



Historic England

**PLANNING ACT 2008 (AS AMENDED) – SECTION 88 AND THE  
INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES 2010 (AS  
AMENDED) - RULE 6**

**REPRESENTATIONS OF THE HISTORIC BUILDINGS AND MONUMENTS  
COMMISSION FOR ENGLAND (HISTORIC ENGLAND)**

**APPLICATION BY NNB GENERATION COMPANY (SZC)  
LIMITED**

**FOR AN ORDER GRANTING DEVELOPMENT CONSENT FOR THE SIZEWELL C  
PROJECT, SUFFOLK**

**APPLICATION REF: EN010012**

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## Summary

As set out in our relevant representation our comment is focused in a number of specific areas.

## Onshore Historic Environment

We note the applicant has provided a full Environmental Statement which includes a detailed historic environment chapter (Chapter 16 Vol 2).

Our primary consideration is the impact of the main development site (platform and reactors) upon the significance of two designated heritage assets known as the Leiston Abbey First and Second Sites. The first site is the initial foundation of a community of Premonstratensian monks in the marshes to the north of Sizewell, and the second the ruins of the re-located priory to the west of the development. This is known to have some of the finest surviving architectural ruins in the County and publicly accessible.

We have previously raised concerns about impacts on the significance of these assets during the construction phase and with regards to the residual impact of the proposal during the operational lifetime of the development.

The proposal also includes new rail infrastructure, which was previously known as the 'Green' rail route. This would be very close to Leiston Abbey (Second site), and we have raised concerns about the impact of this proposal on the significance of the abbey in all our previous consultation responses.

We are also aware the development will result in a range of potentially significant impacts on a number of other designated and non-designated heritage assets, particular in relation to the link road, the two-village bypass, park and ride and freight management facilities and the new Yoxford roundabout.

## Marine Historic environment

Chapter 23 of Volume 2 of the ES presents the assessment of potential effects of the proposed development on the marine historic environment. There are no designated heritage assets present in the offshore works area, and the potential for a significant effect on the marine historic environment is considered by the applicant to be low. However, there are a range of known heritage assets in the area surrounding the offshore works area and in the intertidal zone, the potential impact upon the marine historic environment will be considered.



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## Non-designated archaeology assets within in the Development Area and Peat Strategy

Archaeological investigations within the redline boundaries have identified extensive archaeological remains and surviving pre-historic peat deposits. We consider there is the potential for significant effects, and we will therefore be considering the proposed Archaeological (see Volume 2, Appendix 16H) and Peat Strategies (Volume 2, Appendix 16G) in more detail.



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## 1. INTRODUCTION

- 1.1. The Historic Buildings and Monuments Commission for England (HBMCE), is better known as Historic England, and we are the Government's adviser on all aspects of the historic environment in England - including historic buildings and areas, archaeology and historic landscape. We have a duty to promote conservation, public understanding and enjoyment of the historic environment. HBMCE are an executive Non-Departmental public body and we answer to Parliament through the Secretary of State for Digital Culture, Media and Sport.
- 1.2. In addition to our remit for the conservation of the historic environment the National Heritage Act (2002) gave HBMCE responsibility for maritime archaeology in the English area of the UK Territorial Sea.
- 1.3. In relation section 88 of the Planning Act 2008 (as amended) and the infrastructure planning (examination procedure) rules 2010 (as amended) we are a statutory consultee with responsibilities within the terrestrial landscape.
- 1.4. Our primary remit in relation to this application is to advise on the impact of the proposed development on grade I and II\* listed buildings, registered parks and gardens and on scheduled monuments. We would not wish to comment on grade II listed buildings (unless their demolition is proposed) or individual undesignated heritage assets as these are outside the remit of Historic England. We are content to defer to the Local Planning Authority and their specialist heritage advisors. In particular, the Conservation Team at East Suffolk Council and Suffolk County Councils Archaeology Service. We refer the examining authority to their submissions as relevant.
- 1.5. As we have previously stated Historic England recognises that the construction of the proposed power station is likely to be able to demonstrate considerable public benefit. We also consider that the proposal has the potential to have an effect on both designated and non-designated heritage assets. The level of impact is likely to change through the life of the project and will vary in relation to the nature of the heritage receptors and the nature of the impact.
- 1.6. There will be direct impacts upon designated and non-designated heritage assets during the construction phase, and we consider that the scheme will result in some permanent and residual harm to the significance of a number of designated heritage assets.
- 1.7. We note the applicant has provided a full Environmental Statement which includes a series of detailed historic environment chapters (e.g. Volume 2



Chapter 16). We have reviewed the documents and our detailed comments are provided below.

- 1.8. Our primary consideration is the impact of the main development site (platform and reactors) upon the significance of two designated heritage assets known as the Leiston Abbey First and Second Sites. We are also aware the development will result in a range of potentially significant impacts on a number of other designated and non-designated heritage assets, particular in relation to the Marine environment, link road, the two-village bypass, park and ride and freight management facility and the Yoxford roundabout. Further comments are also provided on these matters below
- 1.9. We also confirm that we have provided any further detailed comment on the baseline assessment, screening and scoping stages, archaeological evaluation or the relocation of the Sizewell B facilities. These matters have been considered in previous correspondence with the applicant and many matters have been previously agreed. We broadly support the approach to archaeological investigation, and mitigation that has been carried out to date in relation to that project.

## 2. COMMENTS IN RELATION TO THE ENVIRONMENTAL STATEMENT (TERRESTRIAL)

### Main Development Site - Terrestrial Historic Environment (Book 6: Volume 2 Chapter 16)

- 2.1 As set out above our primary consideration is the impact of the main development site (platform and reactors) upon the significance of two designated heritage assets known as the Leiston Abbey First and Second Sites.
- 2.2 As set out in the ES we are aware that the likely impact of the development and the nature of that impact is likely to change over time, and as the project develops. There are multiple elements of the development that have the potential to affect heritage asset. We have therefore considered the construction and operation phase of the main development itself as set out in the Environmental Statement with regards to the historic environment (Vol 2, Chapter 16), and then additional elements of things like screening, the landscaping and visual assessment (Vol 2, Chapter 13).
- 2.3 We have also considered the Marine Historic Environment (Vol 2, Chapter 23) and the flood risk mitigation ponds to the west of the main development site in relation to Leiston Abbey 1<sup>st</sup> site as shown on the Flood Risk Assessment Report (see Book 5, Chapter 5.2 Figure 3).



**Significance of Leiston Abby (1st site)**

- 2.4 This is the original site of Leiston Abbey '*Leiston Abbey (first site) with later chapel and pill box*' (List Entry Number: 1015687), more widely known as Leiston 1<sup>st</sup> site. It consists of the well preserved archaeological remain of a Premonstratensian monastery that was founded on this part of the coast in c. AD1182. The site was chosen by the canons who followed the Augustinian order and favoured this isolated coastal location. The site itself on low-lying land, the community suffered badly during the Black Death and the site was prone to flooding. It was from here that the community was moved in AD1363 to a new site situated some 3km to the south west, now known as Leiston 2nd site
- 2.5 Although the abbey was demolished and much of the stone transported and reused at the 2<sup>nd</sup> site, the land remained in use as a monastic cell of Leiston Abbey, until AD1537, and a chapel was erected on the site of the former Abbey. The chapel remained as a ruin until the 2<sup>nd</sup> World War, when a Pillbox was built inside the chapel as disguise and camouflage. Although not separately listed the chapel and the pill box form part of the scheduled monument and demonstrate additional historic values and provide a sense of continuity.
- 2.6 The scheduled monument represents the extent of the former abbey site and is known to contain extensive and well-preserved archaeological deposits. Recent archaeological excavations have highlighted that rich archaeological deposits survive here and illustrate the historic, evidential and communal values of the asset. It therefore demonstrates high significance.
- 2.7 This is a designated heritage asset and is a highly valued and significant scheduled monument. It is primarily an isolated rural archaeological site that dates to the early Norman period and situated with the marshes to the north of the development area.
- 2.8 It is now located within the Minsmere nature reserve, is well managed with signage and interpretation and is open to the public from local footpaths and from the reserve.
- 2.9 Located only 250 m from the coast, the site is notable for and derives considerable value from its panoramic views and from this tranquil, and isolated location. The role of location, views and how that also helps to generate and 'experience' and tell the story of the site arguably contributes much to the significance of the asset. In our view this significance is greatly enhanced by the location and these views.

