



Deadline 5 Submission

Written Representation Regarding Issue Specific Hearing 5 on Landscape and Visual Impact – Tuesday 13th July 2021

(Matters relating to Southern Park and Ride)

On behalf of Marlesford Parish Council Regarding NNB Generation Company (SZC) Limited DCO Application

For Sizewell C Nuclear Power Station and Associated Works

**Richard Cooper
Councillor
Marlesford Parish Council**

**Melanie Thurston
Parish Clerk**



23rd July 2021

Interested Party No.20025903

	Issue	Marlesford Comments
1.	Design Considerations, including night-time lighting effects.	
a.	Introduction	<p>The proposed Southern Park and Ride (SP&R) will have a significant negative impact on the communities of Marlesford, Campsea Ashe, Hacheston and Wickham Market. The impact will be felt in terms of a significant change to the local landscape, the night-time impact of lighting within and around the SP&R site and the significantly increased levels of traffic on the A12 and surrounding road network.</p> <p>Marlesford Parish Council and its neighbours at Campsea Ashe, Hacheston, Pettistree and Wickham Market maintains its objection to the SP&R in its proposed location on the basis that it will be a major intrusion into an otherwise rural landscape. Its prominent position on elevated ground between the two Special Landscape Areas (SLA) of the Rivers Ore and Deben makes the proposed site particularly inappropriate. Whilst the SLA designation has now been removed, the importance of the landscape character remains.</p> <p>We recognise that if we are unsuccessful in overturning the proposals to locate the SP&R at the Hacheston site then we need to find ways of achieving landscape mitigation that is satisfactory and acceptable to all surrounding communities. We have been willing to work with the Applicant to develop more detailed plans, but as we stated in our response to one of the ExA written questions to the Applicant we have only had one meeting to specifically address SP&R issues and that was on 8th October 2020, so it is misleading for the Applicant to give the impression that it has been in regular dialogue with local communities to resolve landscape issues.</p> <p>We do however welcome the reinstatement of the full length of the bund to the NW side of the SP&R which was announced at the meeting on 8th October. Apart from the reinstatement of the bund to the northwest of SP&R we have seen no other substantive changes to the proposals. We await</p>

		<p>further detail on mitigation measures to address the concerns and legacy issues raised at the meeting last October.</p> <p>As a result of this lack of engagement on landscape issues, we feel that local views and concerns have not been fully taken into account.</p> <p>The ExA will be aware that Marlesford Parish Council on behalf of itself, Hacheston, Campsea Ashe and Wickham Market submitted a report by The Landscape Partnership [REP1-149] entitled Sizewell C Project: Southern Park and Ride, Hacheston Suffolk – Review of Landscape and Visual Aspects of Planning Application. We will not go through all the recommendations in the report, but we would ask that the ExA in their next set of Written Questions ask the Applicant to address the issues raised in the report.</p> <p>The general conclusion of the report is that too few viewpoints and visual receptors have been included in the Applicant’s proposals to provide an accurate assessment of impact of the SP&R.</p> <p>To quote from the report: At Para 2.3.6 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, and 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.”</p> <p>In addition, at Para 2.4.3 the report concludes that regarding the Zone of Theoretical Visibility Study “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.”</p>
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		<p>The report goes on to say, when talking about the Site and Context, that the Applicant 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. But, 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 information is important to:</p> <ul style="list-style-type: none"> 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. <p>If current designs for the project in general are to be further influenced by a Design Review Panel and Design Codes, then we would ask that this is extended to the SP&R site, and includes landscape treatments, design of ancillary structures and lighting and involves input from local Parishes.</p>
<p>b. Inappropriate Location</p>		<p>The Local Authorities both accept in their Local Impact Report, that the site of the SP&R will have adverse impacts in an otherwise rural setting – they state, <i>“the presence in the landscape will be of an adverse but medium-term temporary nature, based on the change from current agricultural use to transport hub facility.”</i></p> <p>The site is located in an elevated position between the two Special Landscape Areas of the Rivers Deben and Ore (Policy AP13 Special Landscape Areas, Suffolk Coastal Local Plan, Saved Policies July 2013). This landscape designation has now been abandoned by East Suffolk Council (ESC), but we argue that the landscape characteristics which originally warranted the designation endure and therefore the landscape should continue to be regarded as a highly valuable and of special importance. Policy AP13 states that <i>“The District Council will ensure that no development will take place which would be to the material detriment of, or materially detract from, the special landscape quality”</i>. We contend that the development of the SP&R in this location will detract from the quality of the landscape and will be visible over a wide local area particularly at night and we argue that the “no development principle should continue to apply. Suffolk Preservation Society in their Relevant Representation [RR-1178] noted the adverse impact that the SP&R will have on the local landscape character.</p>

