

**Application by NNB Generation Company (SZC) Limited for an Order Granting
Development Consent for “The Sizewell C Project”**

DCO Reference: EN010012

Representation on behalf of The English Heritage Trust

June 2021

CONTENTS	PAGE NO
INTRODUCTION	2
1.0 THE SITE.....	3
The case for mitigation and the current financial sustainability of Leiston Abbey (second site)	4
2.0 THE EXAMINING AUTHORITY'S WRITTEN QUESTIONS AND REQUESTS FOR INFORMATION ..	5
<i>Part 1</i>	5
AQ.1.32	5
AI.1.28	6
AI.1.31	6
AR.1.18.....	7
AR.1.35.....	8
<i>Part 3</i>	10
Cu.1.37	10
<i>Part 4</i>	11
HE.1.4.....	11
HE.1.12.....	11
HE.1.14.....	12
HE.1.15.....	13
HE.1.23.....	13
HE.1.55.....	14
HE.1.56.....	15
HE.1.57	15
LI.1.124	16
<i>Part 5</i>	18
Cu.1.37	18
3.0 CONCLUSION	20

INTRODUCTION

English Heritage Trust (EHT) was formed in 2015 as a registered charitable company, independent of government – effectively English Heritage at that time was split into Historic England and EHT. EHT cares for over 400 buildings, monuments and sites nationally including Stonehenge, Dover Castle and Leiston Abbey. Caring for these places is the cornerstone of everything we do, and our business plan is also driven by the need to be financially independent by 2023. Carter Jonas LLP acts on behalf of the English Heritage Trust (EHT).

Key parts of Leiston Abbey affected by the proposals are within EHT's guardianship. EHT generally has overall responsibility for the main part of the site that is accessible to the public, including the conservation care and repair of the monument. Our responsibilities also include promoting public access to the site and education/understanding about it.

Some day-to-day management and care of our site is undertaken under a management agreement by our local partners Pro Corda - who also run their music school business on part of the site and their separate area to the north. Matters related to Pro Corda's business are not discussed in these representations.

EHT has produced a "Sustainable Conservation and Management Strategy" (SCMS) for Leiston Abbey second site, and this has been shared with SCZ Co. This is a costed plan to help mitigate the effects of the Sizewell C project on Leiston Abbey second site. It is expected that the necessary mitigation identified in the SCMS will be secured through financial obligation in the S106 associated with this DCO.

EHT has entered into a Statement of Common Ground with NNB Generation Company (SZC) Limited ('SZC Co.')

This response sets out some context for EHT and its responsibilities at Leiston Abbey (second site) and answers some of the Examining Authority's (ExA) Questions.

The responses to the questions at **section 2.0** are set out in the table format at supplied by the ExA.

1.0 THE SITE

- 1.1 Most of Leiston Abbey (Second site) is in the care of EHT; it is a scheduled monument and one of Suffolk's most impressive monastic ruins.
- 1.2 The site also includes four listed buildings. Three of the listed buildings – the Guesten Hall, the Barn and the Retreat House (aka Abbey House / the farmhouse) – are outside of the EHT Guardianship area. These buildings are Pro Corda's responsibility.
- 1.3 A map of the EHT guardianship area, and access arrangements, can be seen at Appendix A. This land is held under guardianship under the Heritage Acts and managed by English Heritage Trust i.e., we have responsibility for maintenance and conservation, including promoting public access and education / understanding of the site.
- 1.4 The Leiston Abbey (second site) is an English Heritage free to enter site open during daylight hours. Lying in tranquil open fields the striking ruins represent parts of the abbey church and the extensive remains of the buildings around the cloister.
- 1.5 The site tells an important story about the history of the area, which is valued by the local community with clear cultural and education benefits. Visitors are also able to gain from appreciation, education and understanding of the site. The abbey has value as a tranquil place with a religious heritage. All these elements will be affected by the harm caused by the development to the setting and historical significance of the site.
- 1.6 Leiston Abbey (second site) is considered to include some of the best surviving monastic ruins in Suffolk and is one of the most completely preserved examples of monastic ruins of this type in England.
- 1.7 The remains of the Abbey chapel and monastic buildings are of exceptional architectural, historical, and archaeological significance both in local and national terms. See: -
- 1.8 The Abbey Scheduled Monument listing: 1014520
<https://historicengland.org.uk/listing/the-list/list-entry/1014520>
- 1.9 The listed buildings:
- Grade I: St Mary's Abbey (in the EHT guardianship area): 1215753
<https://historicengland.org.uk/listing/the-list/list-entry/1215753>
 - Grade II: Retreat House (Pro Corda's responsibility): 1215754
<https://historicengland.org.uk/listing/the-list/list-entry/1215754>
 - Grade II: Barn at Abbey Farm (Pro Corda's responsibility): 1216380
<https://historicengland.org.uk/listing/the-list/list-entry/1216380>
 - Grade II: The Guesten Hall at Abbey Farm (Pro Corda's responsibility): 1268290
<https://historicengland.org.uk/listing/the-list/list-entry/1268290>

The case for mitigation and the current financial sustainability of Leiston Abbey (second site)

