



MOLLETT'S FARM

Written Representation for Deadline 2 from Mollett's Farm

Summary of this document's contents:

This document contains the written representation from Mollett's Farm to the Examining Authority at Deadline 2, for the Sizewell C development application.

We provide background and detailed information on our home, occupancy, land ownership, business and contribution to the local economy.

We then set out our objections to the SZC DCO and conclude that it should not be approved in its current form. Our objections focus primarily on the Two Village Bypass (TVB) associated development.

We provide details of the specific impacts that the TVB will have on us, our guests and our business.

We then set out the modifications and improvements that we feel the applicant should make in order to mitigate the harm their proposals will cause and highlight the redress we are seeking.

Finally, we have included a number of expert reports and other documentation to support our case.

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1. Introduction, Ownership and Occupation

Mollett's Farm is a thriving business, home and farmstead which we (Richard and Sasha Ayres) have owned since 2005.

The farmhouse has evolved over more than 400 years to become a home for two families – ours and that of our tenants – currently totalling four adults and one child. The house benefits from extensive private gardens of over an acre including two substantial ponds, the majority of which is situated to the south of the main dwelling.

Converted and new farm buildings provide fully-furnished self-catering accommodation in a further six units, occupied throughout the year – with a typical occupancy of around 15-20 people. These buildings also benefit from their own garden areas and farm walks.

As well as providing equestrian facilities, our paddocks also host pitches for touring caravans and tents – which can add upwards of an additional 36 people staying overnight, at peak times.

Our surrounding farmland provides both an agricultural income and an amenity value that is integral to our well-being and business offering.

2. Outline of Business

Our business has just celebrated its 14th anniversary, having been set up around a year-and-a-half after our family first moved into Mollett's Farm.

From its purely agricultural roots – and following significant personal investment – it has grown to become a provider of high-quality and accessible self-catering accommodation to private individuals, wedding groups, festival goers, families on holiday, business travellers and visiting professionals. We also have a popular five-pitch Caravan & Motorhome Club certified site with views across much of our 36 acres of arable land and paddocks, allowing those with touring caravans to also enjoy time here. Our camping site, situated in the eastern paddock, has also proved to be very popular with families pursuing outdoor activities, and is particularly attractive because of its dark skies and the abundance of wildlife, including bats and owls. Last year more than 1,000 people stayed at Mollett's Farm, whilst visiting and spending their money in local shops, cafés, pubs, restaurants, petrol stations, venues, festivals and nearby tourist attractions.

Our guests choose us because of our location and the facilities that we offer. We are surrounded by open farmland, with a network of public footpaths allowing ready access to country walks, ancient woodland, nearby villages and local services – such as the collection of shops and café restaurant at Friday Street; the caravan centre at Farnham; and the petrol station at Stratford St. Andrew.

We are renowned for being a haven of peace and tranquillity, an escape from every-day life for our guests. This is what we will lose should EDF's proposed Two Village Bypass (TVB) go ahead. Without substantial mitigation being built into the proposed TVB (and absent at present), the unique selling points on which our

business has grown and thrived will be destroyed. A reputation carefully grown and nurtured business will be obliterated and all through no fault of our own.

EDF has consistently ignored the business we have – dismissing Mollett’s Farm as an *“isolated farmstead”* (see **EN010012-002032-SZC_Bk6_ES_V5_Ch4_Noise_and_Vibration**) – and has put no special measures in to protect us from the development they are proposing.

3. Our Principal Objections

Although not exhaustive, the following summarises the principal areas of EDF’s Sizewell C development proposals that we object to:

- No acknowledgement or redress for the harm EDF’s proposals will have on our business.
- No acknowledgement of the harm EDF’s proposals will have on the contribution we make to the local tourism economy.
- Inadequate mitigation for us against the harm (noise, light, pollution, dust, visual, etc.) caused by the TVB during its construction and future operation.
- Severance of historical access between Mollett’s Farm and Friday Street that we and our guests have benefitted from over the last 16 years, forming an integral part of our business offering.
- Severance of surface water drainage towards Friday Street, into which our fields drain and our sewage treatment package discharges.
- Severance of our overland irrigation from Friday Street, which is critical to successfully growing high-value agricultural crops on our land.
- No evidence of measures to manage or maintain safe use of our A12 entrance whilst traffic volumes are ramping up, prior to the TVB coming into full operation.
- No evidence of measures to manage or mitigate the harm caused to us and our guests by the TVB construction compound during its life, including ensuring our nearby A12 entrance remains useable.
- Failure of EDF to accurately measure, quantify and assess the noise impact to us.
- Concern that the increase in TVB road-speed from 50 mph to 60 mph has not been correctly factored into assessments of harm (for example, noise) on our property.
- Concern that the increase in TVB road-speed from 50 mph to 60 mph now takes EDF’s design well outside the recognised ‘best practice’ percentile limits for new road construction (for example, minimum radius of bends) – unnecessarily increasing the potential risk to road users.

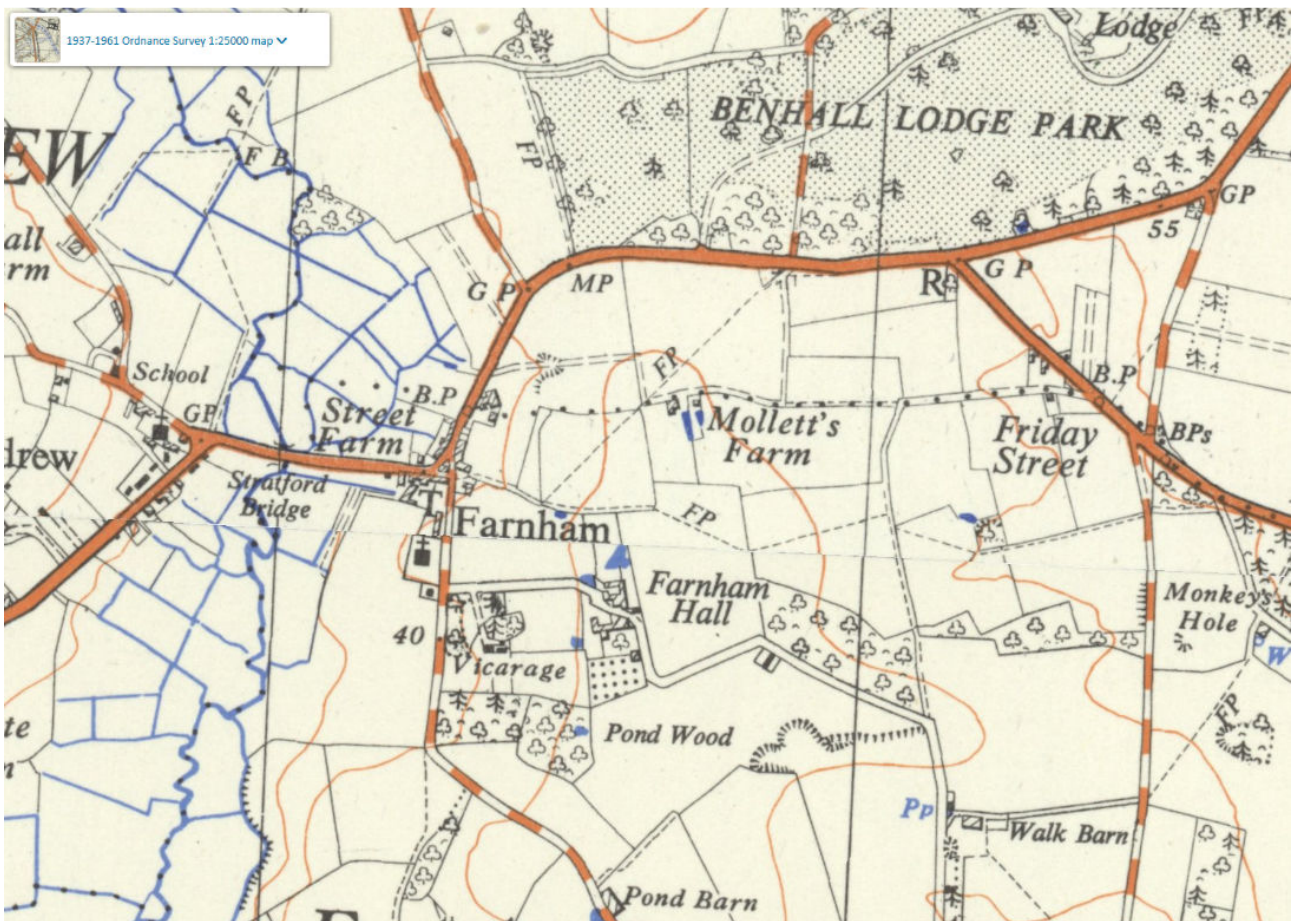
- Severance of historic pedestrian access to Foxburrow Wood and environs, using the waymarked circular walk from our paddock's SE corner gate.
- Inadequate consideration of the compounding effect that multiple, simultaneous, major infrastructure development projects will have (including for example, Scottish Power Renewables offshore windfarms and associated onshore facilities).
- We believe that the DCO application, as it currently stands, should not be approved.

4. Historical Background to Mollett's Farm

Mollett's Farm was originally one of many farms owned by the Benhall Lodge Estate, with evidence of its existence dating back to at least the early 17th Century.

Below are extracts of the **Ordnance Survey 6 inch to 1 mile (1888-1913)** and **1:25000 maps (1937-1961)**.

Both clearly show that Mollett's Farm was originally only accessible via Friday Street Farm. This historical route has been retained as a private track, with some parts also designated as a Public Right of Way (PRoW) footpath. It also shows the historical north-south trackway leading to Walk Barn (still retained as private track along part of its length and designated along its entire length as a PRoW footpath), passing through the gap between Foxburrow Wood and Palant's Grove.



5. Title and Extent of Holding

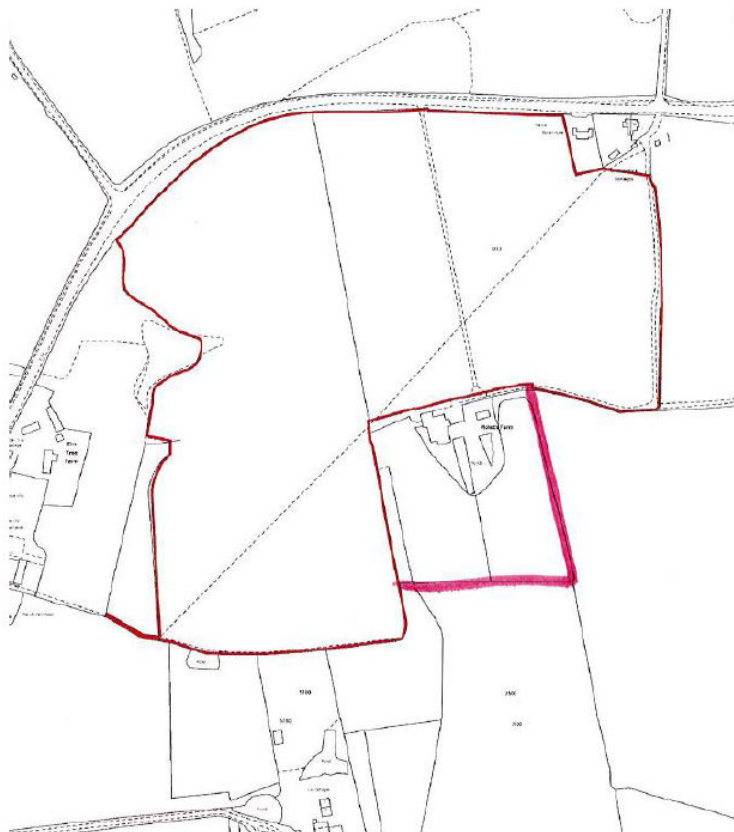
Our family owns the freehold to approximately 38 acres of land in both Farnham and Benhall parishes, all lying to the east of Farnham village and to the south of the current A12. This is split into 33 acres of arable farmland, four acres of grassland and around an acre of land containing gardens and both residential and commercial buildings.

The nearest part of the proposed TVB lies to the east of our land-holding but then also wraps around to the south. We are effectively sandwiched between current and proposed A12 alignments.

Our land-holding includes the following:

- **SK116128** – Mollett’s Farmhouse and Private Gardens (circa 0.75 acre)
- **SK350549** – Commercial Buildings (circa 0.25 acre, including Multi-Use Barns and Self-Catering Accommodation)
- **SK203679** – Paddocks surrounding Farmhouse (circa 4 acres, including Caravan Site)
- **SK288747** – Arable Land to North and North West of Farmhouse (circa 33 acres)

The following sketch shows the approximate extent of our current land-holding:



6. Business Areas

Mollett's Partnership (trading as Mollett's Farm) is a successful VAT-registered diversified farming business that was established in January 2007 and has over the years become a significant contributor to the local economy – particularly the tourism sector. It encompasses the following principal business areas:

- Self-Catering Accommodation for both leisure and business travellers in six fully-equipped, self-contained cottages and studios – including significant (50%) provision for people with disabilities, which is in limited supply locally.
- Caravan & Motorhome Club (CAMC) Certificated Location (CL) providing five all-year pitches with electric hook-ups and other facilities for touring caravans and motorhomes.
- Farming and maintenance of our arable and grass land, using contract resources from neighbouring farms where necessary.
- Seasonal permitted development camping and caravanning in eastern paddock.
- Rental of marquees for events.
- Rural craft sales.

7. Trading Performance and Valuation Reports

Mollett's Partnership has traded profitably for all five of its most recent accounting years and continues to do so, despite the challenges of Brexit and the global Coronavirus pandemic.

We have taken professional advice and pre-emptively secured Red Book and other valuations of our current property and business interests.

We would be happy to share trading performance and valuation reports with the ExA on request but have not included them here for reasons of confidentiality.

8. Contribution to the Local Economy

Our business has a significant impact on the local visitor economy in East Suffolk. The '**Economic Impact of Tourism**' report for 2018 conducted by **Destination Research** showed that day visitors on average spent £29 per head and overnight visitors spent £211.70 per head.

Our business attracts an average of 1,000 overnight visitors per year. In revenue terms the value to the tourism economy is therefore estimated as £211,700 per annum (1000 x £211.70 for the overnight visitors).

Please note this is not the revenue we as a business receive but the total spend calculated when visitors choose to stay here. It is the money that the combined businesses in East Suffolk would lose should we close.

We help attract people to East Suffolk, and local pubs, other accommodation providers, retailers, restaurants, cafes, visitor attractions, public and private transport providers all benefit from our business and would be impacted by our closure or diminution. Our business also sources local produce for hospitality and so the closure would have an extended impact on the local economy through these suppliers.

In addition to the economic value our business provides employment for numerous people (contractors and ourselves) all year round, remaining open and surviving these turbulent times is essential to continue this employment.

We have survived and thrived despite the economic crash, Brexit and Covid but EDF's proposals now threaten all that we have built and grown.

9. DCO Alignment Impact

We still do not fully understand all the alignment implications, as we have consistently been denied any meaningful or accurate engagement to give us the details required to fully assess them. EDF's DCO submission is at best confusing and full of contradictions, and so disparate that one struggles to find the required information. Even then, there is no guarantee that it is accurate or correct, nor does it contain the specific details that we have requested.

There is no natural justice in this as only those with very deep pockets could hope to be able to read, interpret and argue the points made, with multiple references to other documents. How are we supposed to be able to find the time or expertise to be able to analyse, understand it or even be able to assess the impact upon us? The reports we have had to commission independently and in conjunction with the **Farnham Environment Residents & Neighbours (FERN)** association have demonstrated omissions, obfuscations and errors in EDF's DCO application. These reports cost thousands of pounds. If EDF had produced the correct and transparent information we would not have had to spend this money. It is patently unjust that private individuals and small businesses should be pitted against a major player such as EDF and that major player should not do appraisals properly.

Our proximity to a new single-carriageway road running along the indicated alignment will bring the edge of the A12 to within 150m of our farmhouse and private gardens, and 50m of our paddocks. This is unacceptably close and will have a significantly negative impact on our family, guests, business, land-use and property value – notably as this is the paddock used for the camping arm of our business and other outdoor events. Nor will our livestock take kindly to the levels of noise suggested, including our daughter's horse, which we will have to permanently move to livery if the TVB goes ahead.

9.1. Noise

The change from the current A12's 50 mph speed limit to the TVB's proposed 60 mph will mean noise levels experienced here will greatly increase, especially taking into the direction of the prevailing wind. Vehicles accelerating and going through the gears to and away from the roundabouts on the A12 (especially HGVs) will significantly add to noise and pollution. It is also worth highlighting that EDF consulted exclusively on a TVB limited to 50 mph and has only now increased it to 60 mph in its DCO application – eliminating any possible constructive dialogue or opposition during the consultation process. We have had our own noise impact report produced, which has examined the information produced by EDF as well as taking independent measurements in a position which is more pertinent to our business interests. This report highlights the inadequate and misleading data included in EDF's DCO application. One of the problems with EDF's noise survey is it fails to recognise that we run a tourism business – we are not just an *"isolated farmstead"* as suggested in its documentation.

The independent noise report, produced at our request by **Mike Hewett MIOA of Acoustical Control Engineers & Consultants**, is attached in full as **Appendix A below**. Its principal findings are as follows:

"9 Conclusions

- 9.1 The baseline sound levels used to represent Mollett's Farm are not adequate for a proper assessment. The measurement durations were too short, the location was unrepresentative, one of the key indicators was not reported and the absence of weather data in the survey report means the validity and relevance of the results cannot be determined.*
- 9.2 The methodology of the noise assessment follows established practice for this type of assessment, but this does not adequately evaluate the specific impact on the tranquillity of Mollett's Farm.*
- 9.3 Wind direction has a significant effect on sound propagation. The assessment methodology is based on a comparison of predicted levels for the existing and proposed routes that assume downwind propagation to the farm from both. This is unrepresentative as the farm is located between the two routes. The prevailing wind direction is such that sound from the proposed route will have favourable propagation conditions to the farm much more often than the existing route.*
- 9.4 As a result, occasions when road noise is audible and intrusive at the farm are likely to be more frequent, and its impact and effect will be greater than predicted by the methodology used.*
- 9.5 The assessment predicts adverse impacts at several stages of the road construction process. It is vital that the Construction Noise Management Plan for the road scheme includes monitoring of noise levels and extensive liaison with residents about the location and duration of high noise activities."*

9.2. Rights of Way

Land at Mollett's Farm benefits from an historic access to Friday Street, which can be shown to have existed for centuries (see **Section 4 above**), which the proposed TVB will make unusable or sever completely.

This and other routes (including a Public Right of Way) allow ourselves, our guests and walkers from the direction of Farnham to access the Friday Street farm shop, butchers, fishmonger, antiques centre, café restaurant and car-boot sale. Aside from any legal issues, the loss of this route would have a material effect on the attractiveness of our tourism business, as it connects our self-catering and caravan site visitors and campers with local shops and services.

Suggesting that the route will still exist across the new road is ludicrous at best, as pedestrians and high-speed vehicles do not mix well. Given the proposed traffic flows and speeds it would be highly dangerous to cross the proposed TVB, if indeed possible at all.

With its impact to the above in mind, we would ask the ExA to challenge the reasoning and justification for re-routing PRoW footpath E-137/029/0 to the south of its current alignment, when it could (and should) be retained as is. The suggested route is longer and more convoluted than its current straight alignment – which we do not consider to be required or prudent.

We also benefit from an historic access to Foxburrow Wood and environs, from a gate at the SE corner of our east paddock. This lets out onto a waymarked Circular Walk providing pedestrian access to the PRoW network and Foxburrow Wood (part of the similarly named County Woodland Site), to which public access is permitted. There is no evidence that EDF are taking steps to ensure that we and others can continue to benefit from this amenity, which will be severed by the TVB.

We and our customers have been using these routes regularly for 16 years. These are benefits that are important to our business and EDF is proposing to sever them with no regard to the impact this will have on us or our business.