**Impact**

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- 2.10 As set out above this is a designated heritage asset with high overall significance and heritage values. Our analysis suggests this site draws considerable significance from its setting. This includes views to, and from this asset, and the quiet rural location in which it is found and can be experienced. What is distinctive about this site is that part of its setting and therefore significance is clearly related to this diverse and characterful location.
- 2.11 We are very conscious that at present there is clear visibility from the scheduled monument south to the Sizewell estate, where the existing reactors buildings and turbine halls can very clearly be seen (see Volume 2 Chapter 13 Appendix A Illustrative viewpoints 11 and 12). There is therefore visual relationship between the Sizewell estate and the location of the scheduled monument.
- 2.12 There are two elements of the new development that we consider would result in a significant effect. This is the construction and then the operation of the new power station.
- 2.13 Of these, the construction is likely to have the most effect as this will cause an erosion of the visual setting of the scheduled monument, particularly through the movement of cranes, and the noise associated with a large-scale development. We are conscious this is considered to be a 'temporary' effect; however, the scale and longevity of the development phase is a considerable cause for concern. This means the visual disruption and noise caused by the construction will be present at the Leiston Abby 1st site for up to 10 years. Although small in the overall lifetime of archaeological site it is hardly a temporary effect.
- 2.14 The second element would be the residual effect of the new development. It will be a large and therefore very visible from the monument itself.
- 2.15 We are therefore concerned that the new development would have a detrimental effect on the designated assets through development with it setting. We consider the effects to be significant in both construction and operation. In policy terms we consider this will result in a high degree of less than substantial harm to the significance of the asset through development within its setting.

### **Position**

- 2.16 The asset, its significance and a description of the factors that contribute to its significance are well set out in the ES (see 16.4.05) and we consider that applicant has overall provided a fair and balanced assessment. They have identified that the effects would be significant and that there would be an impact during both construction and operational phase of the development. They have also provided a cumulative impact assessment which is welcomed.





- 2.17 As set out above at present there is clear visibility from the scheduled monument south to the existing Sizewell B buildings. We are acutely aware the new development would be clearly visible in this view and this is illustrated in the ZTV (Vol 2 Ch Figure 13.6). This is however not directly illustrated and specific viewpoints and photomontages have been omitted.
- 2.18 To extrapolate the impacts upon the chapel we would draw the Examining Authorities attention to illustrative viewpoints 11 and 12 (Vol 2 Ch 13 Appendix A), and then the representative viewpoint from Minsmere Sluice (Vol 2 Ch 13 viewpoint 14 and 13.10.56).
- 2.19 In early iterations of the ES and previous consultation the scheduled monument was illustrated with its own heritage specific viewpoint, wireframe and photomontages (the illustrations were, we believe set out in the PIER consultation under Vol 1, Chapter 7: figures 7.7 and 7.8).
- 2.20 Having now viewed the whole ES we believe this viewpoint has been omitted. In our view, the viewpoint is needed to illustrate the direct connection between the monument and the development and is an important visualisation for historic environment purposes, and we would like to see it added. We would recommend the Examining Authority request that this viewpoint and photomontage to be provided at the next deadline.
- 2.21 This would be an aide to illustrate the visibility of the proposed development from the scheduled monument and help explore the nature of the impact.
- 2.22 Overall, however the impact of the development upon this asset is one of our main areas of concern. We have identified that this site perhaps more than other similar sites derives a considerable amount of its significance from its setting. The remote character and location were influential in the selection of the site by the original monastic community and drew them to this location. The later the abandonment of the site due to the harsh coastal landscape and issues with flooding is writ large in the low-lying coastal landforms that surround the monument.
- 2.23 The establishment of the chapel in the isolated area continue to tell the story of quiet isolation and contemplation. Even the pill box which sought to reuse and hide within the former chapel is very much of this place. Its story enhances the significance of the whole site and increases those heritage values that are derived from its history, and its evidence.
- 2.24 In policy terms the asset therefore derives considerable significance from this setting. This landscape also contributes to our appreciation of the asset. The



peace and tranquillity are a complement to the spiritual characteristic of the former monastic site.

- 2.25 Following the ES we note the applicant has already identified that the potential effect on the asset during construction and operation of the plant would be significant. The impact is caused by the high degree of visibility between the scheduled monument and the construction site and then the size and scale of the overall development.
- 2.26 The most representative viewpoint currently available (from Minsmere sluice) clearly demonstrates the scale, massing and quantum of the proposed development. Likewise, the degree of change to the skyline due to the size and scale of the new structures in conjunction with the new pylons required for the grid connection is considerable.
- 2.27 In considering both the effect of the construction (noise and visibility) and the relatively long period of construction on the monument we consider the impact on the significance of the monument would be severe due to the change in its setting. This in our view would equate to a very high degree of harm but would however be less than substantial in nature.
- 2.28 We also consider the main development during operation would also be harmful. The quantum of development, in conjunction with existing infrastructure and its high degree of visibility would also result in a high degree of harm to the significance of this monument.
- 2.29 In line with our previous advice we consider this would be a significant residual effect. We fully appreciate the approach taken by applicant with regards to the mitigation, through design modifications, embedded mitigation and the 'additional mitigation' (see Table 16.8 pp116) however we are of the view that it is not going to be possible to successfully mitigate all the effects of the development upon the historic environment and for the considerable lifetime of the development.
- 2.30 Historic England accepts that the level of impact will decline significantly post construction, however the visibility of the development from the moment is a meaningful and persistent change. We therefore disagree with the conclusion reached in the ES with regards to the residual effects (*ibid*) and consider the operation impact to be adverse and significant.
- 2.31 Whilst we accept this is our view of the scheme proposals, we consider the degree to which this is harmful in heritage terms needs to be fully considered by the examining authority, particularly in relation to the balance between harm and



public benefits as set out in policy. In particular we would draw attention to the NPS policies 5.8.14, 5.8.15 and in particular 5.8.18. The degree to which positive mitigation for the historic environment can be measured and delivered will also be critical.