- 1.10 English Heritage Trust's aim is to be financially self-sustaining in the near future. As a charitable trust, EHT relies on the income generated from admission fees to its properties, membership fees and trading income from (e.g.) catering, holiday cottages and shops. We also have income from fundraising and grants. Leiston Abbey (second site) is a free to enter site which generates no income to EHT.
- 1.11 The conservation and upkeep of the Leiston Abbey (second site) for future generations is however an expensive obligation for English Heritage Trust (EHT). Despite the priority we put on care for the monuments, EHT's capital budgets are stretched nationally across the hundreds of sites that we look after. Therefore, our ability to proactively care for the Leiston Abbey site is limited despite its high historic significance. In practice our repair and maintenance funds across the country are prioritised annually according to historic significance and need.
- 1.12 In addition, the abbey monument presents unique challenges for conservation – it comprises buildings with highly vulnerable flint and rubble type masonry construction. There is a backlog of conservation and repair defects that have built up on the site over the past 100 years or so, and some past repair work carried out with the best of intentions, but without the knowledge we have now, has done more harm than good to the structure.
- 1.13 Parts of the abbey monument are currently not in good repair and for health and safety reasons are protected by Heras fencing (which of course harms the historic setting and visitor experience). Without further proactive work, parts of the site could be closed in the near future. This, together with the harm caused by the development, would have a disproportionate adverse effect on the public enjoyment, understanding, and benefit from the site.
- 1.14 The harm caused to the site by the development – as identified by SZC Co. in the Environmental Statement – therefore, has a direct effect on the visitor experience and this in turn has a direct harm on English Heritage Trust. Our core objectives, as set out in our Business Plan, are to promote public INSPIRATION from and INVOLVEMENT in the monuments in our care (sitting alongside CONSERVATION & STEWARDSHIP and FINANCIAL SUSTAINABILITY). See: -
- <https://www.english-heritage.org.uk/about-us/our-priorities/>
 - <https://www.english-heritage.org.uk/about-us/annual-reports/>
- 1.15 The harm to the historic significance and visitor experience can be offset by an improved and better resourced Sustainable Conservation and Management Strategy (SCMS) for the site. This will help ensure the site is well maintained and presented and is safe and accessible for visitors to benefit from, so that they can continue to be enjoyed for generations to come. This is the basis for the need for mitigation and compensation, as set out by EHT.

2.0 THE EXAMINING AUTHORITY'S WRITTEN QUESTIONS AND REQUESTS FOR INFORMATION

2.1 Hereunder, we respond to some of the Inspectors' questions as set out in the Examining Authority's Written Questions and Requests for information. We have sought to respond to questions directed to the EHT and some others where there is some relevance to the Leiston Abbey (second site), and/or the responsibilities and operation of EHT.

2.2 We have responded to the following questions:

- Part 1 - AQ.1.32, AI.1.28, AI.1.31, AR.1.18, AR.1.35,
- Part 3 - Cu.1.37.
- Part 4 - HE.1.4, HE.1.12, HE.1.14, HE.1.15, HE.1.23, HE.1.55, HE.1.56, HE.1.57, LI.1.124
- Part 5 - NV.1.76

2.3 We intend to be in attendance at the hearing sessions to take part in discussions and to answer any further questions that the Inspectors may have about our replies or any other information that we have supplied.

Part 1

ExQ1	Question to:	Question
AQ.1.32	The Applicant	<p>Combined Heat and Power Plant</p> <p>It is important to understand how the concerns highlighted in Q 1.17-1.24 knock on, if at all, to the assessment within the other chapters of the ES in particular, Noise and Vibration, Heritage, Landscape, Ecology, Agriculture.</p> <p>In answering the above questions, please address any knock on effects which may be relevant to these aspects of the scheme.</p>
	Response	<p>A key concern of EHT is the impact of the accommodation campus, and its likely effects upon the Leiston Abbey (second site). The proposed CHP plant is potentially a significant part of the effect on the setting of the Abbey.</p> <p>EHT has read the air quality chapters of the Environmental Statement and can see that the stack for the proposed CHP plant is some 12.8m in height as referenced in table 12.11. This is described at 12.5.3, as being an "<i>optimised stack size</i>" to manage air quality impacts. EHT has not been able to identify any part of the ES where the visual impacts of the stack are assessed. It will introduce a new physical (manmade) and industrialising feature into an otherwise entirely natural landscape setting of the abbey. This will be part of the significant impacts of the campus, and it is accepted that the stack is proposed to be a relatively narrow diameter at 0.45 m, however, it is proposed to be a permanent feature including during the operation phase. At 12.3.14, it is stated that:</p> <p><i>"...it is proposed that the campus CHP would be retained during the operational phase."</i></p>

