



Historic England

EAST OF ENGLAND OFFICE

Wendy McKay and The Sizewell C Case Team
National Infrastructure Planning

Our case ref: PL00032773

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Application by NNB Generation Company (SZC) Limited, Proposed Sizewell C Project

Planning Act 2008 (as amended) – Section 89 and the Infrastructure Planning (Examination Procedure) Rules 2010 – Deadline 2

Historic England response to The Examining Authority's written questions and requests for information (ExQ1)

Dear Wendy McKay,

The Historic Buildings and Monuments Commission for England (HBMCE), known as Historic England, are the government's advisor on the historic environment and we provide independent advice on heritage matters. We have a duty to conserve, as well as promote public understanding and enjoyment of the historic environment.

HE.1.2

Overarching Written Scheme of Investigation (WSI)

Please provide a critique of the Overarching WSI contained within Appendix 2.11.A of [AS210]. Are you satisfied that the content and level of detail would allow you to discharge your responsibilities?

Historic England Comment

Historic England recently provided commented on this document (3rd Dec 2020) to the applicant. The version provided in the ES is therefore broadly in line with draft versions that we have previously seen. We are comfortable that the proposed archaeological investigation methods are sensible and appropriate. We have provided more detail in our written representation (see Paras 2.76- 2.87) and have recommended and detailed minor changes that need to be made prior to approval of the final WSI.



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HE.1.5

Evaluation Trenching

At paragraph 16.3.31 [APP-272], the Applicant confirms several limitations in respect of the assessment. One such limitation is that it has not been possible to undertake evaluation trenching on some areas of the site, however most of the site has been subject to a magnetometry survey. Are you satisfied with this approach?

Historic England Comment

We recommend evaluation should be undertaken prior to the submission of the DCO as following best practice, and industry norms. We have however acknowledged that some parts of the development area could not be fully evaluated prior to the DCO submission. This is due to several limiting factors including land access and COVID 19. We are pleased to see a commitment in the ES to fully evaluate and investigate all archaeological sites at the earliest opportunity.

Whilst we acknowledge the issues the applicant has faced during this campaign this lack of evaluation does present number of limitations for the applicant, and a potential policy issue that the Examining Authority (ExA) need to be aware of. In particular that the lack of evaluation and testing of known assets and exploration for unknown sites means the significance of known and unknown assets across all part of the development area can not been fully established. This is only in those areas that have not been evaluated.

The consideration is with regards to the requirements of the historic environment polices set out in EN-1 (Overarching NPS for Energy) when the ExA seeks to weigh the balance in relation to harm and benefit as set out in paragraph 5.8.15.

For example 5.8.12 asks that in considering the impact of a proposed development on any heritage assets, the Examining Authority would need to take into account the level of 'significance' of any heritage assets and that 'account should be taken of the desirability of sustaining and, where appropriate, enhancing the significance of heritage assets'. The Examining Authority would also need to take into account Policy 5.8.14 which states 'There should be a presumption in favour of the conservation of designated heritage assets' and then paragraphs 5.8.4 and 5.8.5 in that regard.

We broadly accept an approach that uses **site**-specific Written Scheme of Investigations (WSI) to approach all sites however we also recommend the examining authority seek from the applicant a commitment to undertaking a full assessment of significance at the earliest opportunity. Furthermore should heritage assets be identified that would meet the criteria set out in para 5.8.4 or 5.8.5 then Historic England and the LPA Archaeological Advisors should be contacted at the earliest opportunity so that discussions can be undertaken with regards to the appropriate method for the conservation of heritage assets as set out in 5.8.14.



We also would ask the ExA in relation to this matter to ensure that they are comfortable that the DCO is sufficiently well worded to ensure a full programme of archaeological works will be completed post consent and confirm the applicant's commitment to completing this work.

HE.1.7

Summary of Survey Status

Table 16.5 [APP-272] confirms where geophysical surveys and/or evaluation trenching has not been undertaken. In such areas, the Applicant has confirmed that a programme of further work will be set out in a site-specific Written Scheme of Investigation. Do you see any significant limitations with this approach?

Historic England Comment

See advice above at HE 1.5.

HE.1.12

Direct Effects on Heritage Assets

Construction 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 121574, LB 1216380 and LB 1268290). Please comment as to whether such assets comprise relatively minor and peripheral elements of the monastic landholding? Would harm to such designated assets discernibly affect the informative potential of them?

Historic England Comment

Historic England would need to defer to the LPA archaeological advisors at SCCAS as we have primarily assessed the impact of the development on the significance of the designated heritage assets at Leiston Abby. However, we would draw the ExA attention to Policy 5.8.4 of EN-1.

