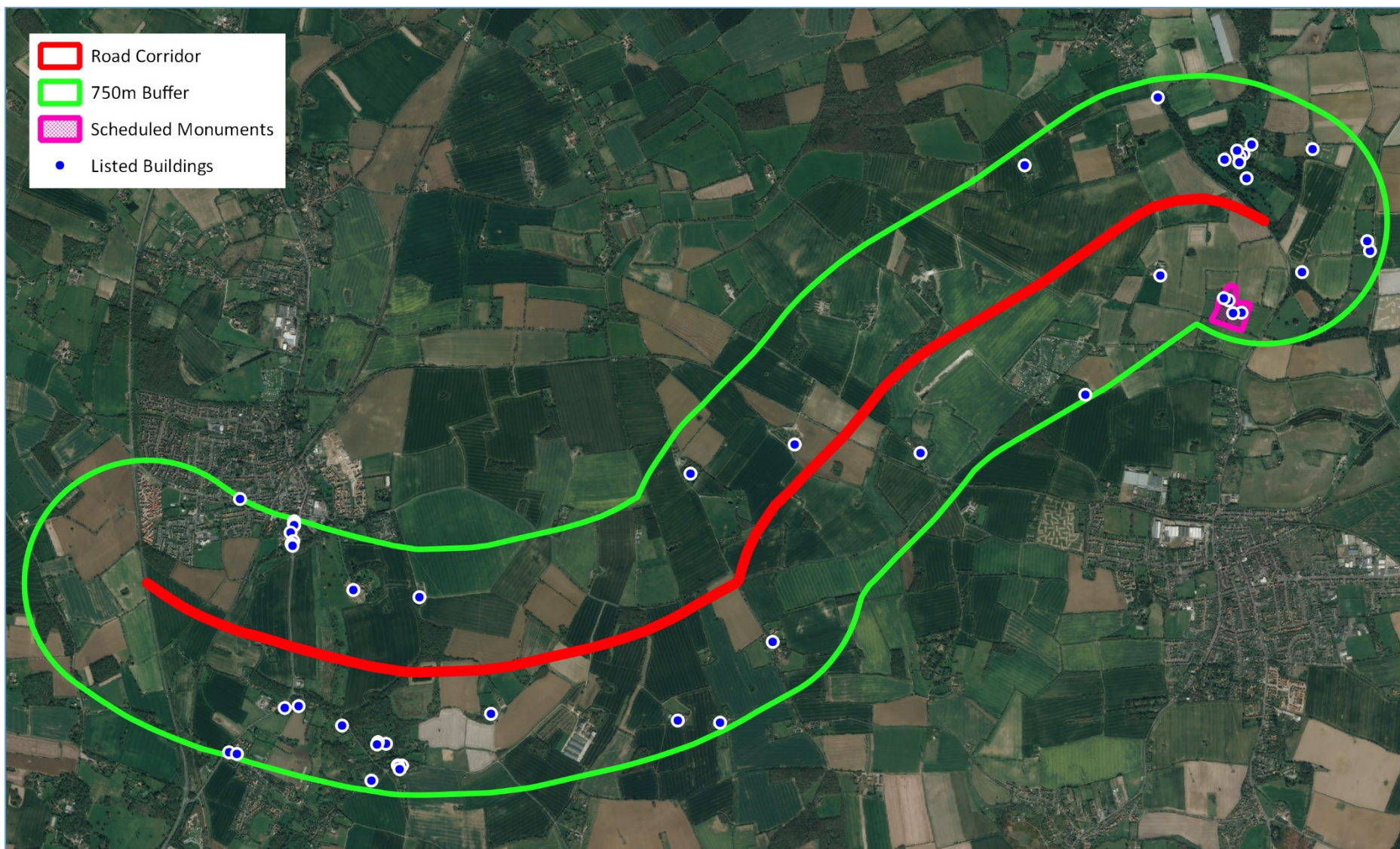


Figure 5. The northern variation of Route W, showing the Listed Buildings and Scheduled Monument which lie within 750m of the proposed road line.

This loss could be mitigated by a programme of archaeological investigation of the road corridor, in order to ensure that the archaeological interest of any significant deposits and features within the site can be investigated and recorded. This work would be specified and monitored by the Suffolk County Council Archaeological Service and would comprise archaeological evaluation by geophysical survey and trial trenching, to be followed by an archaeological mitigation phase, i.e. excavation and preservation by record, if required. This is a standard approach to mitigating buried archaeological deposits, and is an appropriate strategy to be employed in this case.

#### 4.4 Discussion: Heritage Impacts of Routes Z and W

Having introduced the concept of Sizewell Link Road between the A12 and the Sizewell C development site, which includes the length of the Theberton Bypass, as part of their road-led transport strategy, EDF Energy's Stage 3 consultation documents set out details of four proposed routes which were assessed before the published Route Z was decided upon. The documentation indicates that the decision-making process was influenced by a high-level assessment of environmental factors, which included an assessment of the potential for the route to impact upon Designated Heritage Assets. The table of benefits and constraints for each of the routes examined included the following high-level assessments of the likely heritage impacts (EDF Energy 2019 Vol. 1, p. 315, Table 10.1):

- Route W (north and south): 'Potential effects on the setting of a number of historic assets (Grade I, II and II\*) along each route. Key assets to consider include Hurts Hall and Leiston Abbey.'
- Route Z: 'Potential effects on the setting of a number of historic assets (Grade II) along each route. Key assets to consider include Dovehouse Farmhouse, Theberton Hall and The Gates/Walls at Theberton Hall.'

From these statements it would appear that there was actually very little difference between the routes with regard to affected Designated Heritage Assets in comparative terms, except between the Grades of the highlighted Listed Buildings. However, the summary environmental appraisals of Route W identified that 'the route also passes near to a number of existing heritage assets including

Hurts Hall and Leiston Abbey. There is potential for the significance of several heritage assets to be adversely affected due to changes in their setting resulting from the route's alignments, and as such, this route is not considered suitable' (EDF Energy 2019 Vol. 1, p. 314, para. 10.5.4). Although other factors were referred to, the implication of this statement is that this route was largely disregarded because of its potential heritage impacts.

The comparative analyses of Route Z and the northern and southern iterations of Route W presented here serve to confirm that the initial impression of the two routes being very similar in heritage impact terms is actually valid, with there being very little substantial difference between the positive and negative aspects of each route. However, closer examination of the presented Route Z reveals that the stipulated 750m buffer zone has been misapplied, so that at the eastern end of the route the significant cluster of Listed Buildings within the Leiston Abbey complex are excluded from EDF Energy's reckoning of the total number of affected Listed Buildings and their grades. This inclusion of these figures alters the picture somewhat, and suggests that the northern course of Route W has the lowest potential to impact upon Designated Heritage Assets of the three routes examined.

This conclusion has been reached based on the following arguments. The archaeological character of both routes is very similar and in all instances is able to be mitigated by an appropriate programme of archaeological investigations. The likely impact on buried archaeological remains is therefore not a material concern in distinguishing between the three routes. Of greater significance, though, are the relationships between the routes and the numerous Designated Heritage Assets which lie in their vicinities. Figure 6 presents a tabulated summary of the numbers of Designated Heritage Assets which lie within each of the 750m buffer zone study areas of the three proposed routes., and includes figures from the recalculated Route Z illustrated in Figure 3.

As can be seen, Route Z, comprising the full length of the Sizewell Link Road including the Theberton Bypass, is the only route which has a Listed Building within its proposed development corridor, and that the EDF study area contains more Listed Buildings than the southern version of Route W. When factoring in the



additional Listed Buildings which form a part of the Leiston Abbey complex, including the Grade I listed ruins, the total number of Listed Buildings within the Route Z 750m study area surpasses that of both of the Route W options.

	<b>Route Z (EDF)</b>	<b>Route Z (recalculated)</b>		<b>Route W (South)</b>		<b>Route W (North)</b>	
	<b>750m</b>	<b>750m</b>	<b>375m</b>	<b>750m</b>	<b>375m</b>	<b>750m</b>	<b>375m</b>
Listed Buildings (Corridor)	1	1	1	-	-	-	-
Listed Buildings (Study Area)	45	50	18	41	7	49	9
• Grade I	1	2	-	1	1	1	-
• Grade II*	1	2	1	3	1	3	1
• Grade II	43	46	17	37	5	45	8
Scheduled Monuments	1	1	-	1	1	1	-

*Figure 6. The numbers of Designated Heritage Assets within 750m and 375m of each proposed route.*

In terms of the grades of the building represented, all three Routes have one Grade I listed building, which in the case of the two Route Ws is the ruins of Leiston Abbey. As discussed, Route Z includes Theberton church, the recalculated Route Z also incorporates the Grade I-listed Abbey ruins, leaving it with twice as many Grade 1-listed buildings as the two variations of Route W.

While both Route Ws have three Grade II\* buildings, as opposed to Route Z's one or two under the recalculated Route Z, both Route Z and the northern Route W have approximately the same number of Grade II Listed Buildings as each other. EDF Energy's Route Z has 43, although the recalculated Route Z has 46; the northern variation of Route W has 45 Grade II Listed Buildings, but the southern version of Route W has considerably fewer with only 37.

More important than just the simple figures, though, is the distribution of those buildings within the study area. While many of the Listed Buildings in the Route Z study area stand in close proximity to the line of the proposed new link road, which broadly parallels the line of the existing B1122 and bypasses a significant concentration of the Listed Buildings at Theberton, the Listed Buildings which stand within the two Route W study areas are generally much more dispersed and

further removed from the proposed line of the road, which follows a path between settlements rather than seeking them out.