		<p>Therefore, to help mitigate the effects of the Sizewell C project on Leiston Abbey second site, EHT is proposing a comprehensive Sustainable Conservation and Management Strategy (SCMS).</p> <p>EHT proposes that the works and projects within the SCMS provide the protection and enhancement needed. This includes advocacy for best practice site maintenance and care, conservation, improving understanding of the site, enhancing the visitor experience, and promoting local community participation. This will help to better reveal the significance of the Abbey site, and help protect the site for generations to come</p>
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ExQ1	Question to:	Question
AI.1.28	The Applicant	<p>Site selection for the Sizewell Link Road</p> <p>The Planning Statement, Appendix A - Site Selection Report, paragraph 7.4.14, Route W is described as “requiring engineering works to traverse the landform which would have had a significant adverse effect on the existing landscape character and there was the potential for the significant (sic) of several heritage assets to be affected adversely as a result of the route’s alignment.” Yet in Table 7.1 in comparison with Route Z, the preferred option, there is very little difference in the summary presented in that table between the two options in terms of Landscape and Heritage. Given the level of engineering operations required to traverse the landform in the design progressed the Applicant is asked to explain in more detail why the Route W options have been discounted for the reasons set out in Table 7.1?</p>
	Response	<p>EHT is concerned about the transport and traffic impacts of the Sizewell C Project. This includes harm from noise, air quality decline, and visual intrusions to the setting of the Leiston Abbey (second site) and to the visitor experience.</p> <p>EHT accepts that there is some potential mitigation embedded in the building of the SLR. The SLR route will, in part, direct traffic – and its associated impacts – away from Leiston Abbey (second site), but the overall level of traffic increase will have some effect, and also make accessing the Abbey site more difficult turning off the B1122 road, made busier by the Sizewell C Project.</p>

ExQ1	Question to:	Question
AI.1.31	The Applicant	<p>Site selection for the Sizewell Link Road</p> <p>The ES 6.7 Volume 6 Sizewell Link Road Chapter 3 Alternatives and Design Evolution, paragraph 3.2.46, states that the W route could have had an adverse effect on the setting of the existing heritage</p>

		assets including Hurts Hall and Leiston Abbey as they are situated approximately 450m north and 300m north of Route W respectively. Please provide further details of those heritage impacts and the landscape impacts and explain why they could not have been satisfactorily mitigated?
	Response	<p>EHT is concerned about the transport and traffic impacts of the Sizewell C Project.</p> <p>EHT is concerned about the transport and traffic impacts of the Sizewell C Project. This includes harm from noise, air quality decline, and visual intrusions to the setting of the Leiston Abbey (second site) and to the visitor experience.</p> <p>EHT accepts that there is some potential mitigation embedded in the building of the SLR. The SLR route will, in part, direct traffic – and its associated impacts – away from Leiston Abbey (second site), but the overall level of traffic increase will have some effect, and also make accessing the Abbey site more difficult turning off the B1122 road, made busier by the Sizewell C Project.</p> <p>Appropriate financial contributions, through the S106 agreement, for EHT can help to offset the harms caused by traffic impacts to the the abbey site, and challenges presented by making accesss for vistors more difficult, by improving the visitor experience in many ways. This will, in turn, help visitors to better understand the site, and better reveal the site’s significance.</p>

ExQ1	Question to:	Question
AR.1.18	ESC, SCC, English Heritage	<p>Leiston Abbey</p> <p>The Applicant concludes that the effects of construction and operation on Leiston Abbey in amenity and recreation terms would [APP-267 para 15.6.98] be significant.</p> <p>(i) Is this conclusion agreed?</p> <p>(ii) Is the assessment on potential visitor numbers during construction and subsequent operation conservative and therefore fairly predicts the significance of effect in this respect?</p>
	Response	<p>EHT agrees that the effects of construction and operation on Leiston Abbey in amenity and recreation terms would be significant.</p> <p>The level of harm has been well set out in other responses including those from Historic England, and we note that this has been assessed as such, by the applicant, in their Environmental Statement.</p> <p>There will be harm to the historical setting of the Leiston Abbey</p>

		<p>(second site) and to the visitor experience.</p> <p>The proposals will have an adverse effect on the setting and significance of the Leiston Abbey (second site) both during the construction and operation phase. Concerns centre around increased traffic, noise, the new rail route, the proximity of the construction campus, and the visual impact of the scheme and associated infrastructure.</p> <p>The current peace and tranquillity of the Leiston Abbey (second site) helps the understanding, interpretation, and visitor experience. A good visitor experience is at the heart of EHT's corporate focus, and the harm to this will affect the long-term sustainability of the site without mitigation.</p> <p>The Leiston Abbey (second site) also currently helps the local community understand the history of the area and helps with local education, and this important link will be damaged without mitigation.</p> <p>During the construction phase the proximity of the construction workers campus could also present management problems to EHT given the open nature of the Leiston Abbey (second site) - with increased visitor numbers, and the risks of anti-social behaviour and vandalism.</p>
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ExQ1	Question to:	Question
AR.1.35	English Heritage	<p>Leiston Abbey</p> <p>[APP-577] sets out a summary of project wide effects at the Abbey, do you agree with the overall conclusions?</p> <p>What effect do you consider this would have on visitors to Leiston Abbey and would you regard the effect as significant?</p>
	Response	<p>EHT is pleased to note that SZC Co. recognises the effects of the proposals on the Leiston Abbey Second Site. The scale of these effects should continue to be discussed through the DCO process. Obligations and S106 discussions continue on a 'without prejudice' basis.</p> <p>EHT's main focus for the Abbey site is to make it accessible to the general public, promote education and understanding of the site, and preserve and care for the buildings. The general visitor experience is very important here.</p> <p>EHT is concerned about the effect on the Abbey site both during the construction phase and once it is fully operational. As is discussed</p>

