

FERN 20026497 input to ExA questions to the Applicant on Two Village Bypass

Sarah Green for FERN

(Note: FERN includes Farnham Manor Hinton 20025977, 2 Farnham Hall Lee 20025982, 3 Farnham Hall Davies 20025976, 4 Farnham Hall Davies 20025976, 5 Farnham Hall Bingham, Booths Barn Arlidge 20026030, 2 Farnham Barns & 2a The Cartshed Morgan 20026369, Farnham Barns Noble 20026476, 1 Hall Cottages Brindley 20025928, 2 Hall Cottages Evans 20025975, The Old Vicarage Ogilvie 20026674, Mollett's Farm Ayres)

We have put individual representations in previously but continued as advised for ease as a group FERN 20026497. We have also submitted two professional reports at WR Deadline 2 - Bioscan on Ecology & Brighter Planning on Heritage under FERN 20026497.

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1) ASV TVB FOLLOW UP INFORMATION

On the ASV I was asked to remind the ExA about things ExA wanted EDF to provide after they had walked the TVB route:

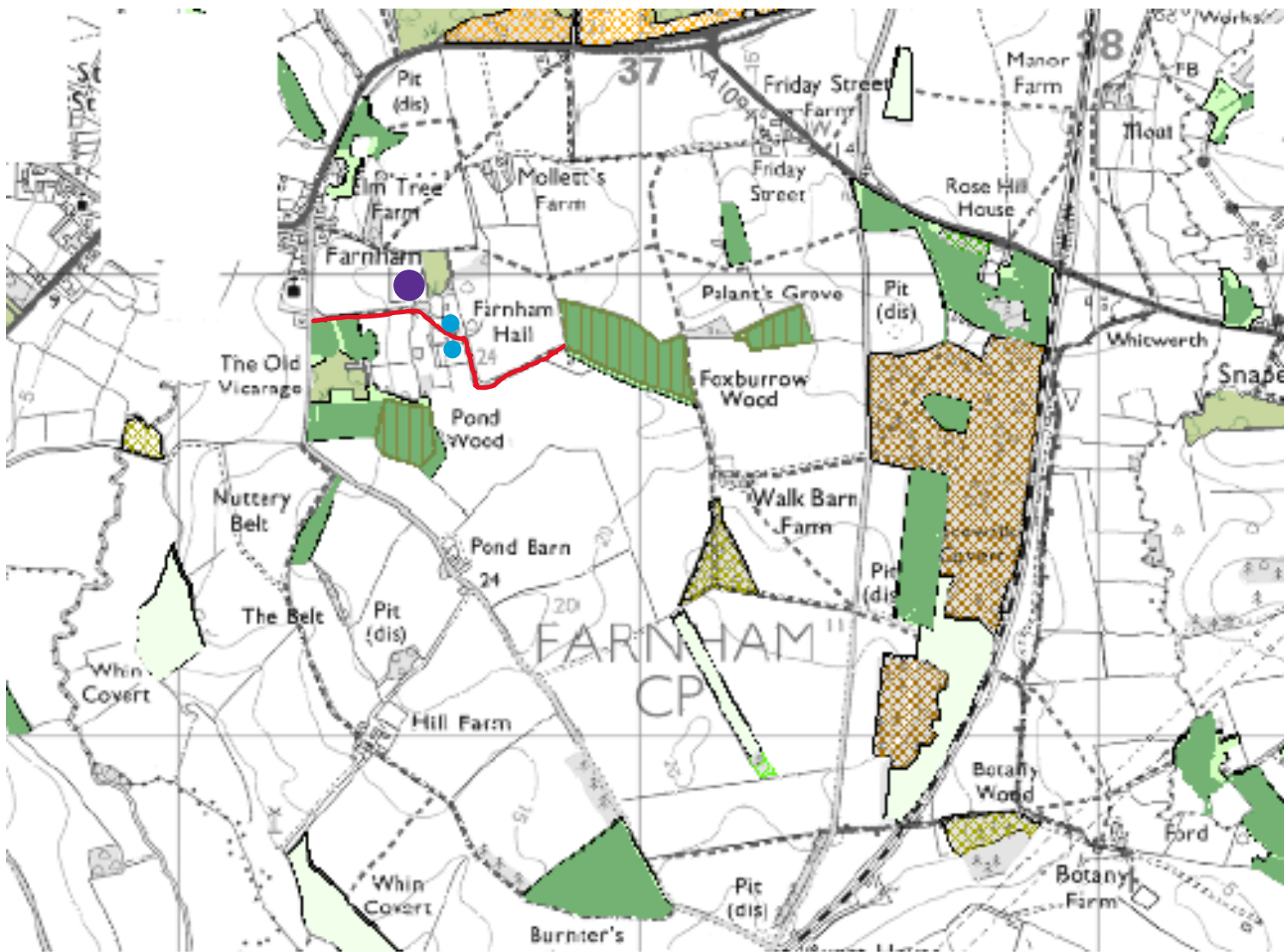
- 1) Provide a hydrology report for Foxburrow Wood
- 2) Provide exact distances of its proposed footpath and workings from Foxburrow Wood
- 3) Provide information on the survey of Nuttery Belt (which is likely to be Ancient Woodland)
- 4) Explain CWS status of the gap between Foxburrow Wood and Palant's Grove
- 5) Provide exact distance of its route from Pond Wood
- 6) Ecology - follow up on lack of GCN surveys to ponds that were listed as 'access not granted'

On Ecology FERN received a phone call on 21.6.21 from a "Jake" at Dalcour Maclaren to arrange a Great Crested Newt Surveys for FERN.

We are awaiting:

i) Surveys of European protected species Dormouse; Farnham Barn 90m from EDF's proposed site had a dormouse nest last year. These should have been surveyed as i) they are likely to be present ii) there is a record nearby.

ii) Bat roost surveys, although Jake confirmed they had finally been done but only on Mr. Latham's land (the farmer who appears to benefit from much surveying, unlike FERN members). FERN has repeatedly asked for proper bat surveys to include the sites mapped below that are adjacent to EDF's site. The red line Ancient Wildlife Corridor is where the greatest bat activity is recorded, yet ecologists have failed to survey properly where these bats come from, ignoring listed maternity roosts and other ancient trees adjacent to their site.



- Listed maternity bat roosts Booths Barn & 2 Farnham Barn
- Grove of Listed Ancient/Veteran trees
- Ancient Hedgerow

If it wasn't for local people, EDF's lack of information or mis-information would have gone unnoticed. I have not encountered a DCO before but as a Kew trained horticulturist find it deeply disturbing that any corporation treats it as a game of "cat and mouse" for those affected and in respect of the harm to the built and natural environment. It is also deeply upsetting to the villagers who live by and care for their natural environment; the expectation is that these habitats would be given a fair and proper consideration to enable the ExA to make the best balanced decisions, ever more important with the rate of species and habitat loss being experienced in our countryside. EDF's website states that they will be 'exemplary partners' when it comes to the environment; we have seen very little of this to date.

Pond Wood for example was not disclosed as AW (we did inform EDF before they submitted the DCO but we were told to address it at the DCO). Given the bypass site boundary is at its closest 10m distance away from this wood, a proper assessment would have revealed it was AW predominantly of Red Listed Ash trees. Because this woodland - unlike Foxburrow Wood & Palant's Grove - has ponds and is quiet and private, it is a key part of the Wildlife Corridor. Migratory deer including Red deer are a common site, as are badger (badger sett in Old Vicarage BAP Wood pasture adjacent), hare, toads, and all manner of birds and bats. Similarly misleading information forms the basis for Ancient Trees, Bat roosts, Wildlife corridors, loss of Ancient Hedgerows, Hydrology effects etc. etc., It paints the wrong picture of the severance the Applicant's route will cause, not to mention degradation of habitats.

I think you have to live here to understand why we are fighting so hard for it; those ancient trees, for example, you may think are just a few, but they are over 400 years old and form part of the historic essence of the village walk, villagers for generations have been walking past them up the lane and have a great emotional connection to them.

Out of any option there is always going to be some severance but no wildlife is going to use what appears to be 100m long ramps up to an overbridge 2.5m above ground level with high fencing on either side: there are no other wildlife crossing points along the bypass, just one at the southern end. How are terrestrial mammals being fed in at the southern end able to navigate the staggered junction to access BAP Old Vicarage Woodpasture and Parkland or Pond Wood, then there is no cover thereafter for their route to continue north, until they would end up on the old A12, causing increased traffic incidents. Has the Wildlife Corridor aspect been considered properly? We do not think so.

Our Ecology report summed up the Applicant's methods 'at best incomplete and at worst irresponsibly deficient'. They continue 'To date the Applicant has not given full consideration to evaluation of the potential impact of alternative options, and by this failure, it fails to meet the sequential process of the mitigation hierarchy that is central to environmental assessment processes. There are clear arguments that less ecological damaging alternatives exist and have been inadequately considered. The ecological assessment must therefore be considered unsound.'