As a Private Means of Access, they should be shown for stopping up and alternatives provided.

9.3. Privacy

EDF are proposing to provide a new Permanent Private Means of Access on the western side of the TVB as it passes Mollett's Farm (between PCF11/7 and PCF11/9). The purpose and justification for this new route are unclear to us and may require further explanation. Either way, this new access will infringe on the privacy and setting that we and our guests currently enjoy and will therefore require additional screening on its western side.

9.4. Business Harm

When we questioned the impact on our guests / tourists, we were told to look at **EDF's Section 6 – the Tourism Fund**. Having read this section there are very few points which relate directly to us. Our problem is that EDF's proposals completely change our immediate environment and our ability to trade without offering us concrete mitigation, nor is there any offer of realistic, timely compensation or business continuity support.

Even by EDF's own admission we are marked as *"Major adverse, significant"* for main construction but with no recognition of us as a business. If it is deemed to be that bad as an *"isolated farmstead"*, how can it not be worse as a tourism business? We cannot just pick it up and move it. 4.6.9 says that on Saturdays it is considered worse because of the difference in activity on these days – translated this means that for us, as a tourism business, it will be *'major adverse, significant'* all the time; as the activities here are the same regardless of the day of the week. This is probably another reason for failing to acknowledge our status as a tourism business. 4.6.10 makes this even scarier. EDF makes the following assertion:

4.4.6 "On Saturdays between 07:00 and 19:00 hours, there would be a significant adverse effect at Mollett's Farm during the site preparation phase. There would be no other significant effects at this or any other receptor during site preparation at this or any other time."

Please would the ExA ask EDF to explain why Saturday would be any different? So then in 4.7.7 it states that we would also be significantly affected – how can both statements be true? The document is internally inconsistent. Ditto with 4.7.8, which then goes on to say that we are significantly affected again! Again totally inconsistent with 4.4.6. How can the tables and statements be so utterly contradictory?

9.5. Air Quality

The air quality report is just as obfuscated – only an expert could read this. We need to be told what it actually means not pointed at a document which is totally unreadable by the lay person.

EDF claims that building the TVB will *"reduce air pollution [in the villages of Farnham and Stratford St. Andrew]"*, which sounds great until you realise that they are actually only moving it to another location. Our doorstep. We are concerned that increased levels of pollution will be experienced at Mollett's Farm and the many dwellings at Farnham Hall, for which we see no attempt at mitigation.

9.6. Surface Drainage

The proposed route crosses a drainage ditch carrying surface water from much of Mollett's Farm (and other arable land to the east) towards Friday Street. Parts of the proposed route and adjacent land are already subject to flooding and run-off during severe weather events – this is detrimental to our tourism business, our home and our agricultural interests.

9.7. Irrigation

Water that is essential for the irrigation of certain crops at Mollett's Farm is pumped overland from stored and bore-hole derived sources at Friday Street. The crops that require this water perform an important role in both the health of the arable land (being a break crop in the farming rotation) and in the income derived from it. Severing this facility would cause financial hardship – requiring mitigation.

9.8. Agriculture

The same crop is often planted in fields that are adjacent, in order to minimise the travelling distance of expensive and heavy farm machinery and maximise the area that can be cultivated / sown / tended / harvested in a single visit.

The route mentioned in **9.2 above** is used by agricultural vehicles moving between such adjacent land parcels at Mollett's Farm and Friday Street Farm, which the TVB will sever. This will lead to less efficient use of the land and increased transport and manpower costs. We see no evidence that EDF acknowledges or intends to mitigate or compensate for this loss.

9.9. Tranquillity

The effect of the project on the tranquillity of the area can be found in **Volume 5 Chapter 8 of the ES** and its associated appendices and figures. Mollett's Farm is close to receptor location TVB7 in the assessment of tranquillity.

And **EDF's** assessment for TVB7 states:

"Natural sounds plus distant road traffic. With development, the distant road traffic level would dominate and tranquillity would be lost".

How can EDF refuse to acknowledge that this will affect our business?

9.10. Ecology

As per our numerous submissions during the consultation process (the most recent of which is contained within the email to EDF shown in **Appendix C below** and that to the earlier Stage 3 in **Appendix D below**), we are concerned that significant harm to fauna and fauna will occur as a result of the TVB construction and use.

We regularly observe a variety of wildlife species directly adjacent to or transiting the proposed TVB alignment – many of which are protected or in national decline. Of particular note are multiple species of Deer, Badger, Brown Hare, Red Fox, Hedgehogs, Red Kite and an undetermined number of Bat species.

Some birds – such as Skylarks actively nest on the land proposed for the TVB. Bats regularly patrol and hunt along the Oak trees forming our southern boundary (immediately adjacent to the TVB site boundary), as well as in our garden and over our two ponds.

Many of our sightings and photographs are recorded and expert-verified in the public domain at the **Biological Records Centre** (<https://www.brc.ac.uk/irecord/>).

As well as being intrinsically important, the local wildlife forms part of the 'countryside experience' and setting that our guests currently enjoy. Harming the habitat and character of the area adjacent to Mollett's Farm will harm our business and our own well-being, and we see no evidence that EDF is actively addressing these issues.

9.11. Heritage

Mollett's Farm is a non-designated heritage asset, with the farmhouse and barn dating to the early 17th Century and the Farnham / Benhall parish boundary running east-to-west along their northern boundary. A publically-accessible Heritage Asset Assessment is available documenting this, produced by **Suffolk County Council Archaeological Service** in April 2011 (see **Appendix AB below**).

The following is a summary of the assessment's findings:

"Mollett's Farm lies in open countryside approximately 500m north-east of St Mary's church and 250m south of the A12 from which it is reached by a concrete track. The farmhouse is not listed but preserves an early-17th century timber-framed parlour bay with chamfered ceiling joists and a clasped-purlin roof structure to the east of its contemporary axial chimney. The rest of the original house is reputed to have been destroyed by fire in the mid-19th century. The site was formerly accessible only by a track from Friday Street to the east, which formed the boundary between Farnham parish to the south and Benhall to the north. At the time of the tithe survey in 1841 the farm was a modest tenanted holding of approximately 20 acres on the estate of Benhall Lodge.

The barn to the west of the farmhouse is shown on the tithe map and retains at least one bay of early-17th century timber-framing to the north, but has otherwise been extensively rebuilt and largely converted for semi-domestic purposes in recent years. Its thatched roof structure was entirely replaced with softwood and corrugated sheeting after reputedly suffering damage in the 'hurricane' of 1987. Much of the building's historic character has accordingly been lost, and any precise analysis of its fabric and development is hampered by the concealment of its fabric by modern boarding. The single-storied shed adjoining its southern gable is a relatively late addition of circa 1879 and had also been largely dismantled by the time of inspection. The chief interest of the site lies in the relationship of the early-17th century barn to the surviving parlour bay of the contemporary farmhouse, which indicates the latter faced a southern courtyard flanked by the barn on the west in the typical manner of the period. The barn is also of interest as its northern gable adjoins the Benhall parish boundary and may preserve archaeological evidence of the banks and ditches often associated with features that in many instances can be shown to pre-date the Norman conquest."

Despite this, we see no recognition that irreversible harm will be caused to the landscape setting of Mollett's Farm or indeed any attempt by EDF to mitigate these effects.

We would also draw your attention to the contents of the Heritage Report produced at the request of the **Farnham Environment Residents & Neighbours** (FERN) association, as it refers to heritage assets with which Mollett's Farm is closely associated.

9.12. General

We have ploughed our way through the DCO submissions – as lay people – and all we can say is that the documents do not address the issues we have raised. EDF consistently fails to recognise Mollett's Farm as a tourist business not just an *"isolated farmstead"* and has not answered any of our specific concerns in any of the areas, even the ones they pointed us to (see **Section 10 below**).

It seems grossly unfair and immoral that businesses only have the right to claim compensation after the project is completed if we think it has been detrimental to us. We ask the ExA to seek elucidation as to whether this is before or after EDF's actions have bankrupted us? It is inevitable from EDF's own evidence that we will be significantly affected yet the process of consultation has offered us no redress at all. Constantly being told it won't be as bad as we think will not change the fact that we are innocent victims of EDF's proposals.

We were asked what we wanted. We want EDF to acknowledge Mollett's Farm in EDF's documentation as a tourism business and acknowledge that the actions EDF is proposing are going to significantly affect us. Compensation after completion of the project is useless to us; we would potentially not be able to sustain our business during the time it would take which in reality is up to seven years post project completion, assuming we can operate after the road is completed. It could potentially be post build of Sizewell C, in which case it is likely given the delays on other EDF projects that we will be residents of the Farnham graveyard before we are eligible to claim. We are guessing EDF knows that already but ask the ExA to consider the position we might be in.

10. Contact with EDF and its Agents

From the very outset of the consultation process we have fully participated as individuals and as a business. We have responded to each consultation stage in full and in great detail to the best of our ability, given the scant information presented by EDF at each stage. Should they be required, we would be happy to furnish the ExA with copies of our consultation submissions (our most recent is contained within the email to EDF shown in **Appendix C below** and that to the earlier Stage 3 in **Appendix D below**). We have also attended the various meetings and roadshows in different locations and tried to engage with EDF, but its staff have consistently been in 'broadcast' mode rather than putting their listening head on.

Despite our efforts we have been consistently ignored and overlooked. EDF's DCO application dismisses us with a catch-all reference to an "*isolated farmstead*" with no mention of our business or our endeavours to engage. We have never had any meaningful responses to the numerous issues we have raised during consultation nor are they covered by the submission of the DCO, which we understood should be front-loaded and completed in detail.

Then in December 2020 we were contacted by a Lidia Bosa. Her title was "*Stakeholder Engagement SZC*", although she introduced herself as someone who dealt with accommodation issues for Hinkley Point. She also brought a colleague from the local office in Leiston. We had one introductory face-to-face meeting and then, subsequently, had to revert to online conference calls due to Coronavirus lockdown. After both meetings there were no resolutions. After both meetings we had to write to explain that this was not true engagement as they were not offering anything, not answering any of our questions and not providing any new information. It was simply lip service. A tick-box exercise to say they had 'engaged'.

To try and make this clearer and have her understand the issues we needed answers to, we wrote to her including our last submission with specific issues.

Her response is attached along with my responses to her (see **Appendix C below**), which have never been dealt with as she was apparently involved in an accident in March or April and no replacement has ever been forthcoming. The meetings simply ceased.

The reason we are citing this is to demonstrate the actual engagement process, rather than that which EDF seems to suggest we are receiving. Engagement with EDF has been a one-way street. **Farnham with Stratford St. Andrew Parish Council** used the expression *"We have not been heard."* in one of its submissions, and we feel the same way!

The point we are trying to make is that there is no natural justice in this process or indeed in what is being imposed upon us. We don't just stand to lose a lovely location for our home. We stand to lose our business and our livelihood. Over the last sixteen years we have built a home and business. Probably small change to EDF but significant to us and for our future. Are we scared of what is going to happen? Of course. To have to move because our home is not what it was is one thing but to lose our business and income is incomparable and unsurmountable for us – and it is not because of anything we are doing, but because some large powerful organisation is totally ignoring the impact its proposals will have on us. It is through no fault of our own so why should we have to pay the price?

11. Compensation

We have sought expert opinion on the subject of compensation and have received the following advice from **Richard Heldreich BSc Hons (Est Man) FRICS**, who has over 30 years' experience in Planning and Development specialising in Compulsory Purchase and Compensation throughout the UK. He has acted for many statutory authorities as well as claimants in the promotion of CPOs and the settlement of compensation claims:

"I have been asked to examine the compensation options available to the owners of Mollett's Farm in the light of the proposed Sizewell C DCO and specifically the construction of the Two Village Bypass. Mollett's Farm includes not only their residential dwelling and their farming interest, but also a holiday lettings business operating six units out of the farm's converted buildings, together with permanent site for five touring caravans & motorhomes and seasonal campsite.

The Sizewell C DCO is promoted by EDF and until very recently EDF had chosen to ignore the fact that this business existed, let alone seek to work with the owners to find a methodology for mitigating the effects of their scheme. Deliberately seeking to avoid the property from any land-take raises further questions about EDF's motives. These actions are significantly at odds with accepted best practice and particularly with recently promoted major infrastructure schemes, such as HS2.

In assessing the compensation opportunities available for the commercial element of Mollett's Farm several factors need to be considered. The fact that the acquiring authority have sought to avoid any land-take from the property severely restricts these options. Compensation is meant to offset losses incurred as a result of the scheme. In this case the business at Mollett's Farm will not only be affected

by the construction of the scheme but also the subsequent use of the scheme. If the claimant can establish the causal link between the scheme and the losses incurred by the business, then the principle for claiming compensation is established.

*Absent of any land-take, two distinct statutory pathways can be used to make a claim against the acquiring authority and these depend on whether the claim is made during either the construction phase or post completion. The two statutory options are detailed in **Part 1 Land Compensation Act 1973** and **Section 10 Compulsory Purchase Act 1965**, with the former allowing for claims to be made for depreciation of an interest in land as a result of the use of the scheme and the latter for damage due to the execution of the works.*

Given the nature of the business which clearly relies on ‘quiet enjoyment’ of the locality, it should be recognised immediately that an impact on the business will be likely in both phases. Mitigation of a physical manner has been discussed above; however the proposed works do not represent a solution which is regarded by the owners’ consultant as being sufficient. Furthermore, there is also a duty on all parties to mitigate both impact and losses but as a result of the available compensation pathways not including any disturbance option for loss of profits, whether they be temporary or permanent, the claimant is reduced to attempting to continue to operate a severely hamstrung business or a total extinguishment.

“For a vibrant and successful business this represents a wholly inequitable slap in the face. EDF has made no reasonable endeavours to either mitigate the effects of its scheme or find a suitable financial package to compensate for the inevitable loss to the business.”

Our attention has also been drawn to **Section 246 of the Highways Act 1980**. It is unacceptable for EDF to say that land-take is “what is required for the scheme” because that depends on the choices and decisions EDF makes. Our understanding is that it is entirely normal for a highway authority to consider what ameliorative measures are required for a scheme and plan accordingly, including for taking the land necessary to implement such. Why therefore has EDF simply avoided the issue? It cannot possibly be regarded as for “the public good” or “in the public interest” for EDF to be allowed to get away with simply not dealing with the impact of the scheme and providing for appropriate mitigation by noise bunds and landscaping. We note that landscaping will have little positive effect in terms of noise attenuation but it should be a requirement on EDF to satisfactorily fit what is a new and quite alien intrusion into the landscape and thereby ameliorate some at least of the worst features of the scheme. Indeed, we ask the ExA not to even consider approving the DCO with the EDF TVB alignment without bringing forward proposals (to be discussed with us properly) for adjusting land-take so as to properly ameliorate. We are content to give up some land for that purpose.

12. Support for FERN

We are members of the **Farnham Environment Residents & Neighbours** (FERN) association and continue to endorse its submissions to the ExA.

To avoid repetition, we have not included all their representations (and in particular the experts' Heritage and Ecological reports commissioned by the group) but they remain equally pertinent to our submission and further demonstrate inaccuracies and obfuscations in EDF's DCO application.

13. Support for an Alternative TVB Alignment

We continue to fully support **Farnham with Stratford St. Andrew Parish Council's** "*improved*" TVB alignment, which would not only move the A12 and its traffic further away from residents directly in those two villages, but also from those parishioners unfortunate enough to be near EDF's suggested alignment. This would result in a road being built to the east of Foxburrow Wood (and not to the west, as EDF would have it) in the gap between Foxburrow Wood and Palant's Grove.

Despite wide local support (including **Benhall & Sternfield Parish Council**, our **County Councillor** and others) EDF has paid little regard to this alternative routing option, as evidenced by the complete lack of quantified appraisals in its DCO application but also in the lack of on-the-ground investigation work (which appears to have focused exclusively on its own route).

14. Need for Mitigation if DCO is Approved

The following is an extract **Sizewell C Project Economic Statement** (SZC_Bk8_8.9_Economic_Statement):

6 Tourism

6.1 Background/context

6.1.1 The NPS EN-1 states that the construction, operation and decommissioning of energy infrastructure may have socio-economic impacts and that:

"Where the project is likely to have socio-economic impacts at local or regional levels, the applicant should undertake and include in their application an assessment of these impacts as part of the Environmental Statement... which may include effects on tourism" (paragraph 5.12.2-3).

6.1.2 It also sets out that that:

"The Infrastructure Planning Commission [now the Secretary of State] may conclude that limited weight is to be given to assertions of socio-economic impacts that are not

supported by evidence (particularly in view of the need for energy infrastructure as set out in this NPS)” (paragraph 5.12.7).

Their **Economic Statement** goes on to say:

6.3.1 SZC Co. recognises that while there is little or no evidence supporting direct effects of the Sizewell C Project on the tourist economy, there is potential for:

- *localised effects (the potential for very local effects on businesses and activities where there is a combination of significant residual environmental effects, identified in the ES);*
- *perception-related effects as a result of sensitivities to different aspects of the Sizewell C Project (the potential for perception of changes to e.g. traffic, where this is already an influencer on propensity to visit).*

We say that this is downplaying the likely impact on local tourism, to EDF’s benefit. Unlike at Hinkley Point, the infrastructure in Suffolk is limited – especially the road network to/from the county and within it. Even so, these are both significant to us. Since we have not been identified as a business it seems we are to be overlooked.

EDF talks a lot about using “*spare capacity*” within the tourism accommodation sector but at the moment there is none available for over half the year. The last Sizewell B refuelling outage (April - August 2021) showed the problems that such workers have to find accommodation, as it coincided with the end of lockdown and the beginning of the holiday season. We had many calls from EDF staff and contractors seeking accommodation but had little-to-none to offer. Even when we have had vacancies, these workers are often only provided an allowance that is significantly lower than that of the tourist-market rates. So much so that, if we had to rely solely on EDF workers, we could not cover our costs let alone make a profit or living wage.

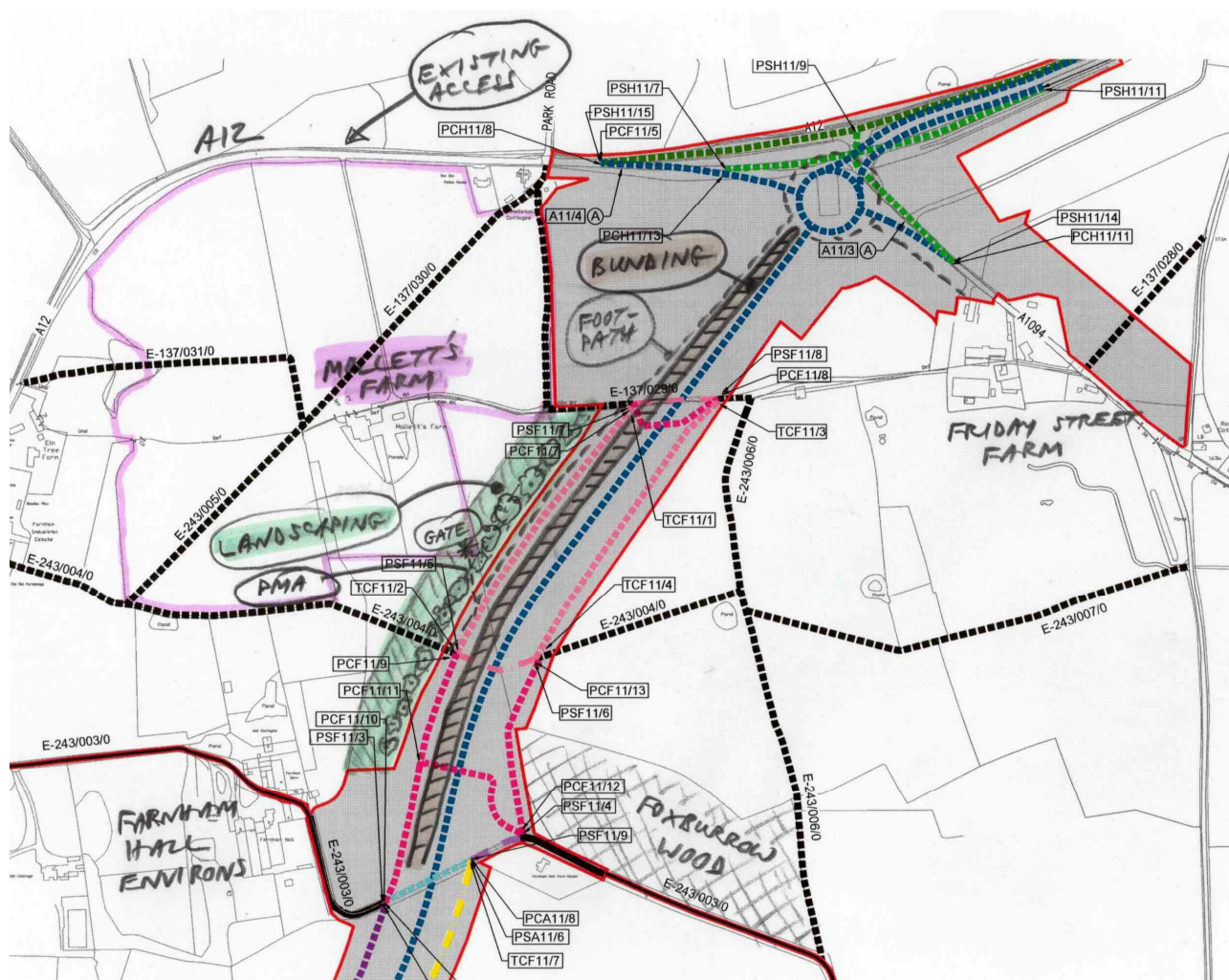
EDF stands to make a great deal of money from the future operation of Sizewell C. It is why it intends to make this investment. At the same time it will, by its actions, be depriving others of their livelihood. We are just one such business.