HE.1.13

Peat Strategy

Please confirm whether the content of the Peat Strategy contained within Appendix 16G [APP-275] is satisfactory? If required, please provide suggested amendments or additions.

Historic England Comment

As set out in our written representation 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 further comments at this stage. We have also set this out in our Written Representation.

HE.1.19

Enhancement of the Permanent Beach Landing Facility (BLF) (Change 2)

Due to the proposed enhancement of the permanent BLF, it is stated that increased visibility of construction plant is likely from the Coastguard Cottages, Leiston Abbey first site and from the edges of the Aldeburgh and Southwold Conservation Areas. Are you satisfied that, as detailed in [AS-181], such an increase in visibility would not alter the level of significance of effect on the above assets?

Historic England Comment

We have limited as per our remit comment to the highly graded asset of Leiston Abbey 1st site and defer to the LPA and colleagues with regards to the other assets mentioned under HE.1.19.

In relation to Leiston Abbey first site we already consider the impact of the construction phase and the operation of the development to represent a very high degree of harm to its significance through development within its setting, resulting in a significant effect in EIA terms. This is set out in our written representation.

The changes to the BLF would not in our view add much to the overall quantum of development and would not raise or change our view on the overall level of harm or the significance of the effect of the development as a whole.

The effect on the marine historic environment would not be sufficiently different and would be addressed by the comments as set out in our written representation.

HE.1.20

Temporary Beach Landing Facility (BLF) (Change 2)

Are you satisfied that the construction of the temporary BLF would be seen within the wider context of construction related activity and visibility would be relatively limited? Do you concur that as a consequence of such limited visibility the level of significance of the effects on Coastguard Cottages, Leiston Abbey first site and from the edges of the Aldeburgh and Southwold Conservation Areas would not change to that detailed in the initial assessment findings in [APP-272]?

Historic England Comment

See our comments in relation to HE.1.19



HE.1.23

Mitigation

Alongside of the proposed site-specific WSI and Peat Strategy, is any further mitigation necessary in relation terrestrial heritage effects at the MDS? If necessary, how do you consider such measures should be secured?

Historic England Comment

Historic England would like to be reassured that any additional heritage mitigation proposed would be secured via an appropriately worded legally binding agreement such as a s.106 agreement or similar. This includes any off-site mitigation proposed for Leiston Abbey 1st and 2nd sites. We have for example recommended a programme of mitigation for Leiston Abbey 1st site that could include conservation repairs, education packages, signage and interpretation, this would need to be directed to the site owners and funding 'ring fenced' for heritage matters. We have supported a similar approach be directed to the guardians and site owners at Leiston Abbey 2nd site.

HE.1.26

Historic Landscape Character - Important Hedgerows

Paragraph 9.4.21 [APP-467] confirms that it is likely that most surviving hedgerows within the site would be considered important under the Hedgerow Regulations. Are you satisfied that these hedgerows are best considered of low heritage significance?

Historic England Comment

Historic England would defer to the LPA and their specialist heritage advisors with regards to this topic.

HE.1.29

Primary Mitigation - Theberton Hall

Would the proposed woodland planting to the west of the SLR, described at paragraph 9.5.5 [APP-467], in the vicinity of Dovehouse Farmhouse adequately compensate for the loss of woodland in the belt west of Theberton Hall? In addition, would the proposed woodland planting east of the SLR successfully minimise views from Theberton Hall Estate and help integrate the proposed Pretty Road overbridge into the surrounding landscape?

Historic England Comment

Theberton Hall is a grade II listed building and therefore we have deferred to the LPA in relation to the impact of the development and any proposed planting upon its significance. We have however identified its former parkland as a potentially under-represented non-designated heritage asset in our written representation (please see HE WR paragraph 2.133 to 2.140). We have raised a concern about the impact of the development on the former park and specifically



on Plumtreehills Covert in our written rep (see HE WR paragraph 2.133 to 2.140). The loss of significance caused by the harm to the former parkland and the parkland planting belt is regrettable in the context of a non-designated heritage asset. We recommend the applicant reconsider this matter in order that the ExA can undertake the balancing required under (5.8.15).

HE.1.31

Historic Landscape Character - Construction

Are you satisfied that although the construction of the SLR would bisect several fields and truncate historic boundaries it would not eliminate the overall landscape pattern or ability to understand it (paragraph 9.6.67 [APP-467])?