		<p>above, elements of the construction campus will remain once the Sizewell C Project is operational, and indeed, the power station itself and the associated traffic will cause some effects. The setting of the Abbey site, and the understanding and appreciation of it by visitors, will be harmed both in the short and long term.</p> <p>EHT is concerned about the effects on Leiston Abbey second site arising from the construction phases of the project, the proposed road and rail movements, and the proposed workers “campus.” The direct effects of these on the setting of the Abbey, and the indirect effects from increased road movements, and potentially visitor pressure will need to be carefully managed. Given the length of the construction phase for the project, EHT is also concerned about any legacy or long-lasting effects on Leiston Abbey second site. These effects will need to be managed and mitigated.</p> <p>In addition, during the operational phase given the size and scale of the development proposals, permanent changes to the local road network, and increased traffic there are concerns about the long-term effects on the site. The new power station will be visible on the horizon and the setting of the site will be harmed by the noise, smell and visibility of increased road traffic.</p> <p>To help mitigate the effects of the Sizewell C project on Leiston Abbey second site, EHT is proposing a comprehensive “Sustainable Conservation and Management Strategy” (SCMS) to provide the protection and enhancement needed. This includes advocacy for best practice site maintenance and care, conservation, improving understanding of the site, enhancing the visitor experience, and promoting local community participation. This will help to better reveal the significance of the Abbey site.</p>
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Part 3

ExQ1	Question to:	Question
Cu.1.37	The Applicant	<p>Project-wide effects</p> <p>ES Volume 10 Project-wide, Cumulative and Transboundary Effects, Chapter 3 Assessment of Project-wide Effects [APP-577] Table 3.1, identifies receptors or receptor groups where there is potential overlap of noise impacts from different elements of the project, and where two or more of the project elements could be close enough to receptors such that combined noise levels may have a significant effect. This includes Receptor 13 (Leiston Abbey, including Pro Corda music school) combined effects are therefore considered significant.</p> <p>(i) Please provide further details and the timing of the proposed bespoke assessment of impacts from the Sizewell C Project on the Pro Corda Music School at Leiston Abbey;</p> <p>(ii) Please indicate whether there has been any progress in relation to the provision of any additional mitigation requirements?</p> <p>(iii) Please explain exactly how that mitigation would be secured through planning obligations.</p>
	Response	<p>EHT is concerned about the noise effects of the Sizewell C Project on the setting and heritage significance of the Leiston Abbey (second site). EHT is not directly involved with the separate discussions with Pro Corda.</p> <p>The Abbey site has developed over the centuries as a fairly remote and tranquil location (which is why of course the Pro Corda music school also use part of the site), and any changes to this setting and feel will disproportionately affect the heritage significance, visitor experience, and understanding of the site.</p> <p>Management and mitigation from the Sizewell C project, to protect the Scheduled Monument and listed buildings, is required. EHT is pleased to note the proposed separate S106 contributions for its work (for heritage management and conservation), and for Pro Corda.</p> <p>Appropriate financial contributions, through the S106 agreement, for EHT can help to offset the harm to the site by improving the visitor experience in many ways. This will, in turn, help visitors to better understand the site, and better reveal the site's significance.</p> <p>Most critically S106 contributions would help EHT to promote and achieve a sustainable state of conservation and maintenance at the ruined site. This underpins the public's continued long-term enjoyment of the site. Day to day upkeep, security, and improved interpretation are all also important.</p>

Part 4

ExQ1	Question to:	Question
HE.1.4	The Applicant	<p>Built Heritage Repair</p> <p>Please provide a response to the statement made by ESC at paragraph 2.15 [RR-0342] that the proposed investment for built heritage repair appears very low compared to the landscape and ecology investment.</p>
	Response	<p>EHT is pleased to note that SZC Co. recognises the effects of the proposals on the Leiston Abbey Second Site. The scale of these effects and the mitigation required should continue to be discussed through the DCO process.</p> <p>Obligations and S106 discussions continue on a ‘without prejudice’ basis.</p> <p>To help mitigate the effects of the Sizewell C project on Leiston Abbey second site, EHT is proposing a comprehensive “Sustainable Conservation and Management Strategy” (SCMS) to provide the protection and enhancement needed. This includes advocacy for best practice site maintenance and care, conservation, improving understanding of the site, enhancing the visitor experience, and promoting local community participation. This will help to better reveal the significance of the Abbey site.</p> <p>Turning to the suggested:</p> <p><i>“S106 contribution to provide for enhancements to the visitor experience is therefore proposed as additional mitigation to reduce the impact to minor adverse “</i></p> <p>EHT has shared its SCMS for Leiston Abbey second site with SCZ Co. and suggests that this is used as the basis for agreeing the necessary financial contribution that could be capable of reducing the scale of effects upon the scheduled monument and the associated listed buildings.</p>

