Sizewell C Project: Southern Park and Ride
Hacheston, Suffolk

Review of landscape and visual aspects of planning application

for

Campsea Ashe, Hacheston, Marlesford, and Wickham Market parish councils

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thelandscapepartnership
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1 Introduction

1.1 Background to the review

1.1.1 NNB Generation Company (SZC) Limited (shortened to SZC Co.) is proposing to construct a new nuclear power station at Sizewell in east Suffolk, known as the Sizewell C Project. The new power station would be constructed adjacent to the existing Sizewell A (which is currently being decommissioned) and the active Sizewell B.

1.1.2 The Sizewell C Project meets the criteria of a Nationally Significant Infrastructure Project under the Planning Act 2008 (new onshore generating station in England with a capacity of over 50MW). As such, the application for development consent is being submitted to the Planning Inspectorate. If consent for the project is awarded, this would be granted in the form of a Development Consent Order from the Secretary for State for Business, Energy and Industrial Strategy following a public examination of the application.

1.1.3 In addition to the works at the main development site at Sizewell, the project includes a number of temporary and permanent installations, both to facilitate construction and operation and to help off-set some of the adverse effects, e.g. through community enhancement and habitat improvement. Such proposals include the construction of two temporary park and ride sites. A northern park and ride is proposed at Darsham and a southern one at Hacheston, to the north of Wickham Market. It is envisaged that these facilities would reduce the amount of traffic that would be generated by the construction workforce on roads and through villages local to the main construction site. It is the Southern Park and Ride (SP&R) that is the subject of this review.

1.1.4 The development constitutes Environmental Impact Assessment (EIA) Development within the criteria set out in the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (as amended) and the Marine Works (Environmental Impact Assessment) 2007 Regulations. As such, an EIA has been undertaken and its findings summarised in the form of an Environmental Statement (ES).

1.1.5 The ES has been presented as a series of volumes. Volume 4 addresses effects associated with the SP&R.

1.2 Objectives of this report and extent of review

1.2.1 The Landscape Partnership (TLP) has been instructed to undertake an independent review of the landscape and visual-related components of the planning application for the Southern Park and Ride (SP&R) site by four local parish councils – Campsea Ashe, Hacheston, Marlesford and Wickham Market – whose parish areas either encompass parts of the site or are so situated that there is the potential for landscape and visual receptors within to be influenced by the proposed development.

1.2.2 The purpose of the review is to provide advice and commentary on the accuracy and reliability of the documents and the effectiveness of the mitigation measures proposed in order to help the parish councils compile informed consultation responses to the application process and evidence at examination. These will be considered by the Planning Inspectorate when determining the award of a Development Consent Order.

1.2.3 In doing so, The Landscape Partnership reviewed the documents and plans supporting the application, and in particular Chapter 6: Landscape and Visual, of Volume 4 of the ES, author uncredited but dated May 2020.

1.2.4 The objectives of the review are to:

- review the methodology used for the assessment of landscape and visual effects within Chapter 6;
- assess whether the landscape and visual assessment considers the full, relevant, baseline information, and identifies the key sensitive landscape and visual receptors;
- review the judgements made about the effects of the proposed development on sensitive landscape and visual receptors; and
- identify any further work that should be undertaken in order that the Planning Inspectorate can make an informed judgement on the likely effects of the proposed development on landscape character and visual amenity.

1.2.5 The review considers only landscape and visual aspects of the SP&R site element of the application.

1.2.6 It should be noted that The Landscape Partnership has not undertaken its own Landscape and Visual Impact Assessment (LVIA), and that any comments made regarding the judgements within the assessment are made following site visits and on the basis of information provided within the ES Volume 4, Chapter 6.

1.2.7 The review of the LVIA was undertaken by Simon Neesam, a Technical Director of The Landscape Partnership. He viewed the application site and its environs on two occasions, from adjacent land, local rights of way, and public locations (e.g. areas with recreational access). The first site visit was made in early November 2020, on an overcast day when visibility was limited; the second was a sunny, bright and clear day in mid November when visibility was good.

1.2.8 It was noted that at this time of year, leaf fall from deciduous trees had commenced, ephemeral vegetation such as grasses and herbaceous weeds in verges and field margins had begun to recede, and that arable crops had been harvested. As such, vegetation in the surrounding landscape was approaching a middle-ground scenario in terms of its seasonal screening properties. At other times of year it can reasonably be assumed that the existing trees, hedges and other vegetation would be more effective in filtering some views of the SP&R in summer months, and less effective in full winter.

1.2.9 Simon Neesam is a Chartered Landscape Architect with over 25 years' experience. He holds a degree and a postgraduate diploma in Landscape Architecture and became a fully qualified Chartered Member of the Landscape Institute in 1994. Simon has a wide range of experience in landscape architecture and landscape planning, and has undertaken projects for private clients as well as national, regional, and local public sector bodies throughout the UK. He has carried out landscape assessments, visual impact assessments, and acted as expert witness for a variety of projects including major out-of-town retail facilities, highway schemes, renewable energy developments, landfill and mineral schemes, flood alleviations schemes, and new housing, often within sensitive landscapes or at potentially contentious locations.

1.3 Format of the review

1.3.1 This review includes the following:

- a resume of the background to the project and its planning context;
- a brief description of the landscape of the site and its surroundings;
- a summary of the proposed development;
- a review of ES Volume 4, Chapter 6: Landscape and Visual with commentary set out under each of the chapter's sub-headings; and
- a summary of any additional information or clarification that The Landscape Partnership considers is required in order in order to assess the full effects of the proposed development, together with any recommendations as to how the proposed mitigation measures might be enhanced.

1.4 Landscape context

1.4.1 The application site for the SP&R is located within the parish of Hacheston, save at the north-eastern end in the vicinity of the A12 where the red line encompasses a small portion of the parish of Marlesford. To the south-west is the parish and town of Wickham Market (c.870m between parish boundary and the main car park) and to the south-east is the parish of Campsea Ashe (c.570m between parish boundary and the main car park).

1.4.2 The main car park would be located on a localised ridge of higher land between two valleys at a level of c.30m AOD. The land continues to climb to the north-west, achieving 45m AOD at the junction of the parishes of Parham, Easton and Framlingham.

1.4.3 To the north the land falls relatively steeply to the river Ore that flows in a generally easterly direction to meet the river Alde to the north of Blaxhall, and onwards to the North Sea at Shingle Street via Snape and Aldeburgh. The valley has a narrow floodplain of grazing meadows and the small village of Marlesford is located on its lower northern sides. To the immediate north-west is Marlesford Hall (Listed Grade II*) and associated parkland. The house itself is orientated to have a southerly aspect and afford a view across the valley in

the direction of the proposed site. East Suffolk Council's Suffolk Coastal Local Plan (adopted 23rd September 2020), Policy SCLP11.8: Parks and Gardens of Historic or Landscape Interest, includes Marlesford Hall Park as a Non-Designated Heritage Asset. The valley side continues to rise above Marlesford, reaching 40m AOD in the vicinity of Parham airfield and Silver Lace Green.

1.4.4 To the south of the site is the valley of the river Deben that flows in a south-easterly direction around the village of Wickham Market and past Woodbridge to meet the sea between Felixstowe and Bawdsey. Wickham Market has developed on higher land (c.30m AOD) above the river and has started to extend down its north and east-facing slopes.

1.4.5 The A12, the main transport route connecting Great Yarmouth to Ipswich, and onwards to London, forms a relatively prominent feature within the landscape that has had an influence on the pattern of the landscape. The route formerly passed through Wickham Market prior to the construction of the A12 'bypass' and included the north-easterly slip-on from the B1078/B1116 junction from which the proposed site access commences. The A12 passes immediately to the south-east of the site. The East Suffolk railway line, connecting Ipswich and Lowestoft, follows a line some 1.5km to the south-east of the site but is much less visible in the landscape.

