

FERN (Farnham Environment Resident and Neighbours) WR Deadline 10 Supporting Submission No. 20026497 on the proposals for a Two Village Bypass (2TVB) for Farnham & Stratford St. Andrews

1) INTRODUCTION

FERN continues to oppose the Applicants 2TVB alignment on the grounds it causes too much harm to the built and natural environment. Surprised by the Applicants lack of rigour in its preparation, FERN has had to correct the Applicant's information numerous times, as documented in our previous submissions. There is no doubt this route has been promoted on inaccurate information.

FERN continues to support the alternative - known as the Eastern Route 'ER' - proposed by the Parish Council 'PC' of Farnham & Stratford St. Andrews from 2016 Consultation 2 onwards; supported by the adjoining Parish Councils of Marlesford and Little Glemham. There was little to no engagement between the Applicant and the 'PC', you would have thought local knowledge should account for something.

Suffolk County Council and East Suffolk Council also adopted a defensive position from the get-go. They chose this route from previous studies, namely Aecom 2012 and the 1995 Four Village Bypass Report. Yet these studies were incomplete and reached no final decision until further evidence was collected. It was a false narrative that the Applicants 2TVB alignment is the "least bad option" as this is based on inaccurate information.

In WR ISH9 FERN documented the positive reception the Inspector's Report gave in 1995 in weighing up the benefits of the alternative 'ER', concluding 'it was better to build a route 400m longer, but in the right place'. Something we all agree on and have tried to show why.

The 'ER' was never properly investigated, more defended against, starting with an inaccurate designation of the corridor between Palant's Grove and Foxburrow Wood. It appears thereafter that a settled 'group mindset' took hold.

2) HERITAGE

FERN have submitted a second submission from Brighter Planning Consultancy at D10. Brighter Planning explains the Applicant has failed to meet the requirements for proper consideration of the heritage implications at Farnham Hall Estate.

'The buildings (at Farnham Hall Estate) are still clearly legible within the historic landscape context including the paths and lanes leading to the site. The ability to appreciate such a related collection of heritage assets within a relatively little altered landscape context, is very rare to find in England today.'

The unique collection of historically interrelated buildings and landscape around Farnham Hall Estate would be severely denuded by the proximity of the Applicant's 2TVB route. The buildings sit within some lovely historic parkland landscape of ancient trees, woodland, and many ponds. It would be an irreversible loss to the county, and one that many walkers and visitors enjoy, to denude this tranquil landscape that is so life supporting.

If the Applicant's scheme is accepted, which it shouldn't be, we ask for the best mitigation possible to protect this heritage asset and its wide range of biodiverse habitats.

3) MITIGATION

FERN have had one Mitigation meeting with the Applicant on 21st July 2021. FERN have been offered a second meeting w/commencing 18th October. Whilst we respect that the Applicant are now engaging, the notes received after the meeting; SZC Meeting Notes, SZC Actions, and a Map (copies attached separately Deadline 10), fell short of expectations

What we did all agree on at our one meeting is that the tranquil environment we currently reside in will be greatly changed during construction and operation of the Applicants 2TVB. The DCO confirms this in SZC_Bk6_ES_V5_Ch4_Noise_and_Vibration.pdf:

Table 4.20: the Difference between baseline noise against the noise once the road is up and running one year after Sizewell C is built estimated at year 2034:

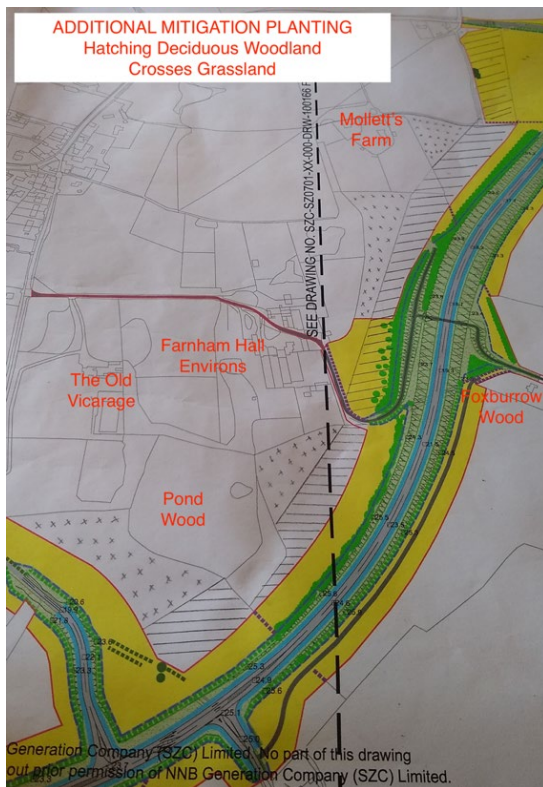
Day +12.6 dB. - Effect Major adverse

Night +10.6 dB - Effect Major Adverse

The Applicants noise levels for construction and operation are also Major adverse.

Given the above, it is understandable that FERN members seek considerable mitigation, including;

- a) Soundproof fencing at the start of construction around housing and woodlands.**
- b) Construction work to be undertaken in a pincer manner using both construction sites, rather than continually passing residential areas.**
- c) Reasonable working hours during construction given proximity of residences.**
- e) Reduced noise road surfacing.**
- f) 3m earth bunds with 2.5m soundproof fencing on top on the western flank from Pond Wood to Mollett's Farm, the decibel reduction currently on offer is far too low.**
- g) Deeper planting to provide meaningful mitigation for loss of wildlife corridors; extend the buffer zones for Pond Wood and the habitats at Farnham Hall and Mollett's Farm and, to reduce visual impact on the landscape. The hatching on the map below shows the extent of new planting requested.**



Hatching shows new deciduous woodland planting
Crosses shows areas of grassland

Map showing the required level of new planting to
meaningfully produce a long term legacy of
biodiversity net gain

h) An obstacle in the Applicants plans is they have chosen the wrong location to build an overbridge and footpath ramps, right opposite housing and putting further pressure on already stressed ancient woodland. It was confirmed by the Applicant's sound expert that the noise escaping from the gaps - required for footpaths - will reduce sound proofing measures considerably. Can this not be worked up better for Farnham Hall Estate, AW Foxburrow Wood and Mollett's Farm?

Mollett's Farm Have submitted their own sound survey, mitigation, and comments.

4) TOURISM

It is wrong that the Applicant only latterly woke up to the existence of a significant tourism business at Mollett's Farm, having previously identified it as a 'farmstead'. This is probably because in the previous studies this route was based on Mollett's Farm wasn't there as a thriving tourism destination.

There are two busy tourism destinations effected by the bypass Friday Street & Mollett's Farm. The Applicant took an early position of defending Friday Street and ignoring Mollett's Farm. Friday Street Market is a shop and cafe business on the busy A1094 and close to the current A12. It is a daytime operation that does not rely on ambience. Yes, it's short season pick your own business would be marginally closer to the 'ER', but this operates for a couple of months at most and is currently in a noisy location.

Mollett's Farm holiday lets, caravan and camping site DOES rely on ambience. It has been a dark moment in the Applicant's dealings that they did not engage with them earlier or more fruitfully. Mollett's Farm have had separate meetings with SZC and will continue to submit their own input.

5) LANDSCAPE IMPACT, INCLUDING ECOLOGY, TREES AND WOODLAND

In Boris Johnson's September 2021 speech to the UN general assembly, he said; *'We trash our habitats again and again with the inductive reasoning that we have got away with it so far and therefore will get away with it again. We are approaching that critical turning point when we must show we are finally taking responsibility for the destruction we are inflicting. We need to halt and reverse the loss of trees and biodiversity.'*

The Applicants environmental appraisal work has been inadequate, with much being done in a catch-up manner. As recently as August-September 2021 the Applicant undertook bat and dormice surveys. Our ecologists Bioscan Ltd have already confirmed this was 'too late for the Applicant to undertake a robust survey for dormice by conventional means'. This means the Applicant have failed to properly assess a nationally important species. (See Submission D10 Bioscan Consultancy).