As a consequence of the intrusive and destructive nature of EDF’s proposals, we feel that it wholly reasonable for them to be compelled to provide the following meaningful mitigation:

- Substantive measures to ensure safe use of our access onto the current A12 (for us, our guests, towed vehicles and farm machinery).
- Signage from the current A12 and TVB, to direct road users back to our business – both during the disruptive periods of TVB construction and during the TVB’s future operation.
- Noise attenuation and security fencing along the entire western edge of the TVB construction area prior to commencement of work.

- Review of working hours (both weekdays and weekends) to ensure minimal impact on our business during TVB construction.
- Bunding and permanent noise attenuation structures on the western side of the TVB between the new roundabout at Friday Street and the dwellings at Farnham Hall.
- Alternative arrangements to allow the free, safe and convenient passage of pedestrians and vehicles between Mollett's Farm and Friday Street Farm.
- If the above cannot be provided on the existing alignment, then we suggest a Public Footpath should be created along the western edge of the TVB from the Friday Street roundabout to the footbridge at Farnham Hall / Foxburrow Wood. This could follow an alignment broadly similar to EDF's proposed Private Means of Access between PCF11/7 and PCF11/9.
- Landscaping and tree planting on the western side of the above, with a detailed management plan and maintenance schedule to ensure its long-term health and survival.
- The Friday Street roundabout should include safe facilities for pedestrians (with accompanying children) to cross each of the four road arms.
- Provision for an alternative Private Means of Access from the SE corner of our paddock to the PRow footpath E-243/004/0 where it meets the newly established route crossing over the footbridge to Foxburrow Wood (PCF11/9). We should be given rights over that Means of Access.
- Positive use of land adjacent to the TVB to provide net gain, particularly in terms of wildlife habitat and landscape setting and especially on the western side of the TVB in the area surrounding Mollett's Farm and the numerous dwellings at Farnham Hall.
- Acquisition of land under **Section 246 of the Highway Act 1980** to enable additional impact-reducing measures to be incorporated, as well as to fit the TVB scheme into the landscape in a much more acceptable way.
- The above would help us to continue trading with income parity and give us the ability to develop our business as we had planned, without further reference to EDF.

The following sketch illustrates the approximate location and extent of the principal mitigation discussed above:



The fair and right level of mitigation can only be ascertained after it is clear how many homes and businesses are affected and 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 us during the two-year construction phase, even though this includes major earthworks, bridge building and a large construction compound at the northern end, which will bring construction vehicles continually past our home and business.

Future medium and long-term planning must take into account the projected increase in the numbers of HGVs, buses and cars due to both Sizewell C and other proposed energy projects in this region – which will necessarily require increased levels of noise barriers, bunding and extra planting.

15. Conclusion

We have been asked on multiple occasions to provide responses and ask questions but with no real feedback, acknowledgement or response from EDF. Its approach is based on limited information and sometimes / often inaccurate data or at best incomplete data.

We are a thriving business and of value to the East Suffolk economy. The burden of this TVB proposal is proving hugely detrimental to our health and wellbeing as well as our pockets. We simply do not have the time, staff or resources to fight the injustices being heaped upon us by a major player with time, resources and staffing to obfuscate and obliterate without ever being under any obligation to do what is right and/or fair.

From its purely agricultural roots – and following significant personal investment – Mollett's Farm has grown to become a provider of high-quality and accessible self-catering accommodation to private individuals, wedding groups, festival goers, families on holiday, business travellers and visiting professionals. We also have a popular five-pitch Caravan & Motorhome Club site with views across much of our 36 acres of arable land and paddocks, allowing those with touring caravans to also enjoy time here. In addition we have a 'pop up' campsite in our eastern paddock – which has proved to be very popular. Each year more than 1,000 people stay at Mollett's Farm, whilst visiting and spending their money in local shops, cafés, pubs, restaurants, petrol stations, venues, festivals and nearby tourist attractions.

Our guests choose us because of our location and the facilities that we offer. We are surrounded by open farmland, with a network of public footpaths allowing ready access to country walks, ancient woodland, nearby villages and local services – such as the collection of shops and café restaurant at Friday Street, the caravan centre at Farnham, and the petrol station at Stratford St. Andrew.

Although a 50mph single-carriageway section of the existing A12 lies around 250m to the north of our nearest buildings, we currently enjoy a tranquil setting and dark skies. This is because our guest accommodation, public areas and private gardens are further to the south, 300-350m from the road and shielded by the above buildings, with the prevailing winds generally carrying road noise away from us.

We have planning permission to build another fully accessible accommodation unit and to develop the barn into a function hall. All this has had to be put 'on hold' because of the impact that EDF's proposals have had on us. In other words, we are already being blighted.

It is not only that we will be unable to surmount the impacts of the Two Village Bypass construction but also the additional burden of the impacts during its operation, which could, as it stands, destroy the key selling points of the business we have built.

Even if a different alignment is approved it still leaves us with many other issues. Whilst a route that is further away is preferable it by no means obviates the issues we will face as a business and for two dwelling units.

It is also probable that, given the volumes of traffic likely during construction of the bypass itself (for which we have been unable to obtain any real information from EDF) that we may well be unable able to access

our own entrance or exit it, during the years of construction, most notably if a right turn is required in that manoeuvre, nor would our current customers be safe to do so, especially when towing (e.g. a caravan). This is putting aside the obvious implications of who would want to stay here anyway, with the impact of a road being built just behind and beside us. EDF has suggested in its documentation that this would only be of concern on a Saturday but this argument is obviously flawed when it comes to holiday makers.

We have lived and worked here for 16 years and contributed to the local economy. We have established a business here that has benefitted our local community and continues to do so. EDF's proposed actions will deprive us of our home and business which is our livelihood. We are currently having to delve very deep into our pockets and use monies set aside to develop our business, which is completely contrary to natural justice. Why should this process, which is not of our making, be costing us thousands of pounds because the applicant refuses to share relevant information or even provide accurate information or explain the impact to those affected in a meaningful way? Let alone actually offer a real amelioration of the damaging landscape and noise impacts of their alignment?

The ExA will see, from the reports submitted by ourselves, and in conjunction with FERN, just how unjust and misleading EDF has proven to be by not providing us with accurate and relevant information and by refusing to acknowledge the effects they will have on the people and businesses its proposals will affect.

The DCO redline has been drawn to deliberately avoid our property. Now, whilst this would seem to be beneficial to a landowner, this is far from the case. The fact that having land taken allows the landowner to make a claim for disturbance is significant for owners such as ourselves. Of course it is possible that compensation can be sought for diminution of value both during the construction phase under **S10 Compulsory Purchase Act 1965** or via **Part 1 Land Compensation Act 1973** on completion of the scheme but neither of these options allow for the business disturbance aspect to be compensated and therefore those compensation rights are not an adequate remedy.

In our view and that of our expert adviser, it seems that EDF has not only sought to turn a blind eye to the existence of a successful Suffolk business right on the boundary of its TVB scheme, but also to have deliberately avoided acquiring interests in land to simply avoid a claim for disturbance. That is the outcome and a reasonable inference that it was deliberately intended, perhaps because the obvious inference is that by the time such compensation can be sought it is likely that we would not have survived the transitional period required due to the devastation of our business.

We have consistently asked EDF to include us within the TVB red-line boundary, so that we could at least be eligible for business loss or disturbance or even business extinguishment, but have been faced with a refusal. During its rare engagements with us EDF has suggested that its proposed development (both main site and Two Village Bypass) is likely to have little to no impact on us or could even be beneficial. If this is the case, then why would it refuse to include us within the red line boundary? If what EDF says is true, conceding on this point would never be detrimental to it.

Given the manifest failings of EDF and particularly in its dealings with us, we must maintain our objection to the DCO and ask the ExA not to recommend its approval. As things stand, EDF's proposals are simply unacceptable.

Appendix A – Acoustic Review Report



Acoustical Control -
Acoustic Review Rep

This embedded document has also been provided separately and is entitled **“Acoustical Control - Acoustic Review Report B5393 R (2021-05-11).pdf”**

Appendix B – Heritage Asset Assessment



SCC Archaeological
Service - Mollett's Farm

This embedded document has also been provided separately and is entitled **“SCC Archaeological Service - Mollett's Farm Barn Heritage Asset Assessment (2011-04).pdf”**

Appendix C – Example Correspondence with EDF

Email from Mollett's Farm to EDF (January 2021)

From: Sasha Ayres (Mollett's)

Sent: 29 January 2021 13:24

To: Lidia Bosa ; Tracy Hateley

Subject: Meeting 26/01/2021

Tracy Hateley

Lidia Bosa

Richard Ayres

Sasha Ayres

With reference to the meeting held on 26th January 2021 between the above recipients, we thought it might help you to understand our situation if we shared with you our last response to EDF. This is now our 6th submission – none of which have had any response or follow up. We have now been asked to submit yet another one and our feelings are running high because it takes time and money and nothing seems to be answered and nothing is done. It seems grossly unjust that your organisation can come along, and cost us time and money and don't or won't even take the time to respond or engage with us in any meaningful way.

The purpose of our meetings is supposed to be about how we can best move forward and what options may or may not be available to us given the position EDF has put us in. We have consistently said that we understand that in these situations there are always casualties for the greater good, and that we are prepared to engage and discuss options that could mean working together and even major changes for us on the understanding that our current business probably cannot survive the imposition of your required development options. Unfortunately, as with the meeting on 26th January, I find myself trying to explain that we are becoming increasingly concerned by the lack of anything concrete or even any addressing of our concerns. Whilst we realise there can be no "promises" until there is a decision made, it does not change the fact that we are unable to, as you say, "just carry on as normal" as that is exactly what this "sword of Damocles" is preventing us from being able to do. We realise that it is a Catch 22 situation, which is why we would like EDF to be exploring more precisely exactly what it is they can or cannot offer.

So to try and seek some clarity – as we do not think we are making much progress here, let's give you the big picture and we will highlight below the issues we raised – anything in **blue**, so that you can see it in context – and it can act as a reminder so that you can follow up as you said you would in the meeting, in time for our next meeting next month.

Our submission was as follows:

Yet again – an opportunity lost!

EDF Energy have once again missed an opportunity to demonstrate that they are acting on or even listening to the views of those affected by their Two Village Bypass proposals.

As members of FERN we fully endorse their submission (under separate cover), but also feel the need to submit separately due to additional factors concerning ourselves and our business.

- a) Lack of Detail – There is still a fundamental lack of detail, which has compromised our ability to make a reasonable assessment of your proposals and to judge if they are suitable or not. Proceeding to a formal DCO application prior to providing such detail and allowing those affected to respond has seriously undermined the credibility of your consultation process. It has also blighted our business and prevented us from moving forward, given the uncertainty of the situation you have put us in. [This is the sword of Damocles we keep referring to. Our business plan was to continue developing the business, by investing in the barn et alia – but we cannot risk doing this because we do not believe the business as is, will still be viable when the bypass goes in. Already we are losing income as developing the barn would increase our revenues by an estimated 36%. Still not answered by any of the above.](#)
- b) Proximity – A new single-carriageway road running along the indicated alignment will bring the edge of the A12 to within 150m of our farmhouse and private gardens, and 50m of our paddocks. This is unacceptably close and will have a significantly negative impact on our family, guests, business, land-use and property value. Despite consistent representations from our two parish councils, County Councillor, neighbouring properties and neighbouring businesses, no re-assessment of EDF's poor choice of Two Village Bypass route has been offered; despite the many and clear advantages of an alternative to the east of Foxburrow Wood being highlighted. We therefore continue to fully support the proposal to re-route the Two Village Bypass through the gap between Foxburrow Wood and Palant's Grove, based on the greater good it will serve. The shallower ground levels would also allow road construction with smaller gradients, thereby keeping vehicle-derived noise and air pollution down. [On this point, Lidia kept saying that she did not believe it would be as detrimental as we think and that other businesses have done well pointing out that of Andrew Jeanes for example. Whilst we think it is good to be up-beat there really is no comparison given the very different factors here. He had all the advantages of being well located and able to develop his business for the future using the benefits \(unspecified by Lidia but I am guessing there was input from EDF that was mutually beneficial\) but without the detrimental side of being on a new bypass etc. ie it was not like for like. But that aside, to suggest that it would make the current A12 better – I still don't see how that will benefit us when the contra side of that is we have the new route much closer and disastrously positioned for noise,](#)

pollution, light etc. There would be little benefit to having an easier access prospect to something no one would want to come to. (Still not answered by any of the below)

- c) Speed Limit – We are wholly opposed to a 60 mph speed limit being introduced on the new bypass. The change from 50 mph to 60 mph will mean noise levels experienced here will greatly increase, especially taking into the direction of the prevailing wind. Vehicles accelerating and going through the gears to and away from the roundabouts on the A12 (especially heavy lorries) will add significantly to noise and pollution. We have not had a satisfactory explanation about the noise and pollution impact on our particular property nor, therefore, adequate information about potential mitigation. We did not actually touch on this in our meeting today, but it is all part and parcel of point b. - this measure suddenly appeared as part of the adjustments made so any opposition was quashed because consultation had already ended.

- d) Noise and Vibration – Modelling in earlier bypass reports assessed that several properties along the proposed alignment – including our own – will experience noise levels in the “red” zone, which is detrimental to an extent that is considered hazardous to health and well-being. Again there has been no response to our concerns on these issues. Indeed we have been designated as “not significantly impacted” without any survey or documentation to support this complete U-turn from previously assessed information. We have asked again and again for noise reduction measures such as low noise road surfacing and noise attenuation fencing / bunding, especially as the proposed cutting is not very deep as it comes past us, and could be completely ineffectual. Again, this has fallen on deaf ears. Again, this is pertinent to our discussion. Your belief that it will not affect us, when, as I explained, a small reservoir four times the distance away at least, was unbearable.

- e) Air Quality – The consultation process has acknowledged that such a bypass would increase levels of NO_x (oxides of nitrogen) and carbon emissions, which will adversely affect properties along the proposed alignment. What measures will be taken to eliminate or mitigate these effects or compensate for them? Again, we would suggest that the easterly route alignment would be much more appropriate. And again we would ask for proper documentation, surveys, etc. Again no answers given. Complete obfuscation – see below

- f) Light Pollution – We are concerned that 24x7 lighting of the proposed roundabout at Friday Street will lead to light pollution and cause a loss of the dark sky views that can currently be obtained here. Such things enrich our lives and bring pleasure to those visiting (often from more built up areas) and would be shame to destroy. Lighting design should be used to minimise the effects of any mandatory lighting beyond the roundabout surface itself. Again, there has been no response to our concerns. Still not answered by any of the above

- g) Wildlife – By creating a new physical barrier, the proposed route will sever and disrupt established wildlife corridors connecting multiple habitats. These routes are known (and documented) to be extensively used by Muntjac, Red Deer, Roe Deer, Fallow Deer, Red Fox, Brown Hare, Badger and Hedgehogs. Construction will also destroy land, hedgerows and mature trees actively supporting Harvest Mouse, Wood Mouse, Field Vole, Common Shrew, Grey Squirrel, Weasel, Stoat, Skylark, Meadow Pipit, Barn Owl, Tawny Owl, Little Owl, Shelduck, Kestrel and Common Buzzard. Many of the above listed species are recognised as being in national decline, with ever-decreasing habitat.
- h) Agriculture – As well as the loss of productive farmland due to the new road's footprint (and associated works), the proposed route will also sub-divide existing parcels with the effect that they will become either physically inaccessible or uneconomic to farm. Future access would also require rights of way which do not currently exist; the destruction of hedges; and/or the bridging of water courses. If this project nonetheless proceeds, we would like to see annexed land parcels used constructively and sensitively to create both visual-impact and noise-abating buffers between the new road and affected households and businesses. As yet we have still had no response to our concerns nor can we see any details addressing them in the DCO submission or this consultation. [And again – no response](#)
- i) Environment – The proposed route (and associated works) will be within close proximity of several ponds (and therefore neighbouring countryside) known to support Newts, Frogs, Toads, Rudd, Mallard, Moorhen, Dragonflies, Darters, Grass Snakes and Bats. As well as ground water contamination, we are also concerned about disturbance of ground water levels – which our ponds follow and are therefore dependent upon. Again no details have been provided, nor surveys carried out to assess the impact on us.
- j) Drainage – The proposed route crosses a drainage ditch carrying surface water from much of Mollett's Farm (and other arable land to the east) towards Friday Street. Parts of the proposed route and adjacent land are already subject to flooding and run-off during severe weather events. But yet again, there are no details or responses to our many concerns as to how this will affect us. [Still not answered by any of the below](#)
- k) Irrigation – Water that is essential for the irrigation of certain crops at Mollett's Farm is pumped overland from stored and bore-hole derived sources at Friday Street. The crops that require this water perform an important role in both the health of the arable land (being a break crop in the farming rotation) and in the income derived from it. Severing this facility would cause financial hardship - requiring mitigation. But no one will respond

to our concerns nor is there anything in the DCO application or this consultation. [Still not answered by any of the below](#)