It should be noted that the 750m buffer zone study area was stipulated by the Suffolk County Council Archaeological Service, who would have recommended this with a view to it being an appropriate distance with which to assess the likely impact of the scheme of buried archaeological remains, and not the impact which the scheme is likely to have upon the setting of the Designated Heritage Assets which lie along its length. Issues of setting tend to be addressed by the district Conservation Officer and Historic England (the latter only in the case of Grade II\* and Grade I Listed Buildings). According to EDF Energy's consultation documents, neither body was involved in specifying the buffer zone, and it is considered that, in most instances, the setting of a Listed Building is of a considerably smaller than the specified 750m.

With this in mind, a more realistic assessment of the number of Designated Heritage Assets likely to be affected by each of the proposed routes might be achieved by applying a more limited buffer zone to the corridors, so that only Designated Heritage Assets which lie in closer proximity to the proposed routes are counted. In order to quantify this, the analyses based on a 750m buffer presented above were re-run using a 375m buffer (i.e. half the distance). The results of these analyses are also presented in Figure 6, with accompanying maps reproduced in Figures 7 (Route Z recalculated), 8 (Route W South) and 9 (Route W North).

As can clearly be seen, even with a buffer of half the size, the recalculated Route Z contains 1 Listed Building within its corridor and 18 Listed Buildings within the wider study area (Figure 7 and Appendix 5). These comprise 1 Grade II\* Listed Building and 17 Grade II Listed Buildings. The Leiston Abbey Scheduled Monument is not included in the reduced study area. It is also possible to see that the vast majority of the affected Designated Heritage Assets lie at the eastern end of the route, in the immediate environs of Theberton, and that these would be equally affected by the construction of the full Sizewell Link Road and the shorter Theberton Bypass.

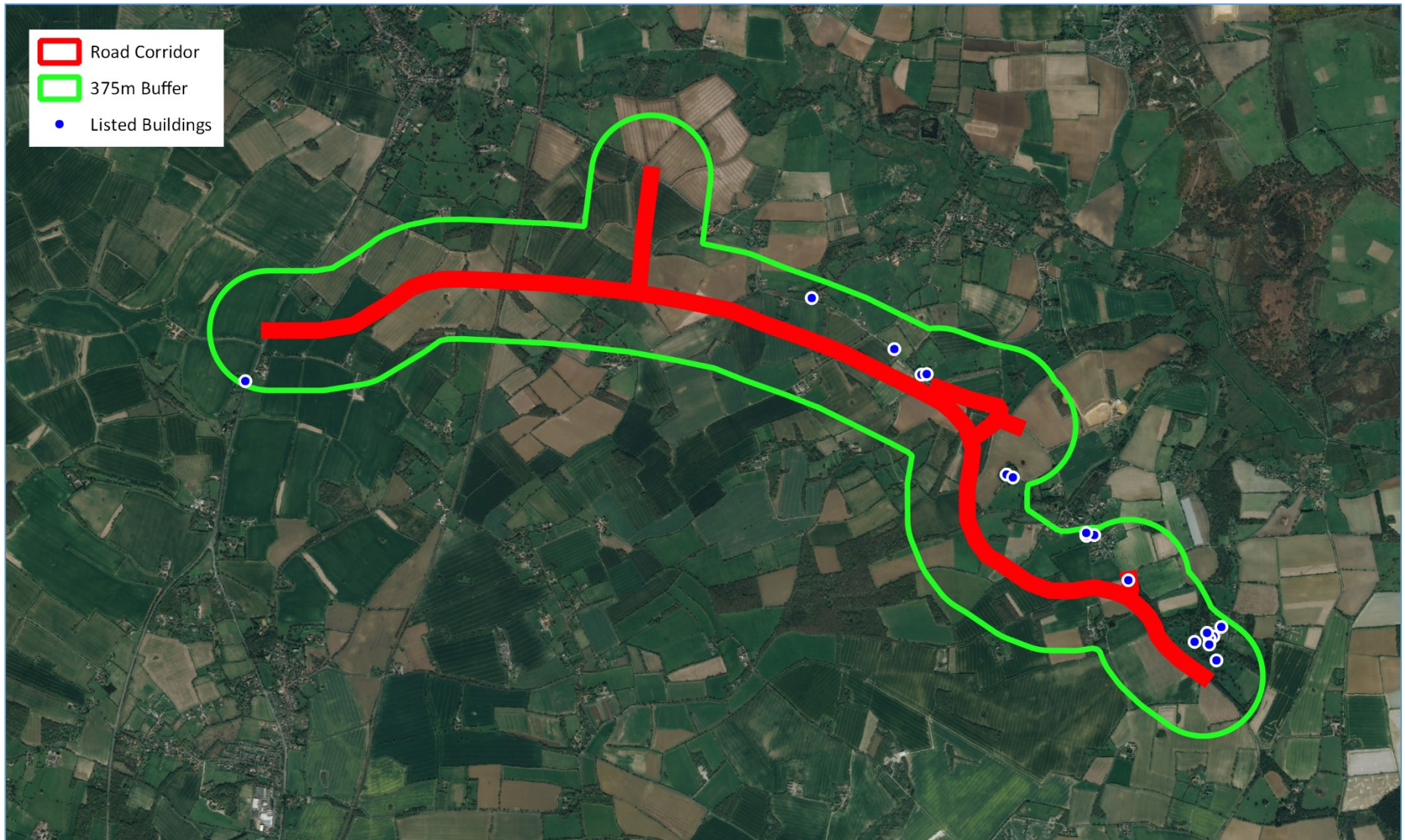


Figure 7. Route Z, showing the Listed Buildings which lie within the recalculated 375m of the proposed road line.



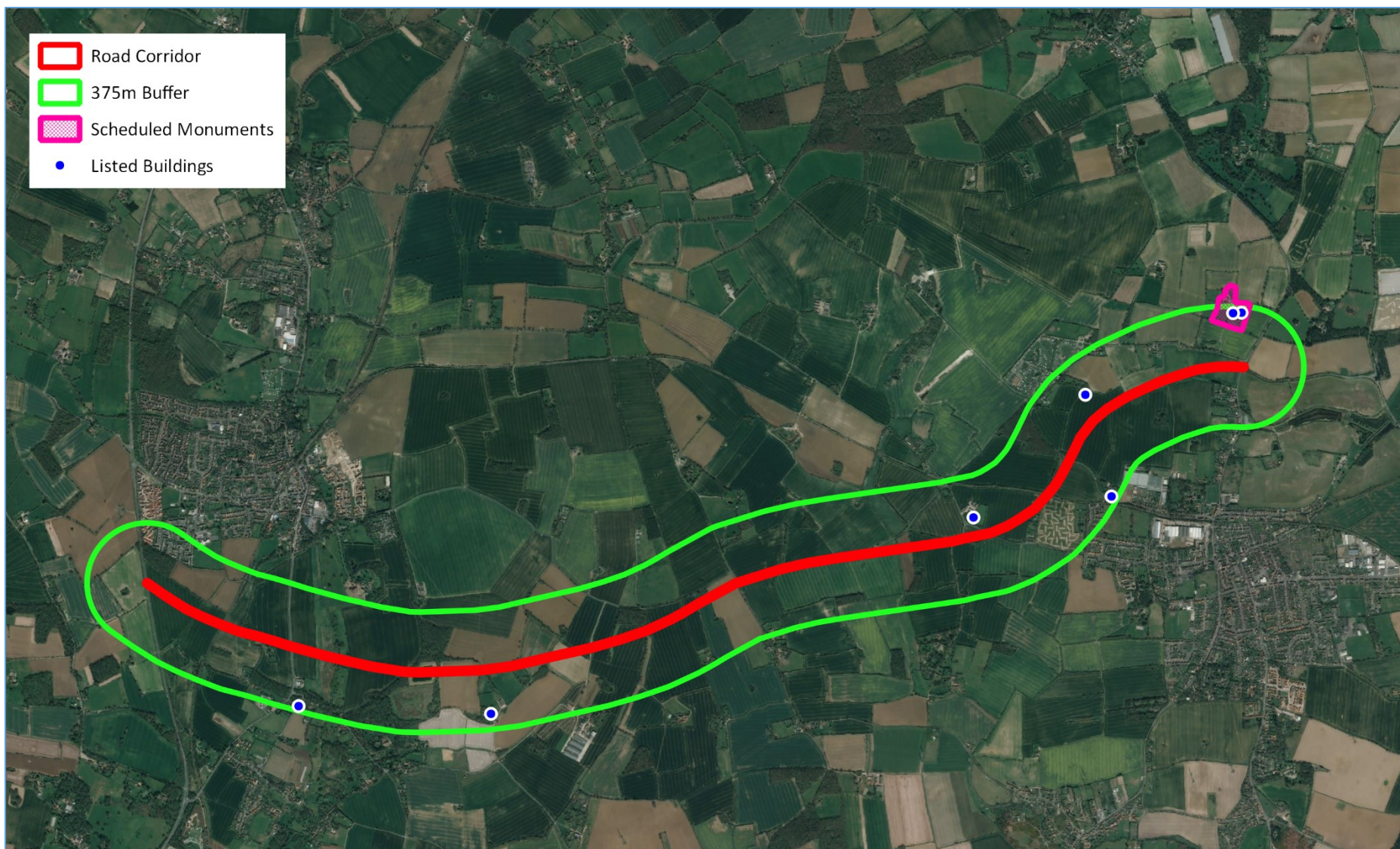


Figure 8. The southern variation of Route W, showing the Listed Buildings and Scheduled Monument which lie within 375m of the proposed road line.



