

Sizewell C Development Consent Order ('DCO') Application
Woodbridge Town Council (IP20025891) – Deadline 3 Submission
Comments on Deadline 2 Examining Authority's written questions, from
Suffolk County Council, East Suffolk Council, and Network Rail

1. Introduction

- 1.1. Woodbridge Town Council ('WTC') details below its comments on certain specific responses to questions put by the ExA to Suffolk County Council ('SCC'), East Suffolk Council ('ESC') and Network Rail ('NWR') where these responses have an impact on previous commentary given by WTC - by WR, oral submission, or comments on others' WRs
- 1.2. SCC responses – REP2-192
ESC responses – REP2-176
NWR responses – REP2-157

2. Freight Management Strategy ('FMS')

AL.1.10 - Strategic alternatives for the movement of freight The Suffolk County Council [RR-1174] states that the Council does not support the Applicant's proposed freight transport strategy as it stands, and considers that it is still reasonably achievable to increase the proportion of rail and potentially sea-borne deliveries. In the light of the Applicant's strategic assessment of alternatives, and the Applicant's subsequent Changes to the original application, please indicate: (i) Why it is considered that an increased proportion of rail transport and sea-borne transport can be achieved without causing undue delay to the construction programme? (ii) Whether the changes to the application have overcome the SCC's concerns in this respect?

SCC's response says that the Applicant hasn't produced evidence that the rail and sea options are deliverable within the Applicant's desired timeframe, and that by inference there is considerable doubt over whether this will actually happen. SCC also says they haven't seen evidence that the HGV usage can be reduced to the levels indicated in the change documents.

Further, in part c) of the response to (ii), SCC says it has "Concerns that adverse impacts of the transport strategy have not sufficiently been minimised and mitigated. This includes impacts from the additional night-time train movements as well as from road traffic. It should be noted that even when marine and rail deliveries are maximised, a substantial amount of additional traffic will be created as a result of the construction activity."

And finally "Due to the uncertainties around the deliverability, if the project is consented it is SCC's strong stated position that the DCO must include suitable controls and monitoring secured by requirements to ensure that mitigation is delivered in a timely manner and impacts

on communities do not exceed those assessed in the ES and Transport Assessment, as set out in the LIR.

WTC welcomes this response.

- We feel that the Applicant is trying to say whatever is necessary to get a positive decision on the DCO - in the expectation that once that stage has been passed and the build started, they will be allowed to use whatever means are expedient to finish. This is of grave concern to WTC; we are very worried that our townspeople's health and wellbeing will be given scant regard once the build has started.
- We contend that throughout its FMS, the Applicant is under-playing the adverse impact of night-time train noise on the health and well-being of people living near the track. The noise will be enough to disturb sleep much further from the track than a few metres.
- While it's welcome that HGV movements are supposed to stop during the night (between 23.00 and 07.00), it's only sharing the misery, rather than giving any relief, to start delivering freight by rail through the night between these same times. Woodbridge is situated between the A12 and East Suffolk Line transport arteries.

HW.1.19 Rail Safety Network Rail [RR-006] identifies concerns, that by introducing any Freight Trains onto the East Suffolk line will (due to their slower running speeds), cause an increased risk and delay to users of level crossings. (i) Please respond to this concern and advise if any mitigation could be provided to address this issue. (ii) If this were appropriate, how would it be delivered through the DCO?

NWR's response in relation to Woodbridge -

- Trains must not be stopped in Woodbridge station to allow the single line to from Saxmundham to Melton to clear, this would cause a freight train to block the level crossing at Jetty Lane, which is unacceptable.
- Trains will only traverse Melton AOCL+B crossing in the down direction in between the hours of 07:00 and 21:00, it is unacceptable for trains to pass in the up direction as this would block Bloss level crossing which is an operational boat yard, this would be acceptable in-between the hours of 21:00 and 07:00 as the likelihood of anybody using the crossing in between these times would be slim

WTC's comment - This appears to say that the Applicant will need the dualling between Woodbridge and Saxmundham or new signalling remote from Woodbridge, otherwise the trains may have to stop in Woodbridge Station.

For information, Jetty Lane is a popular and much-used public route across the railway between the town (and its car-parks), and the river frontage. It's also used by vehicles to access a boat-building yard and a yacht club.