- l) Access – Land at Mollett’s Farm benefits from an historic right of way to Friday Street, which the proposed route will sever. This and other permissions (including a Public Right of Way) allow ourselves, our guests and walkers from the direction of Farnham to access the Friday Street farm shop, butchers, fishmonger, antiques centre, café restaurant and car-boot sale. Aside from any legal issues, the loss of this route would have a material effect on the attractiveness of our tourism business, as it connects our self-catering and caravan site visitors with local shops and services. This route is also used by agricultural vehicles moving between land parcels. Suggesting that the route will still exist across the new road is ludicrous at best, as pedestrians and high-speed vehicles do not mix well. Given the proposed traffic flows and speeds it would be highly dangerous to cross the bypass, if indeed possible at all. [Still not answered by any of the below](#)
- m) Rights of Way – The proposed route severs two other well-used footpaths between Farnham village and the ancient woodland at Foxburrow Wood (known locally as the “bluebell wood”, on account of its prolific display each spring). As well as being Public Rights of Way, they also connect walkers to the Greenwood burial ground, Snape and unspoilt countryside beyond. The one passing between Farnham Hall and Farnham Hall Farmhouse also carries both private and agricultural traffic. The mitigation proposed is woefully inadequate. On the specific question of re-routing the PRow footpaths near Walk Barn Farm, the SCC-proposed Option 1 makes sense – particularly given the historically poor directional signage in this area. Should a wider consensus be reached that a larger deviation from the current PRow route is acceptable, then Option 2a would be preferable. In either case, we would urge the County Council and landowner to improve the PRow signage in this area. Despite being horse owners ourselves, we cannot support the proposed footpath-to-bridleway upgrade as it stands. The current proposals are dangerous and inadequate. [Still not answered by any of the below. We and our customers have been using these rights of way, not only the parts that are public rights of way but over our land for 16 years now – this is a benefit that is important to our business and EDF is proposing to sever it with no regard to the impact it has on us or our business. This is actually a route that has been in place for hundreds of years and Mollett’s Farm has had the benefit of it.](#)
- n) Tourism – Tourism in Suffolk is worth an estimated £1.85bn per annum and is said to account for 13% of all employment. East Suffolk Council estimated 2019 tourism spend as £211.70 per person and we currently bring 1,000 guests a year to the area. Their tourism business plan for 2017-22 found visitors were attracted by the character, culture, festivals, music, art, food, drink, clean beaches and spectacular coastline. We are concerned about the inevitable disruption our tourism business will suffer during bypass and

Sizewell C construction, as well as the impact of other traffic increases encouraged by an upgraded road infrastructure. It is widely acknowledged that the quiet, rural nature of Suffolk is intrinsic to its tourism industry, which is significant in value. These characteristics and the unspoilt landscape immediately around us are fundamental to our business and would be seriously affected by the additional traffic Sizewell C would create and, specifically, by this bypass. Even if we had the opportunity to accept workers to take up accommodation, it is at significantly lower rates and with higher wear and tear – this would make our business unviable as the levels offered are not even enough to cover our costs. There is no doubt that tourists would not come and even if they did the detrimental effects of poor reviews (based on noise and disturbance) would decimate our business and the reputation we currently enjoy. *Of course this is the main point we have raised with EDF – and as yet we don't seem to be making much headway.– we believe the combination of issues that EDF's proposals will throw at us is likely to destroy our business prospects completely as there is no hope of attracting tourists with the by-pass being constructed even if they could even get here given the additional traffic the construction of this and the Station. Even if EDF put us down on their preferred supplier list, there would be no guarantee that even their people would come, and the rates they have quoted so far are equivalent to a day rate here not a week – and as stated above would not cover our costs. Even if they did come, we would then have to relaunch a business blighted by a by-pass. Having lived here for nearly 16 years we do understand where the noise come from and what the impact will be. Having made a home here, and launched and run a business, we do understand the likely impacts of EDF's plans.*

- o) Construction – Inadequate information has been provided about the adverse effect of this road's construction – such as noise, vibration, dust, light pollution, contamination, traffic disruption, temporary loss of access – or on its mitigation. EDF's proposed construction compound at Friday Street also appears unacceptably close to the two Stockhouse Cottages, The Old Police House and ourselves. These factors cannot be ignored, should be minimised and must also receive careful consideration before accepting such a scheme. Building this bypass as well as the power station itself is likely to make our business totally unviable. The inevitable noise and disruption is set to completely devastate our livelihood, yet in EDF's proposals they fail to address any of our concerns or even respond to our issues.
- p) Compensation – What measures will EDF put in place to provide legal support and/or compensation for those homes, businesses and land owners disadvantaged by their proposals and activities? Currently EDF's plans show none, as we are not within the red line development boundary. *We need compensation in a timely manner – we fail to understand how any business can potentially destroy another by its actions with no responsibility to compensate it properly. EDF will not guarantee us occupancy or compensation – keeps asking us what we want, then ignoring what we ask.*

Part 1 compensation is totally inadequate and unfair given the impact this is likely have on us. If EDF believe the hype they are giving us, why would they object to offering us suitable alternatives, as if they are right they would never be needed – so what have they to lose?

- q) Failure to Acknowledge our very Existence – We are constantly overlooked on EDF's plans. Not even being designated as an inhabited property, let alone a business. We are at a loss to understand why there is no meaningful engagement or responses to our concerns – there is no point in having meetings if there is nothing concrete being achieved. It is not enough to say it will not be as bad as we think – this is our home, our business, our lives. We would like to know how exactly EDF would answer the questions we have asked and what steps EDF would take to mitigate and compensate us for what they are imposing on us. It is now that this is happening, so telling us to carry on as normal is not possible – we cannot do that because of what EDF is doing – we want to have a plan not wait until it is too late. I worked as a programme and project manager for many years. Two years is nothing in the timeframe of a major programme like this, there must be some plans in place prior to putting spades in the ground – one does not just wait until the decision is made – it would be unrealistic and too late
- r) Failure to Consult – We are already blighted by EDF's plans which are putting us in limbo until a decision is made as, obviously, we cannot continue to proceed with our own business plan and further invest in our business as your proposals might make it totally redundant. Despite numerous attempts to engage with EDF, there has been little to no communication or acknowledgement that we even exist. We have in effect the "Sword of Damocles" hanging over our business. We have been unable to progress our business as we would have wished because of the uncertainty. We have planning permissions to add further accommodation and to develop our barn complex, but have been unable to act on these because of the uncertainty, which could make such an investment potentially ruinous should the bypass go ahead. And still no consultation. We understand one member of staff may now be unavailable – but surely there are others?

So, yet again we do our part and respond to you in the ever-increasing knowledge that a response or even acknowledgement is far from certain. The triumph of hope over experience if you like. We even find ourselves wondering if anyone even reads these or if it is just another tick-box exercise for you.

Perhaps this will give you a better idea of the bigger picture – we don't know if it will help but perhaps it will lead you to a better understanding of our concerns and the context. We would hate to find out in the future that your meetings with us are just another tick box exercise –being used to show that EDF have consulted with us – consultation needs a meaningful dialog with actions and resolutions – and so far this is not happening.

I had hoped to have your follow up notes from the meeting before I sent this, but nothing has come through yet and I think it is important to have an accurate time frame context.

As always, was lovely to talk to you both.

Kind regards,

Sasha Ayres

Email from EDF to Mollett's Farm (March 2021)

We have overlaid a commentary on this response's usefulness or otherwise in rectangular boxes, in line with the email's original text.

From: Lidia Bosa

Sent: 15 March 2021 12:38

To: Sasha Ayres (Mollett's) ; 'Richard Ayres (Mollett's)' **Cc:** Tracy Hateley <

Subject: Meeting 26/01/2021

Dear Sasha and Richard

It was good to meet you last week on the 4th March. As promised, I can provide you with responses to the questions below to the best of my ability.

- a. And point n) It was good to learn that your bookings are looking strong for the foreseeable future and that the COVID pandemic had little impact on the business. We are unable to give you advice on the choices you could make with your business going forward. However, I would suggest that there will be opportunities for a business such as yours with the amount of extra investment SZC will inject into the area, as well as the fact that there will be workers looking for good quality year-round accommodation in the area. One of the commitments that the SZC project has made is a pledge to support the Suffolk Coast tourism sector to offset the impacts from construction through the provision of a tourism fund. This is written into the Section 106 Heads of Terms for the construction of Sizewell C. I would encourage you to read **Section 6 the attached document Economic statement** that was lodged with the Development Consent Order for SZC.

Having read this section there are very few points which relate directly to us – our problem is that EDF's proposals completely change our immediate environment and our ability to trade without offering us concrete mitigation such as guaranteed occupancy by workers at a time or times when it would seem unlikely if not impossible to continue trading as normal due to the impact of their activities in such close proximity. Nor is there any offer of realistic, timely compensation or business continuity support.

- b. Noted
- c. Noted. Please see the responses with regards to Noise below.
- d. On the question of Noise.

Mollett's Farm has been fully considered in the submitted assessments, for both the construction of the two-village bypass, and its long-term use (termed 'operation' in the assessment). The DCO assessment is contained in Volume 5 Chapter 4 of the ES, which can be found [here](#) with the appendices [here](#).

Well it is true to say we are mentioned in the sound report, but not as a business and not in any meaningful way. Nor is the reporting accurate, consistent or fit for purpose when taken in the context of what we are and what we do – see our own sound report (Appendix A above).

There is no natural justice in this as only those with very deep pockets could hope to be able to read, interpret and argue the points made, with multiple references to other documents, how are we supposed to be able to find the time or expertise to be able to analyse, understand it or even be able to assess if it is even correct? This is like spaghetti code – you end up going round in circles!

More frightening is that they are saying they will either offer sound insulation for properties (but only as a last resort) or rehousing (4.5.15) – how do we run a business from somewhere else? Actually, that is irrelevant, as if it was like that there would be no business to run!!!!

Even by EDF's own admission we are marked as *"Major adverse, significant"* for main construction – but still no recognition of us as a business. If it is deemed to be that bad as an "isolated farmstead" how can it not be worse as a tourist business? We cannot just pick it up and move it. 4.6.9 says that on Saturdays it is considered worse because of the difference in activity on these days – translated this means that for us, as a tourism business, it will be "major adverse, significant" all the time as the activities here are the same regardless of the day of the week. This is probably another reason for failing to acknowledge our status as a tourism business. 4.6.10 makes this even scarier.

"4.4.6 On Saturdays between 07:00 and 19:00 hours, there would be a significant adverse effect at Mollett's Farm during the site preparation phase. There would be no other significant effects at this or any other receptor during site preparation at this or any other time."

Please explain why Saturday would be any different? So then in 4.7.7 it states that we would also be significantly affected – how can both statements be true? The document is internally inconsistent. Ditto

It is Receptor 15 in the assessment, as shown on Volume 5 Chapter 4 Figure 4.1 of the ES ([here](#)).

The noise assessments were updated in January 2021, and can be found in Chapter 5 of the ES Addendum, which can be found [here](#), with appendices [here](#).

Again – no noise measuring equipment has ever been located here to our knowledge – and we think we would notice given that it is said to be on our house.

5.2.22 Change from 50mph to 60mph – and all the additional noise, etc. associated with this seems to have been slipped in here with no explanation for the increase or any proposals for mitigation against the increased nuisance that this may pose.

The revised figures for noise are also unexplained with no sound equipment ever having been located where the receptor is located on the map. All that seems to have happened is that figures that were previously marked as significant are now marked as insignificant (5.3.15).

...

...

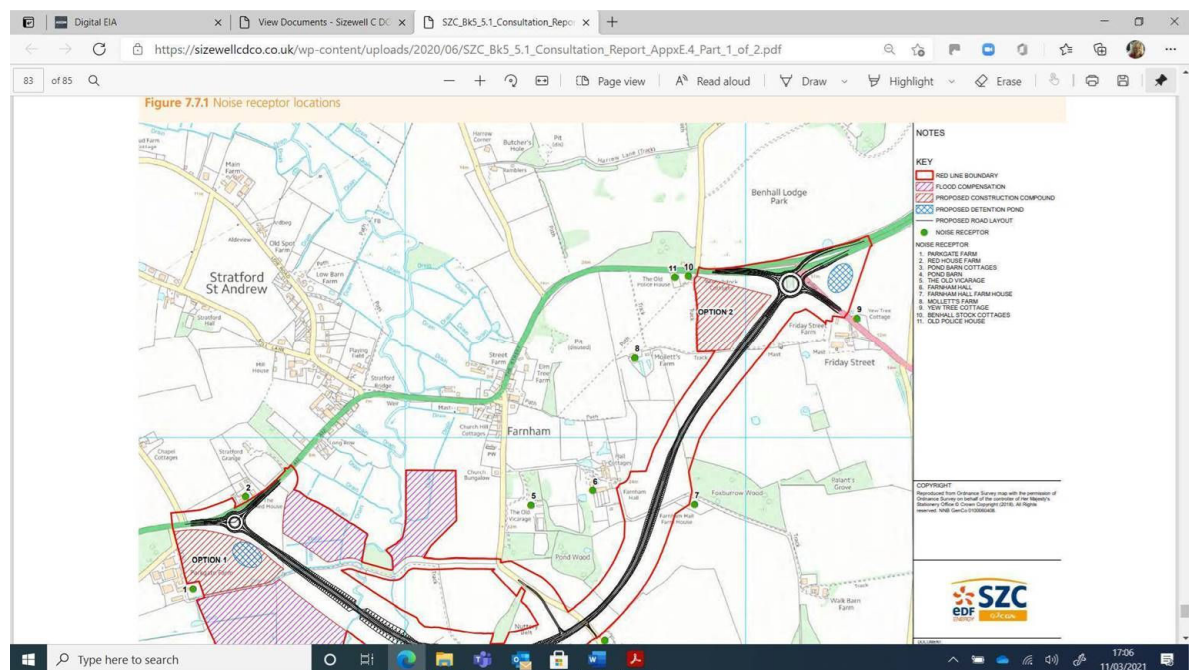
The air quality report is just as obfuscated – only an expert could read this – we need to be told what it actually means not pointed at a document which is totally unreadable by the lay person.

Flood risks – where is the ground water and surface water receptor for Mollett's Farm?

The effect of the project on the tranquillity of the area can be found in Volume 5 Chapter 8 of the ES, which can be found [here](#), with associated appendices [here](#) and figures [here](#). Mollett's Farm is close to receptor location TVB7 in the assessment of tranquillity.

And the assessment for TVB7 states *“Natural sounds plus distant road traffic. With development, the distant road traffic level would dominate and tranquillity would be lost.”* So explain why EDF thinks this will not affect our business?

The tranquillity assessment was also updated in January 2021, and can be found in Chapter 5.7 of the same document in the link above (Chapter 5 of the ES Addendum). The assessment of tranquillity and noise did not change in January 2021.



For the questions related to your queries in points e, f, g, h, i, j, there are responses throughout the volume in the link below.

https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010012/EN010012-002055-SZC_Bk6_ES_V5_Ch11_Geology_and_Land_Quality.pdf

For the best part of your other questions; if they were raised as consultation responses; the replies can be found in the following:

Stage 3 Report
p. 153 – 159

[SZC Bk5 5.1 Consultation Report AnnexE Stage 3 Issues Tables.pdf \(sizewellcdco.co.uk\)](#)
[SZC Bk5 5.1 Consultation Report Annex F Stage 3 S42 Responses.pdf \(sizewellcdco.co.uk\)](#)

Stage 4 Report
P159 – 170

[SZC Bk5 5.1 Consultation Report AnnexG Stage 4 Issues Tables.pdf \(sizewellcdco.co.uk\)](#)
[SZC Bk5 5.1 Consultation Report Annex H Stage 4 S42 Responses.pdf \(sizewellcdco.co.uk\)](#)

P.332 - 339

[SZC Bk5 5.1 Consultation Report AppxE.1 Part 2 of 2.pdf \(sizewellcdco.co.uk\)](#)

This book has most of the answers: Page 375 to page 423.

[SZC Bk5 5.1 Consultation Report AppxE.3.pdf \(sizewellcdco.co.uk\)](#)

Well really this is just a complete fob off isn't it? We can point to our specific questions and EDF has simply ignored the ones it does not like or that it might consider too specific for inclusion.

We have ploughed our way through this – as lay people – and all we can say is that the above does not address the issues we have raised. EDF consistently fails to recognise Mollett's Farm as a tourist business not just an "isolated farmstead" and has not answered any of our specific concerns in any of the above. Indeed it only says businesses have the right to claim after this has happened if we think it has been detrimental to us – may we ask if this is before or after EDF's actions have bankrupted us? It is inevitable from EDF's own evidence that we will be significantly affected yet the process of consultation has offered us no redress at all. Constantly being told it won't be as bad as we think will not change the fact that we are innocent victims of EDF's proposals.

We were asked what we wanted – we want EDF to acknowledge Mollett's Farm in EDF's documentation as a tourism business and acknowledge that the actions EDF is proposing are going to significantly affect us. Compensation after completion of the project is useless to us – we would potentially not be able to sustain our business during the time it would take which in reality is up to 7 years post project completion, assuming we can operate after the road is completed – it could potentially be post build of Sizewell C in which case it is likely given the delays on other EDF projects that we will be residents of the Farnham graveyard before we are eligible to claim. But we are guessing EDF knows that already.

Items P, Q and R

You have been advised of your rights to compensation claim as a Part 1 and the letters were sent to you accordingly. In the meantime, we continue to hold monthly meetings with you. Advice of the consultation meetings have been public from Stage 1 thorough to Stage 4.

Three meetings do not amount to consultation.

We have been to every stage and submitted to every stage – our submissions are not reflected in the responses – see above.

I am happy to sit down with you and go through the plans and explain them further as outlined in the DCO. You would have had the same opportunity during the Consultation Stages, however, It may may help if I guide you through them and advise how we would be available through the build and during operation to provide responses and keep you updated with the progress.

I look forward to seeing you on the 12th April.

Unfortunately this never was an option as there never was another meeting, but it is irrelevant anyway as the information simply is not there, and what is available is questionable at best, but only if you have deep enough pockets to get an expert to look at what it claims to say.

Kind regards

Lidia Bosa MA MCIOB
Stakeholder Engagement SZC

Appendix D – Consultation Stage 3 Response



Mollett's
Partnership - Stage 3

This embedded document has also been provided separately and is entitled “**Mollett's Partnership - Stage 3 Consultation Response (2019-03-29).pdf**”

**Barn at
Mollett's Farm,
Farnham, Suffolk
FNM 019**

Heritage Asset Assessment

OASIS ID: Suffolkc1-99415



**Leigh Alston MA (Oxon), Architectural Historian
on behalf of
Suffolk County Council Archaeological Service**

**The Archaeological Service
(Field Projects Team)
Suffolk County Council, Shire Hall
Bury St Edmunds IP33 2AR
Tel. (01284) 352446**

April 2011

**Barn at
Mollett's Farm,
Main Road,
Farnham,
Suffolk
(TM 366 602)**

Heritage Asset Assessment

This report provides a written and photographic analysis and record at English Heritage (2006) Level 2 of a redundant barn and attached sheds. It has been prepared to a specification written by Edward Martin of Suffolk County Council's Archaeological Service (ref. SpecHAA(EM)_MollettsFm_Farnham_3276_10, dated 14th March 2011) and is intended to inform and accompany a planning application for conversion (Mid Suffolk District Council ref. C/10/3276).

Introduction

The report is accompanied by a CD containing a photographic record in the form of 38 digital images of 21 megapixels (Appendix 1), but also includes 10 printed photographs of key features to illustrate the text (Appendix 2). Each image is described in a separate schedule and the site was inspected on 4th April 2011.

Summary

Mollett's Farm lies in open countryside approximately 500 m north-east of St Mary's church and 250 m south of the A12 from which it is reached by a concrete track. The farmhouse is not listed but preserves an early-17th century timber-framed parlour bay with chamfered ceiling joists and a clasped-purlin roof structure to the east of its contemporary axial chimney. The rest of the original house is reputed to have been destroyed by fire in the mid-19th century. The site was formerly accessible only by a track from Friday Street to the east, which formed the boundary between Farnham parish to the south and Benhall to the north. At the time of the tithe survey in 1841 the farm was a modest tenanted holding of approximately 20 acres on the estate of Benhall Lodge.

The barn to the west of the farmhouse is shown on the tithe map and retains at least one bay of early-17th century timber-framing to the north, but has otherwise been extensively rebuilt and largely converted for semi-domestic purposes in recent years. Its thatched roof structure was entirely replaced with softwood and corrugated sheeting after reputedly suffering damage in the 'hurricane' of 1987. Much of the building's historic character has accordingly been lost, and any precise analysis of its fabric and development is hampered by the concealment of its fabric by modern boarding. The single-storied shed adjoining its southern gable is a relatively late addition of *circa* 1879 and had also been largely dismantled by the time of inspection. The chief interest of the site lies in the relationship of the early-17th century barn to the surviving parlour bay of the contemporary farmhouse, which indicates the latter faced a southern courtyard flanked by the barn on the west in the typical manner of the period. The barn is also of interest as its northern gable adjoins the Benhall parish boundary and may preserve archaeological evidence of the banks and ditches often associated with features that in many instances can be shown to pre-date the Norman conquest.

