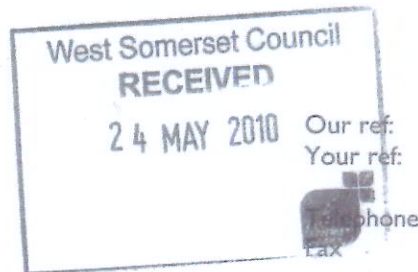


ENGLISH HERITAGE

SOUTH WEST REGION



Mr A Goodchild
Planning Manager,
West Somerset Council
West Somerset House
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Williton
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Somerset
TA4 4QA

Our ref:
Your ref: JH/01
Telephone 0117 975 0689
Fax

13 May 2010

Dear Mr Goodchild

Re: Hinkley Point C- Site Preparation Works: Request for Scoping Opinion in Accordance with Regulation 10 of the Town and Country Planning (EIA) Regulations 1999.

Thank you for consulting English Heritage on this scoping assessment for site clearance, fencing, site access, new utilities, ground terracing and contractors areas at Hinkley Point. English Heritage is the Government's adviser on all aspects of the historic environment in England.

As the Government's statutory adviser on the historic environment, English Heritage is principally concerned with the potential impact of this major development within this part of Somerset and upon its wide range of designated and undesignated historic assets. English Heritage promotes a wide definition of the historic environment which includes not only those areas and buildings with statutory protection but also those which are locally distinctive, valued and important. Due to the scale and far-reaching implications of on-site, off-shore and off-site infrastructure for this proposal, we would anticipate that this scoping report should not only pick up on local impacts but upon sub-regional and regional implications on the most significant historic assets in the area.

English Heritage recommends that Scoping Reports are tailored to the type, purpose, and level of development under consideration. The tiering of Scoping Reports, through the use of an overarching report subsequently fine tuned for particular aspects of the development, can help to reduce repetition and give a better focus to the appraisal framework.

The Scoping Report and resultant Environmental Statement should:

- review the objectives of other relevant policies, plans and programmes, with information on synergies or inconsistencies
- establish the historic environment baseline including trends and gaps in data with notes on sources and any problems encountered
- identify issues and opportunities for the historic environment
- set out the sustainability appraisal framework, SEA/SA objectives, indicators and targets where proposed for the historic environment

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- provide sufficient information on the proposed methodology for the appraisal in order to assess whether effects upon the historic environment will be properly addressed
- consider cross-boundary issues and cumulative impacts.

Our comments are as follows:

We are of a view that there is a significant overlap in the proposals for both the Jetty and the works on site as the construction of the temporary jetty and associated on-shore facilities are dependant on the ground terracing going ahead. The Scoping Opinions do not necessarily recognise this interdependency of the one development on the other and we are therefore concerned that the full implications of the stripping of top soil and ground terracing has not been fully comprehended in terms of the impact this will have on the terrestrial archaeology on site for either scheme.

The jetty proposal will include an on-shore storage facility. The information surrounding this part of the scheme is extremely vague and we consider the on-shore associated development including this storage unit and the access road should have more information than is currently provided in order to make a more comprehensive assessment. We would also raise the question of whether the on-shore aspects of this proposal can be dealt with under the Harbour Empowerment Order or whether a separate Planning Application for them should be submitted. If it is purely covered under the HEO then there should at least be some coverage of the implications of this area of the development within the scoping on the terrestrial ground works covered by this Scoping Opinion. If the latter is required then there is a need for a major amendment to this document.

We would request that both ES's should consider the impact of the overlapping development on the terrestrial archaeology and how the phasing of the land terracing and on-shore associated works will be managed. This is of particular concern to us as the stripping of top soil and ground terracing will require the destruction of all known and unknown archaeology present on the site. In terms of PPS5 this may be needless destruction given the fact that the IPC application for the main site proposals has not been submitted as yet. At this time we have not been able to view the Archaeological reports from the evaluation exercise and we would reiterate that this proposal cannot be fully assessed against HE7.2 of PPS5- as it is not possible to present any evidence to support or otherwise the scoping in 3.18.