### **Leiston Abbey (2<sup>nd</sup> site)**

- 2.32 The second designated heritage asset we would like to draw the Examining Authority attention to is the remains of St Marys Abby, Leiston

### **Significance**

- 2.33 This designated heritage asset is more widely known as Leiston Abbey (2<sup>nd</sup> Site). In designation terms it consists of the Scheduled Monument '*Leiston Abbey (second site) and moated site*' (LEN 1014520), which is also listed at Grade I as '*St Mary's Abbey*' (LEN 1215753), and like so many assets it is a palimpsest and within the Abbey site, there are three additional designations. These are the, and the Grade II listed '*Retreat House*' (LEN 1215754), the Grade II '*Guesten Hall*' (LEN 1268290) and Abbey Farm Barn, which is also Grade II (LEN 1216380).
- 2.34 As discussed above the abbey was moved from its original location (Leiston Abbey 1<sup>st</sup> Site) in AD1363 and following dissolution the site passed through various hands before coming into guardianship with the Ministry of Works and latterly managed for the public by the English Heritage Trust. It is open to the public and free to visit at any reasonable time.
- 2.35 It is therefore widely recognised as one of the best-preserved and iconic monastic sites in the county and regularly makes the lists of Suffolk's best heritage sites. It is also widely recognised as one of the best-preserved Premonstratensian abbeys in the country.
- 2.36 The ruins are extensive, and the site contains an almost complete monastic layout with an unusually high degree of surviving fabric which forms a highly distinctive and important feature in the landscape. The historic fabric is enhanced with material from earlier periods that was brought to the site from the demolished first abbey site, and a mixed of styles and materials from later periods this gives a pleasing and highly valued architectural ruin. This combined with the post dissolution adaption and religious use adds to the complexity of the story and create an important and characterful asset.
- 2.37 The experience of viewing the ruins is enhanced by a raised platform that has been built into the site. The platform is designed to take in panoramic views of the site and includes interpretation, which is aimed at improving visitors understanding of the site, its layout and the function of the various buildings. This



enhances the visitor experience. This platform is an integral part of the site; however, its elevated position allows greater visibility of the area surrounding the development. In particular there are good views to the east towards the main development site and to the south towards the proposed rail infrastructure.

- 2.38 Overall the site is an important surviving monastic ruin, which is enhanced by the surviving architectural elements, and the range of later buildings which show the development of the site over many years. It also has important surviving archaeology and therefore demonstrates high evidential, historical, and communal values. The significance of the asset is enhanced due to its accessibility and because it is an important local visitor attraction.
- 2.39 The asset also draws significance from its setting. In particular the rural landscape that surrounds the site highlights the founding of the abbey and the deliberate choice of this quiet remote corner. The site is separated from Leiston and remains in a predominantly agricultural setting. This setting in our view extends beyond the immediate ruins and buildings that make up the designed assets and includes the surrounding landscape. The tranquillity helps the site to retain that spiritual character and value.
- 2.40 In addition, surviving elevations of the church are also visible from outside of the designated site itself and there are particularly important sustained and glimpsed views of the site as you travel along Leiston Road and in views from the south, south east and north.
- 2.41 Overall, we consider the asset to have a high significance. This significance is derived from a combination of its archaeological and architectural legacy, embedded historic and evidential values, the good survival of buildings and their fabric, but also in part derived from its rural setting.

### Impact

- 2.42 We are aware that the likely impact of the development and the nature of that impact is likely to change as the project develops. We are however also conscious that there are multiple elements of the project that would have a potential effect on this group of assets. These are
- Main development site Construction and Operational phases, in the area to the east of the asset
  - New Rail infrastructure to the south of the asset, including level crossing with the B1122, and the security entrance to the Sizewell estate
  - Sizewell link road, just to the north of the assets
  - New roundabout and site entrance to the north east of the assets



- 2.43 As set out above we consider that the views to, and from the site, and the quiet rural location in which these assets are found is of particularly importance and contributes to their significance. This group of designated assets, therefore, derives considerable amount of significance from their setting. Multiple damaging effects caused by various element of the development would therefore equate to harm to the significance of the assets through development within their setting.
- 2.44 We are concerned that there would be significant effect from the development during the construction phase of the main development, and during the construction and operation of the rail route. Likewise, to the north we are concerned that the construction of the new link road and the site entrance will also have an additional effect.
- 2.45 This will be caused by an erosion of the visual setting of the scheduled monument, particularly through the movement of cranes, and the noise associated with a large-scale development, and through the operation of the rail infrastructure, level crossing and site entrance.
- 2.46 As set out above we are conscious that this is considered to be a ‘temporary’ effect. However, the scale and longevity of the development phase is a considerable cause for concern, meaning this disruption and noise will be present at the site for up to 10 years. Although small in the overall lifetime of archaeological site it is not in our view a ‘temporary’ effect.
- 2.47 The additional element would be the residual effect of the new developments and this is primarily the link road, and the roundabout to the main development.
- 2.48 We are therefore concerned that the new development would have a detrimental effect on the designated assets through development within its setting. We consider the most significant effects would be during the construction phase. In policy terms we consider this will result in a high degree of less than substantial harm to the significance of the asset through development within its setting.

### Position

- 2.49 The assets, their significance and a description of the factors that contribute to their significance are well described in the main site ES (see 16.4.91 and again in the rail volume e.g. 9.4.10) and we consider that the applicant has overall provided a fair and balanced assessment. They have broadly identified that the effects would be significant and have confirmed there would be an impact during both construction and operational phase of the development. The effects from the link road are however not given much consideration in that section of the ES.



- 2.50 The applicant has also provided multiple viewpoints and photomontages, for the main development and the rail route and we would draw the Examining Authority attention to Viewpoints 5 and 8 (Vol 2 Chapter 13: Fig 13.9.05 and 13.9.08). photomontages (Vol 2 Chapter 13: Figs 13.10.17 – 13.10.20 and 13.10.29-13.10.33), and the heritage specific viewpoints from the platform at Leiston Abbey looking east (Vol 2 Chapter 13: Fig 13.10.81- 13.10.84) and from the platform looking south towards the rail entrance (Vol 2 Chapter 13: Fig 13.10.85 – 13.10.88).
- 2.51 Viewpoints are also provided in the Rail chapter Landscape and visual section (Volume 9 Chapter 6; Figures 6.5 and 6.13).

### **Main development**

- 2.52 As set out above the Abbey site is also a significant visitor attraction and therefore a major infrastructure development of this kind has the potential to seriously harm the visitors experience and appreciation of the ruins
- 2.53 The photomontages give a considerable degree of comfort with regards to the visibility of the main development. We are therefore of the view that it is unlikely that the main development site will be visible from the scheduled monument or the listed buildings once constructed.
- 2.54 We are also conscious that significant changes have been made to the design of the layout of the Main Development Site between the various phases of development and that the applicant has sought to reduce as far as possible construction impacts. Of these, changes to the design and layout of the accommodation campus, reductions in the height of the proposed temporary buildings and the relocation of things like sporting and leisure facilities have been the most important
- 2.55 The elements of the project that give most cause for concern are therefore the degree to which the main development, campus and ancillary buildings, and the new roundabout at site entrance will both be visible during construction. Primarily environmental factors such as construction noise and lighting, cranes and construction equipment, as well as noise from the new bypass and potentially higher traffic levels using Abbey Road.
- 2.56 As discussed above, one of the concerns is the length of the construction period and therefore the period of time for which the impacts will be felt at the abbey site. We are aware this is likely to be a considerable period of time.



- 2.57 There is also an accumulation of effects on the abbey site when issues from the main development are combined with the construction and operation of the new rail infrastructure and the link road.
- 2.58 We have also previously expressed a concern with regards to operational viability and security of the site as a visitor attraction. This is not an area of expertise for Historic England, but we would wish to draw the Examining Authorities attention to the submission made by the site managers (English Heritage Trust) and the co-owner/tenants (Pro-Corda).

