

INDEX AND SUMMARY of Submissions for 2nd June 2021

Farnham Environments Residents & Neighbours (FERN)

Supporting Submission No. 20026497

1 General

This submission is an overview and summary of the detailed submissions as listed below. In brief the overarching view of FERN is that:

- FERN opposes the EDF 2VB alignment on the grounds that it would cause too much harm to the built and natural environment as to be accepted especially when there is a better alternative that EDF should pursue.
- That harm to the landscape, heritage, ecology, tourist enterprises and the public rights of network would cause harm and severely degrade the living experiences to those who live in the area.
- EDF's 2VB alignment represents very poor transport planning
- Its economic case is weak compared to the alternative
- The DCO must make it clear that, if EDF's 2VB alignment is accepted, that scheme will form a discrete scheme for the purposes of Parts 1 and 2 of the Land Compensation Act 1973 and not simply be a component of the overall Sizewell scheme (such as to delay Part 1 compensation and works under Part II)

2 Heritage Impact Assessment an independent review on behalf of FERN

In light of the opinion of FERN that the DCO had not performed its duty properly in assessing our Heritage Impact it instructed **Brighter Planning Consultancy** to provide a detailed independent heritage impact assessment of Farnham Hall, its estate and landscape. This included reviewing EDF's DCO proposals and submissions in respect of the Two Village Bypass: identifying the designated and non-designated assets, evaluating their heritage value and significance and undertaking walking site visits to the area in and around the application site. The report found that insufficient weight and importance had been given in the DCO to the potential harm to the setting and significance of Farnham Hall and its surroundings, and that EDF's proposals failed to comply with statutory planning regulations and the guidance of the NPPF. The report concludes that in light of this unacceptable harm, EDF should reconsider their proposals.

3 Ecology Assessment an Independent review on behalf of FERN

Bioscan UK Ltd Ecology Consultancy were instructed by FERN to provide a professional independent review of the ecological assessments of its habitats and protected species found in EDFs DCO in respect of the Two Village Bypass. This included a walkover of land around the Farnham Hall environs in and around the 2VB

site and similarly one for the alternative route proposed by the Farnham & Stratford St. Andrew Parish Council. The inspection covered woodland, trees, hedgerows, wood pasture, parkland and arable and also included a desk top study of existing records. The report found the Applicant's approach to ecology assessment fell 'far below industry standards' and included that; it's surveying, understanding and documenting baseline habitat conditions were cursory; it showed a failure to identify and record ecological features within the Zone of Influence; it failed to survey accurately protected species and failed to meet sequential process of the mitigation hierarchy that is central to environmental assessment process, by not giving full consideration to evaluating the potential impact of alternative options.

4 Trees & Woodland review by Sarah Green on behalf of FERN

A detailed review of the DCO information on Trees and Woodland and explanation of what really does exist in the vicinity of Farnham Hall Environs against the failings of the information reported in the DCO. This report is written by a trained horticulturist Sarah Green Kew Dip. (Hons) who is also a resident of Farnham Hall Environs. It highlights the importance of the woodland habitats both Ancient Woodland and County Wildlife Sites, Biodiversity Action Plan Park & Woodland and ancient trees that exists in the DCO Zone of Influence which have been omitted, misreported or undervalued. It documents the importance of the existing wildlife corridor that uses these habitats, that have failed to be properly documented or even included including the failures to survey Nuttary Belt, a woodland proposed for direct land-take. It also highlights the concerns about the hydrology impact to AW Foxburrow Wood and the misreporting of AW Pond Wood, a botanically and nationally important Ash woodland. This report contests EDF's route on ecological grounds because in their view, they have not done a full and accurate assessment. Its conclusion is in support of the alternative route which would be far better for woodland habitats, wildlife corridors and biodiversity. This is a supporting document alongside No 3 Ecology Assessment by Bioscan (UK) Ltd.

5 PROW impact assessment by Julie Noble on behalf of FERN

Ex-bridleways officer to the British Horse Society and resident of Farnham Hall Environs gives an in-depth analysis of the inadequacies of the DCO proposals and calls for the need for further adequate design and consultation to be given to the subject of PROW. The report details why there are objections to the unnecessary degradation of the local footpath amenity and explains why the upgrading of the access lane to a bridleway for mixed use is ill thought through. The Countryside Agency's Practice Guide On The Right Track has been submitted separately for the assistance of the ExA (also found under No.5).

6 Tourism impact assessment by Caroline Ogilvie & Sarah Green on behalf of FERN

A review by Caroline Ogilvie of The Old Vicarage and Sarah Green of The Cartshed on the detrimental impact of the proposed two village bypass on their holiday letting businesses. Mollett's Farm, further members of FERN, have made separate written representations on their own Tourism Impact.

7 Noise & Pollution impact assessment by Mike Noble on behalf of FERN

A review by resident of Farnham Hall Environs of the impacts of the proposed Two Village Bypass during and after construction, and the underestimation of the noise and pollution impacts to the dwellings around Farnham Hall Estate, Old Vicarage and Mollett's Farm. The report explains how the changes to this environment from one of a rural landscape of clean air and bird sound to one of light, noise and air traffic pollution have not been taken into account accurately and shows the failings in the DCO on reporting these effects.

8 Homes & Amenity impact assessment by Derek Green on behalf of FERN

A report by a member of FERN to present to the ExA a more rounded picture of the impact on homes and amenity, because the number of homes and businesses which will be effected by the 2VB route have been underplayed and misrepresented both throughout the Consultation process and in the DCO. Consideration is also given to the sad and terrible loss of amenity for local villagers and questions are asked why the alternative has not been taken into proper consideration.

9 Alternative Route for the Two Village Bypass on behalf of FERN

A review of the benefits of the alternative route (put forward by the Parish Council of Farnham & Stratford St. Andrews) which reroutes the central section of the bypass to the East of Foxburrow Wood as opposed to the West. The benefits documented are many and, in our view, should clearly explain that the greater good surely is served by the route going East of Foxburrow Wood. There is also a review and our responses to the DCO Chapter 3 Alternatives and Design Evolution. Includes an additional submission also found under No. 9 Parish Councils submission to EDF Consultation 3 detailing the Alternative.

10 Mitigation review on behalf of FERN

This document contains the minimum mitigation requirements should the alternative not be accepted. Although the fair and right level of mitigation can only be properly ascertained after it is clear how many homes and businesses are effected and, the true impact concerning amenity, landscape, habitats and ecology are taken into account. However this review covers what should be the minimum mitigation and that currently EDF have fallen woefully short of what should be provided if the DCO alignment were to be approved.