It seems unclear what point NWR is making about trains only going outwards to SZC and not coming back between 7am and 9pm. Again, this point possibly goes away if the line is dualled

before construction starts. _Not to take anything away from the importance of Bloss crossing to the boatyard, there is also a public crossing at Dock Lane (access also for the boatyard), a private crossing for Anglian Water's Melton sewage works, and another private one at The Maltings.

WTC is puzzled that NWR hasn't mentioned trains being held in Woodbridge station in the up direction. As our previous submission mentioned [REP2-198 point 38], this is a realistic scenario. This would block two heavily-used public crossings at Quayside (aka Ferry Quay) and Tide Mill Way (aka Haywards). Also it would prevent any down train (laden freight or passenger service) in Woodbridge station from moving onwards - unless the section of line immediately North of the station is dualled.

AQ.1.67 - Mitigation In the Air Quality Chapter [APP-212] you refer to primary mitigation as 'minimising' freight movements on roads in light of the other delivery methods envisaged via rail and sea. (i) Is it really fair to say these movements would be minimised when to date neither the rail nor sea alternatives are confirmed, or to what degree they could operate?

SCC's response says that the Applicant hasn't produced evidence that the rail and sea options are deliverable within the Applicant's desired timeframe, and that therefore the number of freight movements by road is not being minimised.

WTC concurs with this response.

HW.1.28 Change Request No. 2 In the event the number of trains were to be increased, please explain what implications this may have for the operation of level crossings on the branch line and the main Ipswich to Lowestoft line and the effect on severance of communities or impacts on emergency services.

SCC's response mentions the impact of day-time trains on the A1152 level crossing at Melton, which is a key bottleneck in the area.

ESC's response says also mentions this, and also the adverse impacts of night-time trains.

WTC observes that holdups here already cause long tailbacks at peak times along the A1152. Even with the suggested dualling of the track between Woodbridge and Saxmundham, we expect that operating long, slow freight trains through Melton at peak hours would cause gridlock to reach along the B1438 as well and directly exacerbate congestion in Woodbridge.

This would affect Woodbridge people's ability to reach Woodbridge and Melton primary schools by car, bus or cycle. Walking to school would also be more difficult because of crossing the roads (already so many families use the lights-controlled crossing at Melton Primary that there isn't time for all the people waiting to cross in one change of the lights).

It would also adversely impact the ability for emergency services to reach many parts of Woodbridge (not to mention other communities).

The serious congestion could extend back to Lime Kiln Quay Road, would threaten to undo all the progress made in bringing the air quality within legal limits in the AQMA. Also there could be air quality impacts on Woodbridge County Primary because it would be close to queuing traffic on Melton Road and Pytches Road.

Overall, the impact would be so great, that it is unacceptable to run freight trains through Melton at peak hours (commuting and school-run times, 8-9.30am and 2.45-6.00pm).

Regarding operating 5 trains per day (in each direction), both **SCC** and **ESC** observe that they can't all be scheduled at night and require some day-time running, which in turn requires a passing loop in order to keep the hourly passenger service.

As **ESC's** response says, neither day-time nor night-time trains offer a workable way forward without rail infrastructure upgrade.

WTC notes this point, and repeats its previous comment that full line dualling between Woodbridge and Saxmundham would be required to give full transport resilience to passenger and freight services. A possible, less resilient option would be two passing loops, one each side of Campsea Ashe.

With careful timetabling of trains passing through Melton in both directions simultaneously, hold-ups could be decreased, and there should be time to run most of the freight trains during the day. Thus, in the undesirable event of the Sizewell C project going ahead, the impact of congestion and night-time noise caused by trains could be reduced somewhat.

WTC's position is that there would be unacceptable impact on Woodbridge's economy, health and well-being if construction were allowed to start before the East Suffolk Line is dualled between Woodbridge and Saxmundham.

NWR's response seems to mention only level crossing barrier times.

SE.1.42 Freight Management Strategy A number of RRs including [RR-0040] expressed concern that the original application would cause economic harm by severing communities and reducing the quality of the environment which is an important contributory factor to the tourism sector. Would an increase in rail and seaborne freight provide an economic benefit by reducing such severance?