### **Rail**

- 2.59 Our concerns are primarily caused by the closeness of the new rail corridor to the Abbey, in that it would pass immediately to the south of the Abbey precinct across the open land that separates the Abbey from the northward extension of Leiston. We are very aware of the inter-visibility between the development land and the remains of the Abbey and in our view the development area forms a part of the rural hinterland that helps to characterise and protect its rural setting.
- 2.60 The rail development will also require a new level crossing and a new site entrance to the Sizewell estate. These are illustrated in the ES but unfortunately this is split across both the Main Development LV assessment and the Rail LV assessment (See Vol 2 Chapter 13 Fig 13.10.85 – 13.10.88 and Volume 9 Chapter 6; Figures 6.5, 6.13). This is also shown on various construction drawings (e.g. SZC-EW0103-XX-000-DRW-100017).
- 2.61 We are therefore concerned primarily about both visual impacts, and about the noise in this predominantly quiet and rural area and the impact this would have upon the significance of the designated assets and upon the visitor experience.
- 2.62 Firstly, this would be during the construction of the railway and the level crossing, – i.e. the noise and disruption of the construction phase. Whereas the operational impact and would be caused by the visibility and presence (noise etc.) of rail traffic using the new route, particularly on the approach to the new level crossing at the junction with the B1122 (Abbey Road), and then as the trains enter the Sizewell estate and the main development compound.
- 2.63 We note as set out in (9.5.6) that the embedded mitigation and design of the railway has sought to minimise visibility of the extension from Leiston Abbey, and that landscape bunds would be the primary mitigation used to screen the Abbey from the development.
- 2.64 We are however of the view that this would only be partially successful and to some extent the impact of the bund itself on the landscape, is potentially harmful.



This is in terms of the visual change and disruption. Although a natural design and form for the bund is being proposed, this is still a large landscape change in a sensitive historic setting. We are conscious that mitigation can in its own right bring changes to the settings of heritage assets and result in negative effects.

- 2.65 The noise and operational elements of the level crossing and security at the entrance would potentially be unavoidable.
- 2.66 We note however the applicant has committed to reinstating the landscape after the construction is completed and therefore, we accept the harm would exist for the lifetime of the construction phase.

### **Sizewell link road and Leiston**

- 2.67 We are aware the ZTV for the road development suggest there would be little or no visibility of the road development from the Abby site itself, we are however conscious this road has the potential to erode the rural hinterland of the site and we are concerned about the increased level of traffic being perceptible from the abbey site.
- 2.68 Although this impact is likely to be modest overall, when looking at the Abbey sight holistically the examining authority would need to be aware of our concern's in this regard.

### **Leiston Abby 2<sup>nd</sup> Site - Conclusion**

- 2.69 We are therefore of the view that the construction phase of the main development, the construction and operation phase of the rail infrastructure and associated infrastructure, and to a lesser extent the construction and use of link road would all erode the Abbey's rural setting.
- 2.70 We consider these effects to be significant and sustained. In policy terms we would consider this to harmful to the significance of this group of assets through a development within their setting, and that this would be a high degree of less than substantial harm.
- 2.71 Historic England accepts that the level of impact will decline significantly post construction, and that this would not be residual harm. In particular as all the main construction elements such as the rail development are removed, and the landscape restored. However, if taken through the lifetime of the construction phase this is still harm of a high magnitude and for a sustained period of time.
- 2.72 Whilst we accept this is our view of the proposals, we consider the degree to which this is harmful in heritage terms needs to be fully considered by the Examining Authority, particularly in relation to the balance between harm and





public benefits as set out in policy. Again, we would draw attention to the NPS policies 5.8.14, 5.8.15 and in particular 5.8.18. The degree to which positive mitigation for the historic environment can be measured and delivered will also be critical.

### **Archaeology and Peat Strategy**

- 2.73 Archaeological investigations within the redline boundaries have identified extensive archaeological remains and surviving prehistoric peat deposits. We consider these deposits to be of a high significance and agree with the significance ascribed to these deposits in the ES
- 2.74 We also confirm that the impact upon these deposits from the construction of the main development would be severe, and a significant effect
- 2.75 We can confirm we support the adoption of the Peat Strategy (Volume 2, Appendix 16G), and have been an advocate of its development and implementation. We have seen several drafts since it was first written and most recently in 2020, and we do not have any additional comments in this regard.
- ### **Outline WSI (Volume 2 Appendix 16H)**
- 2.76 Historic England have recently commented on this document on the 3rd Dec 2020. It is therefore broadly in line with the draft versions we have previously seen. That proposed archaeological investigation methods that will be considered on a site by site basis seem sensible and appropriate (see 4.1.3).
- 2.77 We also acknowledged that some parts of the development area could not be fully evaluated prior to the DCO submission, and so these areas will be evaluated as appropriate post-consent (See 5.2.5 and our comments on individual section of the scheme below). We are therefore pleased to see a commitment to making provision to fully investigate extensive and well-preserved remains that are found during archaeological monitoring (See 5.2.14).
- 2.78 As previously commented, we recommend that spatially distinct samples are considered if yards or floors are identified in order to investigate the use or function of an area and whether different 'activity zones' can be identified (see 5.3.16).
- 2.79 We are also pleased to see that the sampling policy will be inclusive so that a range of deposits and features can be sampled; many environmental remains cannot be seen with the naked eye and so this approach will allow features and remains to be investigated objectively.



- 2.80 Under 5.3.29 the document states that industrial residues and waste from craft activities would be routinely sampled. We recommend that the Historic England guidance document '*Archaeometallurgy*' (2015) is referred to, to aid the sampling strategies used to investigate these sorts of remains:  
[\(https://historicengland.org.uk/images-books/publications/archaeometallurgy-guidelines-best-practice/\)](https://historicengland.org.uk/images-books/publications/archaeometallurgy-guidelines-best-practice/)
- 2.81 Under 5.3.36 the WSI states that all finds and samples will be cleaned; we would recommend that this should be considered on a case-by-case basis as cleaning can remove or destroy some sorts of remains, such as organic residues (Historic England, *Organic Residue Analysis and Archaeology* (2017):  
<https://historicengland.org.uk/images-books/publications/organic-residue-analysis-and-archaeology/>).
- 2.82 We are pleased to see that a range of scientific dating techniques will be considered to develop the chronology for the sampled sites. We would also recommend that the assessment of the chronology within a Bayesian framework be considered if significant remains/sequences are identified.
- 2.83 We would recommend that the Historic England document '*the Role of the Human Osteologist on an Archaeological Fieldwork Project*' (2018) be referred to in relation to the discovery of human remains (Section 5.4.3):  
<https://historicengland.org.uk/images-books/publications/role-of-human-osteologist-in-archaeological-fieldwork-project/>
- 2.84 Chapter 5.5 outlines the post-excavation work that will be carried out. We would like to stress that processing finds, and environmental samples is part of the fieldwork phase of work. Samples need to be processed in a timely manner to ensure that the remains are stable and stored in appropriate conditions.
- 2.85 It is also stated that the intention of a Post-Excavation Assessment is to provide a summary of the material recovered (see 5.5.26). We would argue that it is also to identify the archaeological potential of an area and its ability to address specific archaeological questions.
- 2.86 We would also recommend that the Historic England document '*Piling and Archaeology*' (2019) is referred to when considering the impact that piled structures (such as bridges needed for the road schemes) would have on the historic environment: <https://historicengland.org.uk/images-books/publications/piling-and-archaeology/>



2.87 Overall, we therefore accept the wording of the Outline WSI, however we recommend the changes we have set out above are made to the document prior to approval of the final WSI.

#### **Northern and Southern Park and Ride (Vol 3 and 4 Chapter 9)**

2.88 Historic England have previously provided comments to the applicant in relation to both the Northern and Southern Parks and Ride sites. We note the proposal is for the most part, similar to the schemes layouts that we have already seen and therefore we do not have any additional comments to make at this time.

2.89 We are content to defer to the Local Planning Authority and their archaeological advisors. The Examining Authority would however need to confirm the LPA are satisfied with the proposed programme of archaeological mitigation.