2) Applicants answers to EDF's questions and some FERN comments in RED

A1.1.16

A1.1.16 The Applicant Site selection for the Two Village Bypass The Planning Statement, Appendix A - Site Selection Report, section 6, sets out the site selection process for the Two Village Bypass. This is also noted in the Site Selection Report, paragraph 6.4.70, and the reasons for rejection of that proposal are set out in subsequent paragraphs. The representation of Farnham with Stratford St Andrew Parish Council [RR-0379] expresses concern as regards the route alignment for the bypass of Farnham and Stratford St Andrew villages. There are also objections from a number of local residents including Ashtons Legal on behalf of Farnham Environment Residents & Neighbours (FERN) and others [RR-0108 to RR-0117]: (i) Please respond in detail to the criticism

made by the Parish Council and other IPs to the proposed alignment of the new road including any change to the Ancient Woodland designation, the impact upon the properties at Farnham Hall and the benefit of facilitating a future four village bypass. (Please see the SZC Co. response to Question TT.1.22 in Chapter 24 (Part 6) on this matter. Criticism - the pursuit of a bypass route to the west of Foxburrow Wood, to the exclusion of a more easterly alignment Applicant response - The proposed two village bypass alignment has been selected to minimise its impact on residential properties and sensitive receptors,

Table 1 below shows out of the 26 houses affected by the Applicant's route the majority are worse off. We fail to understand how this '*alignment has been selected to minimise its impact on residential properties*'. Table 2 shows the Farnham & Stratford St Andrews Parish Council's detailed analysis of both the Applicant's Route and the Parish Council's route with exact measurements, this was submitted regularly in the Consultation period and thereafter by the Parish Council (<http://farnhamwithstratfordstandrew.onesuffolk.net/assets/Uploads/Farnham-with-Stratford-PC-Stage-3-Consultation-Response-FINAL3.pdf>). EDF can hardly claim to be unaware of it.

Table 1

Dwelling (* denotes tourism business as well as dwelling)	No difference East or West	Better West Foxburrow Wood	Worse West Foxburrow Wood
Yew Tree Cottage	X		
53 Friday Street		X by 10m	
54 Stockhouse Cottages			X
55 Stockhouse Cottages			X
Old Police House			X
51 Friday Street	X		
Farm Cottage, Fri St		X by 20m	
Mollett's Farm*			X
Walk Barn Farm		X 445m West/40m east	
Farnham Hall Farmhouse			X
Farnham Barn			X
2 Farnham Barn			X
2a Farnham Barn*			X
Farnham Manor			X
2 Farnham Hall			X
3 Farnham Hall			X
4 Farnham Hall			X
5 Farnham Hall			X
Booths Barn			X
1 Hall Cottages			X
2 Hall Cottages			X
The Old Vicarage*			X
57 Pond Barn Cottages			X
58 Pond Barn Cottages			X
1 Hill Farm		X 370m West/255m east	
2 Hill Farm		X as above	

Table 2

APPENDIX D – Comparison of the existing A12 with the two bypass routes

Residential Dwelling	Parish	Residents / Occupancy	Existing A12	Bypass to West of Foxburrow Wood		Bypass to East of Foxburrow Wood	
			Distance to centreline	Distance to centreline	Change from existing A12	Distance to centreline	Change from existing A12
Yew Tree Cottage	Benhall	3	200 m	200 m	0 m	200 m	0 m
53 Friday Street	Benhall	3	245 m	245 m	0 m	235 m	-10 m
54 Stockhouse Cottages (Grade II)	Benhall	3	15 m	250 m	235 m	290 m	275 m
55 Stockhouse Cottages (Grade II)	Benhall	1	15 m	250 m	235 m	285 m	270 m
Old Police House	Benhall	2	25 m	285 m	260 m	325 m	300 m
51 Friday Street	Farnham	2	295 m	295 m	0 m	295 m	0 m
Farm Cottage, Friday Street	Farnham	2	255 m	235 m	-20 m	215 m	-40 m
Mollett's Farm	Farnham	5	255 m	205 m	-50 m	365 m	110 m
Walkbarn Farm Bungalow	Farnham		930 m	485 m	-445 m	40 m	-890 m
Farnham Hall Farmhouse	Farnham	3	660 m	110 m	-550 m	315 m	-345 m
Farnham Barn	Farnham	2	390 m	165 m	-225 m	565 m	175 m
2 Farnham Barn	Farnham	2	400 m	155 m	-245 m	560 m	160 m
Cart Lodge, 2A Farnham Barn	Farnham	2	415 m	140 m	-275 m	550 m	135 m
Farnham Manor (Grade II)	Farnham	1	390 m	195 m	-195 m	610 m	220 m
2 Farnham Hall	Farnham	2	400 m	180 m	-220 m	595 m	195 m
3 Farnham Hall	Farnham		405 m	170 m	-235 m	595 m	190 m
4 Farnham Hall	Farnham	1	415 m	165 m	-250 m	590 m	175 m
5 Farnham Hall	Farnham	2	420 m	155 m	-265 m	580 m	160 m
Booths Barn, 6 Farnham Hall	Farnham	3	425 m	145 m	-280 m	560 m	135 m
1 Hall Cottages	Farnham	1	370 m	180 m	-190 m	570 m	200 m
2 Hall Cottages	Farnham	1	370 m	180 m	-190 m	570 m	200 m
The Old Vicarage	Farnham	1	330 m	345 m	15 m	505 m	175 m
57 Pond Barn Cottages	Farnham		775 m	80 m	-695 m	160 m	-615 m
58 Pond Barn Cottages	Farnham		785 m	80 m	-705 m	150 m	-635 m
1 Hill Farm	Farnham		1010 m	370 m	-640 m	255 m	-755 m
2 Hill Farm (Grade II)	Farnham		1010 m	370 m	-640 m	255 m	-755 m
Business Property	Parish	Residents / Occupancy	Existing A12	Bypass to West of Foxburrow Wood		Bypass to East of Foxburrow Wood	
			Distance to centreline	Distance to centreline	Change from existing A12	Distance to centreline	Change from existing A12
Friday Street - Farm Shop	Benhall	-	235 m	215 m	-20 m	195 m	-40 m
Friday Street - Café	Benhall	-	185 m	170 m	-15 m	165 m	-20 m
Mollett's Farm - Accommodation	Farnham	13	275 m	225 m	-50 m	405 m	130 m
Notes							
1. All distances measured from centre of building to centre of carriageway. No account is therefore taken of overall road width, property footprint or the extent of surrounding private gardens / land.							
2. Number of residents / occupants stated where known.							
3. Proximity of the eastern bypass route to dwellings and businesses could be further improved by sensitive changes to the final A12 / A1094 roundabout location and precise bypass alignment as it passes Friday Street.							
4. Background colour coding: RED = less than 150 m / AMBER = 150 m - 199 m / GREEN = 200 m or greater							

For instance, an alternative alignment further from Farnham and Stratford St Andrew would inevitably extend further into countryside and impact on woodland at Palant's Grove, the route selected was assessed to have the least environmental effects.

THE ALTERNATIVE - to the East of Foxburrow Wood

The bypass that does the least harm is the one put forward in detail in 2016 by Stratford St. Andrew & Farnham Parish Council to EDF's Consultation 2. Details of this and a route map can be found at: farnhamwithstratfordstandrew.onesuffolk.net/assets/Uploads/Farnham-with-Stratford-PC-Stage-3-Consultation-Response-FINAL3.pdf.)

This reroutes predominantly only 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 and leaves the terminal points on the A12 as proposed by EDF. The benefits of this route are that it:

- i) **Limits habitat fragmentation** affecting multiple species and groups including bat commuting routes and isolation between ponds.
- ii) Avoids direct loss and damage of a number of invaluable habitats including a notable section of **ancient hedgerow and removal of Ancient trees**, which form an integral part of a wildlife corridor for bats.
- iii) **Preserves** the ecological integrity of the entire **wildlife corridor including Nuttery Belt** rather than voiding its centre, which is the area of the highest wildlife value.
- iv) **Reduces pollution, noise and lighting effects** and obstruction around the key areas of **biodiversity and majority of homes and businesses**.
- v) **Reduces** the extent of **disruptive groundwork** and cuttings because of a 2m rather than 6m land level difference. (EDF estimate 49,300 tones of construction waste would be created to deal with existing ground levels, and requires a large over bridge and ramps, further affecting Foxburrow Wood, and without providing proper hydrological evidence on that impact).
- vi) **Protect s** the western edge of **Foxburrow Wood** from further decline
- vii) The loss would be of part of a thin **strip of scrub woodland (which is NOT Ancient Woodland) between Foxburrow Wood and Palant's Grove**. Whatever value EDF purports to give to that strip of land, objectively its value is low compared to the damage EDF's route would do (including loss at Nuttery Belt). We find it incomprehensible that protection of this strip is used as any justification for EDF's DCO route.
- viii) **Protect and preserve Ancient Woodland & County Wildlife Site at Pond Wood** that is an Ash woodland with ponds, a key part of the wildlife corridor and ash trees are on the IUCN RED List.
- ix) **Preserve** a relatively peaceful, popular **walk** for local people to still enjoy especially to the bluebell wood and maintaining PROW connectivity close to the village.
- x) The **two major tourism businesses** are Friday Street Farm Shop and cafe and Mollett's Farm. Friday Street Farm currently sits 235m away from the A12. With the EDF alignment for a bypass it would be 215m from the A12 and on a more easterly bypass would be 195m from the A12, a difference of just 20m. The "pick your own "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 fair to the east of the A1094; the Farms hop and Cafe already face the A1094 and their business derives from being on that busy road.