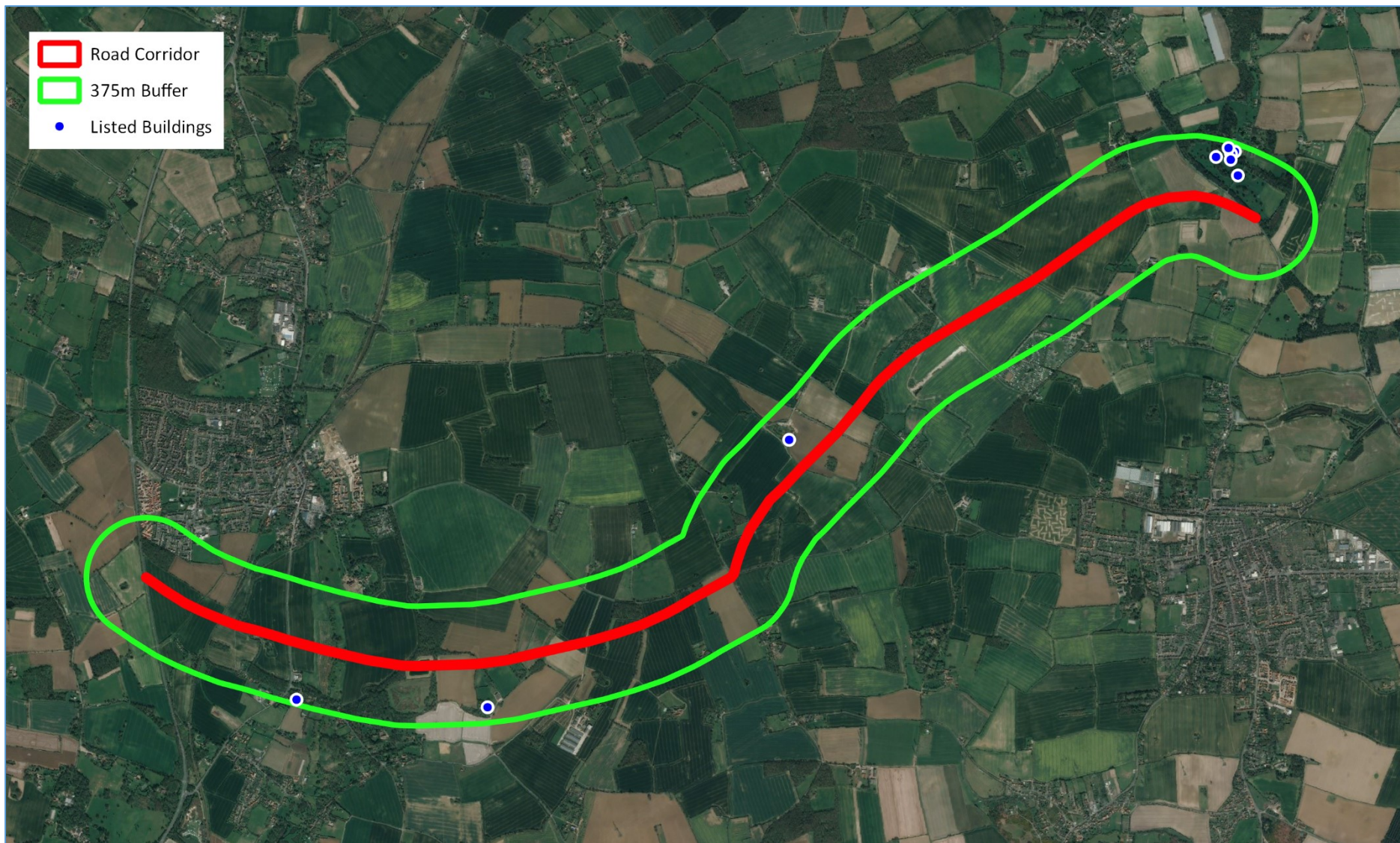


Figure 9. The northern variation of Route W, showing the Listed Buildings which lie within 375m of the proposed road line.

By contrast, with a buffer of half the size, the southern variation of Route W has no Listed Buildings within its corridor and only seven within the wider study area (Figure 8 and Appendix 6). These include 1 Grade I Listed Building, 1 Grade II\* Listed Building and only five Grade II Listed Buildings. The Leiston Abbey Scheduled Monument does lie within the reduced study area.

With a 375m buffer, the northern variation of Route W has no Listed Buildings within its corridor, and only nine Listed Buildings within the wider study area. These do not include any Grade I Listed Buildings, only 1 Grade II\* Listed Building and eight other Grade II Listed Buildings. The Leiston Abbey Scheduled Monument is not included in the reduced study area. Overall, these figures would suggest that of the three routes considered, the northern variation of Route W has the least impact on Designated Heritage Assets.

The EDF Energy consultation documents indicate that to date they have only undertaken an initial study to identify Designated Heritage Assets which have the potential to be affected by the proposed Route Z, and that more in-depth work has yet been carried out in order to assess the likely impact which the proposed scheme would have upon these Designated Heritage Assets. The reassessment of Route Z presented here suggests that even these high-level figures are wrong, and that several significant Designated Heritage Assets have been left out of the reckoning.

The comparative assessment presented here has indicated that while the likely heritage impacts of Route Z and the northern version of Route W are superficially very similar, when the study area of Route Z is calculated appropriately, the southern variation of Route W has the least heritage impact, with the northern variation of Route W also having a marginally lesser heritage impact than Route Z.

When a tighter buffer of 375m is applied instead of a 750m buffer, the dispersed nature of the Designated Heritage Assets along the line of Route W becomes very apparent, this would ultimately enable the impact to be mitigated more effectively with a consequent reduction in overall heritage impact. Both the northern and southern lines of Route W having considerably lower heritage impacts than Route Z. On balance, the fact that under this analysis the northern Route W affects no

Grade I Listed Buildings and avoids the Leiston Abbey Scheduled Monument, makes this the preferred option in heritage impact terms.

It is therefore considered to be premature to dismiss either of the proposed course of Route W on heritage impact grounds, as appears to have been the case thus far, without first undertaking the more detailed comparative analyses required by Historic England guidance so that an informed decision can be made.

In addition to the assessing the standalone heritage impacts of the proposed Route Z and the alternative northern and southern variations of Route W, an assessment of the likely heritage impact also needs to consider the cumulative effect of the associated roundabout at the junction between the A12 and B1122 in Yoxford. As is discussed more fully in the following section, the EDF Energy consultation documents indicate that under both the rail-led transport strategy and the road-led transport strategy which includes the construction of the Sizewell Link Road Route Z, it is considered necessary that a new roundabout is built. It is not considered to be the case that this roundabout would be necessary were either of the variations of Route W selected instead, thus reducing the overall impact of the road-led transport strategy.

## 5 Yoxford Roundabout

The redevelopment of the existing ghost-island junction between the A12 and the B1122 at Yoxford as a roundabout is a common element of both the rail-led and road-led transport strategies, in conjunction with Route Z, and is intended to increase capacity at this junction. The roundabout was one of two options for the junction put forward at the Stage 2 Consultation, where it was presented alongside a signalised junction, and a strong preference emerged for the roundabout option.

Details of the proposal are set out in Chapter 16 of the Development Proposals consultation document (EDF Energy 2019 Vol. 1, pp. 369–73, paras 16.1.1–16.5.12), with supporting in-depth assessments given in Chapter 11 of the Preliminary Environmental Information document (EDF Energy 2019 Vol. 2b, pp. 576–92, paras 11.1.1–11.14.2). The assessment of the terrestrial Historic Environment examined here is presented in section 11.5 of the Preliminary Environmental Information (EDF Energy 2019 Vol 2b, pp. 588–592, paras 11.5.1–11.5.37).

The new roundabout would be situated approximately 100m north of the existing junction, and be built on agricultural land to the east of the A12. The western end of the B1122 would be realigned to meet the roundabout, with a new length of road constructed to the north of the existing road. The outline proposal for the scheme indicates that construction of the roundabout requires cut earthworks to deal with existing ground levels and the removal of trees and hedgerows (EDF 2019 Vol. 1, p. 373, para. 16.5.10–11). Street lighting of the roundabout would be introduced as part of the scheme, as is depicted in the indicative illustration of the proposed roundabout (EDF 2019 Vol. 1, p. 377, fig. 16.2).

An archaeological desk-based assessment of the roundabout site was undertaken in April 2018, the results of which inform the assessment of the terrestrial historic environment presented in the consultation documents (EDF Energy 2019 Vol 2b, pp. 588–92, paras 11.5.1–37). For heritage purposes, a study area comprising a 500m buffer zone around the proposed development itself was agreed with the Suffolk County Council Archaeological Service as appropriate. The proposed development site and the extent of the buffer are illustrated in Volume 3 of the



EDF Energy consultation documents (EDF Energy 2019 Vol. 3, p. 135, fig. 11.5.1) and the figure is reproduced here as Appendix 8.

## 5.1 Designated Heritage Assets

The desk-based assessment identified that there is one designated heritage asset within the proposed development area, the Yoxford Conservation Area, and that an additional 26 Listed Buildings lie within the 500m study area around the site (EDF Energy Vol. 2b, p. 588, para. 11.5.3–4). This section considers the impacts which the proposed scheme might have upon these assets, based on the information presented and heritage data derived from the Suffolk Historic Environment Record and the National Heritage List for England.

### 5.1.1 Yoxford Conservation Area

The desk-based assessment identified that there is one designated heritage asset within the proposed development area, specifically the Yoxford Conservation Area, which the report states 'extends into the eastern edge of the site boundary' (EDF Energy Vol. 2b, p. 588, para. 11.5.3). This statement dramatically downplays the relationship between the proposed development area and the Yoxford Conservation Area, as the entire length of the A12 as it currently exists within the proposed development area, including the existing junction with the B1122, actually lies within the boundary of the Conservation Area itself. Indeed, the eastern edge of the A12 marks the boundary of the Conservation Area between the A12/B1122 junction and the line of the River Yox to the north (Figure 10). It should also be noted that at the time of writing (March 2019) a proposed extension to the Yoxford Conservation Area is being consulted upon, which, if successful, would dramatically extend the Conservation Area to the north, west and south-east by incorporating the areas of Cockfield Hall Park, Grove Park and Rookery Park respectively (SCDC 2019; Figure 10).