Part of **SCC's** response is that even with increased use of rail and sea freight, the council "considers that there would be residual economic impacts of congestion on the local economy. The high level assessment of the economic impacts of congestion as a result of construction traffic commissioned by SCC (see SCC Appendix to ExQ SE.1.42) indicates that for the A12

corridor between Seven Hills and A1152 Woods Lane there would be a significant negative cost to the economy as a result of congestion along this corridor during construction, and gives a range of the economic impacts based on the high level assessment method. As well as the calculated impacts, it is noteworthy that these calculations do not include any assessment as a result of disruption caused by traffic management as a result of highway works nor as a result of abnormal loads. The LIR ([REP1-045] para 24.26) suggests that consideration should be given to a fund to mitigate/compensate for economic cost of congestion. This would be in addition to measures to mitigate tourism impacts through the proposed Tourism Fund."

WTC agrees with this assessment, and further comments that although getting HGVs off the road would reduce the harm done to Woodbridge's economy (and also that of the wider area), the best economic benefit would be gained by cancelling the Sizewell C project - and so avoiding these transport problems altogether.

NV.1.90 Additional Freight by Rail Please explain what effect if any this might have on passenger services on the Ipswich to Lowestoft line.

NWR's response appears to show that analysis of impact on passenger services has so far only considered services between Ipswich and Saxmundham and has not gone further North, nor into the wider Ipswich area. NWR also mention "block signal" upgrades on the single-line section.

WTC comment – NWR's response shows that it can't be assumed that even night-only freight trains won't impact passenger services, at least occasionally when things don't run to timetable. So again the Applicant is assuming they can timetable trains without impacting other network users. A lot more work remains to be done here.

The term "block signals" needs more explanation from NWR to show how it would deliver benefits to clear the single-line section for passenger services. Does it imply passing loops being constructed, so that the signals will control the trains entering blocks of single-line track?

3. Noise from night-time use of Rail for Freight

NV.1.13 Rail Noise (i) The placement of matting under the ballast would appear to be required for all locations where a sensitive receptor is within 20m of the centreline of the railway, and this matting should extend 10m beyond the end of the receptor building. How would this be delivered through the DCO? (ii) Does this require a specific standard of matting to be provided and method of laying of the matting and the ballast to meet the minimum noise absorption required and therefore is a specific minimum specification required? If so, how is this to be secured? (iii) Do Network Rail agree to this method of installation?

NWR's response to (iii) - they have an active Basic Asset Protection Agreement (BAPA) in place which facilitates the design approval process. At present Network Rail does not have sufficient information to confirm this.

WTC comment – this shows the Applicant's proposal for rail transport needs more work before it can be considered ready for DCO.

NV.1.18 Rail SOAEL and LOAEL The SOAEL and LOAEL is based at least in part on the assessment for HS2, and the justification of a higher rating appears to be based on the quantum and speed of rail traffic associated with HS2 as opposed to here. (i) Do the Councils agree this is a reasonable position to take in setting the SOAEL and LOAEL for rail noise? (ii) In the event the Councils do not agree, what method would be considered would provide a reasonable approach in the circumstances of this case?

NV.1.19 Rail SOAEL and LOAEL As currently assessed, the LOAEL would be exceeded at receptors within 42m of the line with trains travelling at 10mph and within 50m of the line for trains travelling at 20mph. In light of the need to protect human health from noise, and length of construction period should not the potential for noise mitigation be made available to all receptors where the LOAEL would be exceeded?

SCC and **ESC** have both given similar response to both these questions, to the effect that the Applicant needs to undertake further work to investigate ways of cutting down the train noise, and to offer better mitigation and to more people.

WTC concurs with this response. We are keen to see how quiet these trains can be. Based on our current experience, night-time freight trains pose an unacceptable threat to the health and well-being of people living in Woodbridge.

NV.1.26 Rail Noise In order to minimise disturbance to receptors in close proximity to the rail line, particularly at night, would a period excluding train operations be reasonable and or enforceable?

SCC's response supports a quiet period at night and suggests it could be between 01.30 and 04.30. **WTC** welcomes the intention of this suggestion, but we are unclear on the actual benefit Woodbridge would see from it. It represents only a short period of undisturbed sleep. Also, it's unclear whether the quiet period applies to the whole length of track between Felixstowe and Sizewell, or just one end, or a point in the middle. If it were at one end, this would still mean trains were passing Woodbridge (and other communities on the line) well into this supposed quiet period.