		<p>We recognise the “temporary” nature of the SP&R as referred to by the Local Authorities. However, in GLIVA terms, 12 years is long term and so we request that all the impacts are considered as if they were going to be permanent. The appropriate mitigation should be employed. Having said this, we expect to see the facility removed in its entirety (with the exception of legacy landscape planting) at the end of the SZC construction period and the SP&R land returned to agricultural use.</p>
<p>c. Omitted viewpoints</p>		<p>Wickham Market Parish Council have made representation to the Applicant regarding omitted viewpoints within Wickham Market and Pettistree and viewpoints have now been included by the Applicant and are recorded as figures 18.51 and 18.52 [REP2-106]. Impacts of the SP&R at these viewpoints are considered to be adverse and appropriate mitigation will be required. Wickham Market has previously suggested that the DCO order limits be broadened to ensure sufficient space for landscape mitigation and enhancement to the SP&R site access road. This part of the site and the park and ride beyond will be very visible from Wickham Market public views now included in Figures 18.51 and 18.52 referred to above.</p> <p>Marlesford, Hacheston and Campsea Ashe contend that LVIA viewpoints have been omitted from the Applicant’s LVIA for the Southern Park and Ride (SP&R). In order that the ExA can take these omitted viewpoints into account we list them below by parish.</p> <p>All map references below are from OS Explorer Sheet 212.</p> <ul style="list-style-type: none"> • Campsea Ashe - Brick Kiln Cottages 323 566 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. In addition to this viewpoint, it is believed that between 25-30 properties on the north side of Mill Lane in Campsea Ashe as well as numerous other properties along the B1078 up to and including the north-west facing side of Marlesford Road, will be able to see the SP&R site – particularly at night and especially so between October and April, when tree cover is removed. We ask the ExA to consider the view from these properties towards the SP&R.

		<ul style="list-style-type: none"> • Hacheston - The Rookery and nearby properties 311 581 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 323 586 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 1 321 585 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.
d.	Lighting	<p>The proposed site of the SP&R would introduce extensive areas of lighting into a landscape that, at the present time, is generally dark. Whilst not a designated dark skies area, residents of Marlesford and the surrounding villages value the relatively unpolluted night skies in an essentially rural area. We ask that the ExA make a night-time visit to the SP&R, viewpoints and surrounding villages in order to witness the dark skies enjoyed by them and to consider the likely impact of the SP&R lighting on dark skies.</p> <p>We are particularly concerned about light spill from the SP&R. We note that the surrounding bunds are in the main 3m high, but lighting columns within the site are 6m. We believe that this will result in widespread visibility of the SP&R at night because of its elevated position. We will request widespread use of low-level down-lit lighting (close to the ground) which we believe will achieve the required effect within the site but will be largely hidden (by the bund) from surrounding receptors.</p>

		<p>We talk to contacts in Darsham who share our concerns about lighting. We understand that Darsham has a dark skies designation, but Marlesford argues that there should be no difference in the specification for the lighting between the Northern and Southern Park and Rides and every effort should be made by the Applicant to preserve the dark quality of the skies around the SP&R.</p> <p>The Applicant has indicated that the TIMA would not be lit when not in use. However, we have yet to see how the TIMA will be lit when it is in use. The TIMA is 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.</p> <p>We expect “smart management” to be applied to the SP&R lighting so that areas that are not in use can be switched off or dimmed. We need further details on the lighting and its impact in order to fully understand the effects on surrounding receptors, especially settlements where light glow is likely to be visible even if the physical elements of the proposed development are not.</p> <p>We draw the ExA’s attention to paras 2.5.14 – 2.5.17 in The Landscape Partnership’s review [REP1-149] where the impacts of lighting are considered.</p> <p>We would expect a full lighting management plan for the SP&R to be produced by the Applicant for consultation.</p>
<p>e.</p>	<p>Landscape Planting</p>	<ul style="list-style-type: none"> • The principles contained in National Planning Policy Framework (2021) particularly the provisions at Paragraph 174 should be applied to the SP&R site. • The proximity of the development to the Whin Belt woodland and the loss of a section of ancient hedgerow and impacts on the ancient oak tree on the southern boundary will result in adverse landscape impacts which have been inadequately assessed and poorly moderated (ref NPPF);

