

## Sizewell C DCO Application

### Woodbridge Town Council (IP 20025891) Open Floor Hearing address – 1410 word abridged transcription

I am Town Councillor Robin Sanders and present the Council view at this Open Forum hearing.

The Council is precluded from holding meetings due to the expiry of the legislation in 2020 Statutory Instrument 82 and the Stage 3 COVID guidance. My address is based on discussion with the Mayor and Town Clerk.

The Council consider the residents and traders in Woodbridge, as well as wildlife in the Deben Valley SPA and RAMSAR sites, will be impacted by the Applicant's proposed freight management strategy ('FMS') as revised by the acceptance of Change 1 to the Application. That change to the FMS places greater emphasis on rail and marine transport but retains a significant road transport element.

I will firstly address the rail transport of freight.

The Council is strongly opposed to the use of night-time freight trains on a line where there is rarely any current night-time traffic.

The Council is concerned about the impact of noise and air pollution on receptors as well as the impact on the safety, and security of residents and property. Change 1 rail FMS refers to up to 9 freight train passages a night, 6 days/week over more than 10 years. This is a flight of fancy. Even assuming the passenger and freight trains work like clockwork over extended periods of time, it is unachievable. The time for freight trains to use the single-track section between Lime Kiln Quay Woodbridge and Saxmundham is roughly 2300 to 0520, allowing for an upline freight train to clear Woodbridge to permit the 0612 first passenger train to leave Saxmundham on time. This is a period of 380 minutes. Freight train passage take approximately 50 minutes between signals at either end of the single-track section. Simple mathematics shows that even in its latest position where the Applicant is considering up to 7 freight train passages at night, as expressed in its report on mitigation for houseboat owners, only 30 minutes float time exists. That float can be markedly, or completely, eaten up by the 2212 ex Ipswich being delayed awaiting passengers off a delayed 2100 ex London train. As a former Woodbridge - London commuter I know that to be a fairly common occurrence, my recollection is on average 2-3 times a month.

The Council has made the Applicant aware that its rail noise isochrons do not reflect the operation of the line. There are signals for both up and down line sections of the railway at Woodbridge Station. To our knowledge the only other line only signals are at Westerfield and Saxmundham. If there is a delay on a downline or upline freight train the only position on the line to halt a downline train is at the signal at Woodbridge. The previous signal is at Westerfield station. Any train held there would block all trains to Felixstowe. The train held at Woodbridge will sit idling near bedrooms in adjacent properties and houseboats. Freight train passage time from Saxmundham to

[Type here]

Woodbridge is 50 minutes. The idling train could be present for up to 45 minutes, or more if there is a breakdown or blockage to the upline train passage. For upline trains the station line signal show red if the previous upline train has not cleared the signal just east of the Felixstowe branch. There is no intermediate signal.

Further increased levels of noise will result when these delayed trains recommence their passage. For the upline a halted freight train will sever all vehicle access, including emergency vehicles, to residents and property riverside of the line north of Woodbridge station. This is an unacceptable position for residents on the river side of the line and exposes property including the Grade 1 building owned by the Council, to periods of no fire service access.

For the downline we are uncertain if the new signal control still requires every train to brake to await the signal switch and power back up to speed. If so, this induces higher noise and air pollution levels on each passage.

There remain one crossing, Kingston Farm, where there is no crossing alarms. Train klaxons are used as a warning. These are also used at other crossing if the driver is concerned about possible transgressions. As residents of Woodbridge know they are used quite frequently. Rail standards compliant klaxons emit sound measured at between 86 - 94dB 25m distance from the line, roughly 110dB lineside. which can be directly compared to around 77db adjacent to a freight train passing at 10mph. That is over 3 magnitudes higher noise level. No account has been taken in noise assessment and mitigation on the impact of klaxons.

Prior to the DCO application, the Applicant had suggested the introduction of a passing loop to allow the transport of freight primarily during the day. The Council is aware that the Applicant had discussions with Network Rail. This option was discounted, in part, due to timetabling not allowing both passenger and rail freight traffic to operate without increasing the speed of freight traffic along the line outside urban areas to 40mph. This would require substantial upgrade works which would not be viable. The Council however do not understand why the use of two passing loops or a longer section of dual tracking was apparently not considered feasible. It could overcome issues and provide a lasting benefit to the East Suffolk community. We believe such an improvement would allow the 20mph freight train line speeds to be maintained with passenger trains running to their timetable.

The Council consider that for residents in proximity to the railway the imposition of frequent and long-term freight train use is unacceptable. The Council calls for the Applicant to be required to either deliver a day only rail FMS or, if that is unachievable, a mix of day and night allowing a minimum of 4 hour during the night with no train passages so that sleep disturbance do not impact the health of those close to the line.

Notwithstanding this the Council is aware that the Applicant is being requested by East Suffolk Council to reduce its mitigation intervention levels to the Applicant's EIA Significance peak values. Whilst such widening of mitigation is welcome the Council considers even at 70dB this remain too high considering the normal low night-time noise levels in Woodbridge.

[Type here]

The Applicant has advised it is the peak value that drives the mitigation as the 8-hour average EIA Significance night-time dB level limit of 55dB will not be breached. However, that level is not in compliance with latest 2018 WHO guidance. WHO “*strongly recommends*” a maximum night-time 8-hour average level of 44dB, over one magnitude lower reflecting the significant evidence base to that limit. Given the reasonable likelihood of significant delay to some trains at Woodbridge, and the use of klaxons during the night, the Council seeks Examiners to request that the Applicant base its mitigation strategy both on peak and WHO night-time 8-hour average guidance. Simulation techniques could be employed to assess this pre commencement of the freight traffic but monitoring should be required to check this theoretical assessment.

Change 1 aims to reduce road freight use but the current usage of the A12 northbound frequently, even outside peak periods leads to queues at the A12/A1438 roundabout in the designated filter lane. For example, yesterday at 1115 there was a queue well over 100m long. This leads to diversion of A1152 non-HGV traffic, and occasionally HGVs, to traverse Woodbridge on roads of non-standard width and locally substandard pavements with only two formal pedestrian crossings. An air pollution hotspot is already present at the traffic lights at the Thoroughfare. The significant Sizewell HGV traffic on the A12 will exacerbate the issue of traffic diversion. Mitigation has been proposed for Wickham Market for similar impact but none for Woodbridge. The Council seeks the Examiners to require that mitigation is provided by way of

- limiting traffic speeds,
- widened pavements and/or
- additional crossings

The Council is also concerned by the noise and air pollution impact of increased traffic due to Sizewell freight and commuters on the residents of Grove Road, part of the A12 north of the A12/B1078 roundabout.

Finally, the Council understand that the Applicant’s intention is not to allow diversion of Sizewell HGV traffic off the A12 onto the B1438. We would request that the Examiners require that even where police divert traffic to use that route, the Sizewell HGV traffic returns to Seven Hills and await clearance of the route to Sizewell.