Mollett's Farm with over 1,000 holiday stays a year would be 405m away from the more easterly route as opposed to 225m away from the EDF route. Their holiday accommodation (cottages and studios), certified caravan/mobile home park and camp site business, reliant on rural ambience, would be severely affected by the EDF alignment should a bypass not go further east.

xi) **Preserve the parkland and heritage** setting of Farnham Hall Estate, including its Grade 11 listed Manor, Hall and associated historic farm buildings which comprise 10 homes, in a parkland setting.

xii) Better allows a possible spur for a **future extension** of the bypass for the adjoining villages of Little Glemham and Marlesford, a long-promised project known as the Four Village bypass.

AGAINST

i) **A loss of a thin strip of land between Foxburrow Wood and Palant's Grove - whatever designation EDF give to that strip of land, its value is low compared to the damage EDF's route would do and it is incomprehensible that this strip is used as justification for a route that is so blatantly wrong.**

whilst increasing journey times and reducing or negating the effectiveness of the road as a bypass.

EDF's DCO route is 2.4km and the Parish Council's more easterly route is 2.9km this calculates at adding around 24 seconds to the journey time, which was confirmed by ESC/SCC in their joint response at Consultation 4 as making little difference to road users.

SZC Co.'s proposals for the bypass to run to the north of Foxburrow Wood obviate that impact. In doing so the proposals also involve a smaller land take than the Parish Council's suggestion and provide an effective bypass which offers a clear benefit to traffic compared with remaining on the existing A12. In this respect, the DCO alignment accords with the lessons learned from previous bypass proposals.

Where is the evidence for this last assertion? Do people opt to travel through Ipswich rather than use the western, southern or eastern bypasses? Likewise for the A12 Martlesham, Woodbridge, Wickham Market, Saxmundham or Kessingland bypasses? Suffolk County Council can no doubt say whether its schemes in Lowestoft (the eastern relief road, the northern spine road and the southern relief road) have failed in the objective of relief of traffic, and providing better routes. Likewise for the Bury St Edmunds eastern relief road and the Beccles southern relief road, EDF are not adducing any evidence to show that a more easterly route will not deliver exactly the same benefits (save a marginal increase in travel time) but without causing anywhere near as much harm to the built and natural environment.

The history of bypass proposals, and how the DCO proposal has evolved from these historic proposals, is explained at Section 2.2 and Chapter 3 of the Two Village Bypass Summary Paper (Appendix 5C). The route selected by SZC Co. is comparable with the preferred route options historically promoted by the Highways Agency, preferred by an independent public inquiry and, more recently, preferred in studies undertaken on behalf of the County Council. This is set out in more detail in the Summary Paper. A consequence of the route is its relative proximity to properties at Farnham Hall.

Not just Farnham Hall estate but also other properties as shown in Tables 1 and Table 2. EDF has obviously not looked closely enough at the Inspector's report on the Highways Agency's scheme,

which makes it clear that the decision was marginal, and it is evident also that the impact on Heritage was not sufficiently taken into account, as it should be now.

Where the proposed alignment passes to the east of the Farnham Hall ExQ1: 21 April 2021 Responses due by Deadline 2: 2 June 2021 Page 172 of 236 ExQ1 Question to: Question: properties, the route would be in cutting approximately 4.5m deep to reduce the environmental impacts on residents. Noise impacts at Farnham Hall have been carefully considered.

Although a cutting is imperative for some properties, the road would still be very present in places as it is only in part in a deep cutting. A further worry is that in the Applicant's addendum it says it could be subject to plus/minus 1m changes vertically. The route goes very close to Pond Barn Cottages, Pond Wood, the gardens and walled garden at Farnham Manor, Farmham Hall Farmhouse, Stockhouse Cottages, Old Police House and Mollett's Farm. Traffic will be visible from upper windows in 2/3/4/5 Farnham Hall. Boothby's Barn and The Cartshed gardens and houses in Farnham Barn would directly face the DCO route and see it and hear it. The noise would severely affect these properties and their outside amenities will no longer be the tranquil places they currently are. The large overbridge and ramps will be an intrusion into the landscape, and people walking up and down the western ramp and over the bridge will have direct views into some of the homes and gardens.

NPS EN-1 requires the avoidance of significant adverse effects on health and quality of life from noise. Paragraphs 4.6.32 and 4.6.33, and Table 4.24 of Volume 5 Chapter 4 of the ES [APP415] confirm that during 2028 Peak Construction, 2028 Typical Day and 2034 Operation, the SOAEL is only exceeded at Pond Barn Cottages (and mitigation made available).

There is no doubt there will be a significant impact from noise and pollution to this rural landscape (and of major detriment); the area is currently one of bird noise and fresh air. People spend a lot of time outside in their gardens and villagers walk up and through here to enjoy the countryside, which will be blighted by EDF's route

The Applicant's table of requirements for the bypass is an earth shattering list including 360 wheeled tracked excavators, 180 loaders, articulated haulers/dump trucks, vibratory tamping rollers, road tipper wagons, compressors and pneumatic tools, motor graders dozers, asphalt pavers (and tipper lorries), crane.

These will be working in close proximity to tourism businesses, homes and gardens for extended hours and over months. Compare this to the 3 diggers that were building a reservoir about 500m from a centre point at Farnham Hall Estate that caused local upset, with constant digger beeping on reversing and diggers engine revving whilst they continual went back and forth. The Applicants bypass comes unnecessarily close to the majority of homes and this will make their environment particularly unbearable during construction. Also, as the main construction site is right by Mollett's Farm there will be continual movement of road building apparatus up by their holiday tourism business and continually going past Farnham Hall Estate/Farmham Hall Farmhouse/Pond Wood/Pond Barn etc. Why has the Applicant chosen the most insensitive route that causes maximum blight to villagers who live in the S.E part of Farnham?

The bypass of course brings lasting noise and other benefits to Farnham and Stratford St Andrew. Criticism - Palant's Grove has been de-classified as Ancient Woodland Applicant response

Yes, the corridor between Foxburrow Wood and Palant's Grove has been declassified as AW. It has been accepted by Natural England that it was NOT ancient woodland and should not have been classified as such.

Please see the SZC Co. response to Question AI.1.22 of this chapter. Criticism - that Farnham Hall is ten separate properties rather than one such that around twenty properties and not eleven will be affected.

The Farnham Hall Estate has Farnham Manor, 2 Farnham Hall, 3 Farnham Hall, 4 Farnham Hall, 5 Farnham Hall, Boothby's Barn, The Cartshed (2a Farnham Barn), 2 Farnham Barn, Farnham Barn, 1 Hall Cottage, 2 Hall Cottage plus The Old Vicarage

Applicant response - Please see the SZC Co. response to Question NV.1.42 in Chapter 21 (Part 5) of this report. Criticism - An easterly alignment would enable the linking up of a future four village bypass. Applicant response – The proposed alignment of the two village bypass in the DCO application would not prejudice the delivery of a longer, four village bypass in the future, This is not sustainable, as

ESC/SCC have said because of the severe loop it would be impossible to link into. The EDF alignment severely prejudices the potential for any future relief of Marlesford and Little Glemham; the more easterly Parish Council route does not do so.

but, based on the conclusions of previous studies (as discussed below), a more preferable solution may be for a separate bypass of Little Glemham and Marlesford to be brought forward in the future by Suffolk County Council (SCC) if deemed appropriate.

This would entail 4 roundabouts in a short distance, slowing traffic and causing tailbacks.

The proposed two village bypass route has evolved as the detail has been developed but it is fundamentally the same route as the preferred route in SCC's 2014 A12 Four Villages Study. This route (known as SB5),

This mis-characterises the 2103 A12 Four Villages study for SCC; it was not conclusive about any route and summarised that all the options needed *'cost/benefit ration analysis, alongside design refinement including mitigation measures, accurate costing analysis and traffic forecast and a detailed environmental assessment'* before a preferred route was decided on." It did confirm that the route known as SB5 was the 'least favourable' option for biodiversity. (<https://www.eastsuffolk.gov.uk/assets/Planning/Sizewell/Executive-Summary-A12-Four-Villages-Study-02062014-REV-2.8.pdf>)

Below are the details of the Applicants' consultations that showed that, after Consultation 2, no further discussions were undertaken with either the Parish Council or local people about the exact details of the DCO route. The plans presented in Consultation 2 comprised a rather vague line on a map making it possible to see any route detail. We can only wonder why EDF were not pressed to make greater efforts to investigate the Parish Council's more easterly route and with the same

diligence that EDF put into investigating its preferred route west of Foxburrow Wood. This made something of a mockery of the consultation process and EDF is engaging in increasingly desperate arguments to attempt to justify what is simply the wrong route alignment

Consultation 1 November 2012-February 2013

This put forward the need to deal with sharp bend at Farnham with:
option 1 cut off bend going north, 1km long
option 2 road widening on bend
option 3 hgv controls on bend

Consultation 2 23 Nov 2016-3 Feb 2017

Responses to Consultation 1 were given in the Consultation 2 documentation **by EDF as follows:**
11.2.6. Of the three options on which EDF sought views at the Stage 1 consultation, the majority of respondents considered Option 1 (Farnham bypass) to be most appropriate. Those who favoured this option generally considered that the bypass would represent a long-term solution to traffic issues at Farnham. It was considered that it would address the narrow bend and remove A12 traffic from Farnham, with consequential benefits in terms of improvements to the character, noise levels and secluded feel of the village.

