



Summary of September 2020 Relevant Representation by Felixstowe Town Council (FTC)

FTC is primarily concerned with:

- The rail strategy, and the potential negative effects on available freight capacity from the Port of Felixstowe to the west of Westerfield junction.
- The significant increases predicted during the construction phase in both LGV and HGV traffic volumes at a number of pressure points on the main road network in the wider vicinity of the town.
- The potential effects on local traffic safety and amenity arising from the proposed Freight Management Facility at Nacton

1.0 Rail strategy

FTC has highlighted the potential impact on rail freight capacity west and south of Ipswich from the additional rail paths required for SZC construction.

These impacts are potentially directly harmful to the short- and medium-term future of the Port of Felixstowe and its associated logistics business sector.

While we recognise the desirability of rail delivery to the SZC site, those issues are limited in time and in scale in contrast to the importance of rail freight capacity to Felixstowe Port as, by far, the largest strategic element of the economy of the Eastern region.

Transport impact assessments must be considered against the evolving port and logistics business. The economic and social life of Felixstowe is dependent on the health of the Port business. The Port is dependent on further expansion of rail capacity, currently running at very high load factors. The shipping and logistics industry is sensitive to disruptions of throughput, and confidence is required in all elements of the supporting infrastructure, including rail freight capacity improvement over time. While Felixstowe has unique advantages in terms of geographic location, lack of rail capacity in short and medium term is critical to its continued viability, and therefore for some operators, a presence in Felixstowe.

FTC has considered the Rail Strategy document. However, while this gives detail on local issues around the SZC site, Leiston and the Saxmundham junction, it has little strategic content, other than suggested detailed times of the 3 trains expected daily during the construction phase.

There appears no strategic consideration of whether and how these trains would impact on the (largely freight) services to the west. The principles around this are discussed below. But it is germane to regret here the unfortunate continuing use of the 0807 Westerfield path, which precludes a rush-hour commuting service between Ipswich and Woodbridge. Locally, for Felixstowe residents, that is manifested in the need to leave Felixstowe at 0636 in order to reach Woodbridge in time for the normal working day (at 0751), the next arrival being 0932 – neither being a realistic commuting schedule.

FTC does not perceive the issues raised have been addressed in the Rail Network chapter of the Transport Assessment. The discussion of the rail system from Sizewell to Ipswich does not properly consider the wider network issues beyond Westerfield.

The issues involved are complex and technical regarding the operation of the rail system. We submit that the Rail Network document is an inadequate presentation of the issues involved and /or mitigation which may be required. It contains a number of significant inaccuracies, and errors or omissions in certain places. We would be happy to supply details of our evidence in that respect at the appropriate time. We request that the Inspector fully consider these alongside this Relevant Representation document.

Critically, it does not establish that adequate freight capacity is available on the rail network to accommodate the SZC traffic.

Paragraph 2.7.55 is highly misleading in respect of the prospects for any improvement during the current Network Rail “Control Period 6” – 2019-2024. It appears to be based on a comment in [Network Rail’s Anglia Route Strategic plan dated January 2018](#): to “Ely Area Capacity Enhancement projects”. FTC understands from many sources that the current expectation for significant improvements at Ely are now expected in 2028/29 at the earliest.

We consider that, taken in the round, the Rail Network document is deficient in almost all regards relating to the strategic rail freight network. It is poorly prepared, and at most a discussion of solutions to the matters at issue.

It is essential therefore that this unpalatable situation is fully recognised in regard to the feasibility of EDF’s plan for any rail delivery to SZC. And from that it follows that significant mitigation should be required from EDF, in order to provide in consultation with Network Rail and all interested parties, funding for such improvements as can be identified to permit the additional SZC rail freight capacity to be provided without prejudice to existing users of the rail network, passengers and freight alike.

2.0 Effects on the main road network

FTC has significant concerns in regard to the volumes of traffic, and especially the degree to which the nearby main road accesses to the town are predicted to suffer from significant over capacity at critical junctions, and the increase in queuing thereby predicted to occur during the Construction phase of SZC.

With only a single main road access via the Seven Hill interchange, any impact on capacity will present a major issue for the economic and social well-being of our residents and indeed our visitors, given that tourism plays a major part in our economy.

FTC have carefully considered the numerous statistical analyses and predictions contained within the Transport Assessment (TA) in regard to both light and heavy goods vehicle traffic flows, as an increased part of already very heavy general traffic – which is itself predicted to increase by some 25% during the period, according to the figures presented.

The Seven Hills Roundabout and the main roads it links are fundamental to convenient and safe access to our town. Hence we are disturbed that even without accounting for the SZC traffic the capacity of the routes is predicted to increase sharply, to a situation of 170% overload, even with the proposed Adastral Park mitigation.

We note that it is claimed that the SZC traffic will make only a marginal increase on these numbers, and hence that EDF state that no further mitigation is justified in connection with the SZC build.

We reject that claim and that and believe that the stance of EDF is wholly unreasonable, and that accordingly the DCO should not be granted on this basis, but should be conditioned that EDF make a proportionate contribution to fund more significant works than those currently conditioned in connection with the Adastral Park development.

3.0 The Freight Management Facility

FTC has many years' experience of the effect of very heavy flows of HGVs into and around the Port of Felixstowe.

Two major factors have successfully reduced delays caused by traffic congestion:

- A) The major rebuild of the roundabout at Junction 58 in 2010, critically with the use of fully interactive computer controlled signalling, which can be observed to change behaviour very significantly at different times of day and according to changing traffic volumes
- B) The implementation by PoF of the Freight Management System (FMS), which remotely allocates entrance times to the port for all HGVs.

Accordingly FTC strongly supports the concept of a Freight Management Facility to mitigate potential negative effects of SZC HGV traffic, not only locally, but throughout the route to Sizewell.

We also have concerns about the proposed traffic management to and from the chosen site on the Old Felixstowe Road. We note that the intention is for all traffic, other than HGVs originating from the PoF, to enter and leave the site from / to the north along the Old Felixstowe Road, via the Crematorium junction.

If this approach is adopted, we submit that a significant mitigation is required by provision of a redesigned layout, ideally with signalisation, at the Crematorium junction. We would therefore ask that the DCO be conditioned to require that.

Beyond the difficulties at the junction itself, we note that the requirement for some 60% of all HGV traffic bound for SZC to use the Seven Hills junction twice. There can only be a significant difference between the direct approach to SZC, simply using the well-designed dedicated slip lane directly onto the A12 northbound, and the need a) to use the right hand slip lane, enter the roundabout, conflict with the A12 southbound and south east sliproad entry traffic, and leave by the A1156 exit, and then later to enter the Seven Hills roundabout from the A1156, conflicting with traffic both from A12 northbound and from A14 south east slip road, will be a major factor in exacerbating congestion at Seven Hills.

A possible alternative could be considered and explored of inbound traffic continuing on the A14 to Junction 59 Trimley, using the flyover there to access the A14 westbound, and enter the FMS site from the east via the existing slip road near Levington. This would remove the inbound traffic entirely from the Seven Hills junction.

And similarly, for HGVs leaving the FMS bound for Sizewell to leave the site eastward and then use the A14 westbound to Seven Hills, using the south east A14 slip to enter the roundabout