

# Marlesford Parish Council

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## Comments on EDF's DCO Proposals for Sizewell C Southern Park and Ride

Prepared on behalf of Marlesford, Campsea Ashe, Hacheston and Wickham Market Parish Councils

### 1) Introduction

We remain opposed to the location of EDF's proposed Southern Park and Ride (SP&R) at Hacheston.

- a) By EDF's admission (Book 6, 6.5, Volume 4, Chapter 6, para 6.4.12) the site is in an elevated position with land falling away in most directions, particularly towards the two Special Landscape Areas of the Rivers Deben and Ore. The SP&R presents a very significant visual and environmental intrusion in an otherwise rural and agricultural landscape.
- b) We believe that the harm caused to the local landscape (albeit long-term temporary) by the SP&R is not compensated for by adequate on-site and off-site mitigation. Wherever possible, mitigation should have a legacy benefit in respect of landscape enhancement. We do not believe that the principle of providing adequate mitigation to deal with the identified adverse landscape and visual impacts has been applied to the SP&R.
- c) Construction of the SP&R is scheduled to start in Year 2 of the project. We argue that construction should start in a meaningful way in Year 1 in order that the site can have as early an impact on traffic as possible.
- d) EDF has ignored our previous requests to incorporate the existing Martlesham Park and Ride in its scheme for parking and bus provision. We insist that this option is revisited.

### 2) Detailed Issues

As well as raising our concerns about the SP&R in the various Parish Councils' Consultation Responses, we presented EDF with copies of a paper containing our specific concerns about the SP&R on 9<sup>th</sup> December 2019 and these same notes were re-sent on 27<sup>th</sup> May. So far, we have had no acknowledgement of these and there has been a reluctance to discuss the scheme at our joint meetings with EDF. Most of the issues raised with EDF remain unresolved and are set out in the notes below.

#### a. Southern Park and Ride Site

##### i. Landscaping Treatment of Boundary

- We requested significant hedgerow enhancement (including planting of hedgerow trees) to the existing hedges to the west, north west, east and south boundaries of the northern part of the site (surrounding the Traffic Incident Management Area). Some limited sections of hedging have been indicated along two boundaries only on the Landscape Masterplan. We regard this as wholly inadequate.
- Regarding the eastern boundary, there is a sight line to the Grade 2 listed Marlesford Hall and to the west, properties in Hacheston on the B1116 will have a view over the SP&R. Where the DCO red line follows existing field boundaries we consider that these should be planted with hedging to provide mitigation and a legacy benefit. Two boundaries remain open to view as does the public right of way which passes alongside the site.

- At consultation Stages 1- 4, a bund was shown extending the full length of the north western boundary. No indication of a change to this proposal was flagged at Stage 4. However in the DCO documents, the bund now only extends from the northern-most corner of the site half-way along the north west boundary. We require the full length of the bund to be reinstated in order to provide mitigation of visual impact and noise to receptors in Hacheston. This is in addition to our request for a hedgerow & trees on the site boundary across the field that adjoins the northern boundary
- It is unclear in terms of detail where the access point to the SP&R site will cross the existing hedgerow and watercourse. We have been unable to locate the ecological data relating to this part of the site but have requested it. We are concerned that the proposed 40 metre wide opening is excessively wide, noting that the width of the access road itself only measures 8 metres. We request further detail to show how the access can be positioned to minimise impacts both in terms of exact position and width. Whilst a section of “retained important hedgerow” is shown on the Landscape Masterplan, it is unclear what elements of the existing double hedgerow, trees, and large oak to either side of the access road will be retained. This significant landscape feature i.e. double hedge and oak are both ecologically important and prominent in the landscape. Their presence appears to have been overlooked as they are not indicated on submitted plans.
- As landscape mitigation, we have previously requested that existing retained and newly planted hedgerows should have trees planted within them for added long term height and wider landscape enhancement. We have noted a few new trees indicated alongside the car park area, affording little shade or wider impact. A second group of trees is indicated adjacent to the access road in the area where we had expected to see the double hedgerow and oak tree retained (adjacent to the bridleway). None of the tree planting shown is within the hedgerows as we have requested.

