

FERN Submissions for 2 June 2021

Supporting Submission No 20026497

9. Alternatives

INTRODUCTION

This representation is made on behalf of FERN (Farnham Environment Residents & Neighbours association). We represent the three tourism businesses and eleven dwellings in the Farnham Hall area (including The Old Vicarage and Mollett's Farm). We have detailed in our various submissions the reasons why we believe the EDF alignment should not be accepted, as not being in the public interest, because it does too much harm to the built and natural environment harm. Here we address the DCO's Alternatives & Design Evolution and show why EDF's route has been based on misleading information. There is a better alternative;

1 THE ALTERNATIVE – Benefits of going to the East of Foxburrow Wood

The alternative bypass that does the least harm was put forward in detail in 2016 by Farnham & Stratford St. Andrew Parish Council from EDF's Consultation 2. In depth details of this and a route map are found at: <http://farnhamwithstratfordstandrew.onesuffolk.net/assets/Uploads/Farnham-with-Stratford-PC-Stage-3-Consultation-Response-FINAL3.pdf>, a hard copy has been submitted separately and is to be found with this submission 9.

This alternative reroutes the central section of the bypass to the East of Foxburrow Wood, as opposed to the current route proposed by EDF, that goes to the West of Foxburrow Wood. The benefits of the Eastern route are that it:

- i) Limits habitat fragmentation affecting multiple species and groups including bat-commuting routes and isolation between ponds.
- ii) Limits direct loss and damage of a number of habitats including: a 120m section of ancient hedgerow, removal of Ancient trees (which form an integral part of a wildlife corridor), Ancient Woodlands at Foxburrow Wood and Pond Wood and possible Ancient Woodland at Nuttery Belt.
- iii) Preserves the best ecological integrity of the local wildlife corridor rather than voiding its centre, an area with the highest wildlife value.
- iv) Reduces pollution, noise and lighting effects and obstruction around the key areas of biodiversity.
- v) Reduces the extent of disruptive groundwork and cuttings because of a 2m rather than 6m land level difference. EDF estimate 49,300 tons of construction waste would

be created from its 2VB to deal with existing ground levels. That alignment also includes an obtrusive, large over-bridge and ramps, further effecting biodiversity and putting pressure on Ancient Woodland Foxburrow Wood. Note that that bridge does not appear to have yet been designed to a standard satisfactory for horse-riding and cyclist use.

vi) Protects the western edge of Foxburrow Wood from further decline.

vii) The loss would be a thin strip of undesignated land between Foxburrow Wood and Palant's Grove. Its value is low compared to the damage EDF's route would do including loss of the unsurveyed woodland at Nuttery Belt. It is incomprehensible that this strip is used as a justification for not considering the Parish Council's alternative.

viii) Protect and preserve the Ancient Woodland & County Wildlife Site at Pond Wood, an Ash woodland with ponds and a key part of the wildlife corridor. Ash trees are on the IUCN RED List as near threatened, this woodland however is showing tolerance to ash dieback and has become part of a Conservation & Scientific research study by Royal Botanic Gardens, Kew and is to be re-examined in July 2021.

ix) Preserve the integrity of a peaceful popular walk surrounded by nature for villagers and walkers to still enjoy.

x) Protects the unique, historic trees, woodlands, parkland trees and our wildlife corridor for future generations to be able to enjoy.

xi) Benefits the majority of homes and tourism businesses. There are 26 homes effected by the bypass:

19 would greatly benefit from the route going East averaging 460m away as opposed to 180m away

2 houses are effected equally by either West or East

2 are 10/20m closer to the East route over the West

2 are 370m away West or 255m away East.

Walk Barn Farm is about 100m away from the Eastern Route, a farm bungalow

xii) Preserve the parkland and heritage setting of Farnham Hall Estate, its Grade 11 listed Manor House, Hall and associated historic farmland buildings, including those converted into homes set within the parkland.

xiii) Allows for a later a spur for a bypass for the adjoining villages of Little Glemham and Marlesford, a long-promised project known as the Four Village bypass.

The greater good is served by the route going East of Foxburrow Wood.

2 EFFECTS ON TOURISM ON THE WESTERN ROUTE

This has been more fully covered in submissions from Mollett's Farm and FERN 6. Tourism.

The two major tourism businesses affected by EDF proposals are Friday Street Farm shop and cafe and Mollett's Farm. Friday Street Farm currently sits 235m away from the A12. With the western bypass it would be 215m from the A12 but on a more easterly bypass would be 195m from the A12, a difference of just 20m. The 'pick your own facility is a short-term seasonal operation that does not rely on ambience as there is traffic noise/views of the A12. It owns 6 holiday cottages elsewhere, a busy car boot fare to the east of the A1094 and the Farm shop and Cafe already face the A1094; their business must come, in part, from being on that busy road, although probably some by diversion from the A12. There must be great doubt whether there be any viability issues for this business owing to the alternative route put forward by the Parish Council and in reality, it would most probably thrive just as well as with the EDF 2VB alignment .