Historic England Comment

Historic England would defer to the LPA and their specialist heritage advisors with regards to this topic area.

HE.1.34

Mitigation

Alongside of the proposed site-specific WSI, is any further mitigation considered necessary in relation terrestrial heritage effects at the SLR? If necessary, how do you consider such measures should be secured?

Historic England Comment

Historic England would defer to the LPA and their specialist heritage advisors with regards to this topic.

HE.1.35

Outline Landscape and Ecological Management Plan (oLEMP)

Would the proposed landscape measures within the oLEMP [AS-264] minimise impacts on cultural heritage resources? If not, please detail why.

Historic England Comment

Historic England do not wish to offer any further comment in relation to this point. We have raised concerns that mitigation proposals can in some cases result in a degree of harmful in there own right, and have noted concerns with regards to the impact of the mitigation for the rail route on the significance of Leiston Abbey second site – however this is detailed further in our written representation.



HE.1.37

Historic Landscape Character - Construction

Please comment on the effectiveness of the proposed planting at the eastern, northern and western borders of the FMF in ensuring that any change to existing landscape would be kept internal to the field (paragraph 9.6.15 [APP-528]).

Historic England Comment

Historic England has raised some concerns with regards to the impact of the construction and operation of the FMF on the significance of designated heritage assets in our written representation (see HE WR paragraph 2.153 to 2.160). The retention of hedgerows and landscape bunds does not necessarily address our concerns. As we have set out in our advice (at paragraph 2.159) even taking into consideration the negative elements of the current setting, we found that the effect of construction and operational elements to be significant for the designated assets which in policy terms equates to harm, but less than substantial.

We have recommended that the applicant consider other ways of providing for the mitigation of effects in relation to these assets. For example, contribution to the conservation of the remaining assets, interpretation and more detailed assessment of the assets with a view to public dissemination. We would like to see the comments we set out here and in our Written Rep addressed.

HE.1.38

Historic Landscape Character - Operation

Would the retention of existing boundary vegetation, the 10m buffer zone around the north, east and west site boundaries and the addition of three landscape bunds be effective in adding a visual screen and close the operational facility off from the rest of the agricultural landscape (paragraph 9.6.25 [APP-528])?

Historic England Comment

See comments at HE.1.37 above

HE.1.39

Effect on Setting of Heritage Effects - Operation

In respect of assets located to the south west of Redhouse Farm (SM 1011344), would the provision of additional planting in existing hedgerows and the landscape bund on the eastern boundary be sufficient in order to reduce any sense of intrusion experienced during operation (paragraph 9.6.20 [APP-528])?

Historic England Comment

See comments at HE.1.37 above



HE.1.40

Secondary Mitigation Measures

Would the proposed secondary mitigation measures detailed in paragraph 9.7.4 [APP-528] reduce the low magnitude of adverse impact on the bowl barrow south west of Redhouse Farm (SM 1011344) to a residual minor adverse effect that would be not significant?

Historic England Comment

See comments at HE.1.37 above

HE.1.41

Mitigation

Alongside of the proposed site-specific WSI, is any further mitigation considered necessary in relation terrestrial heritage effects at the FMF? If necessary, how do you consider such measures should be secured?

Historic England Comment

Historic England would like to be reassured that any additional heritage mitigation proposed would be secured via an appropriately worded legally binding agreement such as a s.106 agreement or similar. This includes any off-site mitigation for the barrows adversely affected by the FMF. We consider further work is needed to address concerns.

HE.1.42

Landscaping Scheme

Would the proposed landscaping scheme, as detailed on the illustrative masterplan [AS196], minimise the impact on setting of historic assets and the historic landscape character?

Historic England Comment

We have made additional representation with regards to the impact of the development including effect of mitigation on reducing visibility in relation to Leiston 1st and 2nd Sites in our written representation.

HE.1.43

Historic Landscape Character - Important Hedgerows

Hedgerows on the site boundary to the east and in a small enclosure in the south-west [AS-196] are considered important under the Hedgerow Regulations. Are you satisfied that these hedgerows are best considered of low heritage significance?



Historic England

Historic England Comment

Historic England would defer to the LPA and their specialist heritage advisors with regards to this topic.

HE.1.44

Mitigation

Alongside of the proposed site-specific WSI, is any further mitigation considered necessary in relation terrestrial heritage effects at the SPR? If necessary, how do you consider such measures should be secured?

Historic England Comment

Historic England have not made any detailed representation on the SPR and would defer to the LPA and their specialist heritage advisors with regards to this topic.