1.4.6 The village of Hacheston itself has developed along the B1116 that connects Wickham Market and Framlingham along the river Ore valley. Campsea Ashe is a scattered village generally focused on the railway station. Although many of the villages surrounding the site have a scattered form, there is little development in the remote parts of the landscape and, aside from the A12, much of the countryside has a strong rural and tranquil character.

1.4.7 The landscape in the vicinity of the site is largely arable, apart from some grazing meadows in the valley floors. To the north of the A12 it is well vegetated, with several large blocks of woodland; Great Wood (22.9ha) and Catts Wood (7.6ha) to the west of the B1116 are designated as Ancient Woodland. There has been much field amalgamation in the past, remaining hedges are often sparse and gappy. The landscape to the south of the A12 is more open and field size is larger with less hedges.

1.4.8 The landscape in the vicinity of the site encompasses a number of public rights of way, including but not limited to the following:

- Bridleway Hacheston 8 follows a northward line from the slip road/A12 along the eastern boundary of the main site. In doing so, it would be crossed by the proposed access road. The route follows the course of a track and is bound, in places intermittently, by vegetation on both sides including a mature oak, large hawthorns and hazel coppice. Beyond the edge of the site, the bridleway continues in a broadly westerly direction to meet the B1116.

- Public footpath Hacheston 7 (which quickly becomes Marlesford 8) commences close to the A12 at the corner of the site, and then follows a line north-eastward and northward across the adjoining field and then down the valley side, following the parish boundary, to meet Marlesford Road.
- Public footpath Hacheston 16 commences on the southern side of the A12 and follows a route southward across an arable field to meet Station Road adjacent to Bottle and Glass Cottages.
- Bridleway Hacheston 17 commences on the opposite side of Station Road to Hacheston 16 and continues south-eastwards to mee the B1078 Ash Road.
- Public footpath Hacheston 9 (which becomes Campsea Ashe 2) that takes a course eastward from Ash Road and the end of Hacheston 17 to Station Road and Brick Kiln Cottages.
- Public footpath Campsea Ashe 3 (which becomes Marlesford 7) continues northwards from Brick Kiln Cottages, across the higher ground and down the valley side to Ivy House Farm adjacent to the A12.

1.4.9 Other routes in the wider landscape affording views to the site include:

- Public footpath Campsea Ashe 17 that takes a north-westerly route from Mill Lane in the village to Mill Lane close to Ashmoor Hall, so representative of views from the rear elevations of several properties in Mill Lane.
- Public footpath Campsea Ashe 18 that takes a north-easterly route from Mill Lane close to Ashmoor Hall, across an open arable field to the B1079 Ash Road at Ash Row.
- Public footpath Campsea Ashe 19 that follows a north-easterly line from the B1078 between Ash Road and the auction houses across an open arable field.
- Public footpath Wickham Market 9 that follows a line south-westward and then westward, around the southern edge of the village, connecting Spring Lane to High Street.
- Public footpath Pettistree 6 that follows Green Lane and then Sandy Lane (Wickham Market 28) in a north/north-eastward direction, so connecting Chapel Lane and Mill Lane.

1.4.10 The main body of the site comprises a portion of a single field unit. The whole field is currently in arable use. A block of woodland within the site and adjacent to the western boundary – a continuation of Whin Belt – contains a disused pit.

1.4.11 The site has a domed topography, reflecting its location on the peak of a wider ridge of higher land. It rises up from the western boundary between c.25m and 30m AOD, before dropping again to between c.29m and 25m AOD on the eastern boundaries. The highest parts of the site are on the north-western boundaries with a gentle shallow slope down to the A12.

1.4.12 Reference to historic mapping shows that the field in which the site is located has been subject to amalgamation in the recent past. The OS 1:2,500 (1976 to 1979) shows a track extending from the bridleway on the western boundary, along the application site's north-western boundary from a building annotated as Beggars' Barn to the former pit immediately to the north-east of the site, referred to on earlier mapping as a gravel pit. Further annotation shows it was lined with a tree belt containing both coniferous and deciduous species. The track and vegetation remain illustrated on the OS 1:10,000 (1980 to 1985) but is now absent on the ground.

1.4.13 The south-eastern boundary abuts both the north-bound slip road to the A12 and the northern side of the A12 corridor, where the boundary is mostly open and partly defined by a timber post and rail fence with occasional small trees and shrubby vegetation. The road passes in a very slight cutting, giving the field an elevated appearance from the road.

1.4.14 The western boundary of the main site is partly formed by the aforementioned bridleway Hacheston 8 and its associated vegetation. It abuts a block of woodland, Whin Belt, immediately beyond the site. A further block, Wonder Grove, is located in the wider adjoining field.

1.4.15 The north-western boundary is now unmarked – see notes above [para 1.4.12] regarding historic landscape features – although there is a pond and copse of trees at its western end. Likewise, there is no physical feature defining the eastern-most boundary save for a change in land use (former pit beyond).

1.4.16 The remaining boundaries, back to the A12 are demarked by low and managed native hedges.

1.4.17 The new access road would be accommodated within the eastern corner of a further arable field. This field abuts the north-bound slip road to the south-east and the B1116/B1078 roundabout junction to the south-west. The access road would be at height of c.25m AOD, and the whole field slopes gently down to the Deben valley, being around 20m AOD at the junction.

1.5 Overview of the proposed development

1.5.1 Para 2.2.1 of ES Volume 4 provides an overview of the development:

> *The site comprises approximately 26.4 hectares (ha) of predominantly agricultural land and highway land located north-east of Wickham Market. The part of the site which would contain the parking and buildings, postal consolidation building and Traffic Incident Management Area (TIMA) is approximately 18ha in size, and located to the east of the B1078/B1116, to the north of the A12. The remainder of the site encompasses a section of the A12, and an associated slip road where highway improvements are proposed to form the site access, and associated signage and road markings …*

1.5.2 The proposed development would comprise [Para 2.2.6]:

- *Car parking areas for up to 1,250 spaces (of which up to 40 would be accessible spaces), and up to 12 pick up only spaces.*
- *Up to 10 spaces for minibuses/vans/buses.*
- *Up to 80 motorcycle parking spaces.*
- *Cycle shelters for up to 20 bicycles.*
- *Bus terminus area, including shelters.*
- *Security fencing and lighting.*
- *An amenity and welfare building comprising toilets and staff room.*
- *A security building including an administration office.*
- *A security booth adjacent to an exit loop for errant vehicles.*
- *A smoking shelter.*
- *A postal consolidation building at the western part of the site to handle and process deliveries.*
- *Two landscape bunds and additional planting.*
- *A proposed access point to the site from the existing slip road leading onto the A12.*
- *A temporary diversion of bridleway E-288/008/0 around the construction area for the proposed access road.*
- *Other ancillary development, including signage, road markings, lighting, CCTV and utilities.*
- *External areas including roadways, footways, landscaping and drainage infrastructure.*
- *Up to three infiltration ponds and up to seven swales forming part of the Sustainable Drainage System (SuDS).*
- *Protection of a medium pressure (below two bar) Cadent gas main.*
- *A TIMA at the north of the site to enable construction-related vehicles (including HGVs) to be held in the event of an incident within the Sizewell C main development site or external to the Sizewell C main development site on the local road network.*

1.5.3 And continues [paras 2.2.7 to 2.2.8]:

Existing boundary vegetation would be retained where possible, with additional screening from the proposed landscape bunds and security fencing where necessary,

to provide visual screening from local residential properties, the A12 and local public rights of way (PRoWs).

Soft landscaping, comprising grassed areas and suitably sited tree and shrub planting, would be provided whilst the site is operational and would be removed as part of the removal and reinstatement of the site. However, where agreed with the landowner of the site, the screen planting provided around all boundaries of the site during construction and operation would be left in situ following the removal of the proposed development and reinstatement of the site.