		<ul style="list-style-type: none"> • There is limited landscape mitigation on the site boundaries particularly the west boundary where the track/public right of way are immediately adjacent to the site boundary fence; <p>We are concerned about the overall lack of detail for retained and proposed planting. Stated growth rates of 400mm per annum for hedging are over optimistic in the conditions that will be experienced on this site – screening ability is therefore likely to be compromised. We would want to see larger hedging plants used and that in order to ensure their proper establishment, planting should be carried out between the beginning of November and no later than mid-March.</p>
2.	Monitoring and additional mitigation suggestions	
a.	Introduction	<ul style="list-style-type: none"> • The principle should be that <u>best endeavours</u> must be used to provide landscape legacy benefits for the SP&R site and the surrounding area that will endure beyond removal of the SP&R. • We welcome the view of the Local Authorities that the Applicant should be required to reinstate the Associated Development sites on land that they own/lease in an enhanced manner, and where appropriate the Applicant should be seeking to <u>enhance</u> the state of the Associated Development sites being returned to agricultural use, so they are of a higher quality than they were at the commencement of development. • Return of the SP&R site to agricultural use is an important issue and whilst it seems to be generally accepted, we will want to see robust conditions applied so that there is not an easy route into future development on the basis of the SP&R having been a “previously developed site”.
b.	General Landscape Issues	<ul style="list-style-type: none"> • We are asking for the provision of a more comprehensive scheme of landscape mitigation, including early off-site planting which could leave a long-term legacy of landscape

		<p>enhancement, especially in the area from the Fiveways roundabout (B1078/B1116) to the SP&R site access.</p> <ul style="list-style-type: none"> We believe that the landscape treatment of the SP&R needs to address the enhancement of the wider landscape as well as the mitigation of the landscape and visual impacts of the SP&R itself. The Applicant should facilitate the delivery of a long-term legacy of landscape improvements including hedgerow planting and enhancement, tree planting and where possible the enhancement of existing woodland and the planting of additional copses. These measures should be both within the site and off-site.
<p>c.</p>	<p>Specific Landscape Mitigation.</p>	<ul style="list-style-type: none"> A scheme of boundary landscape mitigation through hedges with trees to be provided on the site boundaries in order to secure a long-term legacy of landscape improvements to remain following removal of the SP&R and the restoration of the land back to agricultural use. The eastern boundary of the site is a good example of where there is an existing hedge which could be enhanced by additional hedgerow planting and the introduction of hedgerow trees. We have a particular concern about the landscape treatment of the western boundary of the SP&R site to the north of the bunded area around the Postal Courier Service. The internal site road at this point is immediately adjacent to the western boundary fence with little apparent opportunity to provide adequate screening for the bridleway which runs to the west of the site. We have discussed this with the Applicant but have yet to see detailed plans which provide the screening that we are looking for. We support the provision of soiled mounds to provide visual mitigation, but we have yet to see the full detail of the nature of these bunds for the whole site. We welcome the reinstatement of a full-length bund to the northwest boundary. We would particularly ask that <u>no</u> planting is done on top of the bunds. This is because establishment of planting can be poor and as the bunds will be removed, any planting on the bunds would have to be sacrificed. Any planting around the bunded boundaries should be at the base of the bunds and on their outer side and should be capable of being left as a legacy landscape feature, wherever possible, after the removal of the bunds.