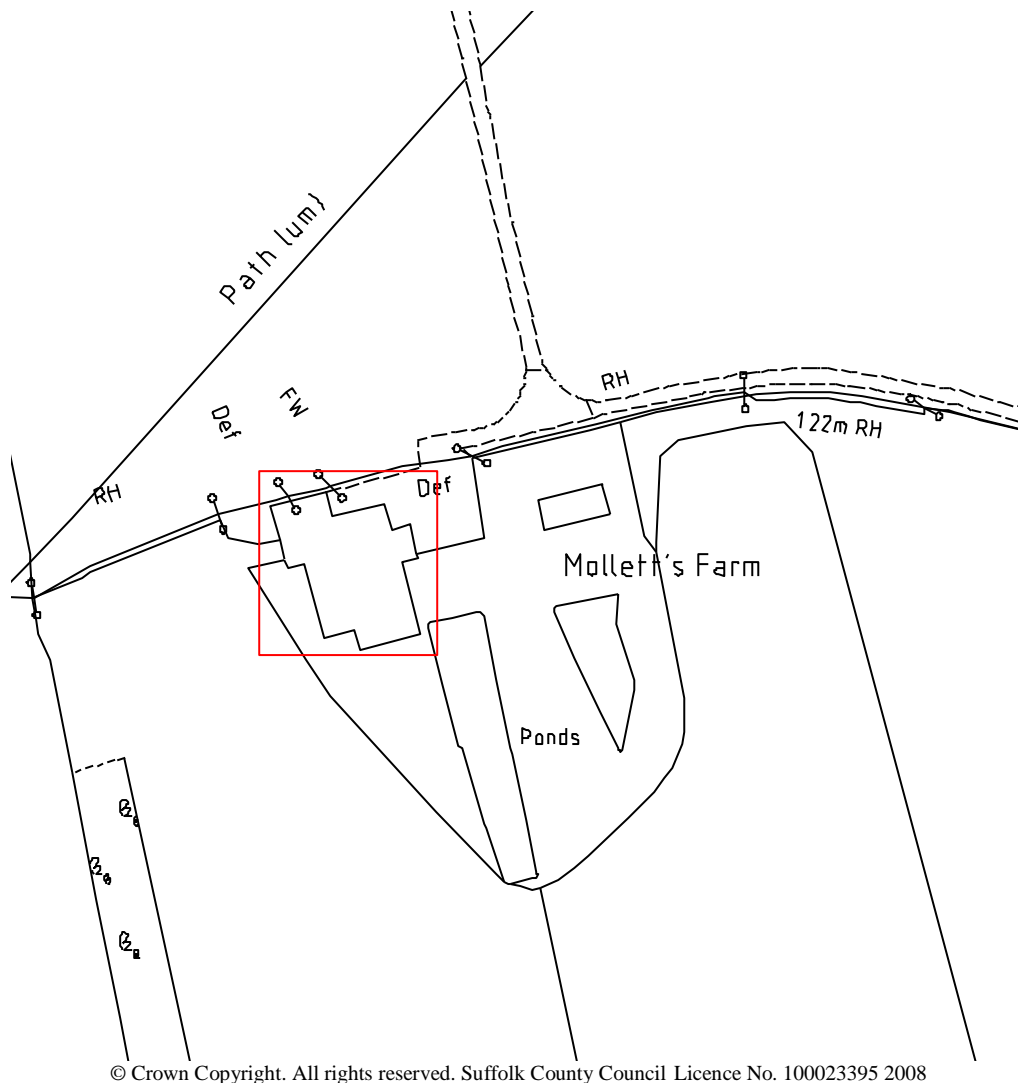


Figure 1
Modern Ordnance Survey
 Enclosing the farm buildings in red and showing the former farmhouse and original entrance track from Friday Street to the east. The simple rectangular outline of the house shown here pre-dates the addition of the modern cross-wing to the west.

Documentary and Cartographic Evidence

Mollett's Farm lies in open countryside approximately 500 m north-east of St Mary's church and is reached by a concrete track from the A12 some 250 m to the north. The track is shown on the Ordnance Survey of 1973 but not that of 1957 and the farm was formerly reached by a lane from Friday Street to the west. The site lies on the boundary with Benhall parish, which follows the same lane and abuts the northern gable of the barn. Most parish boundaries are ancient features with origins in the pre-conquest landscape, and the ground beneath the gable may preserve archaeological evidence of an early medieval bank and ditch. The farmhouse is not listed but preserves an early-17th century timber-framed parlour bay with chamfered ceiling joists and a clasped-purlin roof structure to the east of its contemporary axial chimney. There is evidence of a lobby entrance to the south of the chimney, suggesting the house faced the church and a front yard flanked by the contemporary barn to the west, but the adjoining hall appears to have been rebuilt in the late-19th century and the cross-wing against its western gable is a recent addition. The original hall is reputed to have been destroyed by fire.

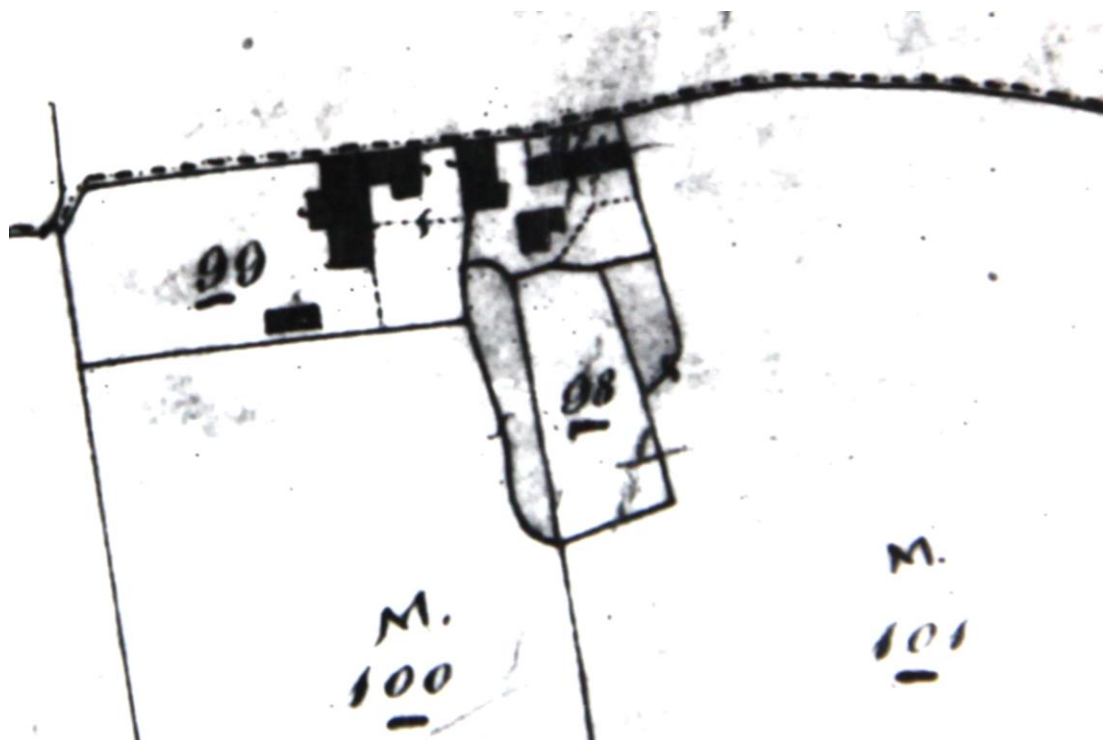


Figure 2

The 1841 tithe map of Farnham parish showing Mollett's Farm adjoining the dotted boundary with Benhall to the north. The barn to the left is shown with a central porch, with the elongated rectangular farmhouse at right-angles to the right

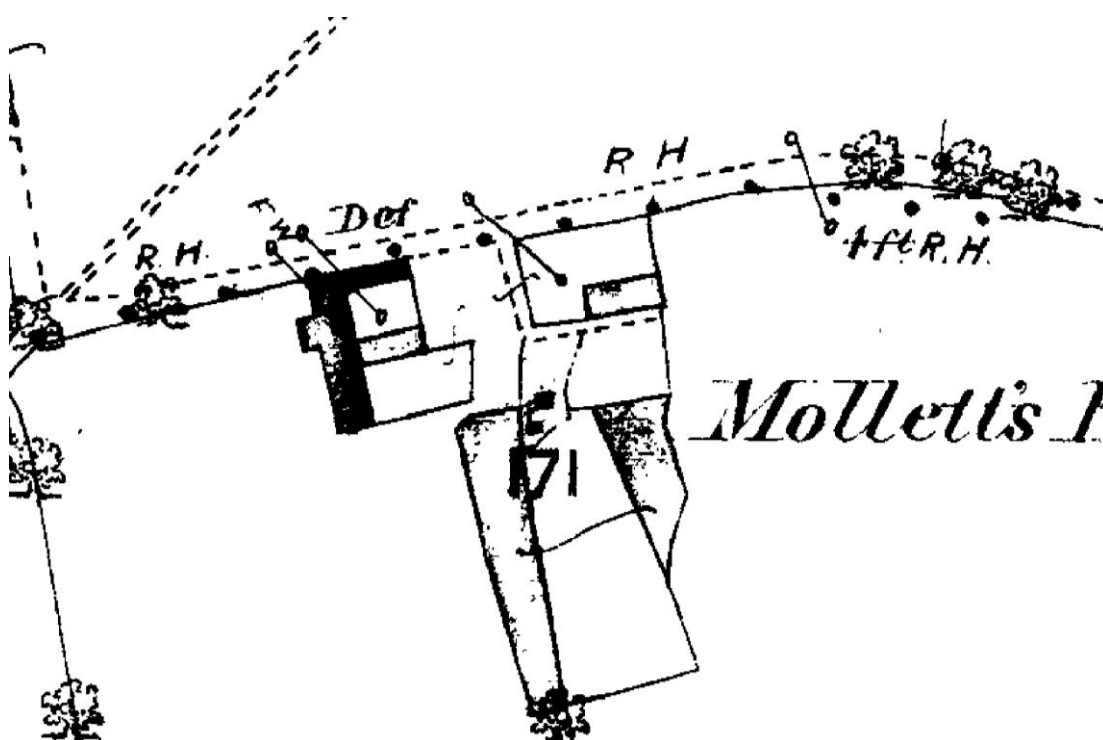


Figure 3

The First Edition 25 inch Ordnance Survey of 1883. The porch of the barn is no longer central as the southern shed had been added to the southern gable since 1841 and the additional building between the shortened house and barn had been demolished.

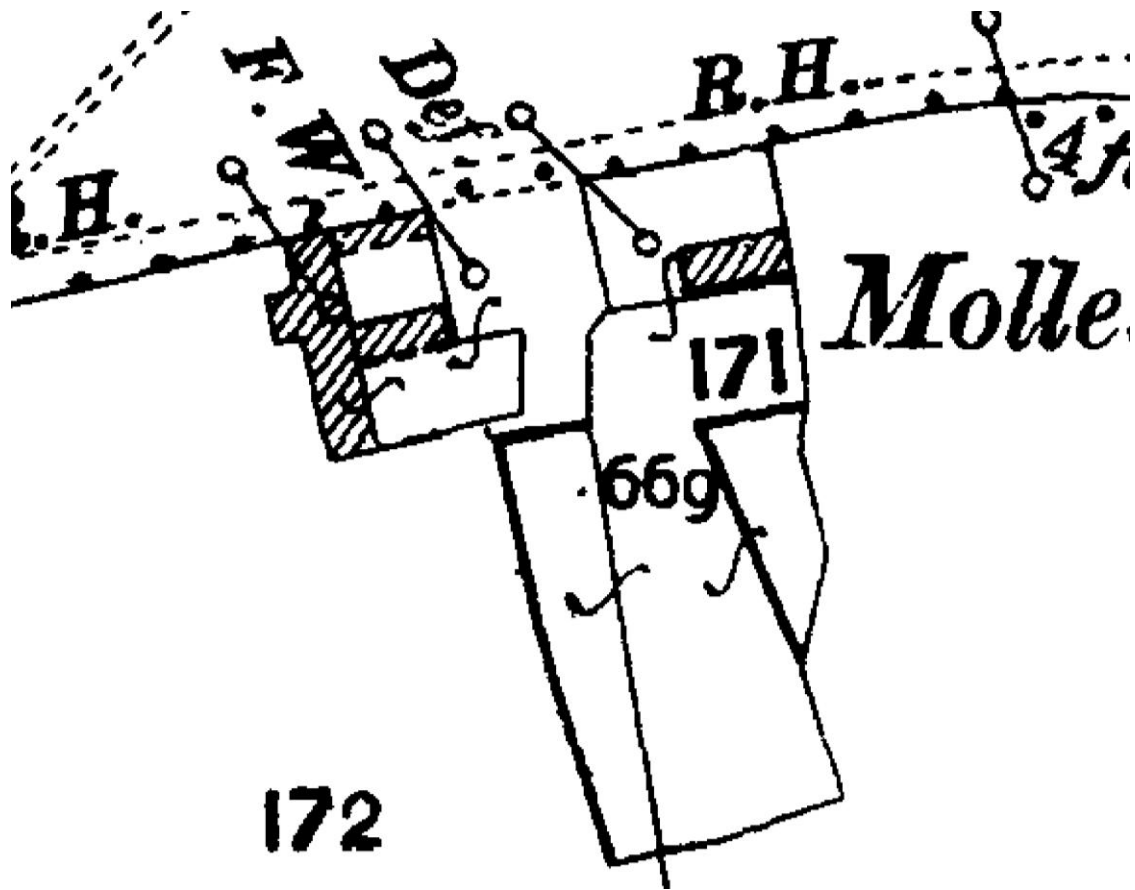


Figure 4

The Second Edition 25 inch Ordnance Survey of 1904. The northern entrance track had not yet been built, and the site was reached by a lane from the east and west which marked the parish boundary (the latter indicated by the dotted line). The two buildings projecting from the barn's eastern elevation are shelter-sheds with open-sided southern elevations serving the two adjoining animal yards.

At the time of the Farnham tithe survey in 1841 the farm was a tenanted holding on the estate of Edward Holland Esquire of Benhall Lodge (1km to the north-east) and occupied by James Toller (figure 2). It contained 20.75 arable acres in Farnham parish and may have extended over the boundary as Toller was named as a farmer in Benhall rather than Farnham by White's Suffolk Directory of 1844. The census return of 1851 (kindly provided by the owner) names the occupant of 'Mollett Farm' as Edward Gibbs, a 'farm labourer on a farm of 22 acres employing 1 man and 2 boys', suggesting the farm was no larger than indicated by the tithe return but that its principal leaseholder (perhaps still Toller) lived elsewhere. The house (plot 97 on the 1841 map) was described in the accompanying apportionment as a 'cottage and garden' with a 'barn, yard etc' to the west (plot 99) and a further 'garden' between two linear ponds to the rear (98). The fields to the south were named as 'paddock with pond' to the west (100) and 'parlour field' to the east (101) – the latter confirming the structural evidence that the surviving 17th century eastern bay of the house was designed as a parlour. The length of the house suggests it still retained its 17th century or earlier hall and service bays, but it had been sharply truncated by 1883 (figure 3). The barn was shown with its present outline but, in contrast to the house, had been extended by 1883 with the addition of the surviving single-storied shed to the south. A second shed was also added at right-angles to its eastern elevation and both this and its neighbour to the north were depicted with broken lines on the 1904 Ordnance Survey, suggested they formed open-sided shelter-sheds for the adjoining animal yards. These sheds were wholly or largely rebuilt in the 20th century but the outline of the barn with its central porch and southern shed remains unaltered today.

Building Analysis

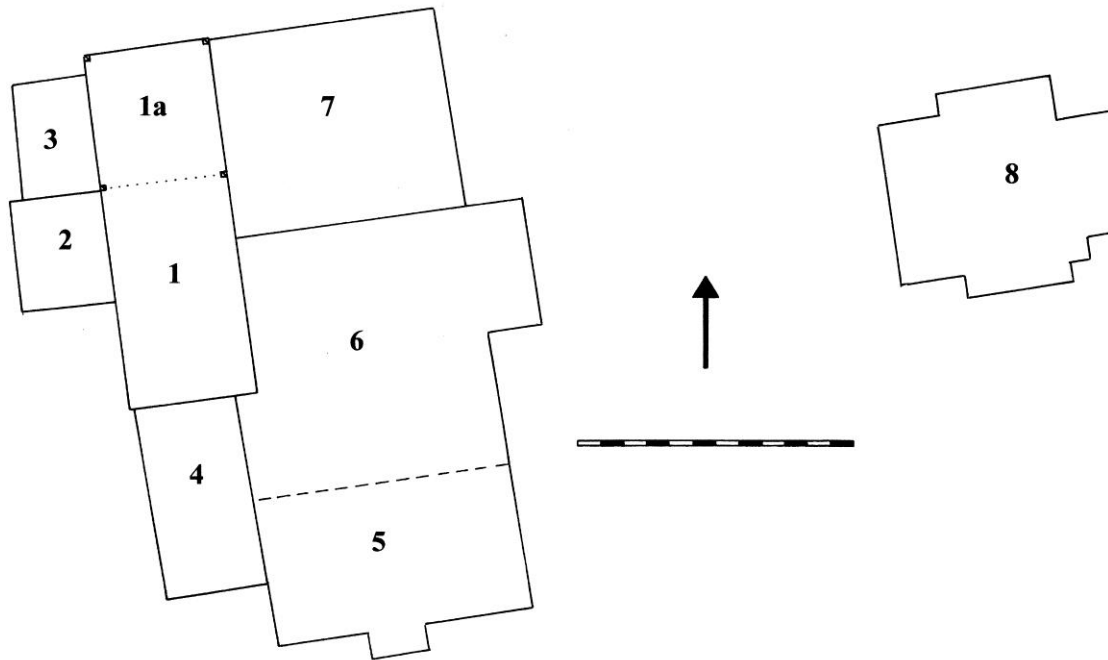


Figure 6

Schematic block plan of the farm buildings, numbering the key elements for ease of reference in the text and photographs. Scale in metres.

Key

1. A timber-framed and weatherboarded threshing barn of four bays with a corrugated sheeting roof. The northern bay (1a) with exposed wall fabric of the early-17th century incorporating reverse-cranked internal braces. The fabric of the remaining three bays hidden by recent boarding, but photographs taken by the present owner indicate much of the frame has been replaced in modern softwood. The roof was formerly a steeply pitched clasped-purlin structure covered with straw thatch but was entirely rebuilt after reputedly suffering damage in the 'hurricane' of 1987. A threshing floor or hard-standing of stone flags in the penultimate northern bay is now hidden beneath boarding.

2. A timber-framed and weatherboarded rear porch with the remains of a threshing floor or hard-standing of stone flags and exposed studwork of the late-18th or early-19th century.

3. A late-20th century lean-to wood-shed built after 1987.

4. A mid-19th century single-storied shed of post-and-rail construction clad in vertical boarding and with a pantiled roof sealed with plaster. The date '1879' incised into a panel of roof plaster which is no longer *in situ*. An original gault-brick floor with an axial drain suggests this building was either a stable or a cow-shed but no relevant fixtures and fittings survive and much of the roof and wall fabric had been dismantled prior to inspection.

5-7. A series of three much-altered and partly rebuilt mid-20th century sheds originally forming covered cattle yards and possibly retaining parts of the southern shelter-shed shown on the Ordnance Survey of 1883 (figure 3 above). Of no historic significance and not discussed further below.