1.5.4 With regard to the site access, para 2.2.10 and 2.2.11 note:

Access to the site would be provided off the slip road from the B1078 which leads to the northbound A12. The site access road would include a deceleration lane. An existing private means of access and PRoW (bridleway E-288/008/0) currently cross the proposed internal access road.

Use of both the private access and bridleway E-288/008/0 would not be stopped or curtailed but both would be temporarily extinguished to the south of the proposed access road, with vehicles and non-motorised users diverted via the proposed site access road. An existing footway along the slip road would be extended into the site to facilitate journeys on foot.

1.5.5 Para 2.2.11 notes that *"…a security booth would be located west of the gate, and access point to the park and ride facility, and north of a turning circle to enable errant vehicles to safely turn and exit the site before they reach the parking area."*

2 Review of ES Volume 4, Chapter 6

2.1 Section 6.1: Introduction

2.1.1 Para 6.1.1 notes:

This chapter of Volume 4 of the Environmental Statement (ES) presents an assessment of the potential effects on landscape and visual arising from the construction, operation and removal and reinstatement of the southern park and ride at Wickham Market (referred to throughout this volume as the 'proposed development'). This includes an assessment of potential impacts, the significance of effects, the requirements for mitigation and the residual effects.

2.1.2 Para 6.1.4 notes that the assessment has been informed by data presented in two technical appendices:

- Appendix 6A: Illustrative Viewpoints; and
- Appendix 6B: Night-time Appraisal.

2.2 Section 6.2: Legislation, policy and guidance

2.2.1 No comment.

2.3 Section 6.3: Methodology

2.3.1 Chapter 6 makes no direct reference to a Landscape and Visual Impact Assessment (LVIA) being undertaken; however, para 6.3.3 notes that:

> *This section provides specific details of the landscape and visual impact assessment methodology applied to the assessment of the proposed development and a summary of the general approach to provide appropriate context for the assessment that follows. The scope of assessment considers the impacts of the construction, operation and removal and reinstatement of the proposed development.*

2.3.2 Notwithstanding this, for ease of reference, the assessment reported in Chapter 6 is referred to in this review as the LVIA.

2.3.3 The methodology proposed for the assessment, as set out at Section 6.3, is *"based primarily upon the guidelines for the landscape and Visual Impact Assessment"* [para 6.3.4]. The Guidelines for Landscape and Visual Impact Assessment, Third Edition, Landscape Institute and the Institute of Environmental Impact Management and Assessment, April 2013 (GLVIA3) is the industry standard for preparing LVIAs and the like. The methodology employed by the Landscape Architect undertaking the LVIA appears sound and reasonable and complies with industry best practice.

2.3.4 Correctly, the methodology requires a judgement to be made of the sensitivity of each landscape or visual receptor, as a product of its value and its susceptibility to change to development of the type proposed. This is then combined with the magnitude of the change experienced (a product of the scale of the effect, its duration/reversibility and its geographical extent), to give a significance of effect. A judgement is then made as to the nature of the effect, be it adverse, neutral or beneficial.

2.3.5 Importantly, para 6.3.37 notes that Major and Major-Moderate effects are considered to be Significant in EIA terms.

2.3.6 The following observations are made:

- Table 6.3: Landscape value separates Local/District landscapes *"Locally or regionally designated landscapes; also areas which documentary evidence and/or site observation indicates as being more valued than the surrounding area"* from Community landscapes (*"'Everyday' landscape which is appreciated by the local community but has little or no wider recognition of its value".).*
- Table 6.4: Assessment of sensitivity of receptors for landscape and visual impact assessments includes a matrix that determines that a landscape with a Community value can have a maximum overall sensitivity of Medium, even when the susceptibility

is High. This would appear to be over-prescriptive, thus limiting consideration of the specific local conditions within landscapes with a Community value that would otherwise result in them having an overall sensitivity greater than Medium when combined with a High susceptibility to change.

- Para 6.3.22 notes that for visual receptors, susceptibility and value are closely linked, and that it is *"therefore not possible to separate out visual receptor value from susceptibility. Typical examples of visual receptor sensitivity are plotted in a diagram within the appendix to Volume 1, Appendix 6I of the ES."* This is at variance from the guidance within GLVIA3. Reference to this table shows that people in the streets around their home or using public rights of way or open space have a Medium-High sensitivity, users of local roads a Medium sensitivity, and users of A Roads a Medium-Low sensitivity.
- The findings of the LVIA are not set out in a clear manner, e.g. it is necessary to scan the whole text to find the sensitivity judgements for each receptor, and how they have been derived. This is contrary to GLVIA3, chapter 8. These could have been set out in a tabular form for ease of consideration.

2.3.7 Para 6.3.41 notes assumptions made during the assessment; TLP makes the following comments:

- The assessment and visualisations are *"based on the parameters for the temporary structures, landscaped bunds and lighting provided in the description of development at Chapter 2 of this volume of the ES"*;
- Photography used in the assessment was taken in winter months when deciduous trees were devoid of leaves, and thus might be considered to represent a worst-case scenario in terms of openness of views.
- Proposed screen planting at year one is assumed to be 800mm high – this would appear to be an optimistic average.
- For screen planting and hedges, growth rates of 400mm per year are assumed. The soils at the site are slightly acid loamy and clayey soils with impeded drainage and moderate to high fertility. Based on local knowledge and direct experience of similar local planting projects TLP considers that a growth rate of around 300mm per year is a more realistic estimate; the exact rate will also depend on species, the form and method of planting and ongoing after care.

2.4 Section 6.4: Baseline environment

i: Key local guidance documents

2.4.1 This is a short list and does not make reference to all the documents noted at Section 6.2.

ii: Site and context

2.4.2 This section provides a brief description of the landscape features of the site and its context. It should be expanded to better describe the character and composition of the particular vegetation structures bordering the site. For example, no mention is made of the mature oak adjacent to the bridleway on the western boundary of the site, nor the historic hazel coppices. Such level of information is important to:

i. understand the full effects of the proposed development on landscape features; and

ii. inform the type, scope and character of the emerging mitigation proposals and any legacy features.

iii: Zone of Theoretical Visibility Study

2.4.3 The analysis of the ZTV illustrated on Figure 6.4 has excluded several views of the site, particularly to the south-east and south. These are considered in subsequent sections of this review. As a result, the *"Zone of visual influence (ZVI) (based on site observation)",* as shown on Figure 6.4, has been mapped with too restrictive an extent. It does not represent the full extent of the likely visibility of the proposed SP&R facility, and should be reassessed and extended where necessary, in order that the assessment takes account of the full range and composition of the views available.

iv: Landscape character

2.4.4 This section provides a very brief overview of published landscape character assessments that encompass the site.

2.4.5 It is usual for the baseline to describe the special characteristics and features of the landscape as identified in the various assessments, in order to identify sensitive receptors. It is noted that further details are included at Section 6.6 but it is important that the attributes of the landscape are fully understood early in the process so that they can be taken into account and/or reflected in the emerging scheme design.

v: Visual environment

2.4.6 Eight representative viewpoints have been chosen to inform the visual assessment. These are illustrated on Figure 6.4, although the presence of the purple ZTV wash makes it hard to see the exact location of the viewpoints.

2.4.7 As noted at para 2.4.3 above, the ZTV does not represent the full range of views available, and this is reflected in the selection of viewpoints within the assessment, chosen to represent the visual effects of the proposed development. The representative viewpoints should be expanded so as to represent a more comprehensive selection of views to and of the site, from at least the following viewpoints that are not currently considered within the assessment. For ease of reference, these additional viewpoints are listed by parish.

Campsea Ashe

Brick Kiln Cottages

2.4.8 From public footpath Hacheston 7, which commences on Station Road adjacent to Brick Kiln Cottages, views across agricultural land are available into the body of the site.

Hacheston

The Rookery and nearby properties

2.4.9 From localised windows in properties in the vicinity of The Rookery and the B1116, views are available up the valley side into the western part of the site.

