

# **Comment on Responses to ExA's Written Questions (D3)**

**Summary of this document's contents:** 

This document contains our Deadline 3 comments to the responses received to the Examining Authority's Written Questions, for the Sizewell C development application.
We review and detail our concerns with the applicant's answer to a question posed about our business in ExQ1.

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## 1. Applicant's Response to ExQ1

As part of ExQ1 the Examining Authority asked the applicant to respond to the following written question:

## SE.1.12 Two Village Bypass (TVB)

[RR 812] Indicates the TVB would adversely affect the holiday business, water supply and drainage at Mollett's Partnership. Please respond to these concerns and explain how the scheme would avoid or mitigate for adverse effects.

### The applicant provided the following response:

#### **Holiday business**

The buildings within Mollett's Farm are located approximately 150m from the site boundary.

It was assessed within the noise and vibration assessment (as a residential receptor) and moderate adverse (significant) effects were identified (with the accepted changes) during the typical and busiest days in 2028. At night in 2028 and in the long-term in 2034 (daytime and night-time), the changes in noise level were identified as minor adverse or negligible, which are not significant effects. The noise effects are set out in **Volume 5**, **Chapter 4** of the **ES** [APP-415] and updated in **Volume 1**, **Chapter 5** of the **ES Addendum** [AS-184] and its associated appendices in **Volume 3**, **Appendices 5.3.A** to **5.3.C** of the **ES Addendum** [AS-245]. Further mitigation will be considered as part of the detail design of the road, including, for example, quiet road surfaces.

The landscape and visual assessment concluded that small scale effects would arise in on the landscape character in the fields around the farm (not significant) during construction. Mollett's Partnership is located between groups 1 and 2 within the visual assessment and is likely to experience significant impacts during construction, but would be not significant during operation. These effects are set out in **Volume 5**, **Chapter 6** of the **ES** [APP-421].

The General Landscape Strategy for the landscape proposals for the proposed development has been designed to minimise potential effects on ecological, heritage and landscape and visual receptors through provision of appropriate planting and will follow the design principles set out in the **Associated Development Design Principles** document (Doc Ref. 8.3(A)). In addition, planting would seek to mitigate the potential impacts of the proposed development as set out in **Volume 5**, **Chapter 2** of the **ES** [APP-411].

*No significant effects on air quality are predicted.* 

SZC Co. has met with Mollett's Partnership a number of times to discuss their concerns and potential opportunities associated with workers looking for good quality year-round accommodation in the area. While SZC Co. is unable to advise on the choices for businesses to make on their business going forward. Mollett's Partnership may wish to consider accommodating Sizewell C workers, as they are well placed for access to the main development site or for workers constructing the associated development sites, including the two village bypass. As part of the Housing Fund, loans and grants for local accommodation providers are proposed, within the terms of the Tourist Accommodation Management Strategy, in order to increase capacity and resilience (see Draft Deed of Obligation, Schedule 3, Sections 1 and 2.7 (Doc Ref. 8.17(C)).

#### Water supply and drainage

SZC Co. is currently working with Mollett's Partnership to understand the arrangements for water abstraction and how these coincide with the two village bypass. SZC Co. is committed to work with the relevant landowner and business to ensure that the route and presence of the 2VB will not impede their ongoing rights and ability to abstract water to the current scale and frequency.

**Volume 5, Chapter 12** (Groundwater and Surface Water) of the **ES** [APP-441] includes for the assessment of the surface drainage network in the vicinity of the proposed two village bypass. The incorporation of sustainable drainage methods for the management of surface water, capacity for design storm conditions and an allowance for climate change, reached in agreement with Suffolk County Council, will enable locally produced flows from the highway to be managed locally and primarily by infiltration. The inclusion of culverts beneath the bypass will enable the continued flow of the existing drainage network.

Overall, with these measures in place, the impacts are not judged to be significant.

We have a number of <u>significant</u> issues with the applicant's response, both in substance and accuracy, to the point that we consider it inadequate and misleading.

#### 1.1. Proximity

The applicant states that "The buildings within Mollett's Farm are located approximately 150m from the site boundary" as if this answers the ExA's question. It does not. EDF is failing to recognise that our business is not just the buildings forming our self-catering accommodation offering or our farmhouse, but the entire farm environment. Guests currently relax in outdoor garden spaces, enjoy nature walks, pitch tents and attend events in parts of the farm that are considerably closer to the site 'red line' boundary – as close as 15m in fact – as clearly seen by the ExA during the recent Accompanied Site Inspection (ASI). The future enjoyment and use of these areas will be dramatically affected by TVB construction and operation.

#### 1.2. Noise

EDF's noise assessment is inaccurate and inadequate (as we have shown in our **Deadline 2 Written Representation [REP2-380]**) — making any impact conclusions drawn from it unsound. It is very frustrating to keep responding to the same claims made by the applicant even after we have taken the time, trouble and expense to prove them misleading. They keep repeating the same thing over and over. It does not make it true.