11.2.7. However, a number of respondents raised concerns about Option 1 (Farnham bypass). These generally related to concerns over potential environmental effects, principally in terms of landscape and visual, ecology and flood risk impacts. Concerns were also raised by some residents relating to the proximity of the bypass to the Riverside Centre and adjacent amenity land used by the local community. Concerns were also expressed that the bypass would increase severance between the neighbouring communities of Farnham and Stratford St Andrew.

11.2.8. Neither Option 2 (road widening at Farnham bend) or Option 3 (HGV traffic controls at Farnham bend) were considered appropriate by most stakeholders given for this were that neither of these options would take traffic out of the village. The HGV controls option in particular was seen as potentially exacerbating the existing traffic situation, which could lead to additional queuing on the approach to Farnham. Most respondents also considered that the demolition of a property as a result of Option 2 (road widening at Farnham) was inappropriate, principally given the listed building status of the property and that the option would have a detrimental impact on the village of Farnham. However, Option 2 was favoured by a number of respondents, principally organisations with environmental interests, who had greater environmental concerns with the principle of a bypass.

11.2.9. Many respondents to the Stage 1 consultation stated that none of the three options presented were appropriate, and that EDF Energy should bring forward, or financially support, a much larger bypass of Farnham, Stratford St Andrew, Little Glemham and Marlesford on the single lane stretch of the A12 between Wickham Market and Saxmundham, a scheme which is often referred to as the 'Four Village Bypass'. Many such respondents referred to previous bypass schemes which have been proposed in this area.

11.4.4. There are a variety of options that EDF Energy could potentially pursue in response to the issues affecting Farnham. The choice between those options is not straightforward. EDF Energy recognises the importance of ongoing consultation with the highway and planning authorities, other statutory bodies and the local community before settling upon a preferred option for inclusion in its application for development consent. EDF Energy's current view remains that there may be a case for the provision of mitigation at Farnham. To this end, this Stage 2 consultation seeks views on four options, which can be summarised as follows: •

Option 1: No change, in other words the application would not propose any physical interventions (Section 11.5); •

Option 2: Road widening at the Farnham bend, similar to that illustrated in the Stage 1 consultation but with more detail (Section 11.6); •

Option 3: Farnham Bypass (also known as the one village bypass), similar to that illustrated in the Stage 1 consultation but with more detail (Section 11.7). There are two design options for the Farnham Bypass which are called Option 3A and Option 3B and each is described; and •
Option 4: Stratford St Andrew and Farnham Bypass (also known as the two-village bypass) (Section 11.8), which has been included following a request from Suffolk County Council (SCC), who consider that it would be preferable to a smaller-scale solution.

11.4.22. SCC has, however, resolved to undertake further work itself to develop proposals for a Four Village Bypass and has instructed consultants for this purpose. At present, this work is at an early stage and the level of uncertainty as to whether proposals for a Four Village Bypass would be developed, and if so, when and in what form, is such that EDF Energy must proceed with its proposals independently. Whether SCC's further work results in an application being made for a Four Village Bypass is, therefore, a matter for SCC and is separate from any proposals that may be advanced by EDF Energy in relation to the Sizewell C Project.

11.4.23. This section presents alternative options for shorter bypasses: Option 3 illustrates a bypass of Farnham only, and Option 4 illustrates a two-village bypass of Farnham and Stratford St Andrew. A preliminary version of the two-village bypass option was initially progressed by SCC as part of an options assessment considering various bypass designs. SCC's appraisal of bypass options along the A12 near the four villages was carried out by Aecom, and is documented in a report called 'The A12 Four Villages Study' (Ref.11.3). It is this version, developed by SCC, which is presented as part of this Stage 2 consultation. EDF Energy has given consideration to the matters that would need to be developed further if the two-village bypass design were to be progressed. These are presented at Section 11.8. The local authorities stated in their Stage 1 consultation that they would favour a two-village bypass over smaller scale interventions, in part because they consider that it may form a step towards an ultimate Four Village Bypass. SCC considers that following completion of a two-village bypass of Farnham and Stratford St Andrew, it could deliver a separate bypass of Little Glemham and Marlesford which, together, would provide a bypass of all four villages.

11.8. Option 4 – Stratford St Andrew and Farnham bypass (a two-village bypass)

11.8.1. Many respondents to the Stage 1 consultation suggested that EDF Energy should provide a more extensive bypass for the villages of Farnham, Stratford St Andrew, Little Glemham and Marlesford. This proposal is known locally as the Four Village Bypass. As discussed above, the local authorities are seeking to progress proposals for a Four Village Bypass. EDF Energy considers that a Four Village Bypass would be a disproportionate intervention to mitigate the effects of Sizewell C traffic and therefore it could not be included within its application for development consent for the Sizewell C Project. However, the Councils have expressed a view that a two-village bypass (of Farnham and Stratford St Andrew) may be an appropriate mitigation for EDF Energy to propose as part of its application for development consent. EDF Energy has therefore included this option as part of this Stage 2 consultation.

11.8.2. The proposals for a two-village bypass and the supporting environmental information that is presented here have been drawn from the work commissioned by SCC. The two-village bypass route presented here is set out as the blue route in 'The A12 Four Villages Study', which was commissioned by SCC and carried out by Aecom. The preliminary environmental information presented here has been drawn from this study. The information does not necessarily represent the views of EDF Energy's advisors. As a result, the level of detail provided here is different to that presented for the other highway options, because EDF Energy has not developed its own proposals for a two village bypass. However, the information is considered to be of a sufficient level of detail to allow consultees to make an informed response as to the proposal's merits when compared to Options 1-3. Should the proposals for a two village bypass progress further following this consultation, EDF Energy would undertake further work to renew the proposals, including reviewing the alignment of the route. It would also carry out environmental assessments to inform

the design development of any such proposals and inform any subsequent stage of consultation.

a) Proposals for a two-village bypass

11.8.3. The two-village bypass would bypass the villages of Farnham and Stratford St Andrew with a new single carriageway road to the south. Once operational, the bypass would form a new section of the A12. The proposed route runs approximately 2.4km across predominantly agricultural land to the south of the existing A12, departing the A12 to the west of Stratford St Andrew via a new five arm roundabout near Parkgate Farm and re-joining the A12 with a second roundabout to the east of Farnham at the A12/A1094 Friday Street junction. The bypass would be a single carriageway 7.3m wide with 3.5m verges. The side roads would be approximately 6m in width. SCC's alignment is shown in Figure 11.16.

11.8.4. The proposed route would cross the River Alde, through Nuttery Belt, clip Pond Wood and skirt around Foxburrow Wood. This route would run through the floodplain. Culverts would be built where the route crosses drains, and a new river bridge would be required where the route crosses the River Alde. In order to protect the River Alde, a diversion of the river under the structure would be necessary.

11.8.5. Where a bypass would cross existing local roads these would be retained where possible. For example, the current proposals include a side road overbridge at the access road to Pond Barn Cottages to allow its continued use. An agricultural underpass and local connections are identified to minimise severance at Farnham Hall. It would be necessary in some cases to divert or terminate routes which would be intercepted by a bypass. For example, the proposals include the termination of a private road for Park Gate Farm and a private footpath and road to Foxburrow Wood. 11.8.6. The proposed route would require some earthworks to suit existing ground levels. Based on the current design, there is a deficit that would require additional material to be brought onsite. Two drainage retention areas are proposed. It is expected that the existing drainage system would be used and improved, subject to further investigation.

11.8.7. The bypass would be designed in accordance with the DMRB so that it could be adopted and maintained by SCC once constructed.

11.8.8. Verge widening is proposed on some curves to provide adequate forward visibility. Fence lines would be positioned to allow for increased visibility. The woodland, known as Pond Wood, may need to be partially cleared to provide appropriate forward visibility. 11.8.9. Figure

11.17 shows an indicative view of the new five arm roundabout near Parkgate Farm to allow access to the two-village bypass west of Stratford St Andrew. b) Construction

11.8.10. SCC estimate that construction of the two village would take approximately three years.

Con 3 4th January- 29 March 2019

At this stage we were shocked when we got to Consultation 3 and there was Option 4 set in stone; any debate or conversation about the detail was resisted by the Applicant and SCC/ESC. It felt like SCC's route from the Aecom study was pulled out of the file and then the file was shut.