Marlesford

Marlesford Hall

2.4.10 From most points within Marlesford Park, the site is screened by intervening vegetation and/or the roll of the topography. However, looking back towards the park from the bridleway on the western edge of the site, there is a clear line of sight to the Grade II* listed Marlesford Hall on the opposite valley side and orientated so that its principal elevation fronts the direction of the site. It is likely, that at least the upper portions of the site, at the top of the opposite valley side, are a component of views from the Hall.

Public footpath Marlesford 1

2.4.11 From public footpath Marlesford 1, which rises up the valley side to the west of Marlesford Park, the eastern edge of the site would be visible, although the footprint of the site would be hidden by the roll of topography. Such viewpoint would be experienced from a similar elevation and aspect to Marlesford Hall.

Pettistree

Chapel Lane/Green Lane

2.4.12 Public footpath Pettistree 6, on south-eastern edge of Wickham Market, follows Green Lane northward from Chapel Lane in the direction of the site. Clear, open and elevated views are available across agricultural land into the main body of the site.

Loudham Hall Road overbridge

2.4.13 From the Loudham Hall Road bridge over the A12, views into the main body of the site are screened by highway planting in the foreground, but glimpses to the footprint of the proposed access road are possible, thus the access road and associated lighting are likely to be visible.

Wickham Market

Border Cot Lane

2.4.14 From the junction of Border Cot Lane and Broad Road, on the northern edge of Wickham Market, views to the site area are blocked by intervening vegetation in the valley floor. However, the proposed development would be located on the opposite valley side and the

effects of lighting are likely to be experienced by receptors in the vicinity of this point. Views are likely to be experienced from some of the residential properties on the elevated Parkway to the south of Bordercot Lane.

Public footpath Wickham Market 9

2.4.15 As it rises up the hill, public footpath Wickham Market 9 follows the settlement edge of Wickham Market, to the rear of properties in King Edward Avenue and connecting Spring Lane and High Street via George Lane. The footpath affords views towards the footprint proposed for the access road. The main body of the site is only partially screened by the vegetation along its western boundary.

vi: Landscape designations and value

2.4.16 It is noted that much of the study area is covered by a Special Landscape Area (SLA) designation. No information is included as to how or why SLA designations have been made.

2.4.17 SLAs in Suffolk were first identified by Suffolk County Council's Countryside Team in c.1976 to 1978. At this time, many other local authorities were carrying out a similar exercise and identifying areas of landscape (not otherwise protected as AONB or National Park) that were considered to be of particularly high value and sensitivity and using local policy to protect them from development. The SLA designation first appeared in the Suffolk County Structure Plan Written Statement (1979), with a view to them being taken up by district councils and included in local plans at a later date.

2.4.18 In Suffolk, areas particularly sensitive to inappropriate development were identified using a combination of desktop study and field work; the task predated more formal methods of landscape character assessment. This exercise formed part of the preparation of a countryside strategy for Suffolk, which included a survey of existing trends and issues, and which resulted in guideline strategies for the conservation of rural landscapes, countryside recreation and tourism. This strategy was incorporated into the forthcoming Structure Plan. The initial tranche of mapping resulted in the river valleys (and in particular the grazed meadows) upstream of the Suffolk Coast and Heaths and the Dedham Vale AONBs being identified as areas worthy of increased protection. For example, the Deben and Ore Valleys SLA extends from the Suffolk Coast and Heaths AONB to (for example) Debenham and Bruisyard. Later areas encompassed important woodlands and historic landscapes, for example Marlesford Hall and Glevering Hall parklands.

2.4.19 SLAs were designated to safeguard special landscape attributes that are particularly vulnerable to change, including river valleys with traditional grazing meadows with marshes, hedgerows and watercourses.

2.4.20 In the vicinity of the site, the SLA encompasses the valleys of the Deben and Ore upstream of the Suffolk Coast and Heaths AONB. To the west of the site the SLA rises up the valley sides to include the higher land between the valley, e.g. Hacheston, Easton and Parham.

2.4.21 The SLA designation has not been taken forward in East Suffolk's Suffolk Coast Local Plan (adopted September 2020). Instead, a landscape character assessment approach to informing policy making and planning decisions is promoted, rather than the use of locally defined area specific landscape designations. Nonetheless, the special characterises of the SLAs (e.g. the river valleys and their tributaries) endure, and remain particularly vulnerable to change.

2.5 Section 6.5: Environmental design and mitigation

2.5.1 Two types of mitigation are proposed. Primary mitigation measures that *"have been identified through the iterative EIA process and have been incorporated into the design and construction planning of the proposed development"* [para 6.5.1], and tertiary mitigation measures that *"are legal requirements or are standard practices that will be implemented as part of the proposed development".*

2.5.2 Para 6.5.2 confirms that the assessment has been undertaken on the assumption that both primary and tertiary mitigation measures are in place.

Primary mitigation

2.5.3 Primary mitigation measures are those that have developed through the iterative design process and which have become integrated or embedded into the project design.

2.5.4 Primary mitigation measures proposed, as relevant to landscape and visual effects, include the following.

Landscape bunds

[para 6.5.4, bullet 1] The creation of landscape bunds up to 3m high to the southern, eastern and northern boundaries of the site using on-site material removed due to earthworks associated with the levelling of the site and top soil storage.

2.5.5 Confirmation is required regarding the footprint of the bunds, their top height and their finished profile, before a judgement can be made regarding their influence on the landscape during the operational phases.

2.5.6 The DCO drawing EDF drawing No. SZC-SZC-01-XX-000-DRW-100164 Rev 01: Southern Park and Ride Proposed Landscape Masterplan and Finished Levels, dated February 2020 illustrates a bund extending only half-way across the northern boundary. Confirmation is required that it would encompass the whole of the northern edge of the site as had been proposed at all earlier consultation stages 1 -4. Such a bund would help reduce views from the B1116, where the northern edge of the site is experienced at the top of the valley side; however, it is likely that some views of structures, lighting columns/lighting and taller vehicles within the TIMA would remain.

2.5.7 More recently, EDF drawing No. 7678_SK_SPR01: Southern Park and Ride at Wickham Market, Annotated Masterplan for Discussions, dated November 2020, was prepared as part of the consultation on Step 5 (November 2020). This drawing illustrates a 3m high

bund along the entire length of the north-western boundary. Parish councils were supportive of this bund being reinstated.

2.5.8 This drawing was submitted to the DCO in January 2021 as part of a package of amendments following the Stage 5 consultation. It is noted that there have been no substantive changes other than the reinstatement of the north-western bund. As such, this drawing does not address the concerns.

Retention of existing woodland

> [para 6.5.4, bullet 2] *The retention of existing woodland and hedgerows where appropriate, as well as additional temporary soft landscaping and suitably sited tree and shrub planting within the car parking areas.*

2.5.9 An Arboricultural Impact Assessment is required to understand which sections of hedgerows and any other vegetation would be removed in order to accommodate the access road and other elements of the development. An Arboricultural Method Statement is required to detail how the retained vegetation, including the woodland margins, would be protected during construction and operational phases.

2.5.10 Initial observation of the Landscape Masterplan suggests that the bund on the western boundary of the site would be very close to, and potentially within the root protection area of Whin Belt, including the copse within the site area.

2.5.11 No detail has been provided as to how the access road would cut through the hedgerow bordering the bridleway. This includes the mature oak that makes an important contribution to the wider landscape and historic hazel coppices that help define the character of the bridleway and which are an indicator of its history and antiquity.

2.5.12 Similarly, existing vegetation is not marked accurately on the Landscape Masterplan but rather by means of indicative lines. The spatial extent needs to be plotted. No vegetation immediately to the north of the access road is being shown as retained, and only a length of hedge to the south. Where vegetation is to be maintained, the spatial arrangement of new features (roads, parking, structures) is such that it appears that insufficient space has been allowed to accommodate the full width of the existing retained vegetation. There is currently no certainty that the mature oak can be retained within the proposed layout. Neither is annotated on the drawings. Its removal (or future loss) would have a large (and unnecessary) adverse effect on landscape and visual character.