Mollett's Farm with over 1,000 holiday stays a year would be 365m away from the more easterly route as opposed to 205m away from the Western route. Their holiday cottages, certified caravan/mobile home park would suffer such a dire effect from the EDF 2VB alignment that continuation of the business must be in great doubt. There are two further smaller holiday letting businesses, small yet providing required income: The Cartshed, an Airbnb, would become financially unviable if EDF's route went ahead being just 90m distance, The Old Vicarage would suffer greatly during construction; after construction the staggered junction and light and noise impact from the roundabout and the route round to Pond Wood would have an adverse effect on business.

3 OUR RESPONSES TO DCO'S REVIEW OF THIS ALTERNATIVE (EDF in blue/our responses in black)

6.6 Vol 5 TVB Chapter 3 Alternatives and Design Evolution

3.3.25 The alternative alignment put forward by the Parish Council was reviewed, taking into account the impacts on woodland, environment and nearby receptors as well as operational matters, but it was not considered to be a better solution.

3.3.26 Any proposed bypass must offer road users a viable, alternative route that would be perceived as quicker than travelling through the villages in order to provide the relief sought to these local communities. The route proposed by SZC Co. is shorter than the alternative alignment put forward by the Parish Council and is therefore more likely to encourage road users to bypass the current A12 route through Stratford St. Andrew and Farnham.

Response: The Western route is 2.4km in length, the Eastern Route is 2.9km so there is a 0.5km difference. This calculates at 24 seconds to the journey time, which is not long enough to deter drivers and proposed signage will make it clear the bypass must be used. This was confirmed by Suffolk County Council in an email dated 7.12.20 Steve Merry Transport Policy and Development Manager: *'From a transport perspective I consider that it is unlikely that the additional 0.4km length of the alternative route would cause traffic to use what would be the 'old' route though Farnham. We've not done any specific route comparison but the choice between a modern derestricted road (2VBP) and a twisting speed limited route would logically lead drivers to follow the former. The 2VBP would also be the route signed as the A12 and in time be the SATNAV route. I've included an extract from our stage 4 response on this matter; "The difference in the length between the two options (400m) would not be significant in terms of use. It is unlikely to encourage traffic through Stratford St.*


Andrew and Farnham in preference to the two-village bypass, although it would increase journey times.”

3.3.30 Farnham with Stratford St Andrew Parish Council have questioned the validity of the ancient woodland designation of Palant's Grove based on reports undertaken in 1994 analysing the origin of the woodland. However, both the Department for Environment, Food and Rural Affairs, and Natural England confirm that the entirety of Foxburrow Wood and Palant's Grove are designated as ancient woodland, as they are both on the Ancient Woodland Inventory. In any event, both Foxburrow Wood and Palant's Grove are a County Wildlife Site. Therefore, any permanent loss of Palant's Grove would be a loss of important habitat resulting in irreversible harm. The bisecting of Palant's Grove would also reduce ecological connectivity. It was therefore considered that the proposed SZC Co. route for the two-village bypass is preferable to that proposed by Stratford St Andrew Parish Council.

Response: We have a letter from SCC confirming that the designation of CWS status to Palant's Grove was automatic when the whole area was, it appears, incorrectly assigned as Ancient Woodland (see letter left below). It can now be assumed that the area that is not AW is neither CWS. The AW mapping has been corrected by Natural England (see map below right). The link between Foxburrow Wood and Palant's Grove is a 110m wide but extremely narrow area, that was once a roadway but now a footpath.

Appendix 1 Letter from SCC and Map of AW

084 fbp-POE - SCC & English Nature - Confirmation...ncient Wood.pdf

**Suffolk County Council**
Planning
23 NOV 1994
RECEIVED

F.A.O. Dr A.D. Martin

Your Reference: 9924.01/ADM/KMC.1
Our Reference: P.JH/DMS 15.2.18
Please ask for: 265190
Direct Line: [0473] Mr P.J. Holborn
Date: 21 November 1994

Dear Dr Martin

RE: EXCLUSION OF PALANT'S GROVE FROM FOXBURROW WOOD COUNTY WILDLIFE SITE (CWS)

Thank you for your letter of 14 November 1994 highlighting the exclusion of Palant's Grove from the CWS. I apologise for this oversight.

Palant's Grove is listed on the Suffolk Inventory of Ancient Woodland (1992) and this automatically receives CWS designation along with Foxburrow Wood.