ESC's response says that enforcement should not be difficult (which is welcome), but seems to prioritise the timetable of construction above the health and well-being of people living near the railway.

NWR's response offers no view on this, other than saying it's not for them to impose restrictions for reasons other than safety or capacity.

NV.1.27 Rail Noise In the Additional information supplied by the Applicant in [AS 257] an assessment of sleep disturbance has been set out. Do the Councils agree the methodology of assessment and the subsequent justification for the setting of the LOAEL and SOAEL in this respect?

NV.1.28 Rail Noise It would appear that the ES recognises a significant harm to between 100 and 110 properties. Would this accord with NPS EN1 Policy to avoid harm to human health, or the aims of the Noise Policy Statement for England? Do the Councils or PHE consider the approach justified in seeking to set a SOAEL at a higher level than the significant level identified through the ES assessment?

SCC and **ESC** have both given responses to these questions that are the same in essence as NV.1.19 above.

WTC doesn't agree with the SCC/ESC assessment of the Applicant's methodology, as detailed in our Deadline 2 submission [REP2-198]. Public Health England has a different view which in part utilises different methodology

NV.1.29 Rail Noise The Applicant concludes [APP 545] that up to 460 properties would be subject to noise above the LA_{max} based LOAEL. Do you agree that the secondary mitigation offered would minimise the adverse effects on health and quality of life?

ESC responds to say it "does not currently consider that the Applicant has adequately explored and exhausted all mitigation options to 'mitigate and minimise' adverse effects on health and quality of life (between LOAEL and SOAEL)."

Similar to previous responses, the response points out that the Applicant should seek to reduce noise before offering mitigations like insulation to residents. The latter should be a last resort.

WTC concurs with this. While it would be best if the project did not proceed at all (for numerous other reasons), the noise from construction trains - whether during the day or at night - should be as little as possible in order to preserve the tranquillity of the town and the nearby important estuary SPA, RAMSAR site and SSSI.

NV.1.67 Rail Noise Mitigation Strategy - The Applicant proposes a Rail Noise Mitigation Strategy [AS-258] in consultation with Network Rail and the rail freight operator. Are you satisfied this gives sufficient control over noise to safeguard health and quality of life?

ESC has responded - "The assessment of noise and vibration from rail assumes that all the engineering and operational mitigation measures set out in the Rail Noise Mitigation Strategy [AS-258] are adopted in full. It is therefore ESC's view that all of these measures would need to be in place for the predictions/assessment outcomes to remain representative. The Council has raised this with the Applicant who is in ongoing discussions with Network Rail to discuss how this can be secured." The response goes on to say that the Applicant is working on an approach to noise mitigation, which might satisfy ESC's concerns, but is ongoing.

WTC appreciates this response, because it shows yet again how much work the Applicant has yet to do so that it can deliver the optimistic noise figures it claims for its FMS and how great a concern it is for the people of Woodbridge.

NV.1.93 Night-time Rail Noise. Campsea Ashe Parish Council, Woodbridge Town Council and ESC all express concern that the assessment of effects from the night-time rail operation as proposed has not been adequately assessed or those effects on residents properly mitigated.

- (i) *[Applicant] Please respond to the concerns and set out how the assessment has been undertaken and how the mitigation offered would work in practice.*
- (ii) *Do the Council [ESC] agree with these concerns?*

ESC's response to (ii) agrees that those identified effects would not be properly mitigated, based on current proposals. The Applicant has provided a draft Rail Noise Mitigation Strategy and a Noise Mitigation Scheme; ESC is not currently satisfied with these and is discussing further with the Applicant.

WTC appreciates ESC's clear response, which concurs with responses to other questions above about Noise and Vibration, and again shows that the Applicant has not done enough work on its FMS to submit a properly-formed DCO.

NV.1.94 Night-time Rail Noise (i) Please explain the limiting factors for daytime deliveries. (ii) In understanding what these are, what alternatives have been considered that could overcome these limitations? (iii) How has the assessment of effects from night-time noise been assessed against these alternatives?

NWR response - "... Day time operations will not be possible without significant impacts on daytime passenger operations. ..."

WTC comment – The Applicant has just dismissed day-time capacity improvements as not deliverable in time. However as night-time working is unacceptable to Woodbridge and other track-side communities, the construction should not be allowed to start without first making these improvements (i.e. dualling the line).