8. The western end of the former farmhouse which retains a timber-framed parlour bay and chimney of the early-17th century to the east and probably faced south towards a yard flanked by the contemporary barn in the typical fashion of the period. Not discussed further below

1-3. The Timber-Framed Barn

The barn at Mollett's Farm is a timber-framed and weatherboarded structure of four bays on an approximately north-south axis at right-angles to the nearby farmhouse. Its northern gable abuts the ancient boundary between the parishes of Benhall and Farnham and may preserve below-ground evidence of the ditches and banks normally associated with such features.

The building extends to 15.25 m in length by 5.8 m in width overall (50 ft by 19 ft), and its walls rise to 3.2 m (10.5 ft) at their roof-plates on low brick plinths above an internal floor of 20th century boarding. The roof is a shallow-pitched softwood structure of the 1990s covered in corrugated sheeting which replaced a steeply pitched thatched predecessor with clasped-purlins that was reputedly damaged in the 'hurricane' of 1987 (as shown in illustrations 1 and 2 of Appendix 2 below).

The new roof was hidden above a new boarded ceiling at the time of inspection, and most of the wall fabric was concealed behind wall-boarding inserted as part of a recent conversion. It was therefore impossible to determine the age and layout of the original barn, but photographs supplied by the owner suggest the three southern bays had been largely rebuilt in modern softwood, re-using old roof-plates and tie-beams with 19th century bolted knee-braces. A threshing floor or hard-standing of stone flags is understood to lie beneath the boarded floor of the penultimate northern bay, which evidently contained the barn's principal entrance. Parts of this floor are still preserved in the rear porch (which was designed to extend the length of the threshing floor rather than an entrance) and the original full-height doors appear to have faced east towards a farmyard adjoining the house. Flag stones of this kind were often salvaged from the pavements of Ipswich and other local towns in the late-19th and 20th centuries to serve as hard-standing for vehicles and may not have been used for threshing.

The northern gable also consists only of modern softwood (now hidden but visible in illustration 2) but the side walls of the northern bay (1a) remain intact and are exposed internally. The oak frame is typical of the early-17th century, with oak studs of heavy scantling and mortises for internally trenched reverse-cranked corner braces rising to the (missing) gable tie-beam and the roof-plates. A single brace remains *in situ* (to the east) but empty mortises and trenches reveal the positions of the others. A number of additional studs have been nailed between the original timbers (which are tenoned and pegged to the frame), and the southern end of the western elevation has been rebuilt with a diagonal primary brace (interrupting the studs) in the manner of the 18th and early-19th centuries. The fabric of the porch is identical to this reconstruction, suggesting a major refurbishment at this period. The unusual length of the northern bay, at 5.3 m (17.5 ft), suggests it may have been designed to accommodate the stables and hay lofts often found at the ends of 17th century barns in Suffolk, but this is not certain.

4. Southern Animal Shed

The single-storied shed attached to the barn's southern gable extends to 8 m in length by 4.25 m in width overall and is an addition of the mid-19th century. It had been stripped of its original pantiles and largely dismantled at the time of inspection, reputedly after sustaining storm damage in 1987, but retained a gault-brick floor with an axial drain to the west of its centre which suggests it was designed either as a cow-shed or stable. Given its large scale on

a small farm and the absence of any hay loft the former is more probable, but no other evidence survived. The walls were of post-and-rail construction with vertical boarding and the rafters were sealed with lime plaster on a bed of reed. An incised date of 1879 on a fragment of this plaster (no longer *in situ* but preserved elsewhere by the owner) is highly likely to date the building, which is shown on the Ordnance Survey of 1883 but not the tithe map of 1841. A number of boards bearing dates and initials in the 1880s were also salvaged from the walls.

Historic Significance

The barn at Mollett's Farm retains at least one bay of early-17th century timber-framing to the north but has otherwise been extensively rebuilt and largely converted for semi-domestic purposes in recent years. Much of its historic character has accordingly been lost, and any precise analysis of its fabric and development is hampered by the concealment of its fabric by modern boarding. The single-storied shed adjoining its southern gable is a relatively late addition of *circa* 1879 and had also been largely demolished. The chief interest of the site lies in the relationship of the early-17th century barn to the surviving parlour bay of the contemporary farmhouse, which indicates the latter faced a southern courtyard flanked by the barn on the west in the typical manner of the period. Despite their early origins both the barn and farmhouse have probably been too heavily altered to meet the strict English Heritage criteria for listing. The barn is also of interest as its northern gable adjoins the parish boundary between Farnham and Benhall and may preserve archaeological evidence of the banks and ditches often associated with features that in many instances can be shown to pre-date the Norman conquest.

Appendix 1 (on accompanying CD): Full Photographic Record

Descriptions of Photographs in Appendix 1

Photograph no.

1. *Circa* 1974. Farm buildings from east from an old photograph in possession of current owner. Showing the original thatch of the barn (1) in rear to right and the pantiles of the southern shed (4) in rear to left.
2. *Circa* 1990s old photo. Barn (1) from north-west during repairs after 1987 storm damage showing remains of thatched clasped-purlin roof.
3. 2006 old photo. Interior of barn (1) from north showing softwood studwork of walls.
4. 2005 old photo. Interior of porch (2) from barn (1) to east showing softwood studs of barn to left.
5. 2006 old photo. Interior of barn (1) from north showing remains of stone-flag floor in threshing bay.
6. 2006 old photo. Interior of barn showing modern roof structure of northern bay (1a).
7. 2008 old photo. Detail of 1881 dated graffiti on board of southern shed (4).
8. General view of site from 20th century entrance track to north showing early-17th century parlour at left end of house & barn right.
9. Exterior of barn from north-east showing modern storage shed (7) to left and early-17th century bay (1a) to right.
10. Exterior from north-west showing modern lean-to shed (3) to left & porch (2) to right.
11. Exterior from west showing barn (1) to left and remains of southern shed (4) to right.
12. Exterior of partly dismantled southern shed (4) from south-west showing post-and-rail wall fabric.
13. Exterior of southern shed (4) from west showing fragmentary condition with gable of barn (1) to left.
14. Internal eastern elevation of southern shed (4) showing post-and-rail construction.
15. Interior of southern shed (4) from south showing axial drain in original gault brick floor.
16. Internal eastern elevation of southern shed (4) showing original render on reeds between rafters.
17. Detail of 1879 dated daub removed from roof of southern shed (4).

18. Detail of plank with incised date 1889 removed from southern shed (4).
19. Exterior from south showing barn (1) to left and 20th century yard sheds (5-7) to right.
20. Exterior from east showing 20th century yard sheds 5 to left and 6 to right.
21. Eastern exterior of central covered yard (6) showing southern yard shed (5) left and northern shed (7) to right.
22. Interior of central covered yard (6) from west showing open elevation of southern shed (5) to right.
23. Interior of southern yard shed (5) from central covered yard (6) to north.
24. Interior of central covered yard (6) from north-west showing junction with southern shed (5).
25. Interior of central covered yard (6) from east showing south-eastern corner of barn (1) to right & southern shed (4) to left.
26. Southern interior of porch (2) showing modern weatherboarding of barn (1) to left.
27. Interior of porch (2) from west showing modern softwood roof structure with door and weatherboarding to barn (1).
28. Northern interior of porch (2) showing original 19th century frame with primary bracing and re-used timber.
29. Interior of barn (1) from north showing recent wallboard and ceiling board concealing the timber frame.
30. Interior of barn (1) from south showing the recent boarding which conceals the fabric of all but the northern bay (1a).
31. The modern softwood roof structure of the barn (1) seen from the north above the recently inserted ceiling.
32. Western interior of the barn (1) showing the southern gable to the left and the door to the porch (2) right.
33. Eastern interior of the barn (1) showing the southern gable to the right and the entrance to the yard shed (7) left.
34. Eastern interior of the barn (1) showing the exposed early-17th century framing of the northern bay (1a) to the left.
35. Internal north-western corner of the barn (1a) showing mortises and trenches for two internal corner braces.
36. Eastern interior of the barn's northern bay (1a) showing intact early-17th century frame with trenched brace to left.

37. Internal north-eastern corner of the barn (1a) showing intact trenched brace with mortise for gable brace and inserted stud to left.
38. Western interior of the barn's northern bay (1a) showing later studs inserted into early-17th century frame with brace trench right

(Photographic Appendix 2 follows on pp.11-15)

Appendix 2 (pp. 11-15): Selected Printed Photographs



Illus. 1 *Circa 1974.* The farm buildings from the east showing the original thatched roof of the barn (1) in the rear to the right and the pantiled roof of the southern shed (4) to the left. From an old photograph in the possession of the current owner.



Illus. 2 *Circa 1990s* old photograph. The exterior of the barn (1) from the north-west during storm repairs showing the remains of its original thatched clasp-purlin roof.



Illus. 3 2006 old photograph. The interior of the barn (1) from the north showing the largely 20th century softwood timber of its walls and roof (all hidden by boarding at the time of inspection)



Illus. 4 General view of the site from 20th century entrance leading from the main A12 to the north showing the unlisted farmhouse with an early-17th century parlour to the left and a late-20th century cross-wing to the right. The barn is shown to the far right. The track which passes from left to right in front of the house marks the boundary between Farnham and Benhall parishes (the photograph taken from Benhall).



Illus. 5 Exterior of the barn (1) from the north-west showing the modern lean-to woodshed (3) to the left & the 19th century porch (2) to the right.



Illus. 6 The exterior of the partly dismantled southern shed (4) from the south-west showing its post-and-rail wall fabric with the barn (1) to the left and the corrugated iron southern yard shed (5) to the right.



Illus. 7 The interior of the southern shed (4) from the south showing the axial drain in its original gault-brick floor.



Illus. 8 The interior of the barn (1) from the north showing the recent wallboard and ceiling board which conceals most of the timber structure.



Illus. 9 The eastern interior of the barn's northern bay (1a) showing the intact early-17th century frame with original reverse-cranked trencled brace to left. A number of additional studs have been inserted between the original timbers.



Illus. 10 The western interior of the barn's northern bay (1a) showing empty trenches for a missing wall brace to the right and later framing with a diagonal primary brace in the style of the 18th and 19th centuries to the left.



MOLLETT'S FARM

Response to EDF Energy's Sizewell C Stage 3 Consultation

from Mollett's Partnership

29th March 2019

Dear Sir / Madam,

We are writing to you in response to your Stage 3 pre-application consultation for the construction of Sizewell C.

Mollett's Partnership

Our business has just celebrated its twelfth anniversary, having been set up around a year-and-a-half after our family first moved into Mollett's Farm.

From its purely agricultural roots – and following significant personal investment – it has grown to become a provider of high-quality and accessible self-catering accommodation to private individuals, wedding groups, festival goers, families on holiday, business travellers and visiting professionals. We also have a popular five-pitch Caravan & Motorhome Club site with views across much of our 36 acres of arable land and paddocks, allowing those with touring caravans to also enjoy time here. Last year more than 1,000 people stayed at Mollett's Farm, whilst visiting and spending their money in local shops, cafés, pubs, restaurants, petrol stations, venues, festivals and nearby tourist attractions.

Our guests choose us because of our location and the facilities that we offer. We are surrounded by open farmland, with a network of public footpaths allowing ready access to country walks, ancient woodland, nearby villages and local services – such as the collection of shops and café restaurant at Friday Street; the caravan centre at Farnham; and the petrol station at Stratford St. Andrew.

Although a 50mph single-carriageway section of the existing A12 lies around 250m to the north of our nearest buildings, we currently enjoy a tranquil setting. This is because our guest accommodation, public areas and private gardens are further to the south, 300-350m from the road and shielded by the above buildings, with the prevailing winds generally carrying road noise away from us.



Page 1 of 7

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Since your Stage 2 consultation you have considerably modified the transport options being considered to allow for the construction and operation of Sizewell C. Some of your proposals will have significant material impacts on our business, which are outlined below along with other areas of concern:

1. Transport Alternatives

We wish to give our full support to measures that reduce the need for large volumes of additional road traffic in the first place. Rail and sea transport options should be your priority; along with the use of Park and Ride facilities.

We are therefore disappointed to see the removal of seaborne-freight options at Stage 3 and do not think that you have adequately justified their removal from your transport mix.

Similarly, we feel that significant use of rail is required in order to reduce the effects of increases in HGVs thundering past everybody's properties and businesses – creating additional noise and air pollution, as well as making it more dangerous and inconvenient to use our roads.

If we must choose between *Rail-led* or *Road-led* options, then our choice is *Rail-led*. However, that does not mean that we agree with your exclusion of certain road improvements under a *Rail-led* strategy. Local opinion must ultimately be respected for each element of your proposals, regardless of which category it falls into.

2. Two Village Bypass

Our specific concerns about the *Two Village Bypass* now proposed are set out below. However, we must make the point that most of these concerns apply equally to any A12 alignment – whether the existing road or a new bypass.

- a. **Lack of Detail** – There is still a fundamental lack of detail – which is compromising our ability to make a reasonable assessment of your proposals and to judge if they are suitable or not. This is very disappointing, bearing in mind the amount of time that has elapsed between Stage 2 and Stage 3. Proceeding to a formal application prior to providing such detail and allowing those affected to respond would seriously undermine the credibility of your consultation process.
- b. **Proximity** – A new single-carriageway road running along the indicated alignment would bring the edge of the A12 to within 150m of our farmhouse and private gardens, and 50m of our paddocks. This is unacceptably close and would have a significantly negative impact on our family, guests, business, land use and property value.



- c. **Routing** – Should a new road be built leading south from Friday Street, then we would again ask for it to be routed to the east of Foxburrow Wood – as per the submission we and others (including the local parish council) made at Stage 2, which appears to have been ignored. A sketch map of the suggested alignment is attached, which has the full support of two parish councils, our county councillor and numerous local residents. Whilst not addressing all of our concerns, it would maintain our existing distance to the road and provide significant alleviation of negative impacts. The attached table provides numerical evidence of the ‘greater good’ an alignment to the east of Foxburrow Wood has, when compared to your current approach of trying to squeeze it between the 12 “Farnham Hall” properties (some of which are Grade II listed) and ancient woodland. The shallower ground levels would also assist you in constructing a road with smaller gradients, thereby keeping vehicle-derived noise and air pollution down.
- d. **Speed Limit** – We support your proposal to limit any new road to 50 mph. This would fit well with the existing A12 limits at both ends of the proposed bypass (which are already 50 mph) and help reduce the negative effects your HGVs will have on properties and countryside adjacent to the new road.
- e. **Noise and Vibration** – Modelling in earlier reports assessed that several properties along the proposed bypass alignment – including our own – will experience noise levels in the “red” zone, which is detrimental to an extent that is considered hazardous to health and well-being. We fully expect you to make full use of routing, cuttings, embankments, barriers, tree planting, low-noise road surfaces and other measures to minimise these effects on us.
- f. **Air Quality** – The consultation process has acknowledged that such a bypass would increase levels of NOx (oxides of nitrogen) and carbon emissions, which will adversely affect properties along the proposed alignment. What measures will be taken to eliminate or mitigate these effects; or compensate for them? Again, we would suggest that route alignment be used to maximum effect.
- g. **Light Pollution** – We are concerned that 24x7 lighting of the proposed roundabout at Friday Street will lead to light pollution and cause a loss of the dark sky views that can currently be obtained here. Such things enrich our lives and bring pleasure to those visiting (often from more built up areas) and would be shame to destroy. Lighting design should be used to minimise the effects of any mandatory lighting beyond the road itself.
- h. **Wildlife** – By creating a new physical barrier, the proposed route will sever and disrupt established wildlife corridors connecting multiple habitats. These routes are known (and documented) to be extensively used by Muntjac, Red Deer, Roe Deer, Fallow Deer, Red Fox, Brown Hare, Badger and Hedgehogs. Construction will also destroy land, hedgerows and mature trees actively supporting Harvest Mouse, Wood Mouse, Field Vole, Common Shrew,



Grey Squirrel, Weasel, Stoat, Skylark, Meadow Pipit, Barn Owl, Tawny Owl, Little Owl, Shelduck, Kestrel and Common Buzzard. Many of the above listed species are recognised as being in national decline, with ever-decreasing habitat.

- i. **Agriculture** – As well as the loss of productive farmland due to the new road’s footprint (and associated works), the proposed route will also sub-divide existing parcels with the effect that they will become either physically inaccessible or uneconomic to farm. Future access would also require rights of way which do not currently exist; the destruction of hedges; and/or the bridging of water courses. If this project nonetheless proceeds, we would like to see annexed land parcels used constructively and sensitively to create both visual-impact and noise abating buffers between the new road and affected households and businesses.
- j. **Environment** – The proposed route (and associated works) will be within close proximity of several ponds (and therefore neighbouring countryside) known to support Newts, Frogs, Toads, Rudd, Mallard, Moorhen, Dragonflies, Darters, Grass Snakes and Bats. As well as ground water contamination, we are also concerned about disturbance of ground water levels – which our ponds follow and are therefore dependent upon.
- k. **Drainage** – The proposed route crosses a drainage ditch carrying surface water from much of Mollett’s Farm (and other arable land to the east) towards Friday Street. Parts of the proposed route and adjacent land are already subject to flooding and run-off during severe weather events.
- l. **Irrigation** - Water that is essential for the irrigation of certain crops at Mollett's Farm is pumped overland from stored and bore-hole derived sources at Friday Street. The crops that require this water perform an important role in both the health of the arable land (being a break crop in the farming rotation) and in the income derived from it. Severing this facility would cause financial hardship - requiring mitigation.
- m. **Access** – Land at Mollett’s Farm benefits from an historic right of way to Friday Street, which the proposed route will sever. This and other permissions (including a Public Right of Way) allow ourselves, our guests and walkers from the direction of Farnham to access the Friday Street farm shop, butchers, fishmonger, antiques centre, café restaurant and car-boot sale. Aside from any legal issues, the loss of this route would have a material effect on the attractiveness of our tourism business, as it connects our self-catering and caravan site visitors with local shops and services. This route is also used by agricultural vehicles moving between land parcels.
- n. **Rights of Way** – The proposed route severs two other well-used footpaths between Farnham village and the ancient woodland at Foxburrow Wood (known locally as the “Bluebell wood”, on account of its prolific display each spring). As well as being Public Right of Way, they also



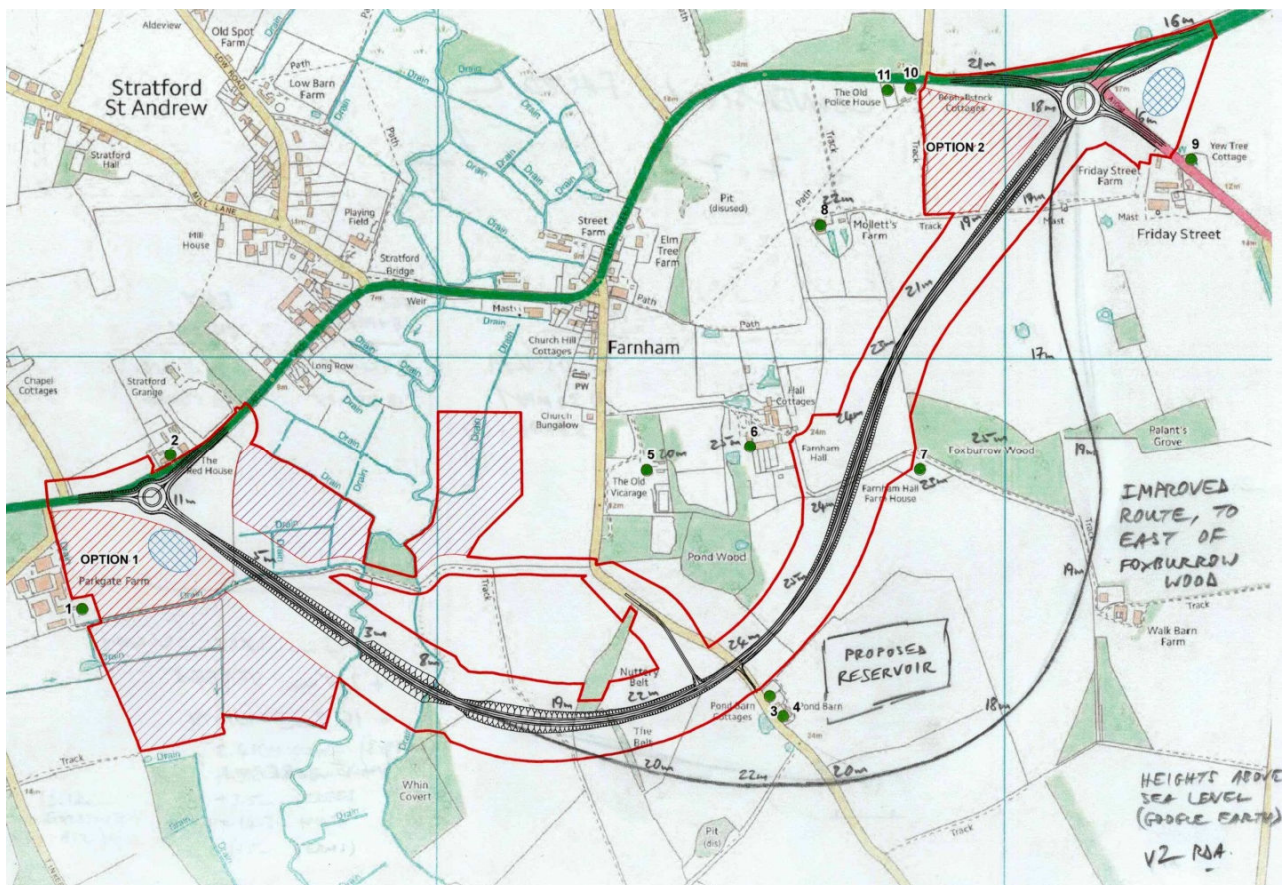
connect walkers to the green burial ground, Snape and unspoilt countryside beyond. The one passing between Farnham Hall and Farnham Hall Farmhouse also carries both private and agricultural traffic.