During the Stage 2 consultation on the Yoxford roundabout, Suffolk Coastal District Council expressed the view that further work was required to assess the impact of the proposals on the setting of the Yoxford Conservation Area (EDF 2019 Vol. 1, p. 370, para. 16.4.6).

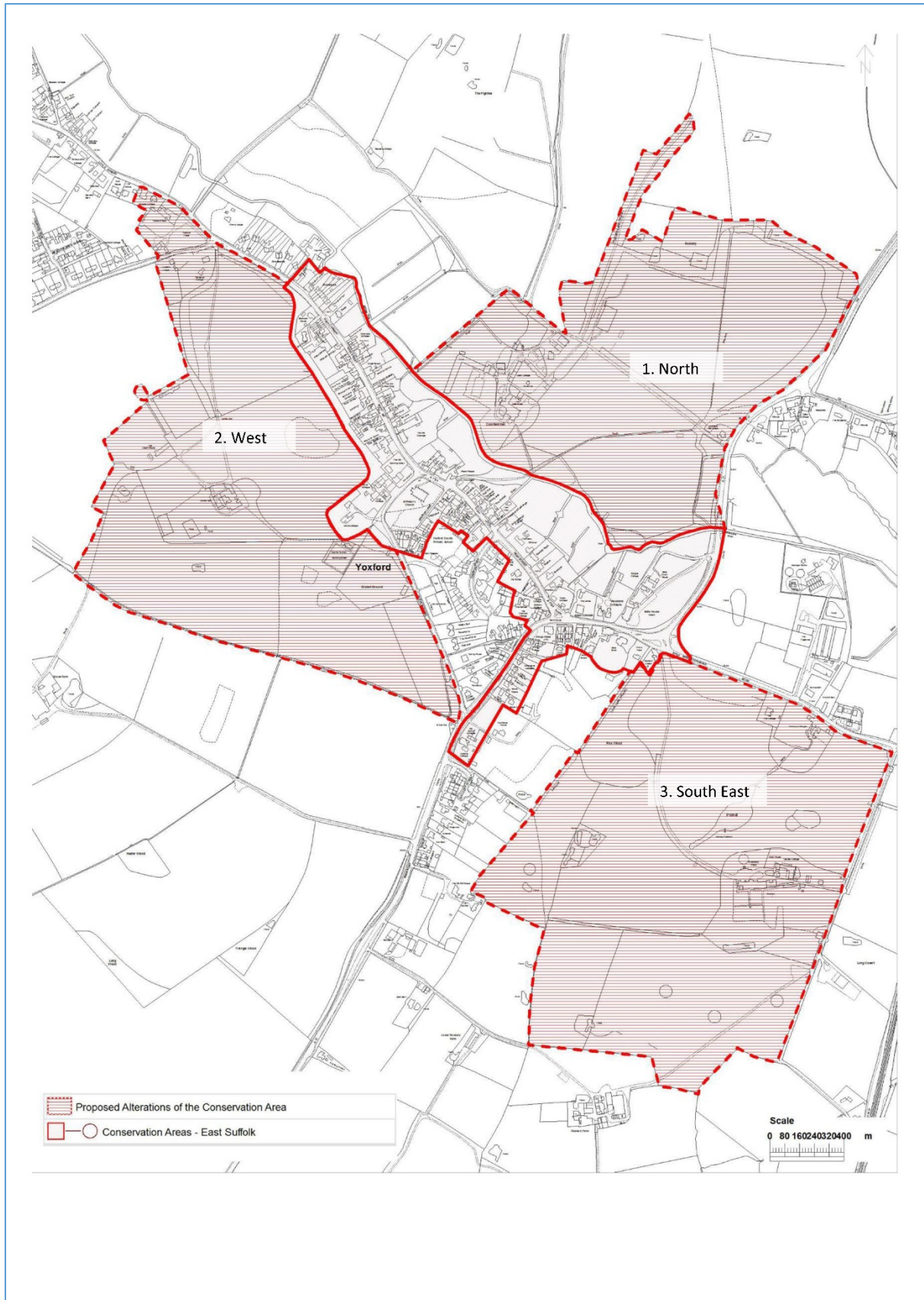


Figure 10. The current extent and proposed extensions to Yoxford Conservation Area (SCDC 2019)

The information set out in the Stage 3 consultation does little to demonstrate that this issue has been taken any further, and acknowledges that the new roundabout would have an effect upon the setting of Yoxford Conservation Area as a result of the visibility of the proposed roundabout in views of and from the fringes of the Conservation Area (EDF Energy 2019 Vol. 2b, p. 590, para. 11.5.29). Although the A12 is already a busy road, that redevelopment of the junction, with associated earthworks, landscaping, road-widening and street lighting will significantly alter the character of the Conservation Area itself and its setting. If these proposals are accepted, the proposed development area of the roundabout will be surrounded to the west and south by the enlarged Conservation Area, meaning that that the potential impacts of the scheme on the Conservation Area will be proportionally greater too. At this stage, it is proposed by EDF Energy that any impacts could be mitigated by 'design and screening' (EDF Energy 2019 Vol. 2b, p. 591, Table 11.5.2), although no details as to how these measures might be used to mitigate the impact are set out.

With overall regard to the impact on the Yoxford Conservation Area, it is acknowledged that there is still a need to undertake further consultation with the Suffolk Coastal District Council Conservation Officer on this matter (EDF 2019 Vol 1, p. 370, para. 16.4.6; Vol. 2b, p. 589–90, paras 11.5.27, 29 and 35). This statement suggests that at this stage EDF Energy have not yet identified a suitable mitigation scheme for the adverse impact which the proposed roundabout will have on the Yoxford Conservation Area. Indeed, it is not clear at this stage if the impact could be mitigated at all, requiring the negative impact on the designated heritage asset to be weighed up against the public benefits of the scheme under paragraph 196 of the revised National Planning Policy Framework (MCLG 2019).

### 5.1.2 Listed Buildings

The desk-based assessment identified that 26 Listed Buildings stand within the 500m study area buffer (EDF Energy 2019 Vol. 3, p. 135, fig. 11.5.1, reproduced here as Appendix 4). While none of these is within the development site itself, and the majority of the buildings are sufficiently removed and screened from the site so as to be unaffected by the proposed roundabout, several Listed Buildings stand in

close proximity to the development site and there is therefore the potential for development of the junction to have an adverse effect upon their settings. Specifically, the three buildings most likely to be affected are: Rookery Cottages (LB 1200791), which are listed at Grade II and stand immediately to the south-east of the point at which the line of the new stretch of the B1122 will leave the existing road; the Satis House hotel (LB 1200636), which is Grade II listed and stands to the west of the existing junction between the A12 and the B1122; and White Lodge and the White House (LB 1377237), which are also listed at Grade II and stand immediately to the south of the western end of the stretch of the A12 which is to be developed.

The consultation documents state that buildings close to the proposed roundabout may experience some disturbance during construction, and that as a result of the construction they may experience changed views and noise levels (EDF Energy Vol 2b., p. 589–90, paras 11.5.26 and 30). EDF Energy states that 'as these buildings are close to the existing A12 junction, it is unlikely that these changes would present sufficient change to give rise to a qualitative change to setting and, therefore, effects would not be significant' (EDF Energy Vol 2b., p. 590, paras 11.5.30). However, no evidence is presented for this assertion and it is clear from the surrounding text that formal assessments of the settings of the nearby Listed Buildings and any impacts upon their settings have not yet been undertaken. The need to complete a full settings assessment is highlighted as a task to be undertaken in consultation with Historic England and the Suffolk Coastal District Council Conservation Officer before the application stage (EDF Energy 2019 Vol. 2b, p. 590, paras. 11.5.34–35). Again, it is proposed that any impacts could be mitigated by 'design and screening' (EDF Energy 2019 Vol. 2b, p. 591, Table 11.5.2), although no details as to how these measures might be used to mitigate the impact are set out.

## 5.2 Non-Designated Heritage Assets

The archaeological desk-based assessment identified that one entry recorded in the Suffolk Historic Environment Record (SHER), pertaining to the medieval settlement core of Yoxford, overlapped with the proposed development area



(SHER YOX 023 (MSF25765)), and that a further 20 HER entries lie within the 500m study area buffer zone (EFD 2019 Vol. 2b, pp. 588, paras 11.5.2–5 and 7). These are used to present a brief chronological overview of the known archaeology of the immediate environs of the site and present an assessment of the likelihood of archaeological remains lying within the development site.

In the absence of any archaeological fieldwork, it is not yet possible to characterise the buried archaeology of the roundabout site, but the archaeological desk-based assessment concluded that there was potential for archaeological remains dating from the prehistoric to medieval periods to lie within the development area (EFD energy 2019 Vol. 2b, p. 588–9, paras 11.5.8–17) . The consultation documents recognise that the groundworks associated with the construction phase of the new roundabout will substantially disturb, if not remove entirely, any buried archaeological remains which may exist (EDF Energy 2019 Vol. 2b, p. 589, paras 11.5.22–23). EDF Energy acknowledge the fact that 'the loss of archaeological interest through material disturbance within the site during construction could have a significant adverse effect' (EDF Energy 2019 Vol. 2b, p. 590, para. 11.5.33).

By way of mitigation, the need for a programme of archaeological investigation of the site is acknowledged, in order to ensure that the archaeological interest of any significant deposits and features within the site can be investigated, recorded and disseminated. This work would be specified and monitored by the Suffolk County Council Archaeological Service and would comprise archaeological evaluation by geophysical survey and trial trenching, to be followed by an archaeological mitigation phase, i.e. excavation and preservation by record, if required (EDF Energy 2019 Vol. 2b, p. 590, paras 11.5.31–33 and 36). This is a standard approach to mitigating buried archaeological deposits, and is an appropriate strategy to be employed in this case.