Supplementary hedgerow planting

> [para 6.5.4, bullet 3] *Permanent supplementary hedgerow planting proposed along the southern and eastern boundaries of the site to screen views from Footpaths E-387/008/0 and E-288/007/0.*

2.5.13 No comment. It is assumed that this planting would be retained in perpetuity.

Temporary hedgerow planting/replanting

[para 6.5.4, bullet 4] *Temporary hedgerow planting would also be planted along the access road, whilst the park and ride is operational, to replace hedgerows lost during construction, and would be re-planted as close as possible to the original hedgerow line during the removal and reinstatement phase.*

2.5.14 Confirmation is required as to where the hedgerow would be replanted. There is a desire by the parishes to ensure that all planting is designed to have longevity so that it can be retained and enhance the roadscape after the car park use has ceased

Lighting design

[para 6.5.4, bullet 5] *Lighting columns within the car parking areas and along the access road would be restricted to 6m in height to minimise visibility during day and night-time.*

[para 6.5.4, bullet 6] *Lighting columns, to a maximum height of 10m including lanterns, would be provided from the roundabout with the B1078 and along the slip road leading to the site and the northbound A12.*

[para 6.5.4, bullet 7] *Lighting columns would utilise LED base lights with zero-degree tilt to minimise light spill and along the perimeter would be fitted with demountable shield to reduce backward spill of light.*

2.5.15 The scheme would introduce extensive areas of lighting into a landscape that is currently devoid of light elements, save from headlights of traffic using the A12 and around the B1116/B1078 roundabout junction. The lighting would be visible from areas that are currently devoid of lighting and which are considered to have strong rural characteristics, e.g. from the northern side of the Ore valley, the Marlesford Conservation Area and in the vicinity of the B1116.

2.5.16 EDF has confirmed that the TIMA would be lit when in use, although this is not indicated in the lighting plans. The TIMA would be located on one of the highest parts of the site and when in use lighting would be particularly noticeable from points in the surrounding landscape, including the more rural parts such as the south-facing valley sides in Marlesford and the B1116 through Hacheston.

[para 6.5.4, bullet 8] *Use of a central management system for the lighting which would be capable of dimming of parts of the site independently from other parts.*

2.5.17 Further certainty is required as to what the light management regime would be and which areas would be lit when, in order to fully understand the effects on surrounding receptors, especially settlements such as Wickham Market and Marlesford, where light glow is likely to be visible even if the physical elements of the proposed development are not.

General design approach

[para 6.5.4, bullet 9] *A general design approach aiming to create an unimposing appearance, with the buildings screened as far as possible. The layout aims to maximise the benefit of existing screening provided by Whin Belt and the other blocks of woodland located to the north, west and east. Where visible the buildings would adopt natural colours to allow their appearance to harmonise with the surroundings.*

2.5.18 No comment.

Decommissioning, reinstatement, and legacy

2.5.19 Para 6.5.6 notes:

Following cessation of use of the park and ride facility, the buildings, lighting, surfacing and associated infrastructure, including site drainage and temporary landscape planting, would be removed. The top soil stored in the bunds would be used for reinstatement and the area returned to agricultural use.

2.5.20 EDF has verbally made reference to leaving a landscape legacy; however, confirmation is required as to what this legacy would comprise. Reference is made to re-planting hedgerows *"lost during construction"*, which would be *"re-planted as close as possible to the original hedgerow line during the removal and reinstatement phase"*. The following detail should be provided in order to fully appraise the residual effects of the SP&R:

- Where the hedgerow re-planting would take place.
- Confirmation that the existing planting along the slip road would be retained and the new hedgerow planting, including hedgerow trees, would be retained beyond the life of the SP&R facility.
- What reinstatement and management are proposed to make good the damage to the ancient hedgerow following the line of the bridleway on the western boundary, following removal of the access road.
- Whether the historic field boundary on the northern edge of the site would be reinstated.

Other mitigation measures

2.5.21 In addition to the mitigation noted above, TLP consider the following measures should be included:

Hedgerow trees

2.5.22 The inclusion of hedgerow trees within the boundary hedges would help filter views of the development from points beyond and provide a long-lasting enhancement to the landscape.

2.5.23 The November 2020 Annotated Masterplan shows the inclusion of hedgerow trees on the site boundaries. Again, confirmation is required regarding the status of this drawing in order to ensure their delivery.

Planting on north-western boundary

2.5.24 A native hedgerow, with hedgerow standard trees, along the site's north-western boundary would supplement and help soften (and in time screen) views of the bund proposed along this boundary that would, in itself, introduce an artificial structure to the landscape. This mitigation would be particularly important in views from the vicinity of the B1116 in Hacheston, e.g. from points within and around The Rookery, where the bund and elements of the SP&R beyond would be visible on elevated ground.

2.5.25 Ideally, this hedge would be retained beyond the life of the SP&R. It would add to the scheme's landscape legacy by reinstating the historic line of planting that, in the recent past, followed the track between Beggar's Barn and the former pit along the ridge of higher land, where it would be visible in the wider landscape.

Woodland copse

2.5.26 The addition of a copse of woodland within the access road area, ideally to the south-west of the proposed road and/or between the access road and the A12 slip road would provide some height, help offset the effects of the new construction (road, building and lighting). Again, this copse should be retained as part of the scheme's landscape legacy where it would supplement the existing vegetation along the line of the bridleway and the A12 slip road.

Hedgerow enhancement

2.5.27 There are a number of hedgerows in the close proximity of the site that would benefit from enhancement and management. For example, the hedges that follow the rising ground between B1116 and the site.

2.5.28 Such off-site enhancement measures would help strengthen their screening attributes, particular in relation to views from road users and properties to the west and north-west of the site. They would also contribute to the long-term future of the landscape by aiding their long-term condition and linking existing (and proposed) hedges and blocks of woodland into the wider vegetation framework.

Tertiary mitigation

2.5.29 Tertiary mitigation measures are those that are required because they are generally imposed through legislative requirements or standard sector practices, regardless of the EIA.

2.5.30 Tertiary mitigation measures proposed, include the following.

- *minimum light levels for safe working and the minimum number of lighting elements to illuminate the work area safely will be used;*
- *lighting will be directed away from site boundaries to minimise nuisance to adjacent properties. If lights cannot be positioned in such way because of*

physical constraints or for safety reasons, then local screening of the lights, including shielding of luminaires, where appropriate, will be used to reduce disturbance;

- *task-specific lighting will be turned off on completion of the task, or at the end of the working day by the contractor;*
- *spotlights and task lighting towers will be positioned away from sensitive receptors, where identified; and*
- *contractors will consider the use of sensors or timing devices to automatically switch off lighting, where appropriate.*

2.5.31 Further details and confirmations are required to understand the full effects of lighting on the landscape, in particular in relation to the timings for the lighting regime. References such as *"… contractors will consider the use of sensors or timing devices …"* do not provide sufficient certainty to be taken into account as mitigation within an assessment.

2.6 Section 6.6: Assessment

a) Introduction

2.6.1 The LVIA assesses effects at the following stages:

- construction - 12 to 18 months
- operation – 9 to 12 years (where relevant, a distinction is made between effects at year 1 following completion of construction and year 10, following "*establishment and initial maturation"* of mitigation planting; and
- removal and reinstatement

b) Construction

2.6.2 The construction phase would involve:

… earthworks to clear the site and reuse of material on-site to provide landscape bunds; the construction and installation of security fencing, surfacing, lighting and buildings ; and the planting of trees and hedgerows. The construction works are anticipated to take 12–18 months to complete and would involve the movement of construction vehicles, storage of materials, task lighting and gradual transformation of the site from a field to a park and ride facility. [para 6.6.4]

i: Landscape fabric

2.6.3 Assessment very brief with no judgements made.

2.6.4 It is noted [para 6.6.5] that 40m of native hedgerow would be removed to create the site access. It is assumed that this relates to the road passing through two sections of the hedge bordering the bridleway, each 20m in length. Even so, a 20m wide corridor to

accommodate the access road appears over excessive. It is not possible to assess the effect of this removal without reference to an Arboricultural Assessment that specifies the extent and quality of vegetation to be removed.