ExQ1	Question to:	Question
HE.1.12	ESC, SCCAS, Historic England, English Heritage	<p>Direct Effects on Heritage Assets – Construction</p> <p>Paragraph 16.6.55 [APP-272] notes that groundworks associated with the construction of the accommodation campus, roundabout and site entrance of the MDS has the possibility of potentially harming buried archaeological remains associated with the Leiston Abbey assets (LB 121573, LB 1215754, LB 1216380 and LB 1268290). Please comment as to whether such assets comprise</p>

		relatively minor and peripheral elements of the monastic landholding? Would harm to such designated assets discernibly affect the informative potential of them?
	Response	<p>EHT does not have significant comments to make on this matter and defers the technical response to Historic England.</p> <p>However, as part of the strategies to evaluate the archaeological value, and potential value, of the land around Leiston Abbey, and the surveys pre-commencement, EHT would appreciate a record of any significant finds related to the abbey. This would aid in the understanding of Leiston Abbey, and the surrounding contemporary communities. In turn, this would help to better reveal the significance of the abbey site.</p>

ExQ1	Question to:	Question
HE.1.14	The Applicant	<p>Leiston Abbey Asset Group (SM 1014520, LB 1215753, LB1215754, LB 1216380 and LB 1268290)</p> <p>Paragraphs 16.6.45 to 16.6.61 [APP-272] sets out the assessment of construction effects on the setting of the Leiston Abbey assets. It is acknowledged that changes to setting would occur given the proposed length of construction, visibility of at-height construction, noise levels and visibility of construction infrastructure for visitors travelling by road from both the north and south.</p> <p>It is identified at paragraph 16.6.50 [APP-272] that the construction features experienced would diminish the contribution of the setting to the heritage significance of the asset group. Given the presence of these new features, please explain how the retention of arable land between the asset group and the B1122 (Abbey Road) would serve to maintain a strong perceptual buffer between the proposed development and the asset group (paragraph 16.6.49)?</p>
	Response	<p>EHT considers the impact on the setting of the Leiston Abbey (second site) to be significant , both during the construction phase and the operational phase of the Sizewell C Project.</p> <p>Leiston Abbey can be described as a scenic and rural site of considerable natural beauty. Indeed, the rural character and context of the site, abutting open fields, makes a marked contribution to the special heritage interest, setting and historic significance of the site. Additionally, the survival of nationally significant monastic ruins such as Leiston makes a significant contribution to the unique cultural character of the wider East Anglian Landscape.</p> <p>Leiston Abbey's un-compromised rural setting also serves to positively enrich the visitor experience. Through providing both a peaceful culturally stimulating place where the story of the Abbey can be appreciated, and through offering a valuable relaxing retreat</p>

		<p>destination away from the hustle and busy of daily life.</p> <p>Promoting a Sustainable Conservation and Management Strategy that supports the conservation and optimisation of the site's unique character is therefore an important objective for English Heritage. Alongside which positive advocacy for the conservation of the site's wider landscape setting will also be central to sustaining Leiston's unique heritage values and significance for future generations.</p>
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ExQ1	Question to:	Question
HE.1.15	The Applicant, English Heritage	<p>Leiston Abbey Second Site – Sustainable Conservation and Management Plan</p> <p>Please provide detail and a progress update on the proposed Sustainable Conservation and Management Plan.</p> <p>To the Applicant - Is the plan to be included as mitigation? If so, how is this to be secured?</p>
	Response	<p>EHT has provided the latest version of the "Sustainable Conservation and Management Strategy" (SCMS) to the applicant. This is a costed plan to help mitigate the effects of the Sizewell C project on Leiston Abbey second site</p> <p>EHT proposes that the works and projects within the SCMS provide the protection and enhancement needed. This includes advocacy for best practice site maintenance and care, conservation, improving understanding of the site, enhancing the visitor experience, and promoting local community participation.</p> <p>The mitigation in the SCMS will predominantly be delivered by EHT (and its contractors), but the funding for it will substantially be secured by S106 obligations.</p> <p>The full scale of these effects and the mitigation required should continue to be discussed through the DCO process.</p> <p>Obligations and S106 discussions continue on a 'without prejudice' basis.</p> <p>This will help to better reveal the significance of the Abbey site, and help protect the site for generations to come.</p>

ExQ1	Question to:	Question
HE.1.23	ESC, SCCAS, Historic England, English	<p>Mitigation</p> <p>Alongside of the proposed site-specific WSI and Peat Strategy, is any further mitigation necessary in relation terrestrial heritage</p>

	Heritage	effects at the MDS? If necessary, how do you consider such measures should be secured?
	Response	<p>EHT is concerned about the impact and harm of the MDS on the Leiston Abbey (second site). It is agreed that the impacts are less than substantial but will nevertheless be significant in places. EHT accepts that some embedded mitigation (primarily landscaping and tree buffers) in the Sizewell C Project will reduce the effects. EHT has also proposed a Sustainable Conservation and Management Strategy (SCMS) as mitigation, and this has been shared with SCZ Co. The mitigation in the SCMS will predominantly be delivered by EHT (and its contractors), but the funding for it will be secured by S106 obligations.</p> <p>The full scale of these effects and the mitigation required should continue to be discussed through the DCO process.</p> <p>Obligations and S106 discussions continue on a 'without prejudice' basis.</p>