However, in assessing the potential impact of the proposals on Non-Designated Heritage Assets, the current EDF Energy consultation documents fail to take into account the impact which the proposed development will have upon the two historic landscape parks which lie immediately to the north-west and south of the development site (Figure 11).



*Figure 11. The two landscape parks which adjoin the proposed site of the Yoxford roundabout. Scale 1:10,000.*

To the south, the development site shares a contiguous boundary on the southern side of the B1122 with the northern extent of Rookery Park, which has its origins in the mid-17<sup>th</sup> century and is recorded in the Suffolk HER as YOX 013 (MSF17530). To the north-west, the development site adjoins the south-eastern corner of Cockfield Hall Park, again with likely 17<sup>th</sup>-century origins, which is recorded in the Suffolk HER as YOX 006 (MSF13079). In addition to being listed in the Suffolk HER, both of these parks are identified as being of particular historic significance within the District in Suffolk Coastal District Council's Supplementary Planning Guidance 6, which concerns historic parks and gardens (SCDC 1995). The proposed revisions to the Yoxford Conservation Area referred to above, which are being consulted

upon at the time of writing, would incorporate Rookery Park, Cockfield Hall Park, and also Grove Park which lies to the west of the settlement, into the Conservation Area itself.

While the presence of these parks is acknowledged in the consultation documents, where they are described as lying outside the development site (EDF Energy 2019 Vol. 2b, p. 589, para. 11.5.17), no reference is made to the likely impact which the development of the roundabout will have upon their settings. In the case of Rookery Park, in particular, the construction of the roundabout and new feeder length of the B1122 will significantly alter the character of its northern boundary and its immediate setting to the north will be changed from one of agricultural fields to a busy road interchange.

### 5.3 Discussion: Heritage Impacts of the Yoxford Roundabout

The development of the new roundabout at the junction of the A12 and B1122 in Yoxford has the potential to have a significant adverse impact upon Designated and Non-Designated Heritage Assets, and on the basis of the information presented in the current consultation documents, it is not clear if or how some of these impacts are to be mitigated. In the case of Designated Heritage Assets, the length of the A12 which is due to be developed as part of the proposed scheme lies within the boundary of the current Yoxford Conservation Area. Although the A12 is already a busy road, it is argued that redevelopment of the junction, with associated earthworks, landscaping, road-widening and street lighting will significantly alter the character of the Conservation Area itself and its setting. Were the proposed expansion of the Yoxford Conservation Area to be adopted, then the development site would be bounded to the west and the south by the Conservation Area, increasing this impact further. There are also several Listed Buildings immediately adjacent to the site of the new roundabout which are likely to see short- and longer-term changes to their settings. To date no detailed assessments have been undertaken to identify the extent of these impacts or develop any meaningful mitigation strategies beyond 'design and screening'.

With regard to Non Designated Heritage Assets, buried archaeological features and deposits are well dealt with by the archaeological desk-based assessment

and the proposed programme of archaeological evaluation, which will ultimately inform any archaeological mitigation strategy which might be required. Less consideration has apparently been given to the impact which the proposed new roundabout will have on the character and setting of the adjacent landscape parks, Rookery Park immediately to the south of the development site and Cockfield Hall Park to its north-west. Both of these parks are recognised by Suffolk Coastal District Council as being of historical significance and both have the potential to be adversely affected by the construction and use of the new roundabout. Again, there are currently no detailed assessments of the extent of these impacts, nor have any meaningful mitigation strategies beyond 'design and screening' been proposed.

The consultation documents indicate that to date only an initial study has been undertaken to identify Designated Heritage Assets which have the potential to be affected by the proposed roundabout, in accordance with Step 1 of Historic England's guidance on the setting of heritage assets (Historic England 2017). However, it is apparent that no more in depth work has yet been carried out in order to assess the likely impact which the proposed schemes would have upon these assets, except in the most general terms, and the need to complete a full settings assessment is highlighted as a task to be undertaken in consultation with Historic England and the Suffolk Coastal District Council Conservation Officer before the application stage (EDF Energy 2019 Vol. 2b, p. 590, paras. 11.5.34–35). At this stage, in the case of the proposed Yoxford roundabout, consultees are being asked to comment upon a proposed development scheme for which the heritage impacts have yet to be fully identified and quantified. It is suggested that more information needs to be collected and provided regarding the likely heritage impact and any proposed mitigation methods before an informed decision can be made by consultees.



## 6 Conclusions

This heritage assessment has been produced in response to development proposals put forward in the Sizewell C Stage 3 Pre-Application Consultation documents published by EDF Energy in January 2019 (EDF 2019a, 2019b, 2019c, 2019d). Specifically, it has focussed on the likely heritage impacts of two main elements of the proposed scheme:

- the Sizewell Link Road between the A12 and the construction site, including a comparative assessment of an alternative route further to the south; and
- the upgrading of the existing ghost-island junction between the A12 and the B1122 at Yoxford to a roundabout.

The comparative analyses of the Sizewell Link Road Route Z and the northern and southern iterations of Route W presented here reveals that the stipulated 750m buffer zone has been misapplied to Route Z, so that at the eastern end of the route the significant cluster of Listed Buildings within the Leiston Abbey complex are excluded from EDF Energy's reckoning of the total number of affected Listed Buildings and their grades. This inclusion of these figures alters the picture somewhat, and suggests that that the northern course of Route W has the lowest potential to impact upon Designated Heritage Assets of the three routes examined.

The comparative assessment presented here has indicated that while the likely heritage impacts of Route Z and the northern version of Route W are superficially very similar, when the study area of Route Z is calculated appropriately, the southern variation of Route W has the least heritage impact, with the northern variation of Route W also having a marginally lesser heritage impact than Route Z.

With a 375m buffer applied, the northern variation of Route W has no Listed Buildings within its corridor, and only nine Listed Buildings within the wider study area. These do not include any Grade I Listed Buildings, only 1 Grade II\* Listed Building and eight other Grade II Listed Buildings. The Leiston Abbey Scheduled Monument is not included in the reduced study area. Overall, these figures would suggest that of the three routes considered, the northern variation of Route W has the least impact on Designated Heritage Assets.

The development of the Yoxford roundabout has the potential to have a significant adverse impact upon Designated and Non-Designated Heritage Assets. On the basis of the information presented in the current consultation documents, it is not clear if or how some of these impacts are to be mitigated. To date, no detailed assessments have been undertaken to identify the extent of these impacts or develop any meaningful mitigation strategies beyond 'design and screening'.

Therefore, in addition to the assessing the standalone heritage impacts of the proposed Route Z and the alternative northern and southern variations of Route W, an assessment of the likely heritage impact also needs to consider the cumulative effect of the associated roundabout at the junction between the A12 and B1122 in Yoxford. The EDF Energy consultation documents indicate that under both the rail-led transport strategy and the road-led transport strategy which includes the construction of the Sizewell Link Road Route Z, it is considered necessary that the new Yoxford roundabout is built. It is not considered to be the case that this roundabout would be necessary were either of the variations of Route W selected instead, thus reducing the overall impact of the road-led transport strategy.

With regard to both the Sizewell Link Road (Route Z), and its proposed alternative routes, and the Yoxford roundabout, it is clear that only an initial study has been undertaken to identify Designated Heritage Assets which have the potential to be affected by the proposed roundabout, in accordance with Step 1 of Historic England's guidance on the setting of heritage assets (Historic England 2017). However, it is apparent that no more in depth work has yet been carried out in order to assess the likely impact which the proposed schemes would have upon these assets, except in the most general terms, and the need to complete a full settings assessment is highlighted as a task to be undertaken in consultation with Historic England and the Suffolk Coastal District Council Conservation Officer before the application stage. At this stage in the process, consultees are being asked to comment upon a proposed development scheme for which the heritage impacts have yet to be fully identified and quantified. It is suggested that more information needs to be collected and presented regarding the likely heritage impact and any proposed mitigation before an informed decision can be made.