2.6.5 The species-rich hedgerows (ES Volume 4, Chapter 7, Figure 7.2) are not illustrated on the Landscape Masterplan, but appears to be of commensurate quality to the retained section categorised as an Important Hedgerow under the Hedgerows Regulations 1997, which is illustrated indicatively (as a single line).

2.6.6 Clarity is also required as to why it is necessary to remove two 20m sections of important and species-rich hedge in order to accommodate an access road and footpath c.5.5m wide. Also, confirmation of exactly which trees and sections of hedge would be removed and how that to be retained would be protected.

ii: Landscape character

2.6.7 The assessment states that the site falls within the Suffolk Landscape Character Assessment, Plateau Estate Farmlands Landscape Type, and makes the following judgements regarding this receptor:

- Sensitivity: Medium to Low (value: Community, susceptibility to change: Medium to Low)
- Magnitude: Medium (scale Large at the site and Medium in the adjacent fields to the north-west)
- Effect: Moderate Adverse

2.6.8 The susceptibility of the landscape to change of the type proposed (Medium to Low) appears to have been underestimated, given that it is currently an agricultural field with little or no reference to built form save the A12.

2.6.9 The overall magnitude of change appears to have been underestimated given the acknowledged Large scale of change at the site, the wholesale change of land use over a relatively extensive area of farmland [not a *"limited extent"* as noted at para 6.6.18] and the introduction of extensive areas of lighting in what is currently a largely unlit landscape.

iii: Visual receptors

2.6.10 The LVIA's judgements on the scale of the effect experienced from each of the representative viewpoints is summarised at Table 6.9. **NB:** as noted above [para 2.4.7], it is considered that the selected representative viewpoints do not reflect the full extent of the site's visibility, and that the assessment should be extended to take into account at least the additional itemised viewpoints.

Viewpoint R1 - A12 at the end of Footpath E-288/007/0 – public footpath on southern boundary of site

Scale of effect: Large adverse

2.6.11 The viewpoint analysis notes:

The construction of the proposed development would occur directly adjacent to this viewpoint. Views would be significantly shortened as the proposed landscape bunds are constructed along the edge of the proposed car parking areas to provide screening. Looking over the proposed bunds, taller construction equipment would be visible, along with lighting columns as they are constructed. A gap in the proposed bunds would be located to the right hand side of the extent of the view shown above, allowing more open views of construction activity.

2.6.12 The description of effects does not make mention of the adverse effects arising from the bund itself and the loss of long distance views across the landscape.

2.6.13 Applying the methodology outlined at Section 6.2, and in particular Plates 6.1 and 6.2, a scale of effect of Large, with a localised effect and a long-term duration, would equate to a magnitude of Medium to High. When experienced by a receptor of High-Medium sensitivity (see below), this equates to an effect of Major-Moderate significance.

2.6.14 Para 6.3.37 notes that: *"… Within this assessment, major-moderate or major effects are considered to be significant and effects of moderate significance or less "are of lesser concern" …"*.

Viewpoint R2 - Bridleway E-288/008/0 – bridleway to the west of the site

Scale of effect: Large adverse

2.6.15 The viewpoint analysis notes:

Construction of the proposed development would be seen in the foreground from this viewpoint. Views would be significantly shortened for part of this route as a new landscape bund is constructed along the edge of the site to provide screening. Looking over and around the bund, construction equipment would be visible, along with the car park area of the proposed development as it is constructed.

2.6.16 The assessment of the view from this point is based on the assumption of there being a bund along western boundary of the site. Reference to the Landscape Masterplan and descriptions of the proposed development within the LVIA suggests that no such bund would be present. Rather, the construction works necessary to build the access road would be in the foreground of the view, with only a section of new hedge to provide any mitigation. There appears to be little room to establish such a hedge and it would be many years before it provided any screening qualities.

2.6.17 The effects experienced by receptors using the bridleway, including the introduction of a security fence in the immediate foreground, should be reassessed to reflect the scheme design.

2.6.18 The November 2020 Annotated Masterplan shows an attempt to introduce a hedge between bridleway and the TIMA access road, along with the site security fence, lighting columns and any necessary changes in level. There appears to be very little space to accommodate and establish a hedge here and further detail is required to demonstrate the practicability of its deliverability, such that it could be relied upon within the assessment. As previously, confirmation is required as to the status and certainty of this element of the scheme.

2.6.19 The commentary relating to R1 regarding significance of effect would apply equally to this view.

Viewpoint R3 - Footpath E-387/008/0 – view from footpath to the east of the site

Scale of effect: Small neutral

2.6.20 The viewpoint analysis notes:

> *Construction of the proposed development would occur behind the existing hedgerow, which would be supplemented as appropriate, behind which the landscape bunds (up to 3m high) would be constructed. The main car park area of the proposed development would be constructed behind the bunds. Views would be limited to taller construction equipment and vehicles, and the lighting columns as they are built.*

2.6.21 Lighting columns and taller vehicles are likely to be clearly visible above the bund and intervening hedge. The degree of change has been underestimated.

2.6.22 Given that an effect is acknowledged, it is hard to envisage how the nature of change could be Neutral and not Adverse, since there is little proposed that would enhance the quality of the view.

Viewpoint R4 - Footpaths E-178/003/0 & E-387/007/0

Scale of effect: Negligible neutral

2.6.23 The viewpoint analysis notes:

> *Construction of the proposed development is unlikely to be seen clearly from this viewpoint, with any views likely to be glimpses of taller construction vehicles and equipment above the landscape bunds on the site boundaries. These glimpses would not notably alter the views, in which the moving traffic on the A12 would remain the more noticeable feature.*

2.6.24 No comment, save the degree of change appears to be underestimated.

Viewpoint R5 - Footpath E-178/003/0 & Station Road. – close to Bottle and Glass Cottages

Scale of effect: Small neutral

2.6.25 The viewpoint analysis notes:

Construction of the proposed development would be visible in the middle distance, with construction of the landscape bunds visible in the early stages, reducing to views of the tops of taller construction and the lighting columns above the landscape bund, when they are built. Vehicles moving along the A12 would remain more likely to catch the eye.

2.6.26 Reference to the visualisation for R5 (see Appendix 4A) shows that the lighting columns and taller elements within the site would rise above the perimeter bund and be clearly visible as they were constructed. As such, it is considered that the magnitude of change has been underestimated.

2.6.27 Again, given that an effect is acknowledged, clarification is required as to how the effect could be judged as Neutral and not Adverse.

Viewpoint R6 – view from the B1116, close to the B1116/B1078 roundabout

Scale of effect: Negligible neutral

2.6.28 The viewpoint analysis notes:

Construction of the majority of the proposed development would occur behind Whin Belt and would not be visible from this viewpoint, with the exception of the site access which would be constructed from the slip road of the A12 to the south of Whin Belt. This construction activity would be viewed in the context of the vehicular movement along the A12.

2.6.29 No comment.

Viewpoint R7 – view from the B1116 & Bridleway E-288/008/0, south of Hacheston

Scale of effect: Negligible neutral

2.6.30 The viewpoint analysis notes:

Construction of the proposed development would occur behind the woodland blocks and any views of construction activity are likely to be through the narrow gap at the centre of the view, between the two areas of woodland. Viewers may see the tops of taller construction equipment and the lighting columns as they are built.

2.6.31 Clarification is required as to whether the assessment is made on the basis of a bund extending the full length of the site's northern boundary.

2.6.32 Clarification also required as to how a Neutral effect can be recorded given the likely visibility of the proposed development.