ExQ1	Question to:	Question
HE.1.55	The Applicant	<p>Change to the Setting of Archaeological Heritage Assets – Abbey Complex</p> <p>Paragraph 9.6.14 [APP-560] confirms that the perception of construction works to the south of the Abbey complex would result in a discernible loss of historic interest. Please confirm the significance of this effect.</p>
	Response	<p>EHT accepts that the effects are less than substantial but are nonetheless significant.</p> <p>To help mitigate the effects of the Sizewell C project on Leiston Abbey second site, EHT is proposing a comprehensive Sustainable Conservation and Management Strategy (SCMS).</p> <p>EHT proposes that the works and projects within the SCMS provide the protection and enhancement needed. This includes advocacy for best practice site maintenance and care, conservation, improving understanding of the site, enhancing the visitor experience, and promoting local community participation. This will help to better reveal the significance of the Abbey site, and help protect the site for generations to come</p>

ExQ1	Question to:	Question
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HE.1.56	The Applicant	<p>Increased Frequency of Freight Train Movements (Change 1) – Abbey Ruins</p> <p>Paragraph 9.6.32 [APP-560] states that the limited number of rail movements means that perceptibility of rail operations would be intermittent and infrequent and would not significantly affect that ability to understand or appreciate the assets interests. Please signpost to where consideration on significance of effect of Change 1 in relation to the setting of the Abbey ruins is located.</p>
	Response	<p>EHT has significant concerns about the impacts of the proposed rail movements and the proximity of the Green Rail Route to the Leiston Abbey (second site).</p> <p>EHT concerns are detailed in response to other questions hereunder and well covered in the responses from Historic England. The effects are to the visual setting of the abbey site, from noise intrusion, and also in the ability to access the site – in a sustainable manner – on foot, from Leiston.</p> <p>EHT are also concerned about the risks of the Green Rail Route being in place for longer than the current proposed period, due to any unforeseen reasons e.g., construction delays.</p>

ExQ1	Question to:	Question
HE.1.57	ESC, SCCAS, Historic England, English Heritage, Pro Corda Trust/Leiston Abbey	<p>Mitigation</p> <p>Alongside of the proposed site-specific WSI and Heritage s106 agreement to provide for enhancements to the visitor experience for the two Leiston Abbey sites, is any further mitigation considered necessary in relation terrestrial heritage effects? If necessary, how do you consider such measures should be secured?</p>
	Response	<p>To help mitigate the effects of the Sizewell C project on Leiston Abbey second site, EHT is proposing a comprehensive Sustainable Conservation and Management Strategy (SCMS).</p> <p>EHT proposes that the works and projects within the SCMS provide the protection and enhancement needed. This includes advocacy for best practice site maintenance and care, conservation, improving understanding of the site, enhancing the visitor experience, and promoting local community participation. This will help to better reveal the significance of the Abbey site, and help protect the site for generations to come</p> <p>Obligations and S106 discussions continue on a ‘without prejudice’ basis, but EHT would expect to see direct links between conditions of the DCO and the S106 when drafted, and the</p>

		SCMS.
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ExQ1	Question to:	Question
LI.1.124	Pro-Corda/Leiston Abbey, English Heritage	Design – Leiston Abbey Does the design of the rail extension route effectively minimise the visibility of the route from Leiston Abbey?
	Response	<p>EHT is concerned that the setting of the Abbey site will be compromised by the construction of the rail extension.</p> <p>The view of the Abbey site through the hedge row on Abbey Lane is iconic. This approach to the Abbey site needs to be conserved as far as possible. EHT do not wish to see any ‘normalising’ of the effects of the rail extension that would allow for permanent changes to setting of the Abbey site.</p> <p>Moreover, the mitigation for the rail must also include improvements to the interpretation and understanding of the Abbey site as visitors approach it from the south. This will help to offset the circuitous Public Right of Way (PROW) redirection that is proposed. EHT is concerned that access to the Abbey site will be directly affected by the closure of PROW E363/006/0 for the construction phase. A diversion is provided which heads east / crosses the railway / heads back west to re-join the current alignment.</p> <p>EHT is pleased to note the following DCO requirement:</p> <p><u><i>Associated development sites: Removal and reinstatement</i></u></p> <p><i>(1) Within 12 months of the completion of the SZC construction works, Work No. 9 (northern park and ride including highway works), Work No. 10(a) (southern park and ride), Work No. 13(a) (freight management facility), Work No. 4B (green rail route), and Work No. 4D (rail spur) must be demolished.</i></p> <p><i>(2) All materials resulting from the demolition of the above Works must be removed from the relevant site, and the land restored to a condition suitable for agricultural use.</i></p> <p>EHT are also concerned about the risks of the Green Rail Route being in place for longer than the current proposed period, due to any unforeseen reasons eg construction delays.</p> <p>To help mitigate the effects of the Sizewell C project on Leiston</p>