2. Project Details

All through this scoping report there appears to be a lack of any mention of the loss of archaeological remains on this site and what the implications of this are. This is a fundamental issue that is for English Heritage one of the key areas of concern as we have already raised in preceding correspondence. We would strongly suggest that it should be mentioned in 2.2.15/16 under topsoil stripping, and in 2.4 where restoration of the landscape is described it should be made clear that this degree of top soil intervention is not reversible for heritage assets- once removed the archaeology will be destroyed forever. We emphasise this because we will not be able to predict whether its loss will ultimately be to make way for future development or not. In effect the proposed planning application for this work to be submitted prior to the IPC submission is premature.

2.3.11 We note that the site access will include the construction of the roundabout and associated road realignment. The close proximity of the Scheduled Monument of Pixies Mound gives us cause for concern on this point. We need to have detailed drawings showing how this will be achieved and as we understand that the relocation of the roundabout is not considered acceptable by the applicants, we will wish to discuss the principles of mitigation in order to soften the impact of this new infrastructure on the setting to the mound. Indeed we would normally be seeking an improvement over the existing situation for this designated asset.



3.17 Landscape and Visual Amenity

There is no direct reference within this section to the historic landscape character or the historic environment generally and the part they play in shaping the current landscape around the site. We are supportive of the use of ZTVs in assessing this aspect of the environment; however, we would reiterate the need to take account of the historic landscape and assets and the significance of their contribution. The study on landscape character in Somerset should assist this process. The use of ZTVs is also invaluable method in assessing the impact of a development upon the historic environment and on specific historic assets within it. We would therefore advocate the need to provide a comprehensive baseline context of the landscape around the main site and indicate how the various assets fit into this context currently and how this aspect of the overall development may impact upon this context. For example the presence of Fairfield House and its Historic Park within the area, what its current impact is and the context that it is found in within the overall landscape needs to be assessed before the impact of the development itself can be fully identified and assessed.

We contend that heritage assets should be considered under both the Landscape and Visual Amenity and Archaeology and Cultural Heritage issues as they are so interrelated. It is also considered essential that ZTVs should be undertaken at different times of the year. We need to be able to understand the visual appearance of the development site through this period of preliminary works as this may have a potential impact on the settings of the nearby historic assets but also upon the general appearance of the site within the wider landscape of this part of Somerset and its impact on the settlements of Shurton and Burton and the historic park to Fairfield House.

3.18 Archaeology and Cultural Heritage

3.18.8. We would reiterate that our main concern is that because we have not been able to look at the archaeological evaluation reports for the site we are unable to judge the significance of what has been found to date. The presence of the Scheduled monument Pixies Mound, although outside the development site, indicates that there has been a significant amount of human activity in this area and that this activity needs to be fully understood before any attribution of significance can be undertaken.

3.18.9 Whilst we are comforted by the proposal to retain the Green Lane, we would still seek further investigation of this landscape feature to ascertain whether there may be any correlation between it and the Scheduled monument. We would be happy to provide specialist advice on how for example the date of this track may be achieved. We would also want assurances that this feature is physically protected whilst either this work or ultimately future development of the site for the NPS goes ahead. More detail is also required about the actual formation of a new access that will transect this track and how it will be designed to integrate with the landscape without detriment to the overall impact of the Green Lane.

3.21.2 Key Environmental Issues: In our view a major omission to this list is the destruction of archaeological remains within the development site.

I trust the above will be of assistance in refining the ES for the next phase of this project.

Yours sincerely,



Caroline Power

Historic Environment Adviser

Cc. Ian Bryant, EDF Energy;

Steven Membery- County Archaeologist.

Mark Wilson, Infrastructure Planning Commission

Rob Iles, Jenny Cheshier, Vanessa Straker and Andrew Vines, English Heritage;

Jonathan Peters- Marine and Fisheries Agency.

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