Regarding alternative routes, Suffolk County Council would be opposed to both of those shown on the enclosed map on the grounds that they go through Ancient Semi-natural Woodland.

I am enclosing a copy of the correct CWS boundary for your information.

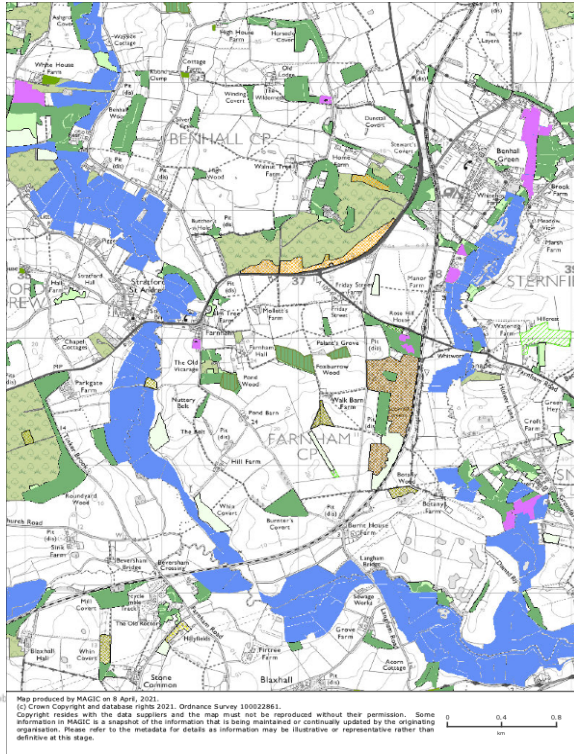
Yours sincerely

[Redacted Signature]

for County Planning Officer

Keep it safe in Dropbox
Quickly find it from any device by saving it to your own Dropbox

Sign Up Sign In



Map produced by MAGIC on 8 April 2009.
(c) Crown Copyright and database rights 2011. Ordnance Survey 100022861.
Copyright notice with the data suppliers and the map must not be reproduced without their permission. Some information in MAGIC is a snapshot of the information that is being maintained or continually updated by the originating organisation. Please refer to the metadata for details as information may be illustrative or representative rather than definitive at this stage.

Appendix 2 Photograph showing the thin and mainly scrub woodland which the Eastern route would cross. Loosing part of this is much less harmful than all the combined losses incurred for the Western route (including the unsurveyed Nuttery Belt which maybe ancient woodland)



4 CONCLUSION

Evidence points to the fact that “SCC/ESC” had their route set in stone by using their Aecom 2013 report (as stated in the DCO). Yet things have changed since 2013; the mapping of Ancient Woodland and County Wildlife Sites for a start and greater urgency to protect biodiversity and habitats. The existence of Mollett’s Farm as a tourism business was ignored. The 2013 report did conclude that further investigation was required before any final decisions were taken but it doesn't seem this happened.

FERN received an email dated January 2021 from ESC that states - *‘ESC is not in a position to promote an alternative route for the two village bypass, there is not the up to date technical assessment available for a judgement to be made on an alternative route by ESC.’*

Our Parish Council were never engaged with, and other local representations were ignored. This was hardly a satisfactory basis for EDF to proceed with its DCO application.

The email continues; *‘Our role is to respond to the DCO proposals as submitted and we have done so and will continue to do so. We have not raised an objection to the routing of the two village bypass and I do not anticipate an objection being raised. However, there are some concerns with regards to the technical detail of the layout and potential impacts on settings of historical buildings and hydrological implications of the route on the ancient woodland that are being discussed with EDF Energy.’*

During the consultation period EDF in support of its DCO alignment argued there were three reasons against the Parish Councils route;

- a) traffic would still use the A12 - not credible
- b) it was further away from Walk Barn Farm - failed to mention it was nearer to the majority of other homes and gave a 40m distance when it is actually closer to 100m from Walk Farm Barn
- c) that the strip of land between Palant’s Grove and Foxburrow Wood was ancient - incorrect, as now recognized by Natural England

It now seems that for EDF to continue to support its DCO alignment it is relying on the damage to the ecology being worse than if it were realigned east but where is the ecological evidence for that? As it is, EDF has failed to recognize the interconnectivity of habitats in the area encompassed by Nuttery Belt, The Old Vicarage woodland, Pond Wood, the Farnham Hall gardens and woodland to the north, the double hedgerow which is a bat movement corridor and Foxburrow Wood. EDF's assessment is simply wrong.

The Councils' failure to think hard enough about heritage, ecological impact and the alternative route has led to them maintaining a false narrative of the "least worst option" for the EDF 2VB alignment. It is in fact so bad that it should be rejected