## **ii. Site’s Physical Boundary**

- Approximately 100m south from the north western corner of the site, the separation between the bridleway, the security fence and the site service road measures less than 5m. This does not allow sufficient space for screening the site on this boundary. We have previously requested that this boundary be planted in order to ensure that adverse impacts are mitigated. There is scope to divert the bridleway to the west to accommodate appropriate screening. We have raised this with EDF, but it has not been acknowledged.
- We welcome the retention of the entire Whin Belt woodland (previously shown to be removed), however we are concerned that the woodland is encapsulated within the DCO red line. We consider that Tree Preservation Orders should be applied to secure future protection for woodlands and trees impacted by the scheme.

## **iii. Public Rights of Way**

- Anomalies between the PRow definitive map and routes shown on the plan have been identified. Parish Councils have also suggested improved linkage between bridleway and footpath to Marlesford alongside field edge (as originally shown at Stage 2). It remains unclear from the DCO documents how this is going to be achieved and we need confirmation from EDF that this legacy issue has been incorporated into their plans.

## **iv. Lighting, Noise and Air Quality**

- At various points around the site, lighting is shown mounted on columns at either 8m or 10m. Isolux contours are shown, but we believe that at nearly 33ft high some of this lighting is bound to cause adverse visual intrusion. Our intention is to maintain the current “dark skies” for the areas surrounding the SP&R. On this basis we would welcome liaison over a lighting scheme which minimises the impact to those “dark skies”.

- We remain unconvinced about the impacts on receptors of noise and air quality. Most parameters that EDF report on are described as negligible/not significant and we find this hard to believe in such an open and elevated location. When the cart racing track is being used, the noise emanating from it is not acceptable – the activity on the SP&R when it is in operation will be many times greater than the cart racing track.
- We urge EDF to use electric buses. These would be cleaner to operate and would create less noise.

**b. Approaches to the SP&R - Vehicle, Pedestrian and Cycle Provision**

**i. Planting**

- EDF should be required to plant hedging (and where appropriate, hedgerow trees) on both the north and south sides of the old A12 (B1078 slip road to Wickham Market Bypass) from the Five Crossways roundabout to the joining of the slip road with the A12. Some limited planting is shown to the immediate west of the entrance to the SP&R, but this is to be removed following cessation of the car park. We suggest that a long-lasting scheme is developed to enhance the road corridor in this area. New planting should be used to supplement the existing (largely Privet) hedge remnants on the side of the slip road, this will provide visual mitigation for views from the south and will give protection/shelter to the proposed cycle and pedestrian path.

**ii. Pedestrian and Cycleway**

- Significant enhancement of the existing roadside footway heading south west from the SP&R site towards the Five Crossways Roundabout is considered necessary. A cycleway should be incorporated and both should continue into Wickham Market village. Whilst it has been stated that a cycle link will be provided, we see no evidence of this on the DCO plans. The DCO red line is drawn tightly to the B1078 so it would seem that enhanced access for cyclists and pedestrians will need to be secured via a S106 or S278 agreement as for the improvements required at WM.
- Pedestrian and cycle traffic is also likely to approach the SP&R from the Marlesford direction and we therefore ask that the existing path on the north west side of the A12 be improved for these users. A safe crossing point must be provided in the area of the Marlesford Farm Café in order to compensate for increased community severance as a result of SZC traffic.

**3) Conclusion**

The parishes local to Wickham Market and Wickham Market itself have raised a number of concerns about the SP&R proposals from Stage 2 onwards. Some amendments to the original indicative plans have been made, but the changes are relatively insubstantial, and we believe they do not provide for this sensitive area, the comprehensive high-quality design and mitigation that we are looking for. The scheme does not provide the legacy benefits to the landscape which we consider should be provided given the adverse landscape and visual impacts which will arise. More effective and long-term enhancement could easily be designed and incorporated without excessive cost. We remain willing to engage with EDF to seek solutions to our continuing concerns about the impacts which will arise from the proposed SP&R project.

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