2.90 We also recommend the Examining Authority consider the wording of the DCO and ensure that it is adequately worded to ensure a suitable programme of archaeological mitigation will be in place prior to works commencing. This would also need to be reflected in the mitigation strategy and the CoCP.

#### **Two Village Bypass (Volume 5 Chapter 9)**

2.91 The proposed development also includes the bypass and associated features: a roundabout connecting the two village bypass to the A12 at the western end, the River Alde overbridge, the Foxburrow Wood footbridge, side roads off the two village bypass, a roundabout connecting the two village bypass to the A12 at the eastern end, drainage and landscape design.

2.92 The development would be retained following the completion of the Sizewell C main development site and would comprise a new 2.4 km single carriageway road that would depart from the A12 to the south-west of Stratford St. Andrew before re-joining the A12 to the east of Farnham.

2.93 In previous correspondence with the applicant Historic England have advocated for a by-pass led approach in this location. Earlier iteration of the transport strategy would have required modifications to the junction on the High Street at Farnham. which in turn would have required the demolition of a grade II listed building known as Post Office Stores (LEN 1230215). This is a C19 vernacular cottage, and the demolition would have resulted in total loss of a designated asset, and a major adverse and harmful effect on that asset.

2.94 Although we have advocated for a bypass, we are aware this element of the scheme has the potential to have an impact upon the historic environment. In this case our primary consideration is the impact of the development upon the significance of the Church of Saint Mary, in Farnham (LEN 1230211)



- 2.95 We are aware of the councils concerns with regards to Farnham Hall and have also considered the Church of St Andrews in Stratford St. Andrew (LEN 1231407) and the Grade I listed Little Glemham Hall (LEN 1278507) and its Grade II registers Park and garden (LEN 100146), although we have not made any further representation on these assets.
- 2.96 Within our remit we have however identified however that the Church of St Mary at Farnham is most at risk from negative effects from changes to its setting. We note that the setting of these assets was considered (see 9.4.16) and that an illustrative viewpoint is provided in the LVIA 2 (see Appendix 6A: viewpoint 1.2)

### Significance and Impact

- 2.97 The Church of St Mary is a surviving Grade II\* listed parish church with its origins in the C12, it sited at the southern edge of the village on a prominent rise that overlooking the River Alde and with view to the south illustrating its wider rural setting. It is fine building valued for its surviving fabric and historic and evidential value. Its elevated position allows longer views both to, and from the church and its churchyard.
- 2.98 We therefore consider the church is an asset of high significance and that its setting including the longer-range views and rural location contribute positively to its significance (see also 9.4.62).
- 2.99 From our analysis we consider the development would be within the setting of the church, particularly as its passes through the agricultural land to the south. In particular, the development would introduce a wholly new and modern form into this landscape. This would in turn result in an erosion of the historic field patterns and a loss of the rural landscape visible from the churches elevated position.
- 2.100 In our view the development would have an adverse and negative effect on this asset, and that this has the potential to be a significant effect. In policy terms this is harm to its significance through a development within its setting.

### Position

- 2.101 We note the applicant's assessment mainly identified construction as the major change. And that and illustrative viewpoint has been provided in the ES. Unfortunately, this viewpoint is particularly unhelpful in relation to the historic environment. It has been taken from an area to the south of the church and certainly not from the main ridge on which the church is situated or from a location that is representative of the churches setting.



- 2.102 We remain concerned that the development, and in particular the construction compound and river crossing would be far more prominent in views than the ES allows for. This is most critical during the construction phase but there may also be a residual impact as this is a permeant element of the development.
- 2.103 We also do not consider that the viewpoint is insufficient to illustrate the impact of the development on the church and consider that a view from the southern part of churchyard would be more appropriate.
- 2.104 Overall, we recognise that the new development here would be preferred to the alternative proposal that would have resulted in the demolition of a designated asset. We are concerned however about the impact of the development upon the significance of the Grade II\* Church of St Mary. We do not consider the applicants have made a compelling case in relation to the settings assessment and find we differ in our conclusions with regards to the overall effects, and find that the development may result in changes that would have a negative effect upon the significance of the church.
- 2.105 In our view the setting of the church needs to be considered with care, we therefore recommend the Examining Authority seek a more illustrative heritage specific viewpoint to illustrate this impact. Ideally one taken from the southern part of the churchyard looking south to Southwest over the development area. This should be provided as either a photomontage or wireframe.

#### **Additional Comments on the two Village bypass: Terrestrial Historic Environment (Vol 5: Chapter 9)**

- 2.106 We also note that the proposed two village bypass intersects the floodplain associated with the River Alde (see 2.2.32). We consider there to be a very high potential for peat and waterlogged archaeological remains to be present in these areas. One area of concern for Historic England is that the fields on either side of the river are untested. They were not subject to geophysical survey or trial trenching (see Vol 5 Chapter 9 Appendix 9A to 9D).
- 2.107 We are aware there have been significant issues with regards to land access during the evaluation stage and this is noted, however we also consider these areas to have a very high archaeological potential. In particular, the palaeoenvironmental potential requires careful consideration in any mitigation strategy.
- 2.108 Waterlogged archaeological remains are particularly vulnerable to damage if factors, such as changes to the groundwater levels occur as this can alter the preservation conditions on the site. We would recommend that the Historic England document 'Preserving Archaeological Remains' (2016) is referred to, as



this outlines issues that can impact these sorts of remains and the approaches that can be used to investigate them: <https://historicengland.org.uk/images-books/publications/preserving-archaeological-remains/>

- 2.109 One of the overarching principles of the NPS as set out at 5.8.14 is for the conservation of heritage assets and therefore prior evaluation is critical in order to better reveal the significance of any assets present. Ideally further evaluation should be undertaken at the earliest opportunity and prior to the main phase of archaeological mitigation.
- 2.110 The assessment has also demonstrated potential for archaeological remains to be present within the development area. Elements of the construction that would have an impact on any heritage assets present, such as site clearance, earthworks, road construction, the construction of bridges and civil structures (piling), utility and drainage installation, installation of permanent fencing and landscaping are also set out (See 2.4.7 and 9.6.3). These invasive works would adversely affect any surviving sub-surface archaeological remains, resulting in the loss of archaeological interest (Section 9.6.3) and again will also need to take into consideration in the final agreed WSI.
- 2.111 Paragraph 9.2.10 lists the guidance documents that have been referred to as part of this work, including the Research and Archaeology Framework for the East of England. It should be noted that the updated version is now available online and the document needs to be updated accordingly (see [https://researchframeworks.org/eoe/.](https://researchframeworks.org/eoe/))
- 2.112 Section 9.3.24 lists the sources of information utilised, which includes the Environment Agency LIDAR data. It should be noted that the resolution of the Environment Agency data is 2m, which is generally inadequate for recording many archaeological features. A resolution of 1m is the basic minimum but where greater detail is required, higher resolution data is preferable Please see Historic England 2018 Guidance 'Using Airborne LIDAR in Archaeological Survey' <https://historicengland.org.uk/images-books/publications/using-airborne-lidar-in-archaeological-survey/>)
- 2.113 Section 9.4.16 – settings study area contains 16 designated heritage assets The existing evidence of prehistoric archaeological remains suggests that there is high potential for further remains to be present within the site boundary, and that there is potential for waterlogged archaeological remains to be preserved in areas adjacent to the River Alde (Sections 9.4.34-9.4.37).
- 2.114 It is noted that much of the site has been in agricultural use for some time, probably since the medieval period and so there has been little disturbance from



modern construction. Any below ground remains present could have been impacted by repeated ploughing. However, where colluvial deposits survive it is possible that prehistoric remains may have been protected from modern ploughing (Section 9.4.52). It is therefore possible that previously unknown remains may be present within the development area.