Figure 5.1 in this chapter provides an indicative sketch of how a potential link could be provided to link the two village bypass to a future four-village bypass.

We are computer literate but could not find this important link. We asked the ExA to help who directed us to Rep2-100 and Rep2-114. The latter is entitled The Sizewell C Project Responses to ExA's First Questions - volume 3 Appendices (and meant to be where we find Appendices 5C Two Village bypass Summary Paper that the Applicant continually refer to). This appears to be 528 pages on the Thames Tideway Tunnel? We have told the ExA that we have had to

respond without seeing this document. We have been prejudiced accordingly by EDF's failure to make information easily accessible.

Alternatively, separate bypasses for Little Glemham and Marlesford could be developed in the future. Criticism – a speed limit of 60mph rather than 50mph which will cause more noise and pollution Applicant response – A speed limit of 50mph rather than 60mph would reduce noise levels by approximately 1dB, however, this noise reduction is unlikely to be reflected at every noise receptor as noise from other roads would mask this marginal reduction.

There is a 6m hill to climb and a roundabout at either end of the bypass so a 60mph speed limit seems excessive and unnecessary. Noise effects to properties have been underestimated in the DCO.

AI.1.18

The Applicant Site selection for the Two Village Bypass The ES 6.6, Volume 5 Two Village Bypass, Chapter 3 Alternatives and Design Evolution, paragraph 3.3.25, indicates that the alternative alignment put forward by the Parish Council was reviewed at the Stage 4 consultation stage,

No meetings or discussion was undertaken with the Parish Council about their proposed route and things were obviously taken as settled at Consultation 3, which makes a mockery of the supposed process of consultation

- . 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.. Please explain: (i) The operational matters that weighed upon that decision.
- (ii) The additional average journey time that users of the alternative alignment would be likely to take compared to the proposed route and the existing routes.
- (iii) Justification for the conclusion that the proposed route would be likely to encourage road users to bypass the current A12 route through Stratford St. Andrew and Farnham compared to the alternative route.

Response (i) In relation to operational matters, the Parish Council's alternative alignment would be considerably longer, diverting traffic well into the countryside, rather than providing a realistic bypass of the villages. The Parish Council's alternative alignment would be 2,860m in length compared to 2,380m for the DCO proposals, almost half a kilometre longer. The Parish Council's alternative alignment has not been designed in detail and, for instance, is not compliant with geometric standards. To address this at a high level SZC Co. has prepared a geometric standards compliant schematic alignment version of the Parish Council's alternative to help understand the potential impact more closely (referred to as the revised alternative Parish Council alignment). A comparison of the Parish Council's alternative alignment, and the revised alternative Parish Council alignment are provided at Appendix A and Appendix B of the Two Village Bypass Summary Paper (Appendix 5C). The revised alternative Parish Council alignment would have significant effects on Friday Street Farm, as the alignment would sever more of the 'pick-your-own' fields from the Farm Shop and Café compared to the proposed alignment in the DCO submission.

This is a small, short lived seasonal operation, currently strawberries (that has about a 4 week season). It is also has currently road traffic noise from its close proximity to both the A12 and the A1094 so would not be further affected.

The Two Village Bypass Summary Paper at Appendix 5C explains in more detail the reasons why the Parish Council alignment is not considered to be a better solution. (ii) SZC Co. has used a strategic model to calculate the journey time on the existing A12 at Peak Construction (2028) through Farnham and Stratford St Andrew without the bypass. The journey time is estimated at 1 minute 50 seconds, but this estimate does not take into account potential delays at Farnham Bend, and therefore the journey time is likely to be greater. This journey time has been measured from the same points on the A12 as where the proposed bypasses (both the two village bypass and the Parish Council alignment) would leave and re-join the A12. The journey times for the DCO proposed bypass is estimated at 1 minute 48 seconds; whilst the journey time for the revised alternative Parish Council alignment is estimated at 2 minutes 8 seconds. (iii) The two village bypass journey time is marginally faster than staying on the A12 through Farnham and Stratford St Andrew, assuming that there is no congestion at Farnham Bend.

It is ridiculous to use the word "marginally". A simple drive through the villages at 30 mph will, shown this as significantly longer in time than the more easterly route.

However, the bypass is clearly needed due to the safety and potential congestion concerns at Farnham Bend, as explained in response to Question AI.1.17 of this Chapter. The Parish Council alignment journey time is longer and could not be expected to be attractive to the majority of drivers.

Again, ridiculous and simply not believed by the local highway authority. EDF is now promoting a 60 mph road; the more easterly route adds minimal journey time.

Whilst Sizewell C construction traffic would be instructed to use the bypass and avoid the two villages, Sizewell C traffic represents only approximately 7% of A12 traffic (based on Location AB – Marlesford, which is just to the south of Farnham – Table 8.6 of the Transport Assessment Addendum [AS-266]) and the majority of other vehicles using the A12 would be less likely to divert onto a bypass which offers no significant benefit in journey time or distance.

This is simply wrong.

As a result of its greater length the revised alternative Parish Council alignment would be significantly less successful in its primary purpose – to bypass the two villages. The revised alternative Parish Council alignment would be unlikely to provide the significant reduction in traffic flows that would come as a legacy benefit for these local communities with the DCO proposals.

Both of these statements are nonsense. If they were to be taken seriously, the local highway authority would support them. We have been told otherwise.

AI.1.19

The Applicant Site selection for the Two Village Bypass The ES 6.6, Volume 5 Two Village Bypass, Chapter 3 Alternatives and Design Evolution, paragraph 3.3.27 states that the alternative

alignment would be closer to Walk Barn Farm than the SZC Co. proposal is to any neighbouring property. Nonetheless the proposed route would pass close to the Farnham Hall complex. Please provide in summary a comparison of the distance of the two routes from residential properties in the vicinity; the numbers of residences in the various locations; the anticipated noise impact upon those residents and any impact upon heritage assets. **See Table 1 and Table 2 in this document above which show correct distances.**

Response The proposed two village bypass has been routed as far away from residential properties as practical, whilst providing an effective bypass and avoiding environmentally important woodland and gardens. Comparison of distance and number of properties within 250m of the routes: Chapter 3 of the Two Village Bypass Summary Paper, and Appendices C and D of the Summary Paper (found at Appendix 5C to this chapter), include plans showing the proximity of the geometric standards compliant Parish Council alignment to properties along the whole route (including 2 properties at Walk Barn Farm),

There is ONE residential property at Walk Barn Farm, it is a small farm bungalow of low architectural merit that is usually unoccupied but occasionally so for holiday lets or a very occasional visit by the owners, we understand. The alternative route would be behind this bungalow, behind a thick line of trees/hedge, the way the house orientates and the height of land levels mean it would have a lower adverse effect to the property than the current route does to many other properties.

We also question the 20m proximity that the Applicants claim the Eastern route would put on Walk Barn Farm. We have detailed plans of Option 14 that went East of Foxburrow Wood drawn up by the Highways Agency in a 1990 consultation (A1 plans which we could provide). This was for a proposed dual carriageway that went east of Foxburrow Wood. It was positioned about 90m from Walk Barn Farm, it did clip Foxburrow Wood by 10m, but was a dual as opposed to a single carriageway. We are not road builders but this 20m measurement appears mistaken.

Walk Barn Farm picture below.



This is just FERN buildings below. EDF is consistently failing to recognise the severe harm its DCO alignment would do the residential and business premises.



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The Old Vicarage 1840 a home and busy tourism business, which sits in part of the 6 acres of Woodpasture & Parkland BAP Priority England. 170m from site boundary.



Farnham Manor, owns Ancient Woodland/CWS Pond Wood and a Walled Garden; 10m and 20m distance from EDF's site boundary and completely exposed.



2/3/4/5 Farnham Hall set in a parkland setting with notable mature trees, their gardens will experience terrible traffic noise and upper windows will be looking down onto the proposed bypass. 100-150m from EDF site boundary.



Boothby's Barn, with registered maternity bat roost in attic facing the ancient wildlife corridor and 20m from the proposed EDF site boundary, will be overlooked by ramps and overbridge.



2 Farnham Barn & Farnham Barn with registered maternity bat roost in attic, gardens run 200m alongside EDF's proposed route with no barriers, will be overlooked by ramps and overbridge. Right on site boundary.



1 & 2 Hall Cottages unusual grove of Ancient Trees, large ponds and BAP Woodpasture & Parkland will be overlooked by overbridge. 70m from EDF site boundary.



The Cartshed, a busy Airbnb facility in a rural setting 20m from the site boundary, will be overlooked by ramps and overbridge.

AI.1.20 The Applicant Site selection for the Two Village Bypass The Consultation Report Appendix G records concern that the two village bypass would damage Grade II listed buildings and other heritage assets in the area.

Please see FERN Heritage report from Brighter Planning Consultancy submitted at WR Deadline 2. This concludes that EDF's assessments and proposals fail to comply with statutory tests (S66(1) Listed Buildings and Conservation Areas Act 1990 and the guidance of the NPPF).

