



## **Deadline 8 Submission**

**Written Representation Regarding ISH 13 – Landscape, Visual Impact & Design**

**On behalf of Marlesford Parish Council**

**Regarding NNB Generation Company (SZC) Limited DCO Application**

**Richard Cooper  
Councillor  
Marlesford Parish Council**

**Melanie Thurston  
Parish Clerk**



**Interested Party No.20025903**

**24<sup>th</sup> September 2021**

## Marlesford PC Written Representations Regarding Landscape, Visual Impact & Design

<b>1.</b>	<b>Introduction</b>	<p>Marlesford Parish Council (MPC) remains opposed to the siting of the Southern Park and Ride (SP&amp;R) between Hacheston and Marlesford on high ground between the valleys of the Rivers Ore and Deben (formerly designated as Special Landscape Areas). We refer the ExA to our previous representations which have made reference to our concerns regarding the SP&amp;R – [RR-0758], [REP1-149] and [REP5-237]. We recognise that if the SP&amp;R in its currently proposed location is to go ahead as part of the DCO, then we need to have been fully engaged in influencing its design and landscaping.</p> <p>We have particular concerns regarding:</p> <ul style="list-style-type: none"> <li>• The Applicant’s assessment of landscape value</li> <li>• Omitted viewpoints</li> <li>• The need for high quality landscape planting and screening</li> <li>• The lighting of the SP&amp;R</li> <li>• The use of the proposed Traffic Incident Management Area</li> <li>• The determination of SP&amp;R matters marked in the DCO as “Not for Approval”</li> <li>• The provision and landscaping of a pedestrian and cycleway from Wickham Market to the SP&amp;R and from Marlesford to the SP&amp;R.</li> <li>• The restoration to agricultural use after the end of its operational life.</li> </ul>
	<b>Issue</b>	<b>Comments</b>
<b>2.</b>	<b>The Applicant’s assessment of Landscape Value</b>	<p>i. We believe that the SP&amp;R will have a greater impact in the landscape than the Applicant suggests. The local authorities in their LIR [REP1-045] admit that <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> We argue that whilst temporary (in the sense that the facility will be removed), a potential 12 year use period is a very significant imposition on the local communities and the surrounding landscape.</p> <p>ii. We note that the landscape around the SP&amp;R is given a value of “Community” (defined as, <i>‘Everyday’ landscape which is appreciated by the local community but has little or no wider recognition of its value</i>). This value leads to the matrix of impacts being “Not Significant”. It</p>

		<p>seems inconceivable that the impact is “Not Significant” given the fact that EDF propose to introduce an industrial scale development into an otherwise rural landscape. This is particularly true of the night-time impact which will introduce a highly inappropriate light source to an area of relatively dark skies (see Section 4 below).</p> <p>iii. <b>We ask that the Applicant revisits the local landscape value and its implication on predicted impacts – we request this in order that mitigation can be provided appropriate to the area affected by the SP&amp;R.</b></p>	
3.	<b>Omitted Viewpoints</b>	<p>i. In [REP5-237] at pg 5 we pointed out that we believe that four viewpoints have been omitted from the Applicant’s LIVA. We are not aware that this issue has been addressed by the Applicant although we note that the Applicant <u>has</u> assessed two additional viewpoints as requested by Wickham Market Parish Council. <b>We would ask that the four viewpoints are appropriately assessed by the Applicant.</b></p>	
4.	<b>The need for high quality landscaping</b>	<p>i. The SP&amp;R site is on high ground, in a prominent position between the valleys of the Rivers Ore and Deben. It is therefore important that the site (if it is developed) is effectively and sympathetically landscaped to ensure that it is screened, and that new planting can be left as a legacy benefit after the SP&amp;R’s restoration to agricultural use.</p> <p>ii. We re-state that we have not had a substantive discussion with the Applicant on SP&amp;R issues since our meeting of 8<sup>th</sup> October 2020, but we acknowledge that at that meeting the Applicant indicated that they would be reinstating the northwest bund to its full length and this was included in the January 2021 DCO changes. We also recognise the retention of the ancient double hedgerow to the west of the site, although we await further detail on exactly how the access to the SP&amp;R will pass through it. However, we are not content with the proposed provision for screening the bridleway (immediately to the west of the site), from the site itself. At ISH 13 the Applicant stated that they had provided additional space in the site to allow for perimeter hedge planting adjoining the public right-of-way on the western boundary. From the plans, this would appear to be correct, but the boundary of the site is so close to the bridleway that hedging is going to provide almost no screening at all for the majority of the operational life of the SP&amp;R. When measured from Drawing No. SZC-SZ0701-XX-000-DRW-100164 Rev 02, Jan 2021 at 1:2500, at the closest point there is no more than 5m separating the bridleway from the internal roadway. <b>We ask that the Applicant does more to mitigate the impact of the SP&amp;R site for users of the bridleway.</b></p>	