- 2.115 Section 9.4.53 summarises the areas of highest archaeological potential of the proposed development area, and states that the geophysical survey work has identified possible linear features of archaeological interest (Section 9.5.54). It should be noted that some archaeological features may not be visible within the geophysical survey if they are sealed by colluvium or if waterlogged deposits are present, as magnetometry is less successful on these sorts of deposits. Alternative techniques, such as Electromagnetism or geoarchaeological investigations may need to be considered for these environments.
- 2.116 The desk-based assessment has indicated the potential for previously unrecorded remains of low or medium significance to be present within the site boundary; the total loss of these remains would be an impact of high magnitude, resulting in a moderate to major adverse effect that would be significant (Sections 9.6.5-9.6.5). We largely agree with these conclusions but recommend that the potential for further remains to be present in the areas of colluvium or adjacent to the River Alde be considered.
- 2.117 It is also stated that deposits of geoarchaeological or palaeoenvironmental interest may be present and are likely to be of low to medium heritage significance. It was concluded that as construction was likely to affect a relatively small proportion of the more extensive deposits that the impacts were likely to be minor adverse and therefore not significant (Section 9.6.7).
- 2.118 This statement would need to be reconsidered if waterlogged deposits will be impacted as work can result in changes to the preservation conditions in adjacent areas that could lead to the damage and/or loss of vulnerable archaeological remains.
- 2.119 We are content to defer to the Local Planning Authority and their archaeological advisors in these matters. The Examining Authority would however need to confirm the LPA are satisfied with the proposed programme of archaeological mitigation.
- 2.120 We would also recommend the Examining Authority consider the wording of the DCO and ensure that it is adequately worded to ensure a suitable programme of archaeological mitigation will be in place prior to works commencing. This would also need to be reflected in the mitigation strategy and the CoCP.



**Archaeological Desk Based Assessment (Volume 5, Appendix 9B)**

- 2.121 We have previously seen and comment on earlier drafts of the DBA and do not have any specific comments. There have however been some changes to guidance and research since the document was published
- 2.122 LIDAR data has been utilised as part of the DBA; the source of the data was not stated in Section 2.3. Please note comment above with regards to use of LiDAR and reference to Historic England Guidance
- 2.123 Section 3.3 mentions the Research and Archaeology Framework for the East of England. Likewise, the updated version should be referred to:  
<https://researchframeworks.org/eoe/>

**Interim Fieldwork Summary (Volume 5, Appendix 9D)**

- 2.124 It is noted that the appendix represents an interim report, and that the finds and sample processing is still ongoing.

**Sizewell Link Road (Vol 6, Chapter 9 Terrestrial Historic Environment)**

- 2.125 This element of the development consists of a new 6.8km section of single carriageway road which would bypass a section of the B1122 and would run from the A12 south of Yoxford to join the B1122 close to Leiston Abbey
- 2.126 We note the applicant has set out there are 44 listed buildings within the study area. Our primary consideration is the listed at Grade I, The Church of St Peter at Theberton (LEN 1227756) and the Grade II\* Theberton House (LEN 1228378) and Moor Farmhouse at Middleton Moor (LEN 1199307).
- 2.127 We note there a number of Grade II listed buildings along the route and these are primarily within the remit of the council. These are a mixture of isolated farmhouse buildings or those associated with the village of Theberton. For example, the Grade II Theberton Hall (LEN 1287529), and a consistent group of Grade II buildings associated with Theberton House, which include the listed stables, walls and gate etc
- 2.128 We are also aware the scheduled monument complex of Leiston Abbey is situated close to the south eastern end of the development. The information is provided in Appendix 9A and on Figure 9.1A & B.
- 2.129 Alongside the Leiston Abby complex, the Church at Theberton is probably the most important asset. It is a fine and imposing thatched church with its origins in the 12th century AD. It is situated on a slight rise at the heart of the village, and clearly visible in long range views from outside of the village. The building draws





it significance in part from the surviving form and fabric but also in part from this setting, situated as it is at the heart of an agricultural and rural community.

Likewise, Theberton House and Moor Farmhouse also benefit from, and draw significance from their rural location and surroundings.

- 2.130 Overall we give regard to the applicants conclusion about the potential effects of the development upon the highly graded assets: we accept there may be some positive effects from the removal of traffic from the B1122 and the villages of Theberton and Middleton Moor, and particularly to the setting of the Church.
- 2.131 We find however that there is also a corresponding loss of these assets' rural context, particularly from the addition of a large and new modern road in the previously undeveloped hinterland to the west. This would in our view lead to erosion of the rural context and a loss of significance to these assets. These changes would therefore result in an overall negative and adverse effect.
- 2.132 In policy terms we consider this would result in a degree of harm to the significance of the assets. Although we accept this would be less than substantial in nature, we would ask the Examining Authority to consider this matter in relation to para 8.8.15 of the NPS, when looking at the development as a whole.

#### **Theberton Hall and Park**

- 2.133 We have also noted the development is also likely to have an adverse impact upon the historic parkland setting of Theberton Hall.
- 2.134 The applicant has clearly identified (see 9.4.19) that the development would intersect with land identified as "post-medieval park and leisure" on the County's HLC survey. This is also the former park and garden that surrounds Theberton Hall. The hall is a much altered 18th century house which is shown on historic maps with a modest formal park, complete with small ponds, gardens and formal clumped planting. Historic mapping indicates that the parkland was encompassed to the east and north, by an extensive woodland planting belt known, which survives and is still known as Plumtreehills Covert.
- 2.135 The overall layout of this designed parkland is still preserved and although much reduced and degraded, with parts turned over to arable, the shape and layout of the former park land is still very evident. One of the most distinguishable features is the fine mature planting belt of Plumtreehills Covert.
- 2.136 Overall, we accept this was a modest park in terms of ambition and scale however we consider that as a landscape feature its should be considered as a non-designated heritage asset. Partly through its value as a landscape feature but also because of the contribution it makes to the setting of Theberton Hall. It



also retains a degree of significance in its own right and although degraded it still demonstrates some of the attributes and landscape feature that were established through the 18<sup>th</sup> century planting scheme.

- 2.137 In terms of impact the proposed development will loop round to the west of the hall, it will remove part of the western side of the park and take out a section of Plumtreehills Covert to the north.
- 2.138 Whilst we accept that the Parkland has also been eroded over the later 20th century, particularly through conversion of park to arable, however this would in our view further divorce the house from its historic setting and erode both the remaining park and the significance of the house.
- 2.139 In our view we feel the applicant has perhaps underestimated the value of the park as an asset and for its contribution to the significance of the Hall. We therefore consider the development would have a significant effect on an important but non-designated landscape feature which would in turn result in an increased effect upon the significance of the grade II listed hall. This would be a significant effect resulting in permanent and residual harm.
- 2.140 We agree the current state of the park has already reduced some of the historic values of this assets however the adverse effect would still equate to a degree of less than substantial harm in policy terms. Likewise, we would therefore ask the Examining Authority to consider this matter in relation to para 8.8.15 of the NPS.

### Archaeology

- 2.141 We are aware there have been significant issues with regards to land access during the evaluation stage and this is noted (see Figures 8.4A & B). From what has been survey however there are clearly some areas of high archaeological potential. The HLC pre 18<sup>th</sup> century landscape character normally indicates an older settled agricultural landscape, often masking older settlement patterns and discreet archaeological sites. The lack of consistent survey across this corridor is therefore a concern.
- 2.142 What survey has been undertaken has demonstrated potential for archaeological remains to be present within the development area. Elements of the construction that would have an impact on any heritage assets present are clearly set out in (Section 9.6.3) and the ES is clear that these elements would adversely affect any surviving sub-surface archaeological remains, resulting in the loss of archaeological interest. The archaeological potential of the surveyed and un-surveyed areas therefore needs to be given greater consideration.