		<ul style="list-style-type: none">• There is an existing (but patchy) hedge from the Fiveways roundabout (B1078/B1116) along the northern side of the slip-road to the northbound A12. This will form the access road to the SP&R site and as such it will be an important corridor. There is an opportunity to enhance the existing hedge from the roundabout heading east and adjacent to the SP&R frontage (including the frontage to the A12). High quality screening planting should be used to mitigate the appearance of the SP&R from the slip-road and A12. To accommodate this, either the DCO Order Limits should be extended, or off-site agreements made in order to allow the planting.• It is not clear that a full Arboricultural Impact Assessment has been carried out by the Applicant for the SP&R site and its surrounding area. This should be conducted as soon as possible and have particular reference to Whin Belt. Where prominent and important trees are identified they should be preserved by TPOs.• We have asked the Applicant to provide details on the width of the site access road where it cuts through the ancient double hedgerow which contains the bridleway to the west of the site. It is important that as much of this hedgerow is preserved as is possible. We believe the Applicant may have allowed up to 40m to accommodate this access road – we understand this may be a protective allowance, and the Applicant has confirmed that land take will be minimised, but we have yet to see detailed proposals. In particular we insist that a veteran oak in the hedgerow very close to the proposed access to the SP&R site should be fully protected.• It is not clear from the plans how the TIMA connects to the main operational parts of the SP&R sites. This is likely to occur on the western side of the site, adjacent to the bridleway. This is a sensitive area of the site because of its proximity to the bridleway and significantly more detail is required from the Applicant on this issue.• It has been suggested that the TIMA will accommodate 100 HGVs in the event of an incident. It is not clear from the masterplans how this will be achieved and the Applicant should provide more detail and more certainty around this number.
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3.	Other Matters	<p>Plans “Not for Approval”</p> <ul style="list-style-type: none"> DCO plans for drainage, lighting, signage and buildings are marked “Not for Approval”. This is a concern to local residents as it leaves open the prospect of key aspects of the site not receiving proper scrutiny. We would ask the ExA to ensure that ESC is required to fully consult on all these aspects of the SP&R development. Until we see detailed plans, it is difficult for us to comment on the key issues of drainage (where open swales are proposed) and buildings. The latter will create further adverse visual impacts in this essentially rural landscape, and we therefore await further detailed plans which we argue should incorporate high quality design in order to ensure that they sit as sympathetically as possible within the site. Consideration should also be given to ancillary features including security fences and CCTV. <p>Pedestrian and Cycleways</p> <ul style="list-style-type: none"> Wickham Market and Marlesford have asked for adequate pedestrian and cycleways to be provided between Wickham Market and the SP&R and between Marlesford and the SP&R. These need to be appropriately landscaped and where additional land is required to accommodate them (even though it may be outside the DCO order limits) the Applicant should use best endeavours to secure the land required. A proper footpath needs to be provided adjacent to the A12 to ensure that a good link is maintained between the bridleway (Number 8) at the southwest corner of the SP&R site and the public footpath from the southeast corner of the site to Marlesford (Footpath Number 7).

<p>4.</p>	<p>Conclusion</p>	<p>The review of the Applicant’s landscape proposals for the SP&R (The Landscape Partnership [REP1-149]) states that: <i>“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”</i>. The parishes that commissioned the review (Marlesford, Hacheston, Campsea Ashe and Wickham Market) are all in full agreement with this assessment and Marlesford reiterates its position that the proposed site of the SP&R is an inappropriate one given its prominent elevated position between the valleys of the Rivers Ore and Deben and the adverse visual impacts it will have on visual receptors in all four villages.</p> <p>Whilst we will continue to voice our opposition to the SP&R in its proposed location, we note that the Applicant has consistently expressed its desire to leave behind legacy landscape features once the SP&R is removed and we would ask that if the SP&R does go ahead, the best and fullest landscape mitigation should be applied to the site in order to minimise the impact of the site’s built features. We will pursue this matter further both with the Applicant, East Suffolk Council, Suffolk County Council and in Issue Specific Hearings. However, we ask that the ExA particularly look at the potential for creating legacy benefits in relation to:</p> <ul style="list-style-type: none"> ○ general boundary hedges and screening ○ how the proposed SP&R could be more effectively screened on the approach to it along the A12 (north bound) slip-road. <p>And we would ask that particular attention is paid to the lighting proposals which we believe will have a highly significant impact and detrimental effect on our community.</p>
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Cllr. Richard Cooper
Marlesford Parish Council

23rd July 2021