SE.1.43 Rail Passenger Services (i) A number of RRs [Greater Anglia, Kelsale cum Carlton Parish Council, Framlingham Town Council, Sudbourne Parish Council in response to proposed changes AS-307] express concern about the potential loss of passenger rail services in the event the freight paths are created as suggested, please explain what effect the proposed freight strategy would have on passenger rail services. (ii) Has the alternative of dualling the Lowestoft to Ipswich line which could give significant legacy benefits including providing the opportunity to significantly increase passenger train services been considered as an option? (iii) Was any other form of expanding the network considered?

NWR response to (ii) ... Dualling the Lowestoft to Ipswich line was not considered a feasible option.

WTC comment. We understand that this is because the Applicant does not wish to wait until the improvement is done before running the trains. We don't consider this an acceptable approach, as it places project timescales above people's health and wellbeing and before the local economy – in the council area and also more widely.

4. Issues with use of the A12 for road freight

CU.1.18 Cumulative effects with other plans, projects and programmes ESC [RR-0342] accepts that the primary issues arising in the cumulative assessment are predominantly managed with the proposed transport strategy. However, one element that continues to raise concern is the A12 west of Woodbridge (i) The Council is requested

to explain further its stated intention to work with the Highway Authority to understand how capacity here can be increased and indicate the prospects of that objective being achieved?

ESC's response to this question is not very specific. It does mention that the improvements to the A12 are at an early consultation stage - and in concurring with that, WTC re-iterates that it will be several years before these improvements are in place. If construction starts before the improvements are finished, with HGVs trying to get through the roadworks, the congestion and adverse impact to the local economy will be enormous. The congestion on the A12 would displace unmanageable amounts of traffic onto the B1438 through Woodbridge and Melton. We point out that to make matters worse, the section to be dualled is on a considerable incline (uphill in the laden, North-bound direction) meaning that HGVs will be slow to pull away and will give off even more emissions, particulates and noise than on the flat; and will cause frustration to other drivers stuck behind them as they toil up the hill, leading to increased risk of accident.

HW.1.0 Methodology (i) Do you agree that the methodology and scope for assessment of effects from the proposed development as set out in [APP 346] is appropriate and has properly assessed the potential health and wellbeing impacts of the proposed development on the local community? (ii) Do the Councils agree with the methodology in determining the degree of intimidation from traffic and in particular from HGVs? (iii) Do you consider the findings of this part of the ES have been adequately justified?

SCC's response in summary is "SCC disagree that impact on quality of life, health and wellbeing are not significant. We consider there to be residual adverse impact on quality of life and wellbeing, particularly when considering the combined impacts across the project, which will also affect the health of our communities. In addition to further embedded mitigation in the various subject areas (as set out in the LIR), SCC considers there to be a residual impact on quality of life, health and wellbeing. This needs to be reflected in scope and scale of the proposed Community Fund."

WTC concur with this statement and the detailed points also made in SCC's response. We consider that Woodbridge will be one of the communities severely impacted by the construction project (see comments above).

HW.1.2 Severance Concern has been expressed by a number of RRs including (RR-0758, RR-1008) with regard to the degree of severance that could occur for their local community either through physical barriers – e.g. Sizewell Link Road, or through volume of additional traffic. (i) Please advise how you consider the proposal minimises these affects for each community and how the scheme has taken into account consideration for more vulnerable groups. (ii) Do the Councils consider the assessment of severance has justified the approach taken, or do you consider there are more adverse effects than have been reported? (iii) In answering please comment on the suitability of the methodology used and be specific in respect of the locations where there remain concerns should this be the case.

SCC's response once more is critical of the Applicant's proposals in terms of assessing and mitigating the impacts of the proposed development. It also points out that the Applicant's methodology isn't agreed, and that its findings can't be accepted at this stage.

WTC appreciates this strong statement, and considers that Woodbridge will be one of the communities affected by severance from the surrounding area during the construction project - by heavy traffic and congestion on the A12 and displacement onto the A1152 and B1438.