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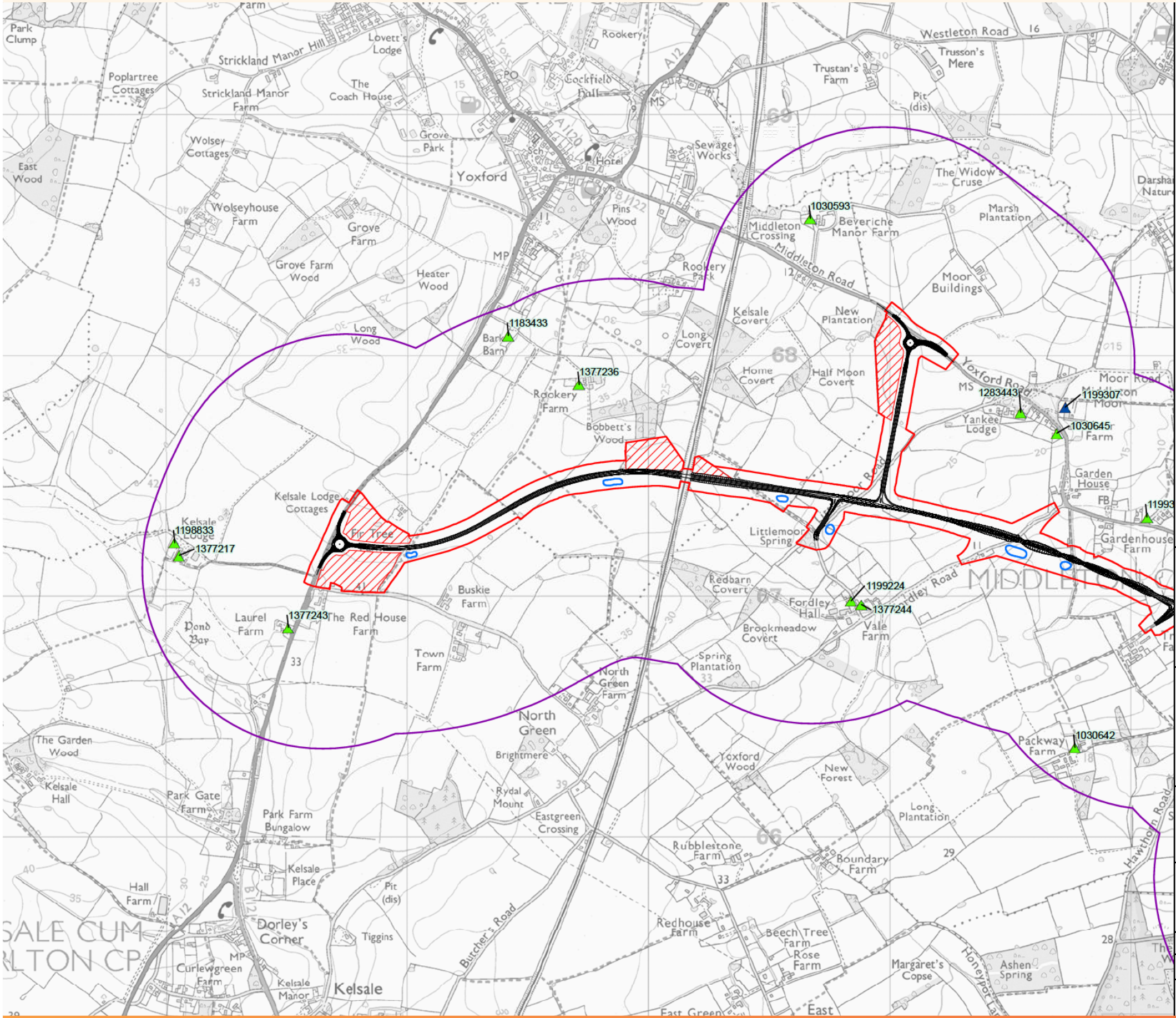
## 8 About the Author

Dr Richard Hoggett is a freelance heritage consultant with over 20 years' experience in the academic, commercial and local authority heritage sectors. Between 2013–16 he was a Senior Archaeological Officer for Suffolk County Council, in which capacity he assessed the heritage implications of planning applications pertaining to listed and historic buildings, and provided specialist advice to Local Planning Authorities, developers and landowners. He is a Fellow of the Society of Antiquaries of London and a Member of the Chartered Institute for Archaeologists.

## Appendix 1: Designated Heritage Asset Maps (Route Z)

Maps showing the Designated Heritage Assets lying within 750m of Route Z (EDF Energy 2019 Vol. 3, pp. 69–70, figs 5.5.1–2).

Figure 5.5.1 Designated heritage assets plan 1



- NOTES
- KEY
- PROPOSED ROAD LAYOUT
  - RED L NE BOUNDARY
  - PROPOSED CONSTRUCTION COMPOUND
  - PROPOSED DETENTION POND
  - 750M STUDY AREA
  - GRADE II\* LISTED BUILDING
  - GRADE II LISTED BUILDING

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DOCUMENT

SIZEWELL C  
VOLUME 3 PEI FIGURES  
CHAPTER 5  
SIZEWELL LINK ROAD PEI  
TERRESTRIAL HISTORIC ENVIRONMENT

DRAWING TITLE

DESIGNATED HERITAGE ASSETS PLAN 1

DRAWING NO

FIGURE 5.5.1

DATE

NOV 2018

DRAWN

J.P.

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## Appendix 2: Designated Heritage Assets table of Route Z (Recalculated) with 750m buffer

### Scheduled Monuments

List Entry	Name	Easting	Northing
1014520	Leiston Abbey (Second Site)	644457	264189

### Listed Buildings

List Entry	Name	Grade	Easting	Northing
1030593	Beveriche Manor Farmhouse	II	640671	268567
1030642	Packway Farmhouse	II	641769	266371
1030643	Hill Farmhouse	II	642580	266998
1030644	Fenn Farmhouse	II	643527	267081
1030645	Thatched House	II	641694	267675
1183433	Bark Barn	II	639419	268080
1198833	Kelsale Lodge	II	638034	267220
1199213	Dovehouse Farmhouse	II	642609	266146
1199224	Fordley Hall	II	640840	266980
1199307	Moor Farmhouse	II*	641728	267783
1199326	Pine Tree Cottage	II	642068	267327
1215753	St Mary's Abbey	I	644521	264174
1215754	Retreat House	II	644468	264172
1216380	Barn At Abbey Farm	II	644442	264252
1216395	Cottage 450 Metres South West Of Upper Abbey Farmhouse	II	644902	264420
1227753	Gates, Gateway, Walling And Wall Head 30 Metres West Of Theberton Hall	II	643270	266199
1227755	Nos. 1-4, Church Road	II	643941	266238
1227756	Church Of St Peter	I	643729	265918
1227758	The Old Rectory	II	643566	265973
1227759	Stable Block 10 Metres To South Of The Lion Public House	II	643764	265806
1227920	Lilycot	II	644005	266242
1228180	Thatched House	II	643773	265872
	The Cottage			
1228246	Moat Farmhouse	II	643186	265115
1228262	The Cottage	II	644676	265713
1228263	Flash Cottages	II	644646	265705
1228265	Woodview	II	644673	265856
1228266	Bob's Cottage	II	644601	265220
1228267	Potter's Farmhouse	II	644981	265185
1228268	Theberton House Stables	II	644550	265161

List Entry	Name	Grade	Easting	Northing
1228269	Gateway 45 Metres North Of Main Entrance To Theberton House	II	644526	265146
1228270	Barn 30 Metres South East Of Old Manor House	II	643632	265883
1228378	Theberton House	II*	644524	265111
1228384	Old Manor House	II	643618	265920
1268290	The Guesten Hall At Abbey Farm	II	644412	264266
1283440	Manor House	II	643482	267324
1283443	The Cottage (Occupied By Mr Mclean)	II	641544	267762
1283470	Valley Farmhouse Annesons Corner	II	642748	266835
1287235	Walls Enclosing Garden 60 Metres To North Of Theberton House And Greenhouse At North End	II	644511	265184
1287237	Gate And Gate Piers 105 Metres South East Of Main Entrance To Theberton House	II	644567	265011
1287260	Gate And Gate Piers 80 Metres North West Of Main Entrance To Theberton House	II	644432	265129
1287282	Flint House	II	643814	265810
1287303	Gate And Gate Piers At Junction Of Leiston Road And Onner's Lane	II	644023	265523
1287529	Theberton Hall	II	643310	266180
1287533	The Lion Public House	II	643764	265824
1287643	Hill Farmhouse	II	644019	264414
1377217	Barn 50 Metres South East Of Kelsale Lodge	II	638053	267168
1377236	Rookery Farmhouse	II	639712	267877
1377243	Laurel Farmhouse	II	638505	266868
1377244	Vale Farmhouse	II	640883	266964
1377245	Farm Buildings 30 Metres East Of Valley Farmhouse, Annesons Corner	II	642780	266838

## Appendix 3: Designated Heritage Assets table of Route W (South) with 750m buffer

### Scheduled Monuments

List Entry	Name	Easting	Northing
1014520	Leiston Abbey (Second Site)	644457	264189

### Listed Buildings

List Entry	Name	Grade	Easting	Northing
1030866	The Limes	II	638518	261817
1187694	Benhall Stores	II	638166	261547
1215743	Little Moor Farm	II	641228	261678
1215749	Buxlow Manor	II*	641071	263232
1215753	St Mary's Abbey	I	644521	264174
1215754	Retreat House	II	644468	264172
1216049	High House Farm	II	640965	261696
1216275	Fisher's Farmhouse	II	643539	263680
1216380	Barn At Abbey Farm	II	644442	264252
1216395	Cottage 450m sw Upper Abbey Farmhouse	II	644902	264420
1227752	Wood Farmhouse	II	643691	263044
1227893	Westhouse Farmhouse	II	641723	263402
1231179	Wood Farmhouse	II	639369	262492
1231296	Hill Farmhouse	II	639802	261758
1231300	Sternfield House	II	639145	261583
1231355	Thatched Cottage	II	639242	261446
1258312	Garden Cottage	II	638605	261827
1268158	Beech Lawn Cottage	II	638597	262978
1268159	Beech Lawn House inc. Orangery to rear	II	638595	262967
1268160	Ivy House	II	638596	262954
1268161	16, South Entrance	II	638574	262909
1268162	Monks Cottages	II	638589	262855
1268163	The White House	II	638578	262838
1268164	Crown House	II	638584	262826
1268178	Hurts Hall	II	638958	262544
1268290	The Guesten Hall at Abbey Farm	II	644412	264266
1278159	Sternfield Hall	II	639050	261355
1278167	1 and 2, The Street	II	639216	261447
1278252	Church Of St Mary Magdalene	II*	639095	261594
1278253	8-10, Church Hill	II	638873	261701
1278254	Start Farm	II	639220	261442
1278255	34 and 35, The Street	II	639226	261423
1287528	24, Westward Ho	II	644008	262959

List Entry	Name	Grade	Easting	Northing
1287532	Crossing Farmhouse	II	642506	263335
1287643	Hill Farmhouse	II	644019	264414
1287646	Leiston House Farmhouse	II*	642829	262928
1287772	Pattle's Farmhouse	II	641565	262176
1287793	Knodishall Place	II	642600	262120
1366000	Post Mill Roundhouse	II	638262	263123
1377133	5 and 6, Benhall Green	II	638215	261536
1458741	Sternfield War Memorial	II	639089	261580



