

FERN Submissions for 2nd June 2021

Supporting Submission No. 20026497

10. Mitigation for the Two Village Bypass (on the alignment west of Foxburrow Wood being promoted by EDF)

INTRODUCTION

This representation is made on behalf of FERN (Farnham Environment Residents & Neighbours Association) We represent the three tourism businesses and eleven dwellings in the Farnham Hall area (including the Old Vicarage) and at Mollett's Farm. We believe EDF has not properly examined the adverse impacts on us, our homes, heritage assets, tourism businesses or the natural environment and ecology. EDF has fallen woefully short of what should be provided if the DC alignment were to be approved; it should not be so approved, because of the serious harm to the natural and built environment in circumstances where a better alternative exists. Proper mitigation would be achieved by the Bypass taking the alignment put forward by our Parish Council and this Mitigation submission is without prejudice to the arguments against the DCO alignment and in favour of the Parish Council's route. The EDF alignment for the Two Villages Bypass is abbreviated to "2VB".

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1 MINIMUM MITIGATION REQUIREMENTS SHOULD THE ALTERNATIVE NOT BE ACCEPTED

1(a) NOISE ATTENUATION FENCING

Given the proximity of the 2VB to homes (the A12 currently sits 380-460m distance, it would be 120-170m away with the proposed bypass, 80m from gardens) including the listed building heritage asset at Farnham Manor (Grade 11), tourism businesses and parkland gardens, noise attenuation fencing should be installed along the whole of the western line of the 2VB at the start of construction.

We currently live in quiet, rural surroundings which our tourism businesses and village amenities rely on. There has been continual difficulty in getting EDF to appreciate how many homes and

people are to be affected. During the consultation period it was said that there was no dwelling within 500 metres. When pointed out to EDF that this was not true, no effort to clarify and amend this important mistake for the benefit of other interested parties reviewing the bypass alignment seems to have been made. The noise estimates in the DCO also underestimate the effects of noise, suggesting that noise and pollution levels will go down when the 2VB is so much closer to us, how can this be? The prevailing easterly winds will direct further noise onto properties and must be taken into account, as must a proper account of biodiversity which so far has been reported inaccurately. During the construction phase which will be lengthy, noisy and dusty (given the amount of earth removal proposed) plus the building of a large bridge, EDF have offered nothing in the way of protection despite the close proximity.

1(b) EARTH BUNDS

There are earth ramps proposed in the DCO for the new bridge, but bunds must be constructed to meaningfully mitigate visual, noise and air pollution around the homes, businesses and parklands at Farnham Hall Estate, The Old Vicarage and Mollett's Farm. They are not high enough nor long enough at each end and they do not mitigate satisfactorily against the visual and noise intrusion, including caused by users of the overbridge who will see directly into homes and gardens; from windows of homes at the Farnham Hall area we will see traffic clearly as it passes Pond Wood; the walled garden at Farnham Manor will have an open view directly onto traffic; tourism businesses facing the road have no protection nor Ancient Woodland or BAP Woodland at the Old Vicarage.

1(c) LANDSCAPE MITIGATION

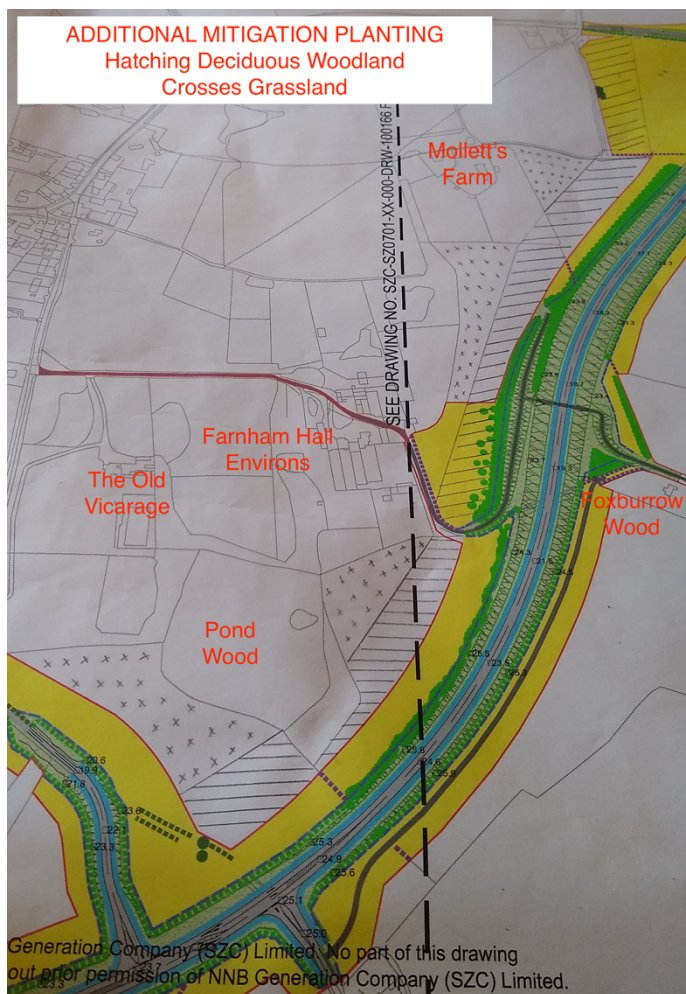
Woodland planting in EDF's DCO shows a 4m strip of planting inside the 2VB fencing, with only a few stretches outside the fence that are about 10m wide in parts. The plans are vague on detail and landscaping would not be planted until the end of construction, causing delays to mitigation. There are no detailed planting plans nor a proper maintenance schedule; given this is an area with severe droughts and water shortages, we request the ExA to obtain from EDF a proper analysis and report to show EDF will commit to the long term survival of any new mitigation planting.