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|  |  | <p>iii. We have raised in our submissions our concerns over the predicted growth rates for the planting proposed by the Applicant and in our response to the ExA's Second Written Questions [REP7-208] we set out why we believe that the growth rates will not be achieved in this particularly dry part of the country. We already have a concern that hedgerow planting will not provide effective screening in the first 5-7 years of the site's operation and any compromised growth as a result of drought or non-establishment will further exacerbate the inadequacy of the screening being proposed.</p> <p>iv. As well as planting within the red-line area, we believe that substantial <u>off-site</u> planting is required. We would want to see high quality planting in the following areas:</p> <ul style="list-style-type: none"> <li>• On the eastern side of the B1116 at Hacheston in order to improve screening from that road and for the properties to the west of the B1116, particularly The Rookery.</li> <li>• From the Fiveways Roundabout to the entrance to the SP&amp;R and beyond to the slip-road to the A12 north-bound, there is, in parts, an existing hedge and we welcome the Applicant's indication that existing hedgerows will be retained, but the hedge is patchy and will not provide adequate screening. We ask that where no hedge currently exists, new planting is carried out and where there is a hedge, it is supplemented with additional planting including hedgerow trees.</li> <li>• We believe that the north-eastern boundary of the SP&amp;R (which forms part of the boundary of the Traffic Incident Management Area) is a field boundary. For landscape enhancement and screening, we believe that this boundary should be planted with hedging and hedgerow trees.</li> </ul> <p>v. The access road into the SP&amp;R passes through the double ancient hedgerow which flanks the bridleway. We had concerns about a veteran oak growing close to where the access road will enter the main part of the SP&amp;R site, but we welcome the assurances from the Applicant that this tree will be protected. The area around the entrance needs to be sympathetically landscaped to provide screening and the works to form the access road need to be far enough from the veteran oak to avoid damage to its root system.</p> <p>vi. The Applicant has stated a number of times that it wants to leave legacy benefits that remain after the operational life of the SP&amp;R. We agree with that and would urge the Applicant to contribute to its legacy by generous, appropriate and effective planting in and</p> |  |
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		around the SP&R and in particular, the use of hedgerow trees that in time will make a significant contribution to the wider landscape.	
5.	<b>The lighting of the SP&amp;R</b>	<p>i. We note the response of the Applicant to the ExA Second Written Question LI2.34 [REP7-053] which relates to MPC’s request for the Applicant to consider low level lighting. We can understand that the Applicant needs to achieve appropriate lighting levels across the operationally active parts of the site and we can appreciate that there are practical constraints that potentially limit the use of lower height lighting columns. We understand that the Applicant is doing what it can to limit light spill from the site ie light cast onto the ground ,and we welcome the Applicant’s commitment to using light fittings that limit light spill and use LED-based fittings with zero-degree tilt and demountable shields, but we also have concerns about skyglow and visible light from the site which we believe will be seen over a wide area and certainly from the villages of Wickham Market, Hacheston, Marlesford and Campsea Ashe. <b>We ask the Applicant to use its best endeavours to limit skyglow and visible light from the SP&amp;R.</b></p> <p>ii. We draw the ExA’s attention to a statement in Para 1.4.13 of Book 6, Vol. 4, Chapter 6, Appendix 6B where the Applicant states <i>“The proposed development would introduce a large area of lighting within the LCT, in an area where there is a small area of existing lighting of a similar type and intensity but at some distance from the site. This would result in long-term effects on this LCT that would be medium scale and occur over a localised extent. Effects would be of medium magnitude, resulting in a moderate adverse effect, which is considered to be not significant, given the relative lack of existing artificial lighting in the vicinity of the site”</i>. This suggests that the Applicant recognises the development will have adverse impacts in the area from the lighting of the SP&amp;R, but it concludes that the impact is “not significant”. It then appears to confuse matters by acknowledging the <i>“relative lack of existing artificial lighting in the vicinity of the site”</i>. We contend that it is exactly this issue which will contribute to a greater impact than the Applicant is suggesting. <b>We are looking for clarification from the Applicant on this statement.</b></p> <p>iii. Tom Whipple, Science Editor of <i>The Times</i> on September 21st, 2021, commenting on a letter to <i>The Times</i> on the same day by Lord Rees of Ludlow (the Astronomer Royal) states that in the UK, an estimated 61 per cent of people live in areas with “severe light pollution”. Whilst here, we are not officially a “dark sky” area, night skies are nonetheless relatively free of light pollution and we do not want the area around the SP&amp;R to add to</p>	