Viewpoint R8 – view from Footpath E-387/009/0, close to Lime Tree Farm, Marlesford

Scale of effect: Negligible neutral

2.6.33 The viewpoint analysis notes:

> *Views of construction of the proposed development are likely to be relatively distant views of the tops of any tall construction equipment and the lighting columns as they are built.*

2.6.34 No comment.

2.6.35 The viewpoint analysis notes:

> *Views of construction of the proposed development are likely to be relatively distant views of the tops of any tall construction equipment and the lighting columns as they are built.*

2.6.36 The LVIA then groups the representative viewpoints into different receptor types. This compacting exercise necessarily averages the assessment findings, discounting the higher (and lower) effects, with the result that there is less detail to inform the emerging mitigation proposals. The assessment has (correctly) identified some adverse effects that would occur from the scheme. The purpose of landscape and visual impact assessment is to test the landscape and visual effects of an emerging scheme and to amend and improve the design as necessary to address any adverse effects arising. Such an exercise cannot be fully completed nor undertaken satisfactorily when the results are processed into a homogenised middle ground.

2.6.37 The GLVIA notes (page 118 and TLP emphasis]:

> *The visual effects that have been identified must be assessed to determine their significance, based on the principles described in Chapter 3. This requires methodical consideration of each effect identified and, for each one, assessment of the sensitivity of the visual receptor and the magnitude of the effect on views and visual amenity.*

2.6.38 The assessment of the view likely to be experienced by each individual visual receptor needs to be considered separately in order that the full effects of the proposed development can be correctly understood and so that appropriate mitigation measures can be designed to address adverse effects.

2.6.39 As might be predicted, the amalgamation of the results has resulted in judgments of lower severity within the assessment than that might otherwise be the case had they been considered individually. For example, despite recording a number of close proximity Large scale of effects being recorded, the assessment found the magnitude of effect experienced by Group 1 receptors (users of footpaths and bridleway to the north of the A12 and within 400m of the site) was only Medium, equating to a Moderate Adverse effect. [Had the full Large scale of change been employed, this would appear to equate to magnitude of Medium-High to High, which in turn would equate to a Major-Moderate Adverse effect.

Long distance routes

2.6.40 Receptors using long distance routes – motorists using the A12 – are judged [para 6.6.28] to have a Low sensitivity. This does not reflect the road's location within countryside, and its function of providing the main route through east Suffolk and to the Suffolk Coast and Heaths AONB. The road is the main way that most people experience this landscape.

Viewpoints not considered

2.6.41 As noted above [paras 2.4.3 and 2.4.7], the visual assessment should be expanded to include the effects from viewpoints on the northern side of the Ore valley (with particular consideration of the effects of lighting at dusk from public rights of way) and from the edge of Wickham Market (lighting from points on the northern edge and open views from points in the vicinity of Chapel Road).

Landscape designations and value

2.6.42 Para 6.6.31 notes that the assessment of the likely effects on the SLA has been made by consideration of the special qualities of the SLA:

- Traditionally grazed river valley meadows and marshes with intact hedgerows and dykes and associated flora and fauna.
- 18th and 19th century designed parks and gardens, and occasionally areas of farmland in their surroundings that contribute to their setting.

2.6.43 Mindful that it is likely that lighting effects would be experienced from the south facing slopes of the Ore valley and from within Marlesford Park, as well as from the B1116, this assessment should be reviewed to ensure that all potential effects are considered and appropriate mitigation measures are designed.

iv: Inter-relationship effects

2.6.44 No comment.

C) Operation

i: Landscape fabric

2.6.45 No further assessment undertaken. Commentary in relation to effects during the construction phase remain.

ii: Landscape character

2.6.46 Plateau Estate Farmlands Landscape Type.

- Sensitivity: Medium to Low (value: Community, susceptibility to change: Medium to Low)
- Magnitude: Medium
- Effect (within the site and adjacent fields): Moderate Adverse
- Effect (within remainder of landscape type): Minimal Neutral

2.6.47 See comments above [from para 2.6.7] relating to effects on landscape character during the construction phase.

Appendix 6B: Night-time appraisal

2.6.48 Para 6.6.41 notes:

> ***Appendix 6B*** *to this volume considers the effects of the lighting elements of the proposed development on the Plateau Estate Farmlands LCT. The assessment indicates that the effects of lighting on this LCT would be of medium magnitude, given that new areas of lighting would be introduced but lighting is already present in the vicinity of the existing A12 elevated junction of the A12 with the B1078 and B1116, and would result in a moderate adverse effect that is considered to be* ***not significant*** *given the relative lack of existing artificial lighting in the vicinity of the northern part of the site.*

2.6.49 The assessment concentrates on the effects experienced at settlements. It gives too much weight to the influence of existing lighting at the B1078/B1116 junction. Lighting along the slip road and into the site area would be visible as a large incursion into what is currently an unlit landscape.

2.6.50 Reference to Appendix 6B shows that the effects of light glow experienced by users of the public footpaths in the Ore Valley in the vicinity of Marlesford, etc. are dismissed on the grounds that they wouldn't be used after dark. The assessment should be reviewed to take account of users returning home at dusk, and the mitigation measures adapted appropriately.

2.6.51 Light glow on the horizon is also likely to be visible from the B1116.

iii: Visual receptors

2.6.52 See comments above [from para 2.6.10] in relation to the visual effects during the construction phase.

Long distance routes

2.6.53 Users of long distance routes – motorists using the A12 – are considered to experience a Medium magnitude of effect in both daytime and night time [paras 6.6.48 and 6.6.49]. For daytime users, this is noted to equate to a Slight Adverse effect, and for night time users a Moderate Adverse effect. It is assumed that the divergence is due to the receptor having a greater night time sensitivity (introduction of lit elements into an unlit landscape) than in the daytime

iv: Inter-relationship effects

2.6.54 No comment.

d) Removal and reinstatement

2.6.55 Para 6.6.57 notes:

> *… In addition, the hedgerows along the access road would be removed and reinstated on their original alignments. Any supplementary planting of boundary hedgerows would be retained, where possible, in agreement with the landowner.*

2.6.56 Greater certainty is required as to what planting would be retained as a landscape legacy.

iv: Inter-relationship effects

2.6.57 No comment.

2.7 Section 6.7: Mitigation and monitoring

2.7.1 Where other mitigation (beyond that noted at Section 6.5) is required to reduce or avoid an adverse significant effect, this is referred to as secondary mitigation.

2.7.2 Para 6.7.2 notes that "No secondary mitigation measures are proposed for the landscape and visual assessment …".

2.7.3 Para 6.7.3 notes:

> *The proposed planting would require maintenance and management during the operation of the proposed development, with replacement of plant failures during the first few years of establishment (usually 5 years) as required.*

2.7.4 No details are provided as to what this maintenance and management would be. Further, no details are provided as to what, if any, management works are proposed for existing vegetation either during the operation phase or on completion to ensure it continues to provide a long-term contribution to the landscape.

2.8 Section 6.8: Residual effects

2.8.1 Para 6.8.2 notes that:

> *Following completion of the removal and reinstatement works, the site would be returned to agricultural use and there would be no permanent landscape and visual effects.*

2.8.2 This section of the assessment should be revisited and opportunities be sought for the project to leave some landscape legacy after it has been completed. This might be in the form of landscape enhancement through the addition of new features or by beneficial changes to or landscape management of existing landscape features. If the proposed mitigation measures are suitably designed, they could, where appropriate, be retained beyond the life of the development to provide this legacy.