HE.1.46

Enhancement of the Permanent BLF and Construction of Temporary BLF (Change 2)

Are you satisfied that the proposed changes in respect of BLFs would not alter the assessment conclusion detailed in [APP-334]? If not, please provide detail.

Historic England Comment

See our comments in relation to HE.1.19

HE.1.48

Outline Landscape and Ecological Management Plan (oLEMP)

Would the proposed landscape measures within the oLEMP [AS-263] minimise impacts on cultural heritage resources? If not, please detail why.

Historic England Comment

We have made additional representation with regards to the impact of the development including effect of mitigation on reducing visibility in relation to Leiston 1st and 2nd Sites in our written representation. We consider further information is needed to help illustrate the effect of the development upon Leiston 1st site and this will be useful to the ExA in determining the visual effect of the development. This is set out in more detail in our Written Rep.

HE.1.50

Mitigation



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Alongside of the proposed site-specific WSI, is any further mitigation considered necessary in relation terrestrial heritage effects at the TVB? If necessary, how do you consider such measures should be secured?

Historic England Comment

We have made additional representation with regards to the impact of the development including effect of mitigation on the Church at Farnham. We do not consider appropriate information has been provided to allow the ExA to fully examine the impact of the development upon this asset nor the likely effect. Further planting and direct mitigation may be appropriate. Likewise, any additional heritage mitigation proposed would be secured via an appropriately worded legally binding agreement such as a s.106 agreement or similar.

HE.1.51

Oak Hall (LB 1030664) – Operational Effect on Setting

Considering the assessment findings and the representative viewpoint provided at Figure 6.14 [APP-362] do you concur that during operation of the NPR there would be no change to heritage significance?

Historic England Comment

Historic England would defer to the LPA and their specialist heritage advisors with regards to this asset.

HE.1.52

Old Hall (LB 1198815) – Operational Effect on Setting

Due to the existing landscaping and buildings located to the north and west of Old Hall, due you concur that there would be no change to either the non-designated parkland or setting of the building?

Historic England Comment

Historic England would defer to the LPA and their specialist heritage advisors with regards to this asset.

HE.1.53

Mitigation

Alongside of the proposed site-specific WSI, is any further mitigation considered necessary in relation terrestrial heritage effects at the NPR? If necessary, how do you consider such measures should be secured?



Historic England Comment

We do not have any specific comments to offer with regards to the NPR and we would defer to the LPA and their specialist heritage advisors with regards to this element of the scheme.

HE.1.57

Mitigation

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?

Historic England Comment

Likewise, Historic England would like to be re-assured by the ExA that the additional heritage mitigation proposed can be secured via an appropriately worded legally binding agreement such as a s.106 agreement or similar, and that it is appropriately worded and deliverable.

HE.1.58

Mitigation

Alongside of the proposed site-specific WSI, is any further mitigation considered necessary in relation terrestrial heritage effects at the YROHI? If necessary, how do you consider such measures should be secured?

Historic England Comment

Historic England would defer to the LPA and their specialist heritage advisors with regards to this element of the scheme. We have made some minor comments in our Written Representation.

LI.1.1

Design Approach – It is imperative that the proposal represents a good quality sustainable design which can be effectively integrated into the landscape. As such, please comment on whether the following measures would ensure this would be achieved in the detailed design, construction and operation phases:

- i) A ‘design champion’. Such a role would advise on the quality of sustainable design and the spatial integration of the both the Main Development Site and Associated Development Sites
- ii) A ‘design review panel’ to provide a ‘critical friend’ role. Such a role would provide comment on the development of sustainable design proposals



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- iii) The production of an approved 'design code' or 'design approach document' which would establish the approach to delivering the detailed design specifications to ensure good quality sustainable design (as approved in the Hinkley Point C Connector Project (EN020001)).

Please advise on how such measures could be secured. In addition, please comment as to whether any other measures or approaches are considered necessary?

Historic England Comment

The proposals sound broadly sensible and appropriate however Historic England do not have any specific comments and would defer to the LPA and their specialist advisors with regards to these matters.

LI.1.2

AONB – Adverse Effects

Has sufficient weight has been given to the statutory purpose and need for protection of the landscape, character and special qualities of the Suffolk Coast and Heaths AONB both within and outside its boundary, in accordance with paragraphs 5.9.9 and 5.9.12 of NPS EN-1? Please qualify your answer. If not, please identify what additional measures are required?

Historic England Comment

Historic England do not have any specific comments in relation to the AONB, which is outside of our statutory remit. We would defer other experts in this matter.

Yours sincerely

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