- o. **Local Services** – Based on conversations with the relevant business owners, implementation of this route is likely to lead to the loss of valuable local services and the employment that these create. Specifically, we believe that the petrol station and shop at Stratford St. Andrew will lose sufficient passing trade to keep it profitable – leading to its closure – and that the Farnham Leisure caravan centre will also be adversely affected by the loss of passing trade. Additional signage guiding traffic back to annexed services and businesses (including our own) may offer some mitigation.
- p. **Tourism** – Tourism in Suffolk was worth an estimated £1.85bn in 2013, making it one of the county's largest industries. In East Suffolk, tourism is said to account for 13% of all employment. East Suffolk's tourism business plan for 2017-22 found visitors were attracted by the character, culture, festivals, music, art, food, drink, clean beaches and spectacular coastline. We are concerned about the inevitable disruption our tourism business will suffer during bypass and Sizewell C construction, as well as the impact of other traffic increases encouraged by an upgraded road infrastructure. It is widely acknowledged that the quiet, rural nature of Suffolk is intrinsic to its tourism industry, which is significant in value. These characteristics and the unspoilt landscape immediately around us are fundamental to our business and would be seriously affected by the additional traffic Sizewell C would create and, specifically, by this bypass. We may also have to accept lower income levels as workers take up accommodation, but at significantly lower rates and with higher wear and tear.
- q. **Mitigation for the Bypass** - Your proposals do not yet contain sufficient detail for us to judge if your mitigation for the proposed new road will be adequate or acceptable – which leads to call for a further stage of consultation, once you are ready to present those details to those that it will affect.
- r. **Construction** – Inadequate information has been provided about the adverse effect of this road's construction – such as noise, vibration, dust, light pollution, contamination, traffic disruption, temporary loss of access – or on its mitigation. Your proposed construction compound at Friday Street also appears unacceptably close to the two Stockhouse Cottages, The Old Police House and ourselves. These factors cannot be ignored, should be minimised and must also receive careful consideration before accepting such a scheme.
- s. **Compensation** – What measures will you put in place to provide legal support and/or compensation for those homes, businesses and land owners disadvantaged by your proposals and activities?



- t. **Scope Creep** – We are very concerned that your limited proposal to construct a two-village single-carriageway bypass will be grasped by Suffolk County Council and used to further their four-village bypass scheme. Should this in fact happen, then we would expect the same standards of rigor to be applied to their public consultation, route selection and mitigation. Such a road is likely to be even more unacceptable to us than your current proposals - being potentially wider, nearer, noisier and bringing with it more destruction of those things we value and depend on. At the very least we would want such a road to go to the east of Foxburrow road as well, so that all of Farnham benefits; rather than just those on the current A12 alignment. Such a route – “Option 14” – was planned by the Highways Agency in some detail in the 1990’s; demonstrating its feasibility.

This diagram shows the approximate route of an improved A12 alignment to the east of Foxburrow Wood – which is our clear preference over the *Two Village Bypass* alignment you have proposed:



This table shows the approximate distances between existing A12 and the properties affected by your *Two Village Bypass* proposal (including ourselves – highlighted in yellow). It can be seen that the ‘greater good’ is served by the route to the east of Foxburrow Wood – which is our clear preference:

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	4	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



Acoustic Review Report


Mollett's Farm, Saxmundham, Suffolk

For: Mollett's Farm

Report Reference: B5393 2021-05-11 R

1 Intro

- 1.1 The Planning Inspectorate (PINS) is currently considering the Development Consent Order (DCO) from EDF for the Sizewell C Nuclear Power Plant. Part of the proposed power plant project involves the upgrading of the A12 through Suffolk, which will be used by vehicles approaching the site during construction. The road upgrade has therefore been included with the scope of the Environmental Statement for the whole project.
- 1.2 Part of the A12 upgrade scheme will involve a bypass around the villages of Stratford St Andrew and Farnham (The Two Villages Bypass). Mollett's Farm is located to the east of Farnham and is currently to the south of the A12. The proposed route of the bypass will move the A12 to the south of the property. The farm was identified as a potential noise sensitive receptor in the noise assessment for the scheme produced by EDF. However, Mr and Mrs Ayres, the owners of the farm, are concerned that the assessment does not adequately consider the potential impacts on their home and its associated businesses.
- 1.3 It is in the nature of a DCO assessment for very large-scale projects that there will be "winners and losers" in terms of environmental impacts and effects, and it is understood that these will be balanced against national and local strategic and economic benefits.
- 1.4 Acoustical Control Consultants (ACC) was appointed by Mr and Mrs Ayres to undertake a third-party review of the assessment submitted by EDF to determine whether it accurately evaluates the impact and effects of the project on the specific conditions and context of Mollett's Farm.
- 1.5 The review was undertaken, and this report was written, by Mike Hewett MIOA, who has 31 years' experience of undertaking similar assessments and reviews.
- 1.6 This report summarises the review.



Mike Hewett MIOA
Principal Acoustician
11 May 2021

2 Scope

2.1 ACC was appointed for the following scope:

- Review in detail the noise assessment documentation provided to the client by EDF.
- Critique the criteria applied to the assessment at Mollett's Farm, both in terms of the potential impact on the farmhouse residents and the potential impacts on the holiday homes.
- Critique the sound monitoring undertaken as part of the assessment, particularly with respect to the levels presented for Mollett's Farm. Provide comment on the levels presented and advise on the appropriateness of undertaking further, site specific, monitoring.
- Review the details of the noise prediction modelling undertaken by EDF and undertake 'sense-check' calculations of the likely levels at Mollett's Farm.
- Review the noise mitigation proposals within the assessment and propose others if appropriate.
- Prepare a report describing the details and finding of the reviews, critiques and calculations set out above.
- Undertake ambient and background sound monitoring at a single location representative of the farmhouse and holiday homes. Include the results and their implications within the report.

2.2 The EDF documents reviewed are listed in the references section at the end of this report along with other standards and guidance.

2.3 Documents 1, 2 and 3 were supplied to the client by EDF the other documents were obtained from the online public portal for the DCO application.

3 Site Description and context

- 3.1 Mollett's Farm is a family home and an arable farm and holiday accommodation business located to the east of the village of Farnham in rural Suffolk.
- 3.2 The location of the farm and its surroundings are shown on the figure below. The farm and holiday homes are surrounded by fields, hedgerows and trees all round with the current route of the A12 currently 250 m to the north and 330 m to the north west. To the south and east are open farmland an isolated farms and minor roads for several miles.



- 3.3 In addition to being a residence itself, the main business of Mollett's Farm is the provision of holiday accommodation in six new built residential units near the farmhouse. A key feature of these holiday lets is their location in a rural and tranquil settling. This does not appear to have been addressed in the assessment.
- 3.4 The holiday accommodation part of the business uses the tranquility of the area as a selling point, and this is reflected in the feedback placed on public internet services by people who have stayed there, for example:

"...a lovely quiet retreat..." - jenny D, July 2020, trip advisor

"...very quiet in beautiful countryside" – Peter B Oct 2018, trip advisor

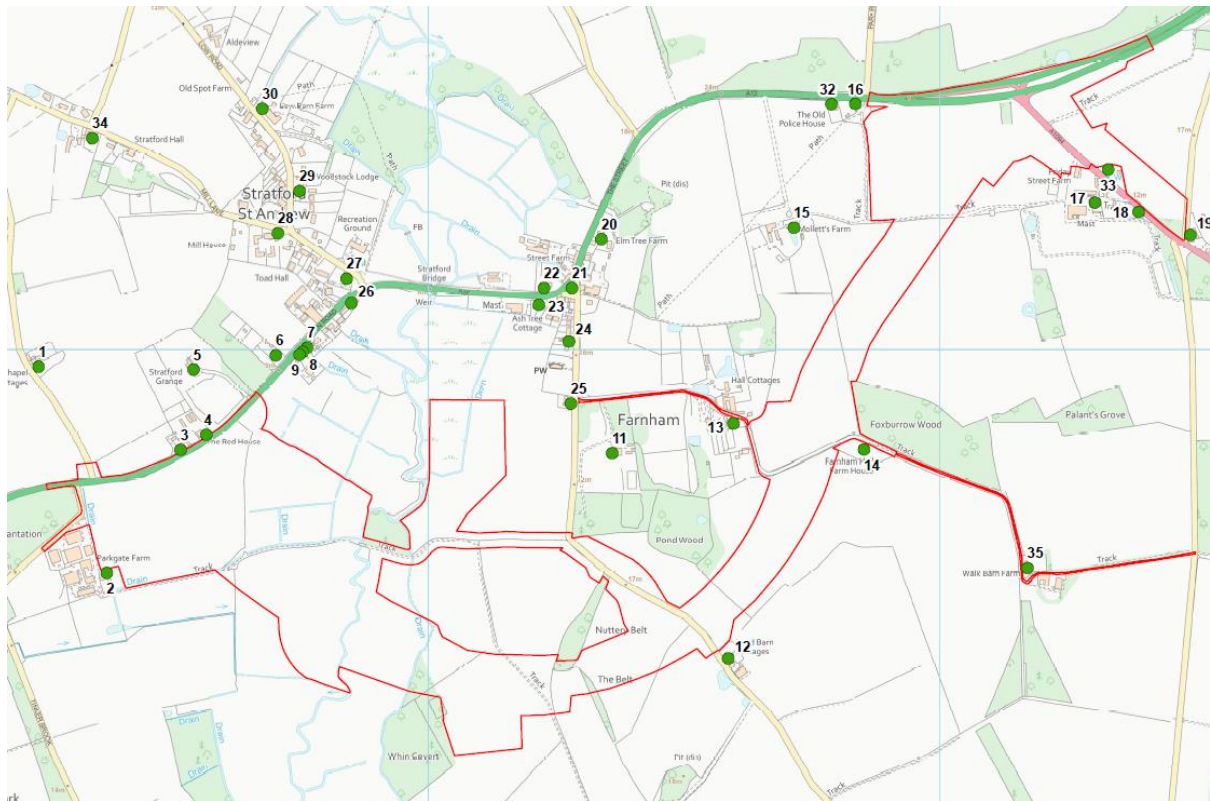
"...The farm is accessed from the A12, but sufficiently far off the road to be quiet (we were never conscious of traffic.." – Tina P Apr 2018, trip advisor

"Excellent location on A12, but quiet..." – Ken Nov 2019, booking.com

"...Even though it is close to the A12 it's very quiet you can hear owls most nights..." – Peter Oct 2019, booking.com

"Very peaceful..." – Siobhan May 2021, booking.com

- 3.5 Any impact on this tranquility could therefore have a material impact on the business.
- 3.6 The proposed route for the Two Villages Bypass runs south of the farm within the red corridor in the figure below. This is significant both because of the reduced separation distance and associated attenuation for road traffic noise at the farm, and also because the prevailing wind currently attenuates sound from the A12 at the farm, whereas it will tend to slightly increase sound from the re-routed A12 at the farm.



4 Review of Documents

- 4.1 EDF supplied the client with the noise assessment for the bypass from the DCO application ES. Volume 5 Two Village Bypass Chapter 4 Noise and Vibration (Vol 5 Ch 4) and its two appendices (refs 1,2 and 3)
- 4.2 Vol 5 Ch 4 makes reference to other documents submitted as part of the DCO application.
- 4.3 Relating to assessment methodologies and scope, reference is made to Volume 1 Appendices 6A, 6C and 6G. Appendices A and C cover the scoping the of overall assessment and responses from stakeholders. These were downloaded from the portal but did not yield any information of direct relevance to this review. Appendix 6G is said (in Vol 5 Ch 4) to contain a *“full method of assessment for noise and vibration”*. However, appendix G is not available on the portal.
- 4.4 Sections 4.2 and 4.3 of Vol 5 Ch 4 deal with the legislation and guidance applied to the assessment and make several references to Vol 1 App 6G. The guidance used is listed in section 4.2 and the criteria for evaluating impacts and effects are derived from these and described in section 4.3. These appear to follow the established pattern for assessment of this type for both construction and operational noise impacts and effects, with no apparent deviations from what is usually applied to assessment of this type. Any relevant specific points arising will be addressed in the sections below.

5 Baseline

5.1 Paragraph 4.3.41 discusses the baseline sound levels used in the assessment:

“4.3.41 The existing baseline character and noise levels have been determined by monitoring as detailed in section 4.4. Baseline noise levels against which road traffic noise effects from the new road are assessed, have been calculated using 3D noise modelling software (SoundPLAN). Calculations of road traffic noise were carried out using the methodology specified in Calculation of Road Traffic Noise ... using a 3D model of the area and based on traffic flow data which is shown in Appendix 4A of this volume”

5.2 The traffic data in Appendix 4A (ref 3) has been reviewed and does not appear to contain any anomalies. However, the key point of paragraph 4.3.41 is that there is a contradiction. **It states that the baseline character was established by monitoring i.e. a survey, but that the assessment was based on calculated levels not the results of the survey.**

5.3 Section 4.4 of Vol 5 Ch 4 which deals with baseline sound levels refers to the baseline report for the whole project: Volume 2 Main Development Site Appendix 11A Baseline Survey Report (Vol 2 App 11A) (ref 4).

5.4 The baseline survey identified a group of receptors specifically for the Two Villages Bypass. The rationale and procedure for the selection of and measurement at these receptors is given on page 15 of Vol 2 App 11A.

“Proposed two village bypass site survey locations – TVB prefix

5.25 A total of nine locations were identified for surveys, and field operatives undertook attended surveys at all locations to capture samples of typical ambient and background sound levels during morning and afternoon periods.

5.26 Most of these locations were also visited during the night-time assessment period (23:00 – 07:00 hours) and a short sample measurement made of typical ambient and background sound levels.

5.27 The field operative recorded the principal sound sources at each survey location, weather conditions, and took photographs for the summary survey sheets.”

5.5 More detail of the procedure for the survey is given on page 9:

“3.12 All baseline sound survey locations were attended by competent field operatives who recorded the sound level meter position, the weather conditions and a commentary on the significant sound sources at the survey position. This included identification of the sources of high maximum sound levels (L_{Amax}) during surveys where possible.

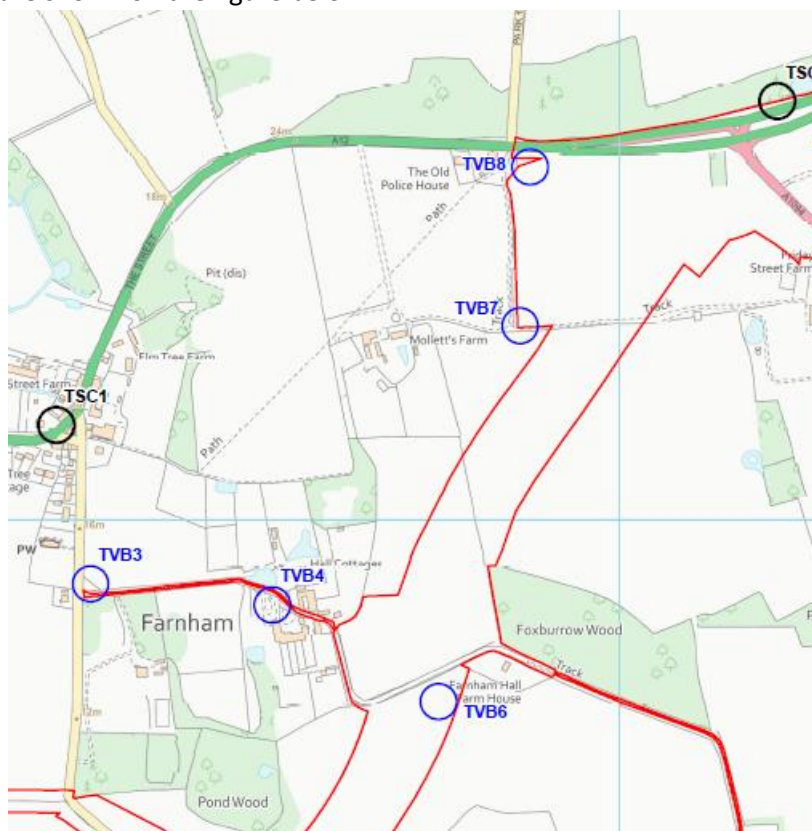
3.13 Where the field operative was in attendance throughout all survey periods at a given location, the weather and existing sound source information was updated

as necessary throughout the survey. At survey locations where a meter was left unattended for longer term survey periods (24 hours and over), these observations were updated on a periodic basis and at equipment servicing intervals.

3.14 As far as was possible, all sound measurements were made away from trees, and with little to no precipitation observed or forecast. On the occasions when a field operative experienced a period of heavy or sustained rain, the surveys were stopped and either recommenced once the rain had ceased, or the survey was rescheduled and repeated on another day. Wind speeds were monitored during surveys where possible.

3.15 Where high winds have been noted by the field operative during a baseline sound survey to the extent that the gathered data is unreliable, the data has been discarded and additional surveys have been undertaken. First-hand information on wind speeds was not available for all of the longer-term sound measurement positions. As a precaution therefore, any data which upon analysis appeared unreliable by means of either heavy rain or high winds (as indicated by publicly available historical weather data), was removed or noted in subsequent data analysis and site summaries."

- 5.6 Two of the nine locations were relatively close to Mollet's Farm, TVB7 and TVB8. The locations of which are shown on the figure below.



- 5.7 Table 7.6 on page 20 of Vol 2 App 11A gives a summary of the of the survey results. Those for

TVB 7 and TVB 8 are repeated below.

Receptor Name	Receptor Reference	Typical Sound Level (day)		Typical Sound Level (night)	
		$L_{Aeq,T}$ (dB)	$L_{A90,T}$ (dB)	$L_{Aeq,T}$ (dB)	$L_{A90,T}$ (dB)
Mollett's Farm	TVB7	46-47	43	-	-
The Old Police House	TVB8	64-66	50-51	57	23

5.8 Based on experience of similar locations, and the reports of the guests at the holiday cottages, these levels seem high, particularly those at TVB7. A quiet rural location would typically have sound levels lower than these.

