

**FERN WR ISH5 LANDSCAPE AND VISUAL IMPACT
(FARNHAM ENVIRONMENT RESIDENTS & NEIGHBOURS)
TWO VILLAGE BYPASS
Supporting Submission No. 20026497**

23rd July 2021

1. This submission is additional notes from Landscape & Visual Impact ISH7 on behalf of FERN (Farnham Environment Residents & Neighbours).

2 If SCC ambitions for the Suffolk Energy Gateway are being realised, it is imperative it gets the road structure right, otherwise it inflicts too great a burden on residents and businesses.

Before exploring the detail of the Two Village Bypass (TVB) design, we feel it appropriate to draw to the Examining Authority's attention the apparent lack of any effective 'planning balance' to inform the applicant's initial route selection. Their proposed road alignment passing, as it does, to the west of Foxburrow Wood and unsettlingly close to the many individual properties at Farnham Hall and the tourism-led business at Mollett's Farm.

It is our view that the applicant has still not offered a clear and open comparison between their proposed route and the widely supported alternative alignment to the east of Foxburrow Wood (explored in some detail by the Department of Transport and the Highways Agency in the 1990's and introduced into the Sizewell C pre-application consultation process by the Parish Council over four years ago). It has instead rather cherry-picked those aspects which show its TVB proposals in a favourable light, such as how many people on the existing A12 in Farnham and Stratford St. Andrew will benefit from the road being moved 'away', rather than exploring how one route or another will disadvantage those currently living in the unspoilt countryside of those same parishes.

Had they clearly set out all the facts relevant to this matter, then we – and the Examining Authority (ExA) – would not just have heard negative aspects of the Parish Council's eastern route (for example, that it was slightly longer than the applicant's western route or that it would add a few seconds to A12 journey times), but would also that it:

- only adversely affects three residential properties, instead of the applicant's fourteen;**
- only significantly affects one residential property, instead of five;**
- only severs three Public Rights of Way, instead of the applicant's four;**
- does not affect any sole vehicular accesses, rather than sever one;**

- and reduces the construction burden (and, potentially, finished road gradients) by lessening the height of the land needing to be climbed between the Alde valley and Friday Street by around 3 m.

Perhaps it would suit the Examining Authority, Interested Parties, and natural justice for the applicant to more satisfactorily address these points and demonstrate that it has indeed made a fair side-by-side comparison of these two possible routes?

We are also concerned that the applicant has not put an acceptable amount of effort and enthusiasm into exploring an alternative eastern design – neatly illustrated by their apparent inability to pass a single carriageway through a gap that the Highways Agency once considered capable of carrying a dual carriageway. Does this not create another scenario where the applicant is effectively setting its own exam questions?

All of this notwithstanding, should the applicant's TVB proposal nevertheless remain unchanged, previous written representations made by FERN, Mollett's Partnership, Farnham with Stratford St. Andrew Parish Council, and others continue to make it clear that insufficient measures have been incorporated into the applicant's TVB proposals to mitigate the undoubted harm it will cause to those unfortunate enough to be along its route. There also seems to be lack of motivation (or aspiration) for the applicant to do the best they can for those affected, rather than just the minimum, and – perhaps – leave a legacy that will be subsequently praised rather than vilified.

3 Route development

For nearly 30 years a bypass has been discussed and consulted on, with consultations in 1990, 2006, A12 Four Village Study 2013/14 and the Applicants. All the previous consultations concluded that more in depth investigations were needed before any route decisions could be made. The most recent 2013 consultation, now 8 years old, the 2014 A12 Four Village Study is, the Applicant confirmed, 'the route had evolved as detail was developed, but it is fundamentally the same route as the preferred route in SCC 2014 A12 Four Village Study.'

in its specific points about the merits of each route in this 2014 report it concluded the blue route (the Applicants one) was the least favourable for ecology.