- 2.143 As set out above one of the overarching principles of the NPS as set out at 5.8.14 is for the conservation of heritage assets and therefore prior evaluation is critical in order to better reveal the significance of any assets present. Ideally further evaluation should be undertaken at the earliest opportunity and prior to the main phase of archaeological mitigation. This would need to be reflected in the mitigation strategy, and the CoCP. The final WSI will also need to take these matters into account in the CoCP and in the final WSI.
- 2.144 We are however content to defer to the Local Planning Authority and their archaeological advisors in these matters. The Examining Authority would however need to confirm the LPA are satisfied with the proposed programme of archaeological mitigation and the timetable for the remaining evaluation. We would also recommend the Examining Authority consider the wording of the DCO and ensure that it is adequately worded to ensure a suitable programme of archaeological mitigation will be in place prior to works commencing.

**Yoxford Roundabout (Vol 7, Chapter 9 Terrestrial Historic Environment, Appendix 9A- D and figure 9.1 – 9.4)**

- 2.145 This requires the development of a new roundabout at the junction between the A12 and the B1122 (Middleton Road). The development would be at the eastern end of the settlement and south of the River Yox.
- 2.146 Our primary consideration in relation to this element of the scheme is the impact of the new roundabout and associated development upon the Grade I listed Cockfield Hall (LEN 1030621) its grade II\* Gatehouse (LEN 1300688) and the Grade II\* Church of St Peter (LEN 1200659), and the Yoxford Conservation area. We note the Conservation Area was extended in 2020 and now includes three additional parks and gardens which surround Cockfield Hall, Grove and Rookery Parks respectively.
- 2.147 These are not registered landscapes however in relation to the NPS paragraphs 5.8.4 and 5.8.5 may be relevant, as these parks may not have been assessed for designation.
- 2.148 Although the extensions to the conservation area are mapped in the Appendices and figures, it is unclear from the assessment provided in the ES whether the impact of the development on the conservation area and its extension has been fully assessed.
- 2.149 We have noted that there is a potential for change to the heritage assets both during the construction and then operation of the new infrastructure. This would primarily be to the significance of the designated assets though development within their setting. Having considered the assessment within our remit, we can



however confirm we broadly agree with the conclusion reached. The highly graded listed buildings are set back from the new development within a mature setting and the new development is unlikely to be present in views from Cockfield Hall.

- 2.150 Although it will result in changes to the overall village and road layout, the development is largely outside of the conservation area, and many of its important attributes are only marginally affected. The quantum of development would not be a significant increase to the existing A12, and therefore would not be significantly different in this context. With additional screening as proposed we consider the development would not have a significant effect, and any harm to the assets described above would be at the lower end of less than substantial.
- 2.151 The assessment has also demonstrated potential for archaeological remains to be present within the development area. Elements of the construction that would have an impact on any heritage assets present, such as site clearance, earthworks, road construction, utility and drainage installation, installation of permanent fencing and landscaping are also set out. These invasive works would adversely affect any surviving sub-surface archaeological remains, resulting in the loss of archaeological interest and again will also need to take into consideration in the final agreed WSI.
- 2.152 We are content to defer to the Local Planning Authority and their archaeological advisors in these matters. As above the Examining Authority would however need to confirm the LPA are satisfied with the proposed programme of archaeological mitigation and the wording of the DCO.

#### **Freight Management Facility (see Vol 8 Chapter 9)**

- 2.153 Our primary consideration in relation to this element of the scheme is the impact of the development upon the significance of six scheduled monuments within the study area: these are part of a large prehistoric barrow cemetery group known as the '*Scheduled bowl barrows and ring ditch south-west of Redhouse Farm*' (LEN 1011342, LEN 1011343, LEN 1011344), LEN 1011344, LEN 1011339, LEN 1011340, and LEN 1011341). The closest of which is thought to be located only 110m southeast of the application boundary and the cemetery spreads out over a 1km to the west of the site.
- 2.154 We note and are aware that a further four equivalent, but non-designated heritage assets are known from the development area and the area immediately to the west. These are three ring ditches that were excavated prior to construction of Ipswich southern bypass. Now better known as the A14 (see Vol 8 Chapter 9 Appendices 9A - 9C and Fig 9.2 LVT 023, 024 and 025) and an additional ring ditches lies to the west (LVT 022).



- 2.155 Our primary consideration is the overall magnitude of the effect of the development upon the significance of the designated assets. This would be through negative development within their setting. Further consideration of 'equivalence' for the all the barrows in this significant group needs to be considered in relation to paragraph 5.8.5 of the NPS.
- 2.156 The applicant's submission (Vol 8 Chapter 9: 9.26) does not consider this policy which may have been an oversight. It is perhaps a matter for debate but even though an asset has previously been excavated does not diminish its value as part of a group of assets - in this case a prehistoric cemetery. In our view this is a highly valued group of assets as a whole, even though only parts of it are designated.
- 2.157 In our view greater weight needs to be given to the assets as a group and the way in which they would have functioned in the landscape, within the wider heathland setting which is also representative of this part of the county.
- 2.158 We accept the way in which the applicant has assessed the assets and although we agree to some extent with the broad conclusions our main concern is more wholistic and relates to the way in which the development is located within this landscape. The development by being situated in the middle of the cemetery separating assets from each other both visually and physically is therefore a significant effect on these assets as a group. This is regardless of the longevity of the development, the preservation, or other intervening landforms such as the A14.
- 2.159 Even taking into consideration the negative elements of the current setting. We therefore find contrary to the applicant, that the effect of construction and operational elements to be significant for the designated assets (see Vol 8 Chapter 9: Tab 9.6 and 9.7). In policy terms this is a degree of harm, but less than substantial.
- 2.160 We therefore recommend the applicant consider ways of providing further mitigation of effects in relation to these assets. Options that could be considered should include a contribution to the on-going conservation of the remain assets and more detailed assessment of the assets with a view to public dissemination.

### 3. LEGISLATIVE AND POLICY CONTEXT

#### Planning Act 1990

3.1 In determining this application the Examining Authority should bear in mind the statutory duty of section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of



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preserving listed buildings or their setting or any features of special architectural or historic interest which they possess.

### **EN-1 Overarching NPS for Energy**

- 3.2 The Overarching National Policy Statement for Energy EN-1 sets out the National Policy Statement for Energy infrastructure (see 5.8). It recognises that the construction, operation and decommissioning of energy infrastructure has the potential to result in adverse impacts on the historic environment
- 3.3 Also of relevance here is 5.8.4 which notes that heritage assets with archaeological interest that are not currently designated as scheduled monuments, but which are demonstrably of equivalent significance may include those that have yet to be formally assessed for designation, those that have been assessed as being designatable but which the Secretary of State has decided not to designate; and, those that are incapable of being designated by virtue of being outside the scope of the Ancient Monuments and Archaeological Areas Act 1979.
- 3.4 Paragraph 5.8.5 says that '*The absence of designation for such heritage assets does not indicate lower significance. If the evidence before the 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.*'
- 3.5 Section 5.8.12 considers that in considering the impact of a proposed development on any heritage assets, the Examining Authority would need to take into account the particular nature of the significance of the heritage assets and the value that they hold for this and future generations. It continues that account should be taken of 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 Examining Authority would also need to take into account the desirability of new development making a positive contribution to the character and local distinctiveness of the historic environment (5.8.13).
- 3.6 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. This is because, 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. Loss affecting any designated heritage asset should require clear and convincing justification (5.8.14).