(i) Please explain in detail the perceived difficulties in maintaining a 15m buffer to Foxburrow Wood and why this could not be overcome? (ii) Provide an update as to the status of Foxburrow Wood and Palant's Grove as ancient woodland. (iii) The extent of the County Wildlife Site that would be lost as a result of the alternative alignment.

As we know only too well at FERN (and keep saying) the CWS was an automatic designation when the corridor between the woods was wrongly designated as Ancient Woodland some years ago; it has been reappraised by Natural England and the corridor between Foxburrow Wood and Palant's Grove has now been undesignated, as seen on magic mapping. By being no longer AW it calls into question whether it is properly CWS. That corridor is denuded and of little value because of its narrowness and proximity to intensive arable farming.

Response The alternative alignment proposed by the Parish Council is not compliant with geometric standards. However, SZC Co. has prepared a revised alternative, comparable to the Parish Council's alignment, so that it is compliant with geometric standards (referred to as the revised alternative Parish Council alignment). The Parish Council alignment, and the revised alternative Parish Council alignment can be found at Appendix A and B of the Two Village Bypass Summary Paper (Appendix 5C of this chapter).

However hard we tried we could not find this document. Why not? We have been handicapped accordingly. As stated earlier ExA directed us to Rep2-114 which appears to be a document on the Thames Tideway Tunnel?

This revised alternative Parish Council alignment has been prepared at a high-level to help understand the potential impacts of an alignment to the east of Foxburrow Wood, however it has not been designed in detail, for example the likely extent of earthworks required. The level of detail shown in Appendix B of the Two Village Bypass Summary Paper (Appendix 5C of this chapter) is considered sufficient to inform this response. (i) The revised alternative Parish Council alignment would pass between the two ancient woodlands of Foxburrow Wood and Palant's Grove, bisecting the woodland between them (which forms part of the Foxburrow Wood County Wildlife Site (CWS)).

Palant's Grove has been kept as AW by Natural England but on a questionable basis, relying on the hachuring shown on Hodskinson's map of 1783, which looks to be some distance further east. A small wood can be seen on the 1803, estate map, however. I repeat, the corridor became designated automatically as CWS by virtue of the corridor being mistakenly designated AW. I re-attach the SCC letter which says that. Please would the ExA ask EDF to unearth any qualitative assessment of the corridor which shows that it actually has a justified CWS status, rather than having had such status ascribed automatically as a result of a mistaken (and now corrected by Natural England) designation as AW. EDF is failing to put into the planning balance the harm that will be caused to Nuttery Belt and the interconnected habitats affected by its DCO route, as well its failure so far to present expert hydrological evidence to show that there will be no threat whatsoever to Foxburrow Wood (properly AW and CWS) and Pond Wood (now designated as AW by Natural England and also as CWS, on proper assessment, not anything automatic). The overall harm caused by the Applicants' route has been woefully underestimated and not even properly investigated (see FERN's expert Ecology report), EDF is not making a fair and proper explanation for the planning balance to be considered by the ExA.

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

Details

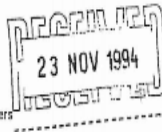
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Suffolk County Council

Planning



Anthony Walker & Partners
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NEWCASTLE UPON TYNE
NE2 1TP

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

Your Reference: 002L01/ADM/KMC.1
Our Reference: PJH/DMS 15.2.18
Please ask for: 255190
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

for County Planning Officer

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As with the DCO alignment for the two village bypass, in addition to the requirement of land for the road itself, the revised alternative Parish Council's alignment would also require additional land for any necessary earthworks, drainage, diversions of PRow, fencing and planting, as well as land to facilitate construction for example haul routes. At this time, as detailed design has not been undertaken, it has been assumed that the Parish Council alignment would require approximately a 14m to 20m corridor on both sides of the road alignment (assuming no earthworks are required) where it passes between the two ancient woodlands to facilitate construction and operation of the road, including the accommodation of haul routes, drainage, PRow changes (specifically E243/006/0) and a fence. This corridor would be wider if earthworks are required. At its closest point, the road in the revised alternative Parish Council alignment would be approximately 23m from ancient woodland on the eastern side and 30m on the western

These comments by EDF represent an exaggerated perspective. The gap between Foxburrow Wood and Palant's Grove is 103m wide and was considered wide enough for a dual carriageway proposed and drawn up in a previous consultation by the Highways Agency in 1990. The scrub woodland corridor itself is flat, as are the fields either side, north and south. What possible earthworks would be required? In design terms, it would be bad practice to provide wide verges,

because that will give too much sense of openness to drivers and encourage excessive speed. Any design should be sensitive to the natural environment and take as little land as possible. EDF is providing no justification from the Design Manual for Roads and Bridges for these assertions., and particularly not for the excessive 14-20 metre corridors it is assuming. Where is such specified in the DMRB? There would be some severance of farmland but that provides an opportunity, particularly on the western side, for enhanced planting. S246 Highways Act 1980 specifically provides for the acquisition of land for mitigation and no doubt SCC can confirm that it has used that statutory power to ameliorate the harmful effects of its road schemes where considered necessary. This requires a value judgement on how a scheme is to be best fitted into the natural environment. EDF's proposals for its DCO route are already woefully short on measures to conceal the alignment. Putting a bypass in the corridor between Palant's Grove and Foxburrow Wood would provide some screening but EDF would have the opportunity to use S246 powers to provide additional screening, so as to even better mitigate the intrusion of a new road into the landscape. It is, however, ironic that, in heritage terms, one would be almost back to having a roadway east of Foxburrow Wood as shown on Hodskinson's map of 1783 terms.

Two PROWS would still be affected, it is true, but with less harm to the villagers generally (ie not just us in the Farnham Hall area or at Mollett's) because the network close to the village would be retained, unlike EDF's DCO route which causes severance and reduces the attractiveness of a walk out to and around Foxburrow Wood or up to Friday Street. EDF apparently considers an at grade crossing acceptable for the public footpath in the north; why is EDF assuming it could not do so on the more easterly route? If EDF considers that overbridges would be required, then surely that must be true of both footpath routes affected by its DCO, and particularly so for the northern one, given its proximity to the attractions at Friday Street.

The comments about drainage are seen with something of a hollow laugh, given EDF's failure to give assurances to the owners of Hall Cottages and Mollett's Farm. Not having the deep cutting EDF is proposing for its DCO alignment must surely reduce the issues on road drainage.

ExQ1: 21 April 2021 Responses due by Deadline 2: 2 June 2021 Page 183 of 236 ExQ1 Question to: Question: side. With a 14m to 20m corridor either side of the road, it would be possible to avoid land take directly from the ancient woodland (assuming no earthworks would be required), but the alignment, due to the corridor, would impinge upon a 15m buffer to Foxburrow Wood and Palant's Grove ancient woodland. In addition, as described above, the revised alternative Parish Council alignment would result in a new road fragmenting Foxburrow Wood CWS. The alignment would separate the two ancient woodlands (Foxburrow Wood and Palant's Grove Ancient Woodland), which are currently functionally linked by the central wooded section of Palant's Grove. Bisecting Palant's Grove would fragment the CWS and sever the ecological connectivity of between the two retained ancient woodlands and prevent movement of wildlife through the existing corridor which connects them. No tree surveys of the section of woodland that would be impacted have been undertaken and therefore the potential for bat roosts is not known, however, historical records and bat transect surveys undertaken in May and July 2019 recorded evidence of bat activity (Common pipistrelle *Pipistrellus pipistrellus*) and the revised alternative alignment would result in loss of woodland that is likely to provide suitable foraging, commuting and roosting habitat.

This is thoroughly misleading. Firstly, there is no justification given in DMRB terms for such wide corridors and we ask that the ExA questions on what possible DMRB basis EDF can justify this

over what is a flat area. Rather EDF should be looking at least 30 metre buffers on each side, which would still leave 50 metres within which to put in a 7.4 metre carriageway. EDF's comments serve to show that it has simply not looked properly at this area (as indeed it has not for Nuttery Belt). It is simply false to suggest that Palant's Grove is being "bisected". All EDF has to do is look at the 1803 estate map to see what areas existed as of that date. The corridor between the two areas of woodland has been allowed to grow up, hence it containing scrub growth for the most part. Yes, there will be some landscape impact but setting that against the harm caused by EDF's DCO alignment to both the built and natural environment a proper planning balance must surely be in favour of a route that causes much less harm.

In bat assessments it was noted by our ecology experts (Bioscan UK independent ecology report submitted by FERN WR deadline 2) that EDF sent ecologists out to undertake walked bat transects but then failed to consider where all the bats were originating from. EDF's DCO reports the closest bat roost as 695m away when there are 2 occupied maternity listed bat roosts in Farnham Hall Estate 20m & 40m from the Applicants site boundary, connected to the Ancient double hedgerow wildlife corridor, which will be severely damaged as EDF proposes it be removed yet links the roosts to AW Foxburrow Wood.