## 1.3. Visual Effects

As to the visual effects, it is nonsense to suggest that the impact is not significant when it is obviously very significant. There is a huge difference between looking out over fields as opposed to looking out over a road under construction and then a busy road for at least 10 years during construction of Sizewell C (after all, that is why they say they need to build it). We are hoping that the ASI enabled the ExA to recognise how ridiculous EDF's assertions are.

## 1.4. Business Recognition

We are grateful that EDF has now – belatedly – recognised that we do in fact have a business here. Until recently we were simply classed as "an isolated farmstead".

#### 1.5. A12 Access

The usability and safety of our existing A12 access to and from our business and home is likely to be severely compromised during construction of the TVB. However, there is still no response on this issue. For example, how should we and our guests get in and out safely, especially when towing a caravan or large agricultural equipment?

## 1.6. Amenity Access

Our guests' ability to access to local amenities (the shops and the café restaurant at Friday Street are within walking distance) is a key selling point for an out-of-town businesses such as ours. This will be completely severed. No acknowledgement of this has been made. Similarly, no provision has been made to mitigate or compensate for its loss.

## 1.7. Business Opportunities

The assertion that they – SZC Co. – have met with us to discuss "potential opportunities associated with workers looking for good quality year-round accommodation in the area" is also misleading. Yes, they have visited us. However their standard phrases are that there are "no guarantees" and "we can promise nothing". Their ExQ1 response does not recognise the fact that should we accommodate their workers (via an open market 'preferred suppliers' list) this would actually be detrimental to our core business. Sizewell C workers' accommodation budget will be – by their own admission – significantly less than the tourist market that we service. We would experience higher costs with lower income. It would also be detrimental to the excellent business reputation we have built over the years (for example Booking.com 9.4, TripAdvisor 5\*). Tourists and workers are not usually a good mix, especially when it involves shift work. Not to mention that we believe the disruption caused by the construction of the TVB is potentially going mean we have no tourists. Again, we refer you to our **Deadline 2 Written Representation [REP2-380]** – which has yet to be addressed by the applicant.

It may well be that other tourist venues will benefit (especially out of season from extra workers) but during high season there is no "spare capacity" to speak of. It is not a 'like-for-like' comparison, as those other businesses will not be blighted and hamstrung by adjacent construction activity – like the TVB. Even if we were guaranteed full capacity at full rates, we would then have to rebuild our business from scratch after construction is completed – assuming that it is even possible, given that we also believe that the blight will continue well into the overall construction of Sizewell C. The response from EDF is simplistic, fails to recognise all the issues and is dismissive. It is grossly misrepresenting the concerns we have raised, by totally ignoring them.

## 1.8. Mitigation

We need proper protection / mitigation involving bunding, noise attenuation fencing and screening. Not just a minor cutting that does not hide the traffic and a few plants that will take 15 years to become established and potentially exacerbate the noise generated by the TVB.

### 1.9. Water Supply and Drainage

At the time EDF wrote their response "SZC Co. is currently working with Mollett's Partnership to understand the arrangements for water abstraction and how these coincide with the two village bypass" we had yet to receive a single contact from them on this subject. At best we can only assume that they are confusing us with someone else. Again, please refer to our **Deadline 2 Written Representation [REP2-380]**.

The applicant's claim that "culverts beneath the bypass will enable the continued flow of the existing drainage network" also neatly demonstrate a complete lack of understanding of the specifics of the situation and their lack of engagement with us. Their documentation shows that the TVB will be in 1.9 m deep cutting at the point that it crosses our existing drainage route, putting the suggested culvert at least 2 m below both the ground-level inlet on the Mollett's Farm side and the ground-level outlet on the Friday Street side. Once our water has dropped into their cutting, it will not be going anywhere but downhill – along the route of the TVB.

#### 1.10. Conclusion

We have put our lives into this business and built something special. We have fabulous reviews and a high percentage of repeat customers. We are happy to share our valuations and other documentation with the ExA as proof. All this is at risk by something completely and wholly outside our control. We ask, nay beg, that this continual misrepresentation and denial by the applicant be halted and they step up and do the right thing. We understand that it is just business to them and that others will benefit from this road, but this is our lives, our future, our dreams, hopes and aspirations that are being crushed, and whilst we recognise we are not supposed to be emotional but factual, it feels like the facts are not being heard, recognised or acknowledges in any way and that EDF simply repeats the same nonsense and quite frankly untruths and nothing changes.

We are a small business – especially in comparison to EDF – and do not have the time, resources (staff or financial) to keep going round in circles like this. EDF keep telling us there will be no impact on us. If this is the case, then they should have concerns putting their money where their mouth is and indemnify us against any impact that results from their activities.