TT.1.25 Traffic Management Monitoring System (TMMS)/ Delivery Management System (DMS). Could the TMMS/ DMS be coordinated and developed to actively manage the following? (i) HGV movements to associated development sites; (ii) HGV movement to avoid sensitive periods in areas where impact might be high, e.g. schools, etc.; (iii) Light Goods Vehicle (LGV) movements and routes; (iv) Bus movements and routes; (v) Route monitoring to ensure that HGV numbers did not exceed those modelled on specific routes; and (vi) Currently the earliest and latest timings of freight movement to/ from the main site will be 07.00 and 23.00, however depending on origins and destinations HGV movements could be on the adjacent highway network for longer periods. In addition to on site monitoring of HGV timings, can HGV movements be managed so as to avoid much earlier and later disruption in sensitive areas?

SCC's response to this question mentions using the Delivery Management System, and tracking vehicle movements by GPS or some other technology.

WTC comments that this response shows commendable desire, but has not gone beyond a suggestion that it might be possible to find out where vehicles are at a given time. In our view, and as implied in question TT.1.24 to the Applicant, 'active management' will need more than evidence-gathering; it needs to be extended to actions to prevent harm to the various communities (including Woodbridge), and where the rules are transgressed there should be a disciplinary procedure with proportionate sanctions, including the option to permanently remove individuals or companies from the project for repeated offences. Those charged with 'actively managing' these activities must be accountable for doing this job properly.

We understand this may already be working on the Hinkley Point C project, and suggest this be investigated to see what can be learned.

TT.1.82 Transport Assessment Addendum [AS-266] – Junction Modelling A12 Corridor Assessment. Paragraph 9.6.20 states that "Based on the VISSIM assessment, no perceivable impact is predicted and therefore no mitigation in the form of highway improvements is considered to be required for the A12 corridor between Seven Hills and Melton. SZC Co. will implement a Construction Traffic Management Plan and Construction Worker Travel Plan to monitor and manage the impacts of Sizewell C freight traffic and workforce movements during the construction of Sizewell C. A Transport Review Group (TRG) will be established to review these plans and review the monitoring report produced each quarter. A transport contingency fund will be made available to the TRG to be used if necessary, to implement any further mitigation measures and remedial actions." Do you agree with this analysis and the suggested approach to any necessary mitigation?

SCC respond that they “do not agree with the conclusion that mitigation is not required on this corridor. SCC recognises that issues along this corridor are both pre-existing and worsened by general background growth, but that these issues will be further exacerbated by Sizewell C traffic.” SCC then go on to mention what appear to be very small extra delay figures produced by the applicant for early and peak years. SCC then give very large figures for extra queue lengths (in minutes) at certain junctions, and mention the assessment by Aecom of the economic impacts, and the MRN bid in preparation.

WTC concurs with SCC that the applicant’s figures of only a few extra seconds per vehicle through this section of road don’t seem credible. We also agree that improvements to this section of the A12 are needed in preparation for Sizewell traffic, not after problems have started occurring. We concur that the Applicant should contribute to the funding of these improvements to ensure they happen in time to lessen the worst impacts of the construction traffic.

TT.1.87 “Rat Running” Traffic Routes Numerous Relevant Representations have raised concerns around rat running through less suitable routes by workers and traffic associated with Sizewell C. Explain measures that are proposed or that could be employed to ensure compliance with recommended routes including any signing and digital navigation services proposed.

WTC comment – this is a difficult area, and SCC’s answer is a list of ideas and good intentions but doesn’t mention any positive way that rat-running could be stopped. However, one suggestion is an ANPR-based system, such as is used in car-parks, roadworks and congestion charging zones. Sizewell workers would have to register their vehicle to get it onto the site, and ANPR cameras would detect if they’d been on rat-run routes. There is more detail on this in the Deadline 2 submission from Wickham Market Parish Council [REP2-493], section 2.1.2 and Appendix 1. The Applicant should pay for this.

PLANNING ISSUES highlighted

- Safety and service impact on the East Suffolk Line
- Health and wellbeing for Woodbridge residents arising from noise and vibration, both from day-time/evening HGVs and night-time trains.
- Road traffic impacts in Woodbridge from railway level crossing operation in Melton
- Crossing obstructions from trains held at Woodbridge stations in both up and down directions
- Economic impacts of road freight traffic starting before A12 improvements complete.

- Traffic management problems with road freight traffic starting before A12 improvements complete.
- Cumulative impact of a massive amount of extra HGV traffic and road infrastructure improvement.

End