In comparison, the route proposed by SZC Co. would avoid both of these Ancient Woodlands in their entirety, and not result in their separation. The proposed route by SZC Co. would also provide a 15m buffer to Foxburrow Wood and would not result in the loss of any CWS. T

This is also misleading. The Parish Council's alternative also avoids both of the areas of AW because it passes between them, not through them. It would also provide a much larger buffer zone, either side, and not have the impact on hydrology that comes from such a deep cutting, on EDF's DCO alignment, much too close to the sunny western side of Foxburrow Wood, where unfortunately trees stress has been seen. EDF's DCO alignment would be a major barrier to wildlife movement, between the inter-connected habitats and sever the diverse areas of habitat biodiversity as listed in Fern's WR Deadline 2 Bioscan Report on Ecology and FERN report on Trees & Woodland. EDF is already proposing bat hop overs but these have been noted to not work; we are also currently a total darkness landscape at night which is why there are so many bats roosting at Farnham Hall Estate that use the wildlife corridor to Foxburrow Wood.

(ii) The central section of Palant's Grove woodland, was previously classified as ancient woodland but was de-classified by Natural England after the submission of the DCO application. However, both Foxburrow Wood and the eastern section of Palant's Grove remain designated Ancient Woodland. In addition, all of the woodland is a non-statutory designated County Wildlife Site (Foxburrow Wood CWS). (iii) The revised alternative Parish Council alignment would pass between Foxburrow Wood ancient woodland and Palant's Grove ancient woodland, requiring the removal of the central section of Palant's Grove. The road itself, and the corridors either side of the road required to facilitate construction and operation of the road (as explained in part (i) of this response), would result in a permanent loss of approximately 1,834sqm of Foxburrow Wood CWS (assuming no earthworks would be required in the revised alternative Parish Council alignment). The County Wildlife Site (CWS) designation is recognition of a site's high wildlife value within the County context and is typically made by the local planning authorities. Site selection criteria vary but in general, these sites support important or threatened species and habitats that are local and national priorities for conservation including the habitat types listed on Section 41 of the NERC

Act. Further information on CWS designations is set out in response to question Bio.1.20 in Chapter 7 (Part 2) of this report. CWSs are not protected by legislation, but their importance is recognised by local authorities when considering any relevant planning applications and there is a presumption against granting permission for development that would have an adverse impact on a site⁶⁴. The removal of this central neck of Foxburrow Wood CWS would fragment the CWS and sever the ecological connectivity of the ancient woodlands on either side, resulting in avoidable harm to the biodiversity of the CWS.

EDF is mistaken in seeking to identify the corridor as part of Palant's Grove. The original form of that wood can be seen on the 1803 estate map. We question EDF's assessment of the area loss., especially if it is based on land take which is excessive. Please let the ExA and us see the DMRB justification.

The reality is that there has been no local authority assessment of this corridor. EDF is making a false assumption, based on what ought to be a logical deduction but here the starting premise is unsound, because the corridor only became CWS as a result of it being mistakenly identified as AW. The applicant seems to continue to ignore the reality, which is that SCC confirmed that the CWS designation was automatic. The reality is that neither EDF nor the Councils have actually examined the corridor and starting from a false premise renders the entire argument unsound and to be dismissed. The reality is that, as with Nuttery Belt, the applicant simply does not know whether the corridor would qualify for CWS status on merit (as opposed to an automatic designation on a mistaken designation as AW). It is deeply ironic that, for its DCO route, the applicant can suggest proceeding without properly surveying Nuttery Belt and yet, when it comes to this corridor, the rules seem to change and suddenly, the applicant is contending for things that do not follow logically and are unproven in fact.

One must also take into account other factors, such as:

- (I) The loss of Nuttery Belt (probably Ancient Woodland; EDF never assessed that woodland properly despite its direct land take and despite it running along a public lane but rather saying it was 'access not granted' which was clearly misleading.
- (II) The loss of 120m of double wildlife corridor ancient hedgerow
- (III) The loss of ancient/veteran trees
- (IV) Further severance and landscape intrusion by a large overbridge
- (V) The loss of wildlife amenity due to the proximity of a road at grade by the AW/CWS Pond Wood
- (VI) The severing of the central portion of highest biodiversity value
- (VII) The loss of amenity for villagers
- (VIII) The damage to heritage and related landscape setting.

Bio.1.14 The Applicant [APP-425] (Two village bypass) – Table 7.4 - please will the Applicant explain why there is no Survey Area for the statutory and non-statutory designated sites. This question applies to this table wherever it appears in the terrestrial ecology chapters of the ES and should please be answered for each of them. Response Statutory and non-statutory designated site study areas have been identified in Table 7.4 on page 18 of Volume 5, Chapter 7 of the ES [APP-425]. 'N/A' against the survey area column indicates that information was gathered by desk study only and so a survey area was not relevant

EDF's ecology surveys were inadequate -

- Ponds were listed as 'access not granted' when access was not requested or just missed out at in the Farnham Hall area. After notifying EDF that this had not been done months ago, a call was made by EDF on 20th June to a member of FERN but no action taken as yet.
- Dormice, a European Protected species were not surveyed for despite there being a 'reasonable case' they would exist at in the Farnham Hall environs as there is a nearby record, and they have also been seen at Farnham Barn
- Bats were not surveyed properly as no bat roosts were shown or surveyed for in the DCO documentation (one misleading recording of one 695m away) despite there being 2 listed maternity roosts in the Farnham Hall Estate right by EDF's proposed route and ancient trees were not surveyed properly for roosts.

EDF should have done more to consider habitats and species beyond the DCO boundary, especially given the potential for a road to lead to habitat fragmentation effects; bat transects were undertaken but then a failure to consider where all the bats were originating from, which is baffling as this should be part of a proper bat survey.

Bio.1.19 Response In an earlier paragraph 7.5.4 of Volume 6, Chapter 7 of the ES [APP-461], the primary mitigation in relation to lighting impacts is defined as follows in relation to the Sizewell link road: "The route of the proposed development would be mostly unlit, thereby maintaining a dark corridor, minimising the potential impacts to nocturnal species.

A busy road full of lorries and cars at night will not be a dark corridor; the existing wildlife corridor (including the ancient hedgerow) between AW Pond Wood and AW Foxburrow Wood is where the new route crosses in a 1.2m cutting by Pond Wood going down to 4m when it gets to the Ancient Hedgerow; traffic will still be very visible and audible.

At the associated development sites, the impacts on the species that fit the criteria are assessed in the following documents: • Northern park and ride - Volume 3, Chapter 7 of the ES [APP-363] • Southern park and ride - Volume 4, Chapter 7 of the ES [APP-394] • Two village bypass - Volume 5, Chapter 7 of the ES [APP-425] • Sizewell link road - Volume 6, Chapter 7 of the ES [APP-461] • Yoxford and other Highway improvements - Volume 7, Chapter 7 of the ES [APP-494] • Freight management facility - Volume 8, Chapter 7 of the ES [APP-523] • Rail - Volume 9, Chapter 7 of the ES [APP-555]

It is concluded that none of the species considered at risk of extinction by the State of Nature report will become extinct on a local scale (or greater scale) as a result of the Sizewell C proposals.

This does not take into account AW Pond Wood, which is Ash Woodland that is i) ancient ii) showing Ash dieback resistance. Ash supports over 1,000 species. it is a nationally important, yet threatened tree. As Pond Wood is showing disease resistance it is being assessed by Kew Botanic Gardens who are working with other government agencies on a project to preserve Ash trees both in situ (retaining this woodland) and ex-situ by DNA sampling and seed collection for the Millennium Seed bank to be able to keep up its stores of viable and healthy Ash tree seed for future generations. It would be key that this Ancient Ash Woodland does not suffer any changes to its environment that may cause damage.

Bio.1.133 The Applicant [APP-425] – Table 7.3 – consultation responses, RSPB, 23 Sept 2019. Please will the Applicant set out a specific response to each of the points raised by the RSPB. Response The responses are set out under each of the points made by the RSPB, here in italics: 1. RSPB ‘We are concerned about the proximity of Foxburrow Wood CWS. Whilst it is difficult to determine from the map, we assume there will be no net loss from the site. Even so, in our view the likely impact would require mitigation.’ The Applicant’s Response- Foxburrow Wood CWS ancient woodland will be retained in its entirety. A buffer distance of 15m from earthworks would be applied to prevent impacts to the trees on the edge of the woodland. Some limited footpath works would however be required at the edge of this zone.

The more easterly route would also retain AW but not affect Nuttery Belt which may be AW. The buffer zone for the DCO route is inadequate. The footpath diversion proposal by EDF in the DCO not only goes close to but will further compress the root zone at Foxburrow Wood and will affect the peaceful nature of the western side of AW Foxburrow Wood that is part of the Wildlife corridor between all the sites at Farnham Hall Estate and elsewhere.

Bio.1.150 [AS-263] – TVB OLEMP – para 4 .1.2 states that where possible Foxburrow Wood, Pond Wood and Nuttery Belt would be retained.

There has always been land take of Nuttery Belt intended in EDFs’ plans yet it was never assessed on the very dubious ground of ‘access not granted’; It is quite possibly AW.