		<p>Abbey second site, EHT is proposing a comprehensive Sustainable Conservation and Management Strategy (SCMS).</p> <p>EHT proposes that the works and projects within the SCMS provide the protection and enhancement needed. This includes advocacy for best practice site maintenance and care, conservation, improving understanding of the site, enhancing the visitor experience, and promoting local community participation. This will help to better reveal the significance of the Abbey site, and help protect the site for generations to come</p>
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Part 5

ExQ1	Question to:	Question
Cu.1.37	The Applicant	<p>Project-wide effects</p> <p>ES Volume 10 Project-wide, Cumulative and Transboundary Effects, Chapter 3 Assessment of Project-wide Effects [APP-577] Table 3.1, identifies receptors or receptor groups where there is potential overlap of noise impacts from different elements of the project, and where two or more of the project elements could be close enough to receptors such that combined noise levels may have a significant effect. This includes Receptor 13 (Leiston Abbey, including Pro Corda music school) combined effects are therefore considered significant.</p> <p>(i) Please provide further details and the timing of the proposed bespoke assessment of impacts from the Sizewell C Project on the Pro Corda Music School at Leiston Abbey;</p> <p>(ii) Please indicate whether there has been any progress in relation to the provision of any additional mitigation requirements?</p> <p>(iii) Please explain exactly how that mitigation would be secured through planning obligations.</p>
	Response	<p>EHT is concerned about the noise effects of the Sizewell C Project on the setting and heritage significance of the Leiston Abbey (second site).</p> <p>The Abbey site has developed over the centuries as a fairly remote and tranquil location (which is why of course the Pro Corda music school also use part of the site), and any changes to this setting and feel will disproportionately affect the heritage significance, visitor experience, and understanding of the site.</p> <p>EHT is not directly involved in the separate discussions with ProCorda on the potential effects on their business.</p> <p>To help mitigate the effects of the Sizewell C project on Leiston Abbey second site, EHT is proposing a comprehensive Sustainable Conservation and Management Strategy (SCMS).</p> <p>EHT proposes that the works and projects within the SCMS provide the protection and enhancement needed. This includes advocacy for best practice site maintenance and care, conservation, improving understanding of the site, enhancing the visitor experience, and promoting local community participation. This will help to better reveal the significance of the Abbey site, and help protect the site for generations to come</p>

		<p>Appropriate financial contributions, through the S106 agreement, for EHT can help to offset the harm to the site by improving the visitor experience in many ways. This will, in turn, help visitors to better understand the site, and better reveal the site's significance.</p> <p>Most critically S106 contributions would help EHT to promote and achieve a sustainable state of conservation and maintenance at the ruined site. This underpins the public's continued long-term enjoyment of the site. Day to day upkeep, security, and improved interpretation are all also important.</p>
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3.0 CONCLUSION

- 3.1 The National Policy Statement for Nuclear Power Generation (EN-6), identifies the following, when specifically considering Sizewell C:

C.8.76 The Appraisal of Sustainability has also identified potential for adverse impacts on the setting of Scheduled Monuments, Conservation Areas and Listed Buildings in the area. These impacts could arise depending on the distance and sight lines from any potential new nuclear power station, and the mitigation that may be applied.

C.8.82 This could have an effect on the purpose of the designation. To further understand these effects and the effectiveness of the mitigating actions proposed by the nominator of the site, further detailed assessment at project level is required – the Appraisal of Sustainability suggests through the provision an integrated landscape, heritage and architectural plan.

- 3.2 The Overarching National Policy Statement for Energy (EN-1), includes guidance for considering the impact of proposed development on heritage assets. This consideration covers not only the inherent educational and cultural value of heritage assets, but also their economic and viability value in supporting tourism, and in their preservation and continued feasibility. The following excerpts from EN-1 are most relevant here:

5.8.1 The construction, operation and decommissioning of energy infrastructure has the potential to result in adverse impacts on the historic environment.

5.8.12 In considering the impact of a proposed development on any heritage assets, the [decision maker] 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.

5.8.13 The [decision maker] 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

5.8.14 There should be a presumption in favour of the conservation of designated heritage assets ... Once lost heritage assets cannot be replaced and their loss has a cultural, environmental, economic and social impact. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting...

- 3.3 At this point NPS EN-1 includes statements that are very similar to those in the National Planning Policy Framework (NPPF), in that if identified harms to heritage assets are substantial then the decision maker should consider refusing consent. Whilst the NPPF is not the primary legislative document in this case it is also worth considering what is said there at paragraph 193, which states that:

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.

3.4 EHT considers that the effects on the Leiston Abbey (second site) will be less than substantial but nonetheless still significant. This, SCZ Co. has agreed through its Environmental Statement, and is part of our Statement of Common Ground with them.

3.5 This being the case, consideration must turn to the harms and the need for mitigation or compensation through conditions, or obligations, as set out in NPS EN-1 as follows:

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.