- 3.7 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 (5.8.15).
- 3.8 In relation to development affecting the setting of a designated heritage asset, it states that applications should be treated favourably 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, any negative effects should be weighed 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 (5.8.18).

### **NPPF and The Historic Environment Good Practice Advice in Planning, GPA 3**

- 3.9 The policy that is set out above echoes that which is set out in the National Planning Policy Framework. This also includes a definition of the setting of a heritage asset as ‘the surroundings in which a heritage asset is experienced.
- 3.10 Setting of heritage assets is considered further in the Planning Practice Guide. This sets out how the extent and importance of setting is often expressed by reference to the visual relationship between the asset and the proposed development and associated visual/physical considerations.
- 3.11 It also notes that although views of or from an asset will play an important part in the assessment of impacts on setting, the way in which we experience an asset in its setting is also influenced by other environmental factors such as noise, dust, smell and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places.
- 3.12 It continues that the contribution that setting makes to the significance of the heritage asset does not depend on there being public rights of way or an ability to otherwise access or experience that setting. When assessing any application which may affect the setting of a heritage asset, local planning authorities may need to consider the implications of cumulative change.
- 3.13 This provides general advice on understanding setting and how it may contribute to the significance of heritage assets. In particular it notes that setting is often expressed as views and that those which contribute to significance can include



where relationships with other heritage assets are particularly relevant (page 10). The document makes specific reference to church towers

- 3.14 'Being tall structures, church towers and spires are often widely visible across land- and townscapes but, where development does not impact on the significance of heritage assets visible in a wider setting or where not allowing significance to be appreciated, they are unlikely to be affected by small-scale development, unless that development competes with them, as tower blocks and wind turbines may. Even then, such an impact is more likely to be on the landscape values of the tower or spire rather than the heritage values, unless the development impacts on its significance, for instance by impacting on a designed or associative view.'
- 3.15 The document also provides a staged approach to taking decisions: identifying heritage assets affected; assessing how setting contributes to significance; assessing the effect of the proposals on significance; exploring how to maximise enhancement and avoid or minimise harm and making and documenting the decision.

#### **4. MARINE HISTORIC ENVIRONMENT**

##### **Marine comments (Volume 2 Chapter 23)**

- 4.1 The development of Sizewell C requires several marine elements to be constructed, including soft coastal defence features, a Beach Landing Facility (BLF), offshore cooling water intakes and outfall heads, nearshore fish recovery and return (FRR) outfalls, and the nearshore combined drainage outfall (CDO). These structures have the potential to impact the historic environment.
- 4.2 The type and nature of the impact has varied considerably over the planning phase of the project as a number of different options have been proposed. Overall the scale of the marine operation as set out in this application are reduced from that originally proposed.
- 4.3 The desk-based assessment has identified heritage assets located within the study area, from submerged palaeolandscapes (Section 23.4.13) to post-medieval losses (Section 23.4.19) and a 19<sup>th</sup> or early 20<sup>th</sup> century wooden merchant ship (Sections 23.4.20 & 23.4.34).
- 4.4 Section 23.4.28 also states that deposit of high geoarchaeological and palaeoenvironmental interest are also present within the study area, that accumulated over the Mesolithic and Neolithic periods.
- 4.5 The historic environment assemblage is therefore consistent with studies elsewhere along the east coast, and range of known finds and well preserved





palaeoenvironmental material. The latter material is of a high value and will contribute to our understanding of important questions such as climate and environmental change over time as well as relative sea level change. This was demonstrated by the vibrocores that were collected in 2015 (see 23.4.31).

- 4.6 It was noted that substantial capital dredging of the nearshore area took place as part of the works to build Sizewell B (Section 23.4.33), and therefore we accept the potential for recovery of any *in situ* near-surface archaeological remains in these previously dredged areas is likely to be low.
- 4.7 Sections 23.5.4 to 23.5.7 present the primary mitigation approaches considered for the project. This includes the use of piled foundations for the BLF, which will limit the extent of disturbance on the archaeological significant deposits (Section 23.5.5). The cooling water intakes and outfall, CDO and FRR will also consist of tunnels bored through the solid geology under the seabed (Section 23.5.6) to minimise the effects to the areas of mobile sediments with relatively limited archaeological potential.
- 4.8 The embedded mitigation by design has taken into consideration the archaeological potential during the design phase.
- 4.9 In considering the approach we agree that that despite the evaluation work that has been carried out to date, there is still the potential for previously unknown heritage assets and deposits of geoarchaeological interest to be present within the footprint of the development that could be impacted by the construction (see 23.6.4 & 23.6.9).
- 4.10 We also agree the geoarchaeological deposits are likely to be of high archaeological significance (23.6.10).
- 4.11 In terms of the previously unknown heritage assets, we support the mitigation proposed which is through the adoption of a reporting protocol to ensure that any discoveries are recorded and assessed. The reporting protocol will be undertaken under a marine licence condition, and Historic England would be happy provide advice on this strategy as required (see 23.7.4).
- 4.12 The mitigation of impact to deposits of geoarchaeological interest will focus on investigating stratified samples of material (see 23.7.5). These strategies are sensible and appropriate and in line with that proposed and agreed at the pre-application stage.
- 4.13 It is important to note these deposits will likely have a relationship to those that have been identified to the rear of the main construction island (see Peat



Strategy above) and that the applicant needs to confirm that results will be shared between the archaeological contractors working on both mitigation programmes.

- 4.14 Overall therefore we do not have any overriding concerns with regards to this element of the scheme

**Appendix 23A: Offshore and Intertidal Historic Environment DBA**

- 4.15 We confirm our view that this provides a thorough assessment of known heritage assets and deposits of archaeological interest and that Historic England have provided advice and comment on this document prior to submission
- 4.16 We are aware however that the document was however last updated in October 2014 and is therefore out of date. There is the potential that relevant discoveries have been made since the document was published and policies cited have changed. In particular key documents such as the NPPF
- 4.17 We therefore recommend that should permission be granted the Examining Authority request that the document is updated prior to works commencing to ensure the offshore WSI is up to date

**DCO and marine historic environment (see Vol 3, chapter 3.1)**

- 4.18 We confirm we support the wording of the DCO (see Vol 3, Chapter 3.1 Part 2 Licensed Activities – General, Section 19 pp136) which sets out Historic England as a named authority with regards to the marine historic environment and with regards to the approval of the WSI.

**5. CODE OF CONSTRUCTION PRACTICE (CoCP) -**

**Book 8 Chapter 11**

- 5.1 We note the CoCP includes the Historic Environment at Chapter 8 and specifically includes standard and additional measures such as the peat strategy for both terrestrial and marine Table 8.1 and 8.2 (Additional mitigation). We support the approach taken and do not have any additional comment.

**6. CONCLUSION**

- 6.1 To conclude, Historic England remains concerned about the impact of the Main Development Site upon the significance of Leiston Abbey (1st site) during the construction phase and from residual effects of the main development.
- 6.2 We have similar concerns with regards to the impact of the construction phase of the development upon Leiston Abbey (2nd site), this includes cumulative impacts



to the Abbey's setting from the main development, the new rail infrastructure and the new link road.

- 6.2 We have also highlighted additional concerns with the link road, the two-village bypass, and have a regard for ensuring the success of mitigation for both terrestrial and marine environment.
- 6.3 These items have been set out more detail above.
- 6.4 Although we do not object in principle to the development on historic environment grounds, we would wish to draw the Examining Authorities attention to these matters, particularly in relation to issues we have raised, but also with regard to any additional mitigation and heritage benefits that are being proposed, and with regards to the planning balance as set out in the relevant NPS policies.

**ENDS**