2.8.3 As noted above [para 2.5.20], EDF has verbally made reference to leaving a landscape legacy. The inclusion of the following elements into the scheme would help leave a legacy after the SP&R has been decommissioned and the agricultural land uses reinstated. They

would also assist in mitigating some of the adverse effects of the proposed development during its years of operation:

- Hedgerow trees within the boundary hedges would provide a long-lasting enhancement to the landscape structure.
- A native hedgerow, with hedgerow standard trees, along the site's north-western boundary would reinstate the historic line of planting that, in the recent past, followed the track between Beggar's Barn and the former pit along the ridge of higher land, where it would be visible in the wider landscape.
- A copse of woodland within the access road area, ideally to the south-west of the proposed road and/or between the access road and the A12 slip road would supplement the existing vegetation along the line of the bridleway and the A12 slip road.
- Enhancement, infill and management of a number of hedgerows that follow the rising ground between B1116 and the site would aid their long-term survival and link existing (and proposed) hedges and blocks of woodland into the wider vegetation framework.

3 Summary and recommendations

3.1 Summary

3.1.1 NNB Generation Company (SZC) Limited (shortened to SZC Co.) is proposing to construct a new nuclear power station at Sizewell in east Suffolk, known as the Sizewell C Project. The new power station would be constructed adjacent to the existing Sizewell A (which is currently being decommissioned) and the active Sizewell B.

3.1.2 The Sizewell C Project meets the criteria of a Nationally Significant Infrastructure Project under the Planning Act 2008 (new onshore generating station in England with a capacity of over 50MW).

3.1.3 In addition to the works at the main development site at Sizewell, the project includes a number of temporary and permanent installations, both to facilitate construction and operation and to help off-set some of the adverse effects. Such proposals include the construction of two temporary park and ride sites. A northern park and ride is proposed at Darsham and a southern one at Hacheston, to the north of Wickham Market. It is envisaged that these facilities would reduce the amount of traffic that would be generated by the construction workforce on roads and through villages local to the main construction site. It is the Southern Park and Ride (SP&R) that is the subject of this review.

3.1.4 The Landscape Partnership has been instructed to undertake an independent review of the landscape and visual-related components of the planning application for the (SP&R) site by four local parish councils – Campsea Ashe, Hacheston, Marlesford and Wickham Market – whose

parish areas either encompass parts of the site or are so situated that there is the potential for landscape and visual receptors within to be influenced by the proposed development.

3.1.5 The purpose of the review is to provide advice and commentary on the accuracy and reliability of the documents and the effectiveness of the mitigation measures proposed in order to help the parish councils compile informed consultation responses to the application process and evidence at examination. These will be considered by the Planning Inspectorate when determining the award of a Development Consent Order.

3.1.6 The application site for the SP&R is located within the parish of Hacheston, save at the north-eastern end in the vicinity of the A12 where the red line encompasses a small portion of the parish of Marlesford. To the south-west is the parish and village of Wickham Market and to the south-east is the parish of Campsea Ashe.

3.1.7 The main car park would be located on a localised ridge of higher land between two valleys at a level of c.30m AOD. To the north the land falls relatively steeply to the river Ore. The valley has a narrow floodplain of grazing meadows and the small village of Marlesford is located on its lower northern sides. To the immediate north-west is Marlesford Hall (Listed Grade II*) and associated parkland. To the south of the site is the valley of the river Deben that flows in a south-easterly direction around the town of Wickham Market.

3.1.8 The A12, the main transport route connecting Great Yarmouth to Ipswich forms a relatively prominent feature within the landscape and passes immediately to the south-east of the site. Access to the site would be via the north-easterly slip road from the B1078/B1116 junction.

3.1.9 Although many of the villages surrounding the site have a scattered form, there is little development in the remote parts of the landscape and, aside from the A12, much of the countryside has a strong rural and tranquil character.

3.1.10 The landscape in the vicinity of the site is largely arable, apart from some grazing meadows in the valley floors. To the north of the A12 it is well vegetated, with several large blocks of woodland. There has been much field amalgamation in the past, but what remains is generally well hedged. The landscape to the south of the A12 is more open and field size is larger with less hedges.

3.1.11 The landscape in the vicinity of the site is well served by a network of public rights of way, many of which afford views into the site. In particular, a bridleway follows the western site boundary and would be bisected by the proposed access road.

3.2 Recommendations

3.2.1 Landscape and visual aspects of the planning application that The Landscape Partnership considers require additional or further study and/or re-assessment before the effects of the proposed development on landscape and visual receptors can be fully described are considered below.

3.2.2 Much of the scheme design currently lacks detail, including some of the mitigation proposed to address landscape and visual effects. Many of the drawings and plans are marked *"not for approval"* and so there can be no certainty that key issues will be fully and properly evaluated and implemented post DCO.

3.2.3 It is important that the effects of the proposed development are fully considered in order that appropriate and meaningful on-site and off-site mitigation can be embedded into the scheme design, such that the project can be delivered, operated and decommissioned, with least adverse impact on the landscape.

- Greater acknowledgement of the sensitivities of the special landscape attributes of the former Special Landscape Area
- Confirmation of the height, footprint and profile of the bunds to be constructed around the boundaries of the site, including confirmation as to the status of the bund illustrated on the November 2020 Annotated Masterplan along the north-western boundary, and certainty as to whether this would be delivered in the final scheme.
- Provision of an Arboricultural Impact Assessment and Arboricultural Method Statement to determine the full effect of the proposed development on the site's tree and hedge resource (particularly of that lining the bridleway on the western boundary) and how it would be protected during the works and operation, and managed and maintained to ensure its long-term contribution to the wider landscape is retained.
- Details of how and where the access road would cut through the hedgerow on the western boundary, and exactly what vegetation would be removed.
- Review of the lighting assessment, with particular consideration of the elevated location of the site and the use of lighting into the evening and night, the effects experienced from points within the largely unlit Ore Valley and the B1116, and the effectiveness of the mitigation measures proposed.
- Review of the judgements relating to the landscape's susceptibility to change.
- Review of the magnitudes of changes afforded to the landscape character of the site and its environs, with further consideration given to the loss of countryside character and to the scale and expanse of the proposed development and to the urbanising influence of the associated infrastructure.
- Extension of the visual assessment to include consideration of the effects of the development on visual receptors during daytime and night time at
  - Brick Kiln Cottages, Campsea Ashe
  - The Rookery and nearby properties, Hacheston
  - Marlesford Hall, Marlesford

- Public footpath Marlesford 1, Marlesford
- Chapel Lane/Green Lane, Pettistree
- Loudham Hall Road overbridge, Pettistree
- Border Cot Lane/Parkway (principally night time views), Wickham Market
- Public footpath Wickham Market 9, Wickham Market

- Extrapolation of the amalgamated grouping of the results of the visual assessment so that judgements made for each of the individual viewpoints can be used as a tool to design appropriate mitigation measures.
- Reviews of what mitigation measures are achievable adjacent to the bridleway and resolution of the variance between what is shown on the Landscape Masterplan and considered in the LVIA.
- Expansion of the mitigation measures associated with the bridleway to ensure an appropriate visual aspect given the close proximity of the proposed works and lack of space. To include confirmation of the status of the hedge shown on the November 2020 Annotated Masterplan and how it could be accommodated in the space available alongside the other infrastructure required.
- A comprehensive scheme of landscape mitigation, including measures to mange and plant new hedgerows, trees and copses, would both assist with screening and remain in perpetuity to leave a landscape legacy after decommissioning of the project.

3.3 Conclusion

3.3.1 The proposed SP&R would be located in an elevated position between and above two river valleys; it would necessitate an extensive and uncharacteristic change of land use from agricultural land to car park and associated infrastructure, including night-time lighting. The development would therefore exert an adverse landscape and visual impact on receptors in the surrounding landscape.

3.3.2 In conclusion, it is considered that the likely effects of the proposed SP&R on landscape and visual receptors have been underestimated within the LVIA accompanying the application, and that several landscape and visual receptors have not been considered. As such, the mitigation measures proposed are not sufficiently developed to satisfactorily address all the adverse effects of the proposed development and a number of potential measures have not been employed, Further, the scheme would not deliver a long-term landscape legacy after the SP&R has been decommissioned.