Until EDF's proposal came about we were surrounded by intensive arable farming with areas (part of a funded farming scheme, I believe) that left fallow the field to the west of Foxburrow Wood and fields to the south and west of Pond Wood. By good fortune this fallow grassland was a key part of our ecological habitats. Sadly, over the last 2 years it has been returned to intensive arable farming, causing further loss of feeding grounds for hunting birds, hares, badgers etc. Intensive farming in the UK is getting evermore intensive as crop yields are reducing with unreliable climate conditions, field margins are getting thinner and there is now scant hedge coverage. If EDF really do care about the natural environment, some grassland should be restored alongside extra woodland planting.

The minimum level of mitigation planting appropriate to the losses are shown on the map below.
This would:

- reduce the visual impact on the landscape and reduce blight on homes and tourism businesses

- mitigate lost habitats and wildlife corridors (including ancient trees and hedgerows and denuded Ancient Woodland and County Wildlife Sites), and mitigate the reduction in wildlife corridors (especially for bats) but also a large range of wildlife that rely on the many natural ponds in this area
- offer some mitigation to BAP Vicarage Wood, AW/CWS Pond Wood
- prevent back up traffic from the northern end roundabout causing extra light and noise pollution to the tourism business at Mollett's Farm
- mitigate the loss of the sunny west side of the AW/CWS Foxburrow Wood that is an important extended habitat for the terrestrial and non-terrestrial biodiversity found around the Farnham Hall environs and in the vicinity of Mollett's Farm.



Hatching shows new deciduous woodland planting
Crosses shows new areas of grassland

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

1(d) WORKING HOURS DURING CONSTRUCTION

Given the proximity of our homes and businesses and therefore exposure to noise/pollution/dust and the extraordinary amount of groundworks, working hours should be reduced to the maximum of 8am-6pm Monday-Friday; 8am-1pm Saturday and no Sunday work; during the wintertime shorter days the finishing hour should be reduced to 5pm. This is a residential area where proper consideration must be given to people's lives, indoors and outdoors, for their mental health and tourism businesses. We are a group that consists of people who contain severely disabled people, vulnerable widows and the elderly. They should be dealt with respectfully.

1(e) SECURITY FENCING

There is intended to be a large construction site up by Mollett's Farm with vehicles continually passing all of us during construction. EDF has also, we are told, offered the chance of a 300 stand caravan park by the construction site with no consultation with the Parish Council or others. EDF have offered nothing in the way of security or privacy. The photograph next shows part of the Farnham Hall estate with a garden running right alongside EDF's site, by way of example; no protection to date.



1(f) RIGHTS INCLUDING ACCESS

In EDF's red line zone, the Title Deeds of residents in the Farnham Hall Estate guarantee access routes along the lane between Farnham Hall Estate up to the end of the walled garden belonging to Farnham Manor's. It is the only means of access for:

- Farnham Manor's garage and walled garden maintenance
 - 2,3,4,5 Farnham Hall & Boothby's Barn only access for garden/house maintenance.
 - There are also rights over this lane for Farnham Barn and 2 Farnham Barn and 1 & 2 Hall Cottages.
 - 1 & 2 Hall Cottages also have rights for drainage pipes in the field adjacent to Foxburrow Wood.
- We have had no liaison with EDF on how the above will be managed.

1(g) SUSTAINABLE MANAGEMENT PLAN

We are seeing more severe climate episodes in this part of Suffolk, where summer temperatures stay high for sustained periods alongside very little to no rainfall. There must be a realistic management plan in place for plants and new ponds.

2 FARNHAM HALL ENVIRONS – WHAT CURRENTLY EXISTS HERE AND WHY IT IS SO IMPORTANT

2(a) -There is a thriving tourism business at Mollett's Farm that has 1,000 holiday stays a year and a certified caravan park. The Old Vicarage and The Cartshed offer holiday lets in the countryside.