- Nuttery Belt: The Applicants route was pushed through with no proper examination of Nuttery Belt, despite direct land take and ignorance as to whether it is AW or of ecological value. It is widely understood that Natural England's ancient woodland inventory excludes any woodland smaller than 2ha, and as such NE's inventory is irrelevant as Nuttery Belt is 0.6ha. We understand from correspondence with the Suffolk Biodiversity Information Service (SBIS) they are embarking on an ancient woodland inventory mapping contract on behalf of Natural England and, as such, Nuttery Belt will be included on that inventory as it is a long-established wood (shown on 1st series OS maps).

- Farnham Hall area: The Applicants route goes adjacent to a very biodiverse area at Farnham Hall Estate and Mollett's Farm. The failure to look at these habitats - meadow grass, ancient trees, ancient woodland, ponds, and many old roof spaces and old barns that house bat species - passing some off as "not having consent" or providing cursory or inaccurate information in support of their proposed route was unacceptable. It is hoped this has or will be rectified.

- Ancient Woodland Foxburrow Wood: The Applicant's promise of a report on the effects on hydrology of a cutting adjacent to Foxburrow Wood has yet to be seen. FERN have catalogued that stressed and unsafe trees are already evidenced on the Western flank of this AW and adjacent to one of the Applicants footpaths. As a number of these trees have lost large branches in the last few years, it would not be safe to have a footpath here without removal of more ancient trees. Ancient woodland is a scarce natural resource, the countrywide figure now falls to covering just 2% of the landscape; the Applicant should not be allowed to do anything which poses a risk or loss of AW.

- Ancient Woodland Pond Wood: The Applicant admitted to not having directly surveyed the woodland except for a cursory check during 2019. They followed up with a statement that 'It is not unusual to have some areas of a route corridor not visited directly and this does not undermine the baseline?' An assessment based on absent field survey information that would be subject to impacts cannot be considered robust enough.

- Mammals: There is an important connection between Pond and Foxburrow Wood, it is a historic migratory route between segmented habitats. No research as far as FERN knows was done on how the wildlife use the area.

The previous submissions (Deadline 2) from FERN contain detailed reports by Bioscan Consultancy Ltd. for Ecology and Sarah Green on Trees and Landscape. It remains FERN's contention that the impact on the natural environment is so harmful that Applicant's 2TVB alignment should not be accepted.

6) CONCLUSION

a) FERN understands that the role of the ExA is to identify the benefits, identify harms and weigh them all up to reach a decision. We believe that very rarely are there developments without harm; what FERN have identified is harm that EDF has failed to identify and present to the Examination. For the ExA to properly assess, understand and mitigate the impacts on protected sites and species the Applicant must reveal the full implications of its scheme. So far, the level of scrutiny has been impeded by the quality of information provided, without such evidence the full implications cannot have been fully understood. FERN ask for all the requested studies and survey material to be properly supplied by the Applicant to the ExA (to include recent dormice and bat surveys, hydrology report Foxburrow Wood, tree surveys) to enable the ExA to fully consider the appropriate measures that would protect our environment.

Proper planning policy has neither been followed by the Applicant's unwillingness to properly explore the viable 'ER' alternative that reduces the damaging impacts and is thereby in the interests of the greater good.

b) FERN believes that the harm we have identified in the EDF T2VB alignment must be given significant weight in the overall planning balance. The alternative put forward by the 'PC', offers the opportunity to shift the planning balance as it would involve less harm and reduce the damage to the built and natural environment, and specifically for heritage, landscape, ecology, tourism, homes, and public rights of way.

c) Notwithstanding if the Applicants 2TVB is allowed, it is simply not offering enough protection against the harm that would be experienced. FERN ask for assurances that an independent authority will oversee the Applicant's engagement and compliance with mitigation.

e) FERN request that the DCO make it clear that, if the Applicants T2VB alignment is accepted, that scheme will form a discrete scheme for the purposes of Parts 1 and 2 of the Land Compensation Act 1973 and not simply be a component of the overall Sizewell scheme (such as to delay Part 1 compensation and works under Part II).