2.2) Two Village Bypass Construction on the remaining areas of the two village bypass will involve the following activities: • temporary contractor compounds; • utility diversions/protections; • earthworks; • drainage; • fencing & safety barriers; • road construction & surfacing; • River Alde overbridge; • Foxburrow non-motorised users overbridge; • pavements, kerbs & footways; • road lighting; • connections to existing road networks; • landscaping. The construction of the two village bypass will be in accordance with the indicative Implementation Plan (Doc Ref. 8.41(A)). Cu.1.19 The Applicant, ESC Cumulative effects with other plans, projects and programmes ESC [RR-0342] in relation to amenity and recreation notes that during the early years of construction there may be impacts in some areas should other NSIPs be under construction simultaneously. The majority of these impacts will be on receptor groups using public footpaths. The majority are considered to be not significant, but receptors at Aldringham Common and The Walks are likely to experience significant effects. (i) Please indicate whether it is considered that any further mitigation other than that already proposed is necessary for receptors in these locations. (ii) If not, why not? (iii) If so, what additional mitigation is sought and how could that be secured through the draft DCO?

The effect on homes/businesses along the TVB will be very difficult to live through with the noise of diggers/long hours/dust/cutting off footpaths, and intolerable living circumstances in dwellings and gardens. If the ExA is prepared to consider approving this alignment there must be more mitigation and proper consideration given to the people that live along EDF’s route i.e. noise attenuation fencing at the start of construction and beyond, bunds, considerate working hours. This has been covered in FERN’s WR Deadline 2 Mitigation.

CA.1.40 Compulsory Acquisition

one property running in alignment by 200m of the proposed new site?

This is 2 Farnham Barn: it would be exposed directly to the work site and EDF's alignment.

NV.1.45 The Applicant Two Village Bypass In light of the above has an acoustic barrier been considered for those sections of road either at grade or elevated above ground, or either side of the proposed bridge? In the event this has not been considered in light of the acknowledged adverse effects, please clarify why this has not been considered or it has been ruled out. Response A number of noise control measures were considered during the design process of the two village bypass, and Sizewell link road, including the use of low noise road surfaces, barriers and bunds and maximising the benefit of natural ground features, such as cuttings, to increase the level of noise attenuation. The measures were fed into the design of the roads, and through a process of optimisation and balancing of various parameters, the road design emerged. It is noted, however, that the roads are designed in outline terms within certain design parameters, and the final design details are not yet fixed. There will be opportunity for further noise control measures to be incorporated into the detailed road design. ExQ1: 21 April 2021 Responses due by Deadline 2: 2 June 2021 Page 58 of 121 ExQ1 Question to: Question: NV.1.46 The Applicant Two Village Bypass (i) The ES [APP-415] identifies that during the first year of operation 2034 significant adverse effects would remain at Hill Farm, Pond Barn Cottages, Farnham Hall, Farnham Hall Farmhouse and Walk Barn Farm. This significant adverse effect would appear from Table 4.23 to remain following the implementation of the Noise Mitigation Scheme. Please confirm this understanding is correct.

This does not seem to be correct as Hill Farm is 370m away from EDF's alignment and Walk Barn Farm 485m away so neither would be adversely affected. There are more significant adverse effects, as shown in Table 1 and Table 2 above.

Ag.1.2 Impact Assessment (ii) 3.15ha of the TVB have not been surveyed due to lack of access. Response (ii) 3.15ha of the two village bypass - This area of land had not been surveyed due to changes to the red line boundary between Stage 3 and Stage 4 consultation. At the time of survey, access to the land could not be agreed between the landowner and the Applicant at the time the surveys were undertaken.

I regret to say that we find it hard to believe this denial of access since, we have seen this excuse used by EDF when they clearly didn't fancy doing something, as for the Farnham Hall Estate habitats and ponds!

These surveys will be carried out in due course to validate the assessment. However, as a worst case assessment has been undertaken, SZC Co consider the assessment to be robust.

Ag.1.6 Mollett's Partnership

The Ayres will submit a separate representation that FERN are in full support of; they have had to battle repeatedly to be acknowledged as a tourism business despite the very close proximity to the Applicants site boundary, hopefully this is now rectified as it was clearly highlighted on the ASV walk.

4) FERN General Comment of the Parish Council's alternative

It is noticeable that EDF is avoiding comment on the relative economics of the alternative schemes. FERN requests that the ExA seeks a proper explanation from EDF as to the costs of the cutting and the approach ramps and footbridge as compared to constructing a bypass predominantly at grade on the modified Parish Council's proposed alignment, from Friday Street through fields, through as narrow a route as possible through the scrub woodland between Foxburrow Wood and Palant's Grove and continuing south, again through fields. Suffolk CC should be able to advise also as to the costs of constructing at grade, for example, on the Bury St Edmunds eastern relief road and the last phase of the Lowestoft northern spine road. Any saving could, of course, be offered to SCC as an S106 contribution towards the costs of a bypass for Marlesford and Little Glemham which will be that much more expensive as a consequence of the position of the roundabout on the A12 to the south of Stratford St Andrew.

FERN appreciates that the exact amount of compensation for individual properties (should the EDF alignment be approved) is not a matter for this Examination but FERN has taken professional advice and understand that the impact of the EDF scheme would be so great that compensation might well be £1 million or more. It would be instructive to know what differential there might have been on values for any arrangement under EDF's purchase scheme..

EDF should also be capable of better definition than offered to date of the impact on properties in the Farnham Hall area, including The Old Vicarage, and also at Mollett's Farm. The noise explanation to which the ExA is being referred is simply unintelligible to ordinary people but in any event the methodology and consequent assessment has been shown to be faulty for Mollett's Farm and that calls into question whether or not there is similar fault for the Farnham Hall area.

EDF appears to remain confused about the corridor between Palant's Grove and Foxburrow Wood. This is surprising since this is not the first time I will have submitted the letter from SCC explaining how the corridor came to be CWS. The corridor was wrongly designated as Ancient Woodland and the designation as CWS flowed from that, not an assessment by the local authorities as to whether it justified CWS status. EDF cannot therefore assert with any confidence that there will be any necessary impact in respect of the CWS, because it does not actually know whether CWS status would have been justified had there not been the error over AW status. Unfortunately, the principal Councils have also misled themselves and not looked properly at what it is they appear to be seeking to protect, in contrast to their apparent acceptance of the harm to the built and natural environment that the EDF alignment would cause; indeed an officer of ESC declined to even look! FERN again calls attention to the failure by EDF to properly assess Nuttery Belt and now the failure by EDF to consider the relative merits of loss of a part of the scrub woodland corridor between Palant's Grove and Foxburrow Wood and the loss that will be sustained in respect of Nuttery Belt.

Consultations proceeded on the basis of a 50 mph road and FERN presumes that the design accorded with the DMRB for that speed. EDF is now promoting a 60 mph road. It is surprising, to say the least, that EDF is questioning whether the Parish Council's alignment meets standards, given that it would not have to be on such a tight curve as EDF is proposing for its scheme. The

ExA is requested to procure from EDF an explanation of how its scheme meets required or desirable standards under the DMRB and to what extent those design requirements would be bettered by the EDF modified version of the Parish Council's alternative, or if not how a more easterly alignment could be modified to meet at least the standards being met for its DCO scheme.

The applicant, EDF, calls attention to Pond Cottages but does not explain that these will be affected anyway by its DCO scheme. Any rational comparison between the alternative schemes would not simply cite "effect" but quantify it and identify how it could be mitigated eg by bunding or other noise attenuation. The same applies to the bungalow at Walk Barn Farm. EDF seems to think that compensation is an adequate remedy for those in the Farnham Hall area (but it is most certainly not) and yet doesn't seem to take the same view as regards the modified Parish Council route. One rule for the DCO route and another for the modified PC route?

FERN assumes it is EDF that has advised the Councils that, in effect, it is too late to change the alignment. That makes a mockery of the DCO process. How is the ExA expected to assess relative harms and possible mitigations if EDF can simply say that "national need trumps all"? The DCO process requires a proper planning balance to be considered in relation to whether all the components of the DCO are justified as being in the public interest. It remains FERN's case that the DCO alignment for a Farnham Bypass is not. Nobody, as far as FERN is aware is saying that there should not be "A" Farnham bypass. It is right that people in the villages should be relieved of traffic flows but wrong that the problem should simply be shifted to another part of the village when there is a better alternative. EDF has chosen the wrong route. If the consequence of that bad decision is delay, the responsibility for that falls to EDF. If it has competent advisers, it should not take long for this component of the overall project to be re-designed and re-submitted to the ExA.

It is somewhat ironic to us that EDF appears to assume that the harm caused to us as home-owners can be mitigated by compensation and yet not take the same approach for Friday Street Farm. Is it really EDF's contention that strawberries matter more than people's homes and living experience? Compensation is not, of course, a remedy for the harm that EDF's DCO alignment causes, in terms of heritage, ecology and the landscape, as FERN has demonstrated. Foxburrow Wood, if lost or severely damaged owing to hydrological impact, is simply not replaceable, and neither would Pond Wood be. EDF is already proposing irreplaceable harm to Nuttery Belt. The alternative route avoids harm to these areas of woodland .