## Appendix 4: Designated Heritage Assets table of Route W (North) with 750m buffer

### Scheduled Monuments

List Entry	Name	Easting	Northing
1014520	Leiston Abbey (Second Site)	644457	264189

### Listed Buildings

List Entry	Name	Grade	Easting	Northing
1030866	The Limes	II	638518	261817
1187694	Benhall Stores	II	638166	261547
1215743	Little Moor Farm	II	641228	261678
1215749	Buxlow Manor	II*	641071	263232
1215753	St Mary's Abbey	I	644521	264174
1215754	Retreat House	II	644468	264172
1216049	High House Farm	II	640965	261696
1216275	Fisher's Farmhouse	II	643539	263680
1216380	Barn At Abbey Farm	II	644442	264252
1216394	Upper Abbey Farmhouse	II	645327	264545
1216395	Cottage 450m sw Upper Abbey Farmhouse	II	644902	264420
1216655	Barn 40m north of Upper Abbey Farmhouse	II	645312	264606
1227893	Westhouse Farmhouse	II	641723	263402
1228246	Moat Farmhouse	II	643186	265115
1228266	Bob's Cottage	II	644601	265220
1228267	Potter's Farmhouse	II	644981	265185
1228268	Theberton House Stables	II	644550	265161
1228269	Gateway 45m north of main entrance to Theberton House	II	644526	265146
1228378	Theberton House	II*	644524	265111
1231179	Wood Farmhouse	II	639369	262492
1231296	Hill Farmhouse	II	639802	261758
1231300	Sternfield House	II	639145	261583
1231355	Thatched Cottage	II	639242	261446
1258312	Garden Cottage	II	638605	261827
1268158	Beech Lawn Cottage	II	638597	262978
1268159	Beech Lawn House inc. Orangery To Rear	II	638595	262967
1268160	Ivy House	II	638596	262954
1268161	16, South Entrance	II	638574	262909
1268162	Monks Cottages	II	638589	262855
1268163	The White House	II	638578	262838
1268164	Crown House	II	638584	262826
1268178	Hurts Hall	II	638958	262544

List Entry	Name	Grade	Easting	Northing
1268290	The Guesten Hall at Abbey Farm	II	644412	264266
1278159	Sternfield Hall	II	639050	261355
1278167	1 and 2, The Street	II	639216	261447
1278252	Church of St Mary Magdalene	II*	639095	261594
1278253	8-10, Church Hill	II	638873	261701
1278254	Start Farm	II	639220	261442
1278255	34 and 35, The Street	II	639226	261423
1287235	Walls Enclosing Garden 60m to north of Theberton House and Greenhouse at North End	II	644511	265184
1287237	Gate and Gate Piers 105m south-east of Main Entrance to Theberton House	II	644567	265011
1287260	Gate and Gate Piers 80m north-west of Main Entrance to Theberton House	II	644432	265129
1287303	Gate and Gate Piers at Junction of Leiston Road and Onner's Lane	II	644023	265523
1287532	Crossing Farmhouse	II	642506	263335
1287643	Hill Farmhouse	II	644019	264414
1287772	Pattle's Farmhouse	II	641565	262176
1366000	Post Mill Roundhouse	II	638262	263123
1377133	5 and 6, Benhall Green	II	638215	261536
1458741	Sternfield War Memorial	II	639089	261580

## Appendix 5: Designated Heritage Assets table of Route Z (Recalculated) with 375m buffer

### Listed Buildings

List Entry	Name	Grade	Easting	Northing
1030643	Hill Farmhouse	II	642580	266998
1199326	Pine Tree Cottage	II	642068	267327
1227753	Gates, Gateway, Walling And Wall Head 30 Metres West Of Theberton Hall	II	643270	266199
1227759	Stable Block 10 Metres To South Of The Lion Public House	II	643764	265806
1228266	Bob's Cottage	II	644601	265220
1228268	Theberton House Stables	II	644550	265161
1228269	Gateway 45 Metres North Of Main Entrance To Theberton House	II	644526	265146
1228378	Theberton House	II*	644524	265111
1283470	Valley Farmhouse Annesons Corner	II	642748	266835
1287235	Walls Enclosing Garden 60 Metres To North Of Theberton House And Greenhouse At North End	II	644511	265184
1287237	Gate And Gate Piers 105 Metres South East Of Main Entrance To Theberton House	II	644567	265011
1287260	Gate And Gate Piers 80 Metres North West Of Main Entrance To Theberton House	II	644432	265129
1287282	Flint House	II	643814	265810
1287303	Gate And Gate Piers At Junction Of Leiston Road And Onner's Lane	II	644023	265523
1287529	Theberton Hall	II	643310	266180
1287533	The Lion Public House	II	643764	265824
1377243	Laurel Farmhouse	II	638505	266868
1377245	Farm Buildings 30 Metres East Of Valley Farmhouse, Annesons Corner	II	642780	266838

## Appendix 6: Designated Heritage Assets table of Route W (South) with 375m buffer

### Scheduled Monuments

List Entry	Name	Easting	Northing
1014520	Leiston Abbey (Second Site)	644457	264189

### Listed Buildings

List Entry	Name	Grade	Easting	Northing
1215753	St Mary's Abbey	I	644521	264174
1215754	Retreat House	II	644468	264172
1216275	Fisher's Farmhouse	II	643539	263680
1227752	Wood Farmhouse	II	643691	263044
1231296	Hill Farmhouse	II	639802	261758
1258312	Garden Cottage	II	638605	261827
1287646	Leiston House Farmhouse	II*	642829	262928



## Appendix 7: Designated Heritage Assets table of Route W (North) with 375m buffer

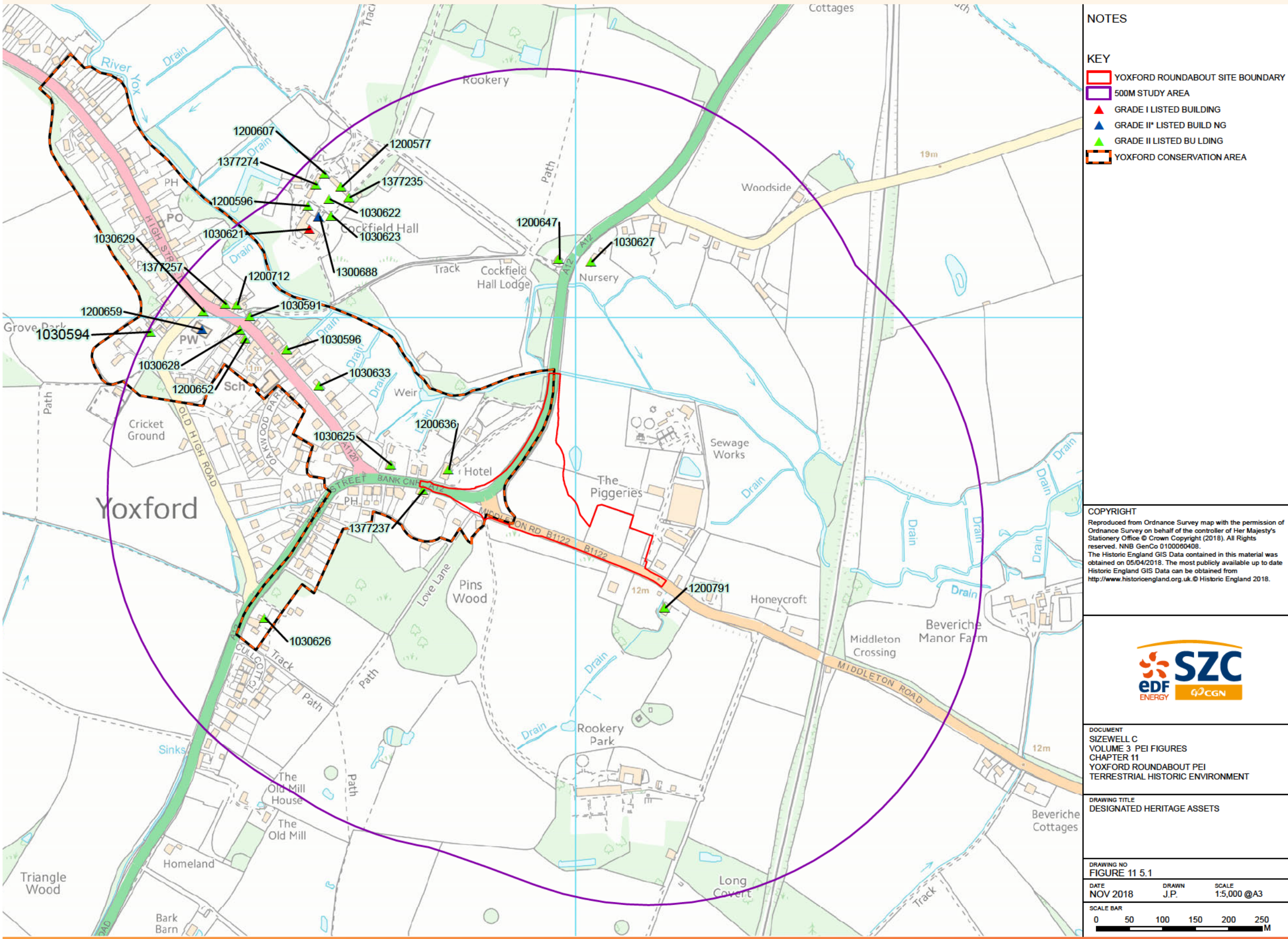
### Listed Buildings

List Entry	Name	Grade	Easting	Northing
1227893	Westhouse Farmhouse	II	641723	263402
1228268	Theberton House Stables	II	644550	265161
1228269	Gateway 45 Metres North Of Main Entrance To Theberton House	II	644526	265146
1228378	Theberton House	II*	644524	265111
1231296	Hill Farmhouse	II	639802	261758
1258312	Garden Cottage	II	638605	261827
1287235	Walls Enclosing Garden 60 Metres To North Of Theberton House And Greenhouse At North End	II	644511	265184
1287237	Gate And Gate Piers 105 Metres South East Of Main Entrance To Theberton House	II	644567	265011
1287260	Gate And Gate Piers 80 Metres North West Of Main Entrance To Theberton House	II	644432	265129

## Appendix 8: Designated Heritage Assets Map (Yoxford Roundabout)

Map showing the Designated Heritage Assets lying within 500m of the proposed Yoxford Roundabout (EDF Energy 2019 Vol. 3, p. 135, fig. 11.5.1).