Our LPC submitted their alternative route to the East of Foxburrow Wood from Consultation 2 (2017) onwards. This was never explored in any detail, the LPC engagement with the Applicant to discuss their proposals were only at their open consultations at the Village Hall, yet these were more a showcase rather than somewhere for meaningful debate. At Stage 3 Consultation even the CC suggested changing the route of the 2VB to minimise the impact on Foxburrow Wood and Heritage.

Whatever the outcome of these historical reports, what should really matter is the here and now. Mollett's Farm has been established since the A12 Four Village study, there's more emphasis on climate change, the need to preserve biodiversity and the value of good quality outdoor spaces as a local amenity.

Although the Applicants say their route 'was assessed to have the least environmental effects' we have shown systematic failures on a number of fronts. For example, the assessment that there will be no significant adverse effects for any heritage assets during construction and operation whilst Brighter Planning Consultancy Heritage report (FERN WR2) concluded the Applicants proposals failed to comply with statutory planning law for Heritage assessment, particularly concerning to FERN is the undervaluing of the historic landscape surrounding Farnham Hall.

BioScan's Consultancy Ecology report submitted (FERN WR2) concluded the Applicants surveying had failed to meet the sequential process of mitigation hierarchy by failing to meet the sequential process of evaluation potential of alternative options. And that there were clear arguments that less ecological damaging alternatives exist and should have been adequately examined.

Mollett's Farm, a busy holiday accommodation site with 1,000 stays a year and a member of FERN, is still finding it hard to be meaningfully acknowledged by the Applicant. This I'm afraid is causing the owners extreme stress and we hope future engagement will bring about a change in this.

4 Alternative

It has been well documented in previous WR by FERN the merits of the alternate route and how we believe it would better sustain the quality of landscape, ecology, long term road planning, homes and tourism. FERN rebut the suggestion that the gap between Foxburrow Wood and Palant's Grove is not wide enough to accommodate the alternative, it is over 100m wide. The assessment that it would be so close to Walk Barn Farm is exaggerated. The extra 50 seconds journey time would have no impact on journey choice. Putting large ramps and an overbridge will greatly denude the historic environs and the local amenity value of the popular circular walk to Foxburrow Wood from the village. The alternative sits better on the landscape because of topography and gives relief to many more houses, it doesn't denude a historic landscape or remove ancient trees or cause significant stress to Ancient Woodland, it also means there is no loss of Nuttery Belt that has a similar make up to Pond Wood and is under consideration by SBIS.

I believe SCC have concurred that the current alignment of the TVB precludes a joined up 4VB option. This is going to cost the villagers not only living on the A12 but those living in the vicinity dearly. We, alongside others, currently have difficulty getting on and

off the A12 at peak season/times, so we also strongly support the future need for a 4vb not just for Marlesford and Little Glemham but also for the surrounding villagers in the locality.

5 UPDATE Mitigation Landscape

As the final decision is for the ExA, we realise engagement with the Applicant on mitigation is important. FERN met with the Applicant on 21st July and were given the plan below showing new hatching for possible additional sound proofing earth bunds and planting for biodiversity.

Whilst FERN is relieved to have communication from the Applicant and encouraged there is to be future dialogue, it cannot interpret proposals with no detail. However the Applicant have offered to come back with this in a month's time and we look forward to a meaningful ongoing exchange.

It does appear however that the additional land offered for mitigation is not in the Applicants recent map of compulsory land take changes.

Mollett's Farm met the Applicant separately, FERN are in support of their concerns about lack of mitigation and they will be submitting their own WR. The map below shows mitigation is unbalanced for them and it just doesn't make any sense.

FERN submitted a detailed Mitigation document at WR Deadline 2, and it still stands by this.

FERN would also like to note that the only access route for Farnham Manor (to its Walled Garden) and Farnham Hall residents (to their gardens and the back of their properties) is on the lane from Farnham Hall to the end of the Walled Garden. This access is used for weekly garden maintenance, house maintenance or in case of fire, so it must be always accessible. It forms part of title deed rights which also applies to the other homes at Farnham Hall Environs. These access rights are within the Applicants site boundary.