		<p>the depressing statistic quoted by Mr Whipple. We take heart from the comments of Lord Rees in his letter that <i>“Where lighting is needed, technology now allows better designs that minimise upward glare and use less energy.”</i> He goes on to say <i>“Hence there are scientific, educational, aesthetic, ecological and economic reasons for preserving dark skies. The requisite strengthening of the planning regulations would earn the gratitude of the next generation and surely command broad support.”</i></p> <p><b>We urge the Applicant to use best endeavours to limit both light spill and the upward escape of light from the site.</b></p> <p>iv. In a recent study by Newcastle University<sup>1</sup>, Douglas Boyes, one of the authors, highlights the problems of the bright white light emitted by LEDs and claims that the blue spectrum of this light is harmful to insect populations. He advocates that filters should be used to take out the blue light and lights should be dimmed or extinguished when not in use. In an article in <i>The Times</i> of September 10<sup>th</sup>, 2021, “Bright streetlights causing insect decline” Patrick O’Donoghue quotes Georgia MacMillan, development officer of the Mayo Dark Sky Park, as advocating LED lights with colour temperatures of about 2,700 kelvins that take the harmful blue colour out of the light spectrum and ensure that “we are not offsetting energy efficiency against ecology”. LED lights with a colour temperature of around 2,700 kelvins create a more yellow light which is less disruptive to insect behaviour. <b>We urge the Applicant to use its best endeavours to ensure that damage to the night-time ecology of the area is kept to an absolute minimum and that all possible measures are taken to filter out and reduce the light wavelengths that are most likely to be harmful to insects, birds and other animals.</b></p> <p>v. We note that the Applicant has committed to “smart” control of lighting within the SP&amp;R and <b>we urge the ExA and the LPA to properly condition the use of lighting to ensure that when areas are not in use, the lighting is turned off and whenever appropriate, lighting is dimmed.</b></p>	
6.	<b>The use of the proposed Traffic Incident Management Area (TIMA)</b>	<p>i. At Book 6, Vol. 4, Chapter 2 Para. 2.5.14 the Applicant states that <i>“a TIMA would be located in the northern part of the site. If there is an incident within the Sizewell C main development site or external to the Sizewell C main development site on the local road network which requires construction-related vehicles to be held or diverted, the Wickham Market TIMA could be utilised to manage vehicles and remove them from the public road network while</i></p>	