Figure 11.5.1 Designated heritage assets





## TECHNICAL NOTE

**Date:** 14<sup>th</sup> May 2021

**File Ref:** AF/VL/P20-2187/02TN Rev A

**Subject:** Sizewell Link Road (SLR) Route Z and Route W Comparison

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### 1.0 INTRODUCTION

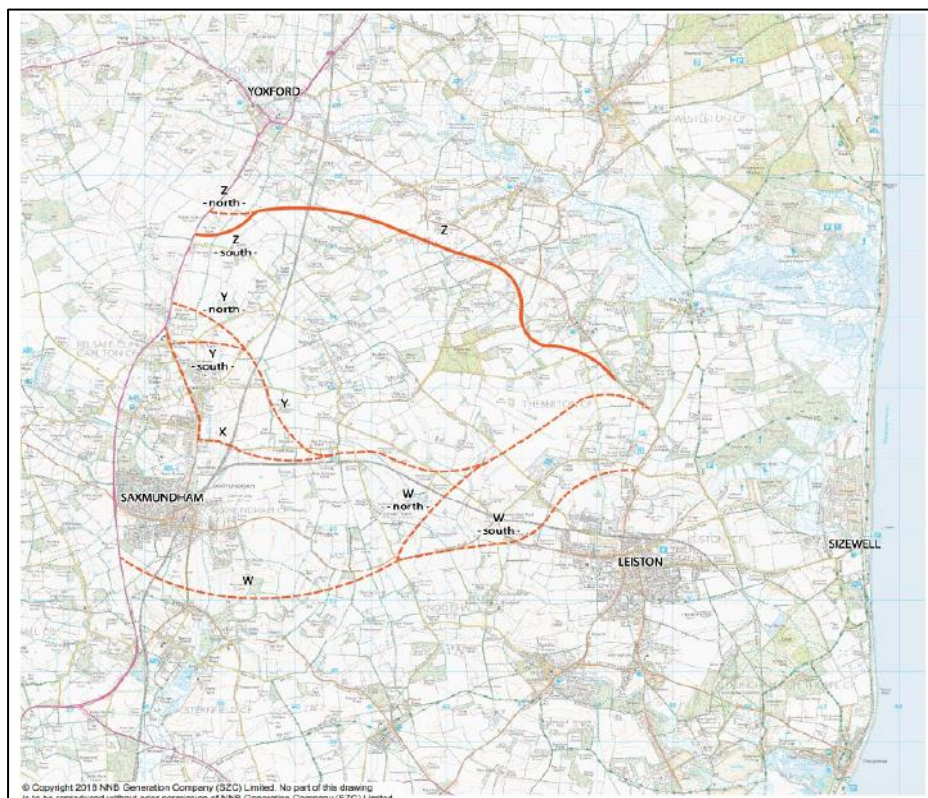
- 1.1 Create Consulting Engineers Ltd have been instructed by the Middleton and Theberton Landowners (MTL) to provide a comparison of impacts and benefits of the proposed Route Z (Sizewell Link Road or SLR) and Route W, following discussion with Thérèse Coffey, Secretary of State for Work and Pensions & MP for Suffolk Coastal.
- 1.2 This report focuses on the route choice from a transport planning viewpoint. It notes that a number of other elements have contributed to the selection of the proposed route, such as Landscape, Heritage, Noise and Air Quality. However, these are for others to comment on.
- 1.3 MTL is a consortium of farmers and landowners operating along the suggested alignment of Route Z and in the surrounding area. It should be noted that some of these land owners have land affected by both route options.
- 1.4 This Technical Note sets out the high-level review of Route Z and Route W outlining the benefits of each scheme and any shortcomings in EDF's decision making process when selecting the SLR as their preferred option.
- 1.5 The proposed alignment of Route Z is shown in Figure 1.





**Figure 1: Proposed alignment of Route Z**

- 1.6 This Technical Note looks specifically at the SLR (shown in Figure 2 below, as Route Z) and Route W (shown in Figure 2 below, as Route W North).



**Figure 2: Route Options**

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## **2.0 FINANCIAL COMPARISON**

- 2.1 This section of the Technical Note compares the estimated costs of both route options using figures provided in EDF planning documents.
- 2.2 EDF have stated that cost was not a driver in their decision to adopt Route Z as their preferred option. However, in the April 2019 AECOM Report ‘Peer Review of Option Selection for Sizewell Link Road’, cost is identified as one of the key selection criteria in considering the route options. As such, MTL find EDF’s statement that cost is not a factor to be disingenuous.
- 2.3 The 2019 AECOM report, estimates the cost of Route W to be £55m and Route Z to have a cost of £46m.
- 2.4 It has been made clear to EDF that the local highway authority Suffolk County Council do not want to adopt the proposed SLR post construction of Sizewell C. Therefore, in addition to the £46m cost to construct the SLR, an additional cost to remove Route Z should be budgeted.
- 2.5 The removal of the SLR post construction of Sizewell C would cost between £10-15m. Therefore, bringing a total cost in excess of that of Route W, whilst providing zero legacy benefits to the region in regard to highways infrastructure.

### 3.0 LEGACY BENEFITS

3.1 The following section reviews the anticipated legacy benefits of both route options.

#### Route Z

3.2 Route Z has very few quantifiable legacy benefits to the area post the construction phase of Sizewell C and severs communities and their access to local towns and infrastructure.

3.3 The sole legacy benefit provided in the 2019 AECOM report is that the route will provide relief to Yoxford, Middleton Moor and Theberton during outages. An Outage is the shutdown of a generating unit, transmission line, or other facility for scheduled inspection, maintenance, or refuelling.

3.4 This reason alone is not substantial enough to warrant the retention of Route Z post construction. The existing highway network is more than capable of accommodating Sizewell traffic during outages without Route Z. Outages have previously been accommodated on the existing highways network for the existing power stations and would continue to be in the event Route Z is not constructed.

3.5 It should also be noted that Route W would also provide relief to Middleton Moor and Theberton during outages.

3.6 The alignment of Route Z runs effectively parallel to the existing B1122, therefore providing no legacy benefit in terms of connecting settlements that isn't already achieved by the B1122. In real terms the Route Z design would only sever local communities.

3.7 The B1122 would operate well within design capacity during the operational phase of Sizewell C and does not have any significant safety issues along its route between the A12 at Yoxford and Leiston.

3.8 Therefore, there is no justification for the retention of the Route Z post construction of Sizewell C.

#### Route W

3.9 Route W provides significantly more tangible legacy benefits in comparison to Route Z. Suffolk County Council has stated that it would prefer Route W for this reason.

3.10 Route W would be of true value to the local communities providing a much-needed improved route between the A12, Leiston, Friston, Aldringham, and Thorpeness. The new route would also offer relief to congestion in Saxmundham, due to traffic associated with two supermarkets and new housing developments to the east of the town, which must pass through the town centre before heading south along the B1121 to the A12.

- 3.11 Route W could also provide access from the A12 to the proposed Saxmundham Garden Village development of over 800 houses to the south of Saxmundham town.
- 3.12 Route W would also provide an improved route for tourism, a large contributor to the region's economy. Therefore, boosting the local economies of surrounding settlements such as Aldringham, Thorpness and Aldeburgh.
- 3.13 The alignment of Route W would provide Scottish Power with a safer and more efficient means of access to their proposed site at Friston, an example of the benefits of shared infrastructure proposed in the Joint East Anglian MPs Response to National Grid consultation in October 2020.
- 3.14 For the reasons stated above, the legacy benefits to the local community, tourism, economy and access for Scottish Power, provided by Route W significantly outweigh those associated with Route Z.



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## 4.0 EDF ROUTE JUSTIFICATION – TRANSPORT FACTORS

- 4.1 EDF state that the assessment of alternative routes is summarised in *Volume 6 Sizewell Link Road Chapter 3 Alternatives and Design Evolution* in their DCO submission. This was then subject to the previously mentioned peer review from AECOM of April 2019 commissioned by EDF.
- 4.2 However, many of the findings in the AECOM review are felt to be inaccurate and misleading.
- 4.3 The AECOM report states that Route W does not provide mitigation to the communities of Yoxford, Middleton Moor and Theberton which are being relieved. However, it fails to make clear that these settlements would not need relief if Route W were to be adopted in place of Route Z.
- 4.4 EDF have stated that 85% of the Sizewell C freight would come from the A14 to the South and would travel north along the A12.
- 4.5 The AECOM review also states that Route Z would outperform Route W when it comes to minimising mileage. This is incorrect. With 85% of the freight travelling from the south on the A12, route mileage would be considerably less for Route W than it would for Route Z, given that Route W leaves the A12 some 5 miles south of Route Z.
- 4.6 In conclusion, from a transport standpoint Route W outperforms the Route Z on almost every metric and should be taken forward as the preferred option.

## 5.0 TECHNICAL NOTE SUMMARY

- 5.1 This Technical Note compares the benefits and disbenefits of Route Z and Route W.
- 5.2 The conclusion of this Technical Note is, from a transport standpoint, Route W outperforms the Route Z on almost every metric and as such the adoption of Route W should be reconsidered as a matter of major local importance.

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