5.9 Individual pages giving details of the measurement at each location are included in the annexes to Vol 2 App 11A. For TVB7 and TVB 8 the information provided was as follows.

5.10 TVB 7 Mollett's Farm, was on a public footpath east of the farm, and was surveyed on 15 May 2019. The survey notes in the baseline report were:

"The sound climate was mainly dominated by natural sounds in this location. The A12 was continuously audible in the background but was at a low level. The only other man-made sound was an aircraft. Birdsong and insect sound could be heard alongside the rustling of nearby trees and bushes. Daytime ambient sound levels were typically 46-47dB whilst background sound levels were 43dB."

5.11 The results given were:

Results: Period	Time	Duration	Sound Pressure Level [dB]		
			L_{Aeq}	L_{A90}	L_{Amax}
Morning	09:58	30 Mins	47	43	58
Afternoon	13:30	30 Mins	46	43	65

5.12 TVB 8 Old Police House, was at the edge of a field, in close proximity to the A12, approximately 10 m to the road centre, was surveyed on 15 May and 22 June 2019. The survey notes in the baseline report were:

"The daytime sound climate was dominated by the A12 due to its proximity. Various birdsong could be heard particularly in gaps between traffic. Various vehicles were present on the A12 including cars, motorbikes, HGVs and tractors. The night-time sound climate was noted as quiet in the absence of traffic, which was occasionally heard from the A12. Occasional bird song was audible. Daytime ambient sound levels were measured as typically between 64-66dB while night-time ambient levels were measured as 57dB. Background sound levels during the day were measured between 50-51dB and 23dB at night."

5.13 The results given were:

Results: Period	Time	Duration	Sound Pressure Level [dB]		
			<i>L_{Aeq}</i>	<i>L_{A90}</i>	<i>L_{Amax}</i>
<i>Morning</i>	<i>10:15</i>	<i>30 Mins</i>	<i>66</i>	<i>51</i>	<i>81</i>
<i>Afternoon</i>	<i>14:24</i>	<i>30 Mins</i>	<i>64</i>	<i>50</i>	<i>93</i>
<i>Night</i>	<i>03:25</i>	<i>15 Mins</i>	<i>57</i>	<i>23</i>	<i>81</i>

5.14 Paragraph 5.27 of Vol 2 App 11A stated that weather conditions were recorded for each measurement. But no such information is included in the results or annexes sections of the document.

5.15 The wind direction can have a very significant effect on the propagation of sound across open countryside. Upwind and downwind levels can differ greatly with levels when the source is upwind of the receiver being greater than when it is downwind. The size of the difference depends on many factors including the topography and nature of the intervening ground, the nature of the sound itself and the speed of the wind. For this reason, many standards and guidance documents make reference to this effect but few attempt to quantify it, for example BS 5228 (ref 8) in Annex F states:

“Meteorological conditions can result in increased noise levels due to focusing of the sound and this can be important, for example, where screening is present.”

5.16 However, clause 6.8 of BS 8233 (ref 7) states:

“Whether noise levels are measured or predicted, wind gradients, temperature gradients and turbulence affect the level of received sound and audibility over short periods. The magnitude of these effects, i.e. variations in noise level and audibility, increases with increasing distance between source and receptor. The effects are asymmetrical and, for distances of 500 m to 1 000 m, typically range from increasing the level by typically 2 dB downwind to reducing it by typically 10 dB upwind.”

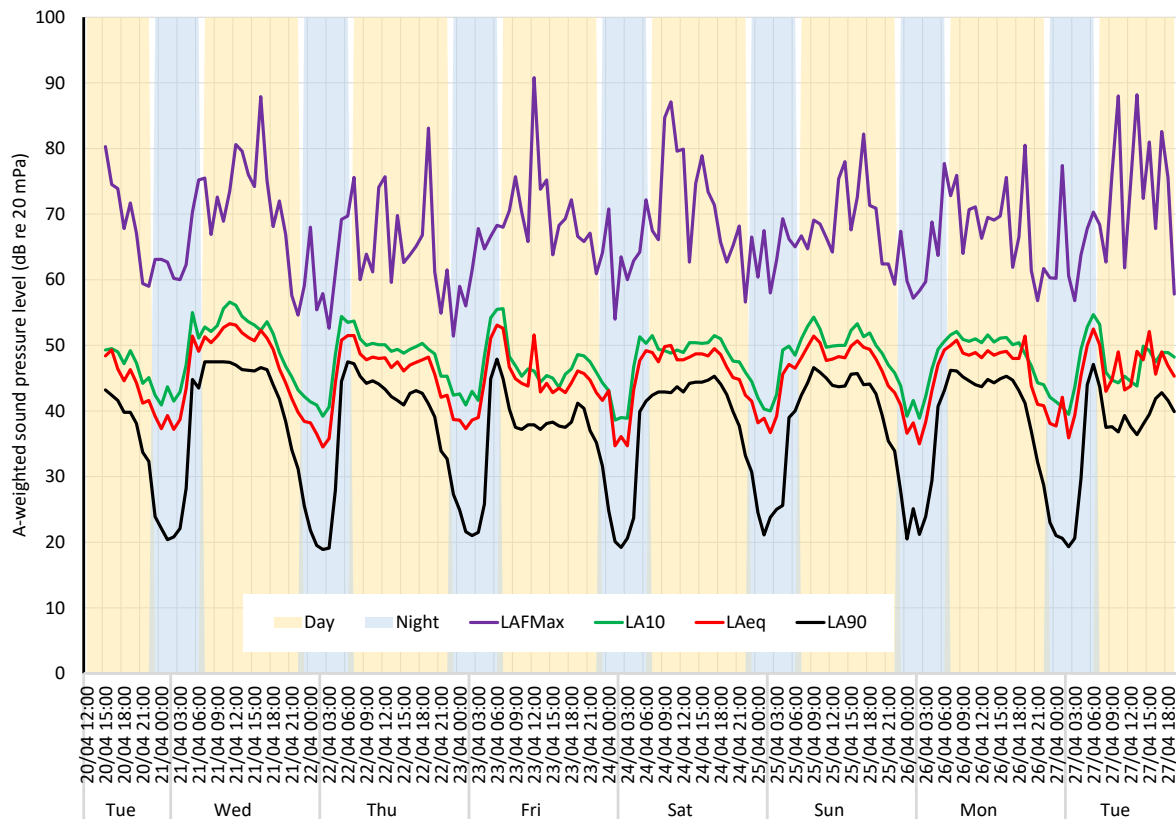
5.17 This gives a difference between upwind and downwind of the same source of 12 dB. The A12 is a significant source of Ambient sound at Mollett’s Farm. Therefore, without information on the wind conditions present during the monitoring surveys there is no way of determining whether the measured levels are representative.

5.18 As part of this review ACC has undertaken a series of measurements at location in the garden to the south of the house and holiday homes. This location was chosen to reflect the area where the family and guests tend to congregate when outdoors. This was more representative than TVB7, which is to the east of the farm.

5.19 It is not intended to give a full description of those measurements in this report. Details of the procedure, instrumentation and calibration are available on request, but follow the principles of BS 7445 Description & Measurement of Environmental Noise Part 1:2003 and Part 2 1999.

5.20 The measurements took place over a week (20th-27th April 2021) with sound levels being

measured and recorded every second. These values were then combined to give the 1 hour average values summarised in the figure below.



5.21 The day and night periods are highlighted in yellow and blue and the four lines show different environmental sound indicators for each hour

- L_{AFmax} - the maximum instantaneous sound pressure level,
- L_{A10} - the sound pressure level exceeded 10% of the time (used as an indicator for road traffic noise)
- L_{Aeq} - the residual sound level (average)
- L_{A90} - the sound pressure level exceeded 90 % of the time (background sound level)

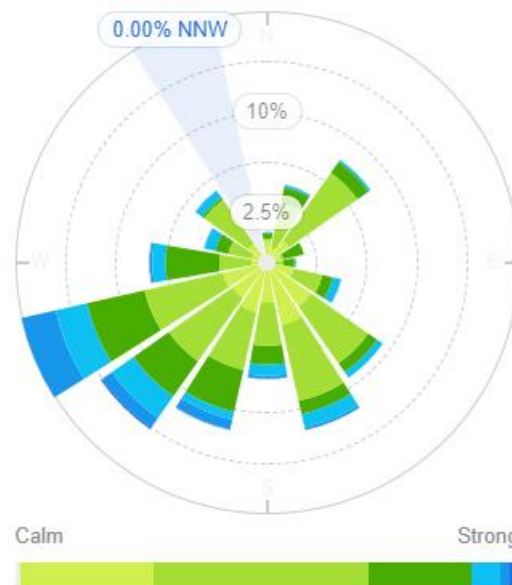
5.22 The wind was light (generally < 5 m/s) throughout the period and the direction varied between the north, north east and east wind for the entire duration of the measurements.

5.23 The loudest time of the day or night was generally the period between 05:00 and 07:00. Examination of the frequency analysis information stored with the data revealed a frequency content consistent with bird song. This was therefore caused by the dawn chorus. As this is a seasonal and natural part of the tranquil environment these periods were excluded from a determination of representative levels.

5.24 Mr and Mrs Ayres also reported unusual activity by military aircraft during some of the daytime

periods, which produced very high short duration sound levels.

- 5.25 The wind speeds and directions in the area were logged throughout the measurement period. For example, on Friday 23rd the wind was from the east and south east, which would be generally unfavorable conditions for propagation of sound from the A12. On Monday 26th the wind was from the north east, which would be more favorable conditions for propagation of sound from the road. The residual sound level during the day on the 23rd in periods unaffected by the dawn chorus or aircraft was in the range 43 to 46 dB L_{Aeq} . On the 26th the residual levels were 48 - 49 dB L_{Aeq} . Similarly, the L_{A10} levels were between 45 and 48 on the 23rd and 50 and 52 on the 26th.
- 5.26 At night, before the start of the dawn chorus, residual sound level consistently dropped to 35 to 37 dB L_{Aeq} .
- 5.27 The relocation of the A12 from the north of the farm to the south will have a major impact on the conditions under which the noise propagates from the road to the property.
- 5.28 The figure below shows a five-year wind rose for the area around Mollett's Farm (the data is for a site in Southwold, but it would be expected that the conditions in Farnham would be very similar).



Source willyweather.com

- 5.29 The rose shows that for the majority of the time (>75%) the wind blows from the south or southwest, with relatively little wind from the north and east. Therefore, the proposed bypass route will be upwind of the farm for a significantly greater proportion of the time than the existing route is. This is material to the impact at Mollett's Farm

6 Operational noise from road

6.1 The baseline noise levels used for the assessment of road traffic noise were predicted by modelling rather than derived from the survey results. There are several reasons for this. The principal reason is that the assessment of the impact of the sound from the operation of the road is based on the expected traffic flows at the future assessment date. Therefore, there is an expectation that road traffic flows will increase anyway regardless of whether or not the bypass goes ahead. The changes in noise levels that would be expected from these increases on the existing roads are therefore predicted using modelling. However, to be robust the model should be calibrated against the current measured baseline. This does not appear to have been done.

6.2 Table 4.14 of Vol 5 Ch 4 gives the day and night predictions of future baseline. The results for Mollett's farm are reproduced below:

Receptor	Name	Day time ambient level $L_{Aeq,16hr}$		Night time level L_{night}	
		2028	2034	2028	2034
15	Mollett's Farm	48	48	42	42

6.3 As required by the CRTN method, these predictions are made assuming down wind conditions from the road to the receptor. So the above predictions have assumed a north westerly wind, which is unusual for this location. Noise levels in the more usual southerly wind would be lower, possibly by around 12 dB as described above. As the route of the bypass is to the south of the farm then the baseline when the wind is from the south is more relevant to assessment of impacts there.

6.4 No measured baseline data for a consistently southerly wind is currently available. However, the results of the ACC survey indicate that daytime background sound levels in wind conditions unfavorable to propagation from the existing road are lower than those presented in Table 4.14.

6.5 Table 4.18 gives the predicted road noise levels for the "peak construction year" and compares them with the baseline.

6.6 The "peak construction year" refers to the year in which the construction of the power station is expected to result in the highest additional traffic flows. It does not refer to the construction of the road itself. The assumption is that the road will be finished, and it is just the impact of power station construction traffic on the road that is being considered.

Receptor		Baseline 2028		With development 2028		Difference		Effect	
		Day <i>L_{A10,18hr}</i> dB	Night <i>L_{night}</i> dB	Day <i>L_{A10,18hr}</i> dB	Night <i>L_{night}</i> dB	Day	Night	Day	Night
15	Mollett's Farm	52.4	42.1	55.8	45	3.4	2.9	Moderate adverse	Minor adverse

6.7 Table 4.19 gives the same assessment for the expected worst single day of the entire power station construction period:

Receptor		Baseline 2028		With development 2028		Difference		Effect	
		Day <i>L_{A10,18hr}</i> dB	Night <i>L_{night}</i> dB	Day <i>L_{A10,18hr}</i> dB	Night <i>L_{night}</i> dB	Day	Night	Day	Night
15	Mollett's Farm	52.4	42.1	56.4	45.1	3.9	3.0	Moderate adverse	Moderate adverse

6.8 Table 4.20 gives the same assessment for the first year with no Sizewell construction traffic. 2034:

Receptor		Baseline 2028*		With development 2034		Difference		Effect	
		Day <i>L_{A10,18hr}</i> dB	Night <i>L_{night}</i> dB	Day <i>L_{A10,18hr}</i> dB	Night <i>L_{night}</i> dB	Day	Night	Day	Night
15	Mollett's Farm	52.4	42.1	55.3	44.4	2.94	2.3	Negligible	Negligible

* sic

6.9 The units for evaluation of daytime baseline are L_{A10} , which is the indicator produced by the CRTN method. This is compared with baseline L_{A10} . The baseline values in table 4.14 were given in different units (L_{Aeq}). No explanation is given for how the L_{A10} values have been derived. In paragraph 4.4.13 it is stated that "a difference of 2 dB has been applied" to convert L_{Aeq} to L_{A10} , but the value in Table 4.14 and those in Tables 4.18-4.20 differ by 4.4 dB. Clause 6.2.2 of BS 8233 (ref 7) says the correction is usually 2 dB \pm 2 dB. The L_{A10} values are not included in previous tables and no L_{A10} results are included in the baseline survey report.

- 6.10 The baseline value for daytime L_{A10} given in the assessment tables is 52.4 dB. The results of the ACC survey indicated that a value closer to 47 or 48 dB would be more appropriate for the prevailing wind conditions. On this basis the differences would increase by around 5 dB which would result in a major adverse effect in all three daytime scenarios.
- 6.11 Similarly at night the results of the ACC survey indicate that the night time baseline level in prevailing wind conditions at least 5 dB lower than that used in the assessment. This again would result in a major adverse effect in all three night time scenarios

7 Construction of road itself

- 7.1 The assessment of construction noise impacts is in section 4.6 b) of Vol 5 Ch 4. This assessment follows a typical methodology for this type of application and uses the standards and criteria that would be expected.
- 7.2 Assessment of construction noise for this type of application is based on the acceptance that noise cannot be avoided but its impacts should be managed and mitigated as appropriate.
- 7.3 Although the construction programme for the Two Villages Bypass project is 24 months. It is explained that different receptors will be affected by different parts of the construction process at different times and that each of these may have different associated noise levels. The assessment and modelling is therefore based on worst case periods for each location. Therefore, the predicted levels are not expected to occur for the entire 24-month period and the contractors will be expected to liaise with the residents regarding when and where noisy activities will occur. It is also expected that there will be a noise monitoring programme in place.
- 7.4 The results for Mollett's farm are given in Table 4.15 and assessed in Table 4.16 using the criteria set out in section 4.3. they are summarised below:

Table	Receptor	Range of predicted levels $L_{Aeq,T}$		Representative predicted levels $L_{Aeq,T}$	
		Preparatory works	Main construction phase	Preparatory works	Main construction phase
4.15	15 Mollett's Farm	54-58	60-63	55	63
4.16	15 Mollett's Farm	Minor adverse not significant	Moderate adverse significant	Moderate adverse significant	Major adverse significant

- 7.5 The base data and calculations from which these results are derived are given in Vol 5, Ch 4, Appendix 4B Construction Assumptions and Calculations (ref 2) was reviewed and appeared to follow usual practice for these assessments with no apparent anomalies.
- 7.6 The results in tables 4.15 and 4.16 therefore clearly acknowledge the potential adverse impact of the road construction work on Mollett's Farm. The document acknowledges that the impacts will need to be managed through the Construction Noise Management Plan.

8 Mitigation

- 8.1 Section 4.5 of Vol 5 Ch 4 deals with the various kinds of noise mitigation to be applied during the construction and operation of the project. These are fairly generic in nature, and do not address the specific issues of Mollett's Farm.
- 8.2 Options for further mitigation for Mollett's Farm are limited. To be effective a sound barrier needs to be located very close to either source or receiver. A large barrier close to the farm dwellings would be unsightly and intrusive.

9 Conclusions

- 9.1 The baseline sound levels used to represent Mollett's Farm are not adequate for a proper assessment. The measurement durations were too short, the location was unrepresentative, one of the key indicators was not reported and the absence of weather data in the survey report means the validity and relevance of the results cannot be determined.
- 9.2 The methodology of the noise assessment follows established practice for this type of assessment, but this does not adequately evaluate the specific impact on the tranquility of Mollett's Farm.
- 9.3 Wind direction has a significant effect on sound propagation. The assessment methodology is based on a comparison of predicted levels for the existing and proposed routes that assume downwind propagation to the farm from both. This is unrepresentative as the farm is located between the two routes. The prevailing wind direction is such that sound from the proposed route will have favorable propagation conditions to the farm much more often than the existing route.
- 9.4 **As a result, occasions when road noise is audible and intrusive at the farm are likely to be more frequent, and its impact and effect will be greater than predicted by the methodology used.**
- 9.5 The assessment predicts adverse impacts at several stages of the road construction process. It is vital that the Construction Noise Management Plan for the road scheme includes monitoring of noise levels and extensive liaison with residents about the location and duration of high noise activities.

10 References

1. The Sizewell C Project 6.6, Volume 5 Two Village Bypass, Chapter 4 Noise and Vibration, Revision: 1.0, PINS Reference Number: EN010012, May 2020
2. The Sizewell C Project 6.6, Volume 5 Two Village Bypass, Chapter 4 Noise and Vibration, Figures 4.1 – 4.2, Revision: 1.0, PINS Reference Number: EN010012, May 2020
3. The Sizewell C Project 6.6, Volume 5 Two Village Bypass, Chapter 4 Noise and Vibration, Appendices 4A and 4B, Revision: 1.0, PINS Reference Number: EN010012, May 2020
4. The Sizewell C Project 6.3, Volume 2 Main Development Site Chapter 11 Noise and Vibration Appendix 11A Noise and Vibration Baseline Report, PINS Reference Number: EN010012, May 2020
5. The Sizewell C Project 6.1, Volume 1 Introduction to the Environmental Statement, Chapter 6 EIA Methodology' Appendix 6A - EIA Scoping Report, Revision: 1.0, PINS Reference Number: EN010012, May 2020
6. The Sizewell C Project 6.1, Volume 1 Introduction to the Environmental Statement, Chapter 6 EIA Methodology' Appendix 6C - EIA Scoping Report, Revision: 1.0, PINS Reference Number: EN010012, May 2020
7. British Standard BS 8233:2014, Guidance on sound insulation and noise reduction for buildings.
8. British Standard BS 5228-1:2009+A1 Code of practice for noise and vibration control on construction and open sites – Part 1 Noise
9. Calculation of Road Traffic Noise, Department of Transport and the Welsh Office
10. British Standard BS 7445:2003, Description and measurement of environmental noise. Part 1: Guide to quantities and procedures
11. British Standard BS 7445:1991, Description and measurement of environmental noise. Part 2: Guide to acquisition of data