		<p><i>the incident is being resolved. The TIMA would only be used for the parking of HGVs when required due to an incident. For the majority of the time, it would be unused with no HGVs parked in this area</i>". This raises two main issues:</p> <ul style="list-style-type: none"> <li>• The Applicant has said that the TIMA will not be lit when it is not in use. However we have yet to see the detail on what lighting will be used and <b>we ask the Applicant to supply this detail.</b></li> <li>• There appears to be no definition of what constitutes an "incident". We believe that that this needs to be tightly defined in order to prevent <i>ad hoc</i> and unnecessary use of the TIMA as this will contribute to the adverse impacts caused by lighting and noise. This is a particular concern for the nearest receptor in Marlesford – Ford Gatehouse, which sits in a dip approximately 400m from the TIMA eastern boundary. <b>We ask that a definition for an "incident" is drawn up in order to effectively limit the use of the SP&amp;R to genuine emergencies.</b></li> </ul> <p>ii. At Book 6, Vol. 4, Chapter 2 Para 2.2.32 the Applicant states that the TIMA will require impermeable surfaces. We recognise that the surfacing of the TIMA has to take into account its use by HGVs but <b>we would ask the Applicant to look for a permeable surfacing solution in order to reduce surface water run-off.</b></p>	
7.	<b>The determination of SP&amp;R matters marked in the DCO as "Not for Approval"</b>	<p>i. MPC, Campsea Ashe, Hacheston and Wickham Market Parish Councils all have concerns about the determination of the Applicant's proposals for, drainage, lighting, signage and buildings which are all marked as "Not for Approval" in the Applicant's DCO, Book 2, 2.7, Plans Not For Approval. All four of these matters are of considerable concern to the four villages. We understand that the detailed application will be determined and conditioned by East Suffolk Council (ESC) as the local planning authority. In ISH 13 counsel for the Applicant inferred that that ESC may or may not consult with local parishes on the matters it is determining. The four parishes have subsequently sought an assurance from ESC (copy submitted to ExA at Deadline 8) that we will all be fully and properly consulted on the Applicant's detailed plans. <b>We want the ExA to ensure that ESC is under an obligation to fully and properly consult on these matters and to action them through appropriate conditions.</b></p>	
8.	<b>The provision and landscaping of a pedestrian and cycleway from</b>	<p>i. Suffolk County Council and the Applicant have accepted that an outstanding issue is the proposal for pedestrian and cycleways from Wickham Market to the SP&amp;R and from Marlesford to the SP&amp;R. This has been identified in the Councils' joint LIR [REP1-045] at</p>	

	<b>Wickham Market to the SP&amp;R and from Marlesford to the SP&amp;R</b>	Table 182, Point 18g but we have yet to see detailed proposals. When produced, these proposals will need to show how the new infrastructure will be landscaped. This issue will be raised again by the parishes in the appropriate meetings with the Applicant.	
<b>9.</b>	<b>The restoration to agricultural use after the end of its operational life</b>	<ul style="list-style-type: none"> <li>i. MPC broadly welcomes the drafting of Para. 1 in Requirement 24 of the Draft DCO [REP7-007] which states that the SP&amp;R will be demolished, and the land reinstated for agricultural use within 12 months of the completion of the SZC construction works, however, “completion” (as it affects the SP&amp;R) needs to be defined in order to prevent the SP&amp;R continuing in existence past its operational life. <b>We ask that this is clarified in the DCO.</b></li> <li>ii. We also welcome the undertaking by counsel for the Applicant to redraft Para 2 of Requirement 24 in order to achieve adequate and appropriate land restoration in order that the site can be returned to agricultural use in a timely manner.</li> </ul>	
<b>10.</b>	<b>Conclusion</b>	<ul style="list-style-type: none"> <li>i. We believe that insufficient progress has been made in addressing the concerns of MPC and other parishes regarding the SP&amp;R. We acknowledge that the Applicant has made two substantive concessions, namely on reinstating the north-west bund and the matter of protection for the ancient double hedgerow along the bridleway immediately to the west of the site. However, on other matters, the Applicant has either not addressed the issues that we have raised or has provided insufficient detail. <b>The four parishes of Marlesford, Wickham Market, Campsea Ashe and Hacheston will be seeking further meetings with the Applicant in order that they can influence the detail of the Applicant’s proposals for the SP&amp;R before an application is made to ESC. Post application we would expect to be fully and properly consulted by ESC.</b></li> </ul>	

<sup>1</sup>Douglas H. Boyes, Darren M. Evans, Richard Fox, Mark S. Parsons, Michael J.O. Pocock. 2021. Street lighting has detrimental impacts on local insect populations. Science Advances. DOI: 10.1126/sciadv.abi8322

**Cllr. Richard Cooper**  
**Marlesford Parish Council**

**24<sup>th</sup> September 2021**