5.8.17 Where loss of significance of any heritage asset is justified on the merits of the new development, the [decision maker] should consider imposing a condition on the consent or requiring the applicant to enter into an obligation that will prevent the loss occurring until it is reasonably certain that the relevant part of the development is to proceed.

5.8.18 When considering applications for development affecting the setting of a designated heritage asset, the [decision maker] 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.

3.6 The NPPF (para. 196), also states:

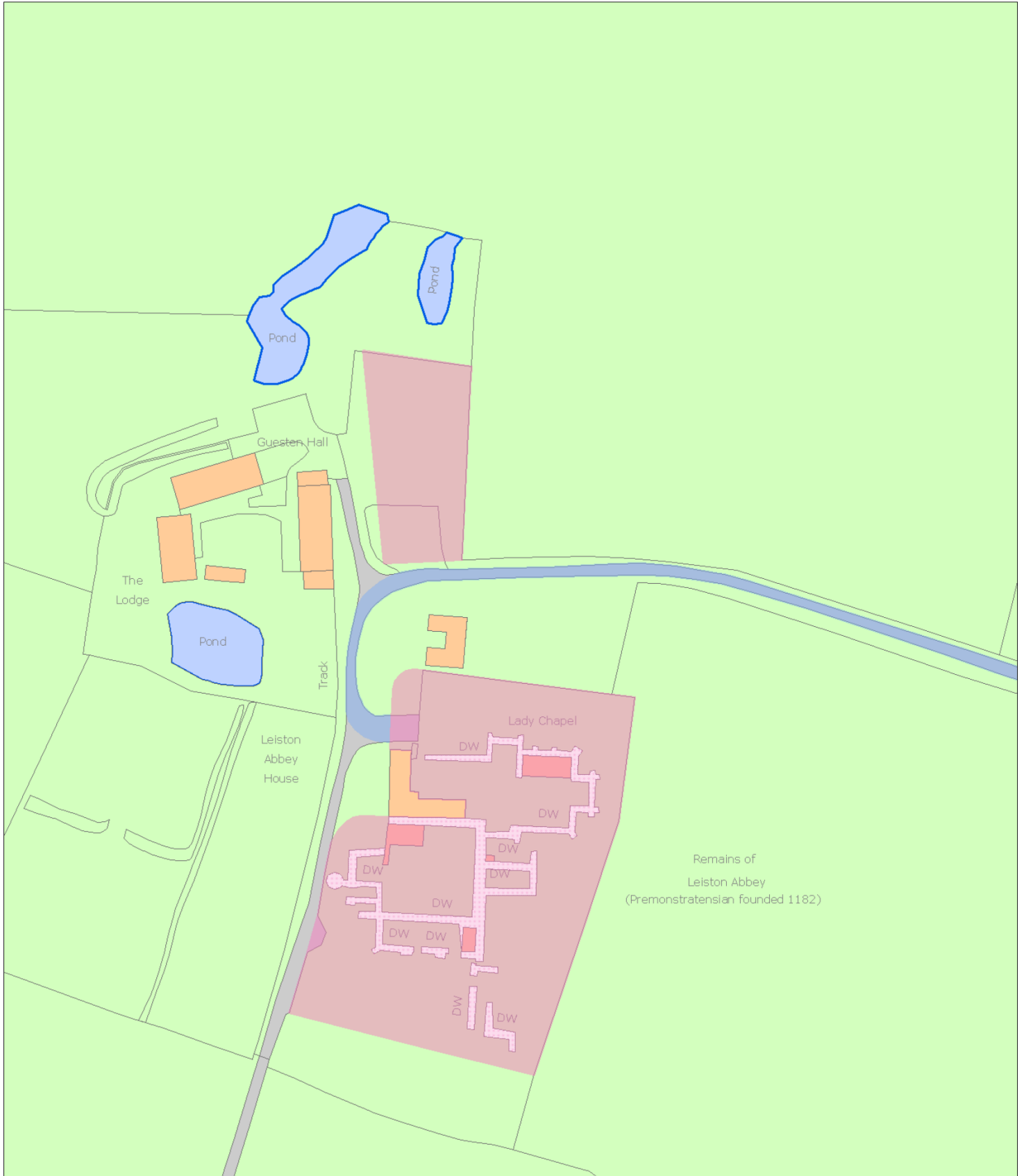
Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

3.7 It is agreed common ground that there will be harm to the Leiston Abbey second site, and mitigation is required. The proposed mitigation which is part of the scheme will go some way to mitigate the effect of the Sizewell C Project, but improvements to interpretation and access at the Abbey Site will help to off-set the harms.

3.8 EHT has considered the impacts of the Sizewell C Project and has produced a “Sustainable Conservation and Management Strategy” (SCMS) for Leiston Abbey second site. The SCMS has been shared with SCZ Co. This is a costed plan to help mitigate the effects of the Sizewell C project on Leiston Abbey second site. It is expected that the necessary mitigation identified in the SCMS will be secured through financial obligation in the S106 associated with this DCO.

APPENDIX A: GUARDIANSHIP AND ACCESS PLAN

Guardianship and access



Map Scale 1:1,526

Map Centre 644497,264232

Date

30/11/2016



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