2(b) We are the most important part of our local wildlife corridor with high biodiversity habitats that cover over 6.7 hectares most likely dating back to c1600 and probably before.

2(c) We are a historic environment with a Grade 11* listed building asset at Farnham Manor. It has been hard trying to correct the misreporting that Farnham Hall is one house when it is in fact there 11 separate dwellings, set in parkland type gardens, interlinked by their large stately trees.

2(d) Our footpaths are the best local amenity providing peaceful pleasant walks from the main part of the villages for people to enjoy nature, the ancient trees, woodlands and copious wildlife.

3 DEFICIENT INFORMATION IN THE DCO THAT FAILS TO FULLY INFORM

Excerpts below reference EDF's DCO document with FERN ***RESPONSES IN BOLD ITALICS***

3a) https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010012/EN010012-002908-SZC_Bk8_8.3A_Two_Village_Bypass_outline_Landscape_and_Ecological_Management_Plan.pdf

Executive summary The outline Landscape and Ecology Management Plan (oLEMP) seeks to provide clear objectives for the establishment and longer term management of the landscape and ecological mitigation proposals. Objectives for post construction habitats and landscape areas have been informed and established through a review of ecological survey information, the landscape strategy, policy requirements and in response to site specific mitigation and consultation. Restore, enhance landscape character and biodiversity at a landscape scale to provide long-term benefits to the biodiversity of Suffolk as a whole.

Response: As the ecological survey information is inadequate (as shown in our ecological reports) this cannot fully inform objectives.

3b) PLANNING STATEMENT TWO VILLAGE BYPASS

8.4 Planning Statement App 8.4e Two Village Bypass Planning Statement

5.7.3 EDF concludes that no significant residual effects are anticipated on terrestrial ecology or ornithology during construction or operation.

Response: We strongly disagree as these have not been properly appraised.

3c) NOISE AND VIBRATION

6.6 Vol 5 2VB Chapter 4 Noise and vibration

Table 4.14

Response: Our homes are not recorded properly

Table 4.21 concludes Summary effects for the construction phase is either minor adverse, negligible or not significant.

Response: *How can this be when Table 4.16 states Farnham Hall is moderate/major adverse to significant and Table 4.18 states major adverse day and night Farnham Hall typical day in peak construction year (2028)? This is clearly most confusing.*

EDF's explanation for noise impact is inadequate. It must be possible to predict noise volumes dwelling by dwelling, given what EDF already has in the Environmental Appraisal, and identify to what extent it might mitigate noise impacts. EDF should accept a condition requiring actual impacts to be measured again 1 year after opening and 3 and 10 years after opening and again 1 year after Sizewell C is fully operational and be required to address continuing noise problems to the satisfaction of East Suffolk Council as planning authority.

3d) AIR QUALITY

6.6 Vol 5 2VB Chapter 5 Air quality 5.4.6

Response: *In Table 5.10 why do N02, PM10 and PM2.5 concentrations go down from baseline figures at SX8 and SX9 near FERN when A12 proximity changes from being 390m away to 100m when the road is built? All their tables say there is nothing but minor/moderate beneficial or negligible, it continues in this light throughout concluding air quality effects would be 'not significant'. How is this possible given the proximity of their bypass to some homes?*

3e) LANDSCAPE AND VISUAL

6.6 Vol 5 2VB Chapter 6 Landscape and visual 6.6.20

Response: *There is no effective screening during construction phase. High land levels on the DCO route make it visually obtrusive in the landscape, it includes a dominant PROW bridge with long rising approach ramps. The height of the bridge, 150m from houses, will cause intrusion to privacy issues for 6 properties and will be a blight on the landscape and further denude the western edge of Foxburrow Wood. The approach to the cutting is gradually sunk and traffic will be visible at the Pond Wood bend further, changing this tranquil environment beyond recognition and denuding the southern and eastern edges of BAP Woodland at The Old Vicarage and AW/CWS Pond Wood. The same applies to Mollett's Farm; the visibility intrusion, noise and pollution will affect all aspects of their tourism business.*

6.6.21 & 6.6.22

Response: *Again, an overall summing up of construction short-term effects around us as 'not significant' or 'minimal neutral effect' on this area - when in reality it will be very significant.*

4 CONCLUSION

The fair and right level of mitigation can only be ascertained after it is clear how many homes, businesses are effected, the loss of local amenity plus the true impact concerning habitats and ecology are taken into account. EDF's work has significant failings in these respects.

Currently there is no protection for homes and businesses during the 2- year construction phase, even though this includes major earthworks, bridge building and a large construction compound up at the northern end, which will bring construction vehicles continually past housing.

Future medium and longer term planning should allow for increased numbers of lorries, buses and cars due to Sizewell including the cumulative factor of all the other proposed energy projects with their projected job creation programs. This must be taken into account when it comes to noise barriers, bunding and extra planting.