

## Sizewell C DCO Application Submission

### Woodbridge Town Council (IP20025891) Open Floor Hearing Transcript

#### **Thank you.**

Woodbridge Town Council, like all other councils at this current time, is precluded from holding meetings due to the expiry of the legislation under the 2020 Statutory Instrument 82 allowing virtual council meetings. Indoor meetings are not feasible under Stage 3 guidance of COVID phased removal of lockdown. My address is thus based on discussion with the Mayor and Town Clerk as the emergency management team and may not fully reflect the position of the Council when in person meetings can be held.

Woodbridge Town Council consider that the residents and traders in Woodbridge, as well as wildlife in the Deben Valley SPA and RAMSAR, will be most directly impacted by the Applicant's proposed freight management strategy as revised by the acceptance of the Changes to the Application. The change to the freight management strategy places greater emphasis on the use of rail and marine transport but retains a significant road transport element.

I will firstly address the matter of rail transport of freight.

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

Woodbridge Town Council is concerned about the impact of noise and air pollution on receptors, human and animal, as well as the impact on the safety and security of residents and property east of the railway line in the Conservation area. The Applicant's change to the rail freight transport strategy refers to up to 9 freight train passages a night, 6 days/week over more than 10 years. This, in our opinion, was a flight of fancy and even assuming the rail network passenger and freight work like clockwork with no delays over extended periods of time is unachievable. The window of time for freight trains to use the single-track section between Lime Kiln Quay Woodbridge and Saxmundham, assuming no late running 2212 down train to Saxmundham, is roughly 2300 to 0520, allowing for an upline freight train to clear Woodbridge to allow the 0612 first passenger train to leave on time. This is a period of 380 minutes. Each freight train passage taking 50 minutes between signals at either end of the single-track section. Simple mathematics shows that even in its latest position, as expressed in its report on mitigation for houseboat owners, where the Applicant is considering up to 7 freight train passages at night that leaves only 30 minutes float time. That float can be markedly or completely eaten up by the 2212 ex Ipswich being delayed picking up passenger off the 2100 ex Liverpool Street train. As an ex Woodbridge - London commuter I know that to be a fairly common occurrence.

The Council has made the Applicant aware that its rail noise isochrons do not reflect the operation of the line in two major aspects. There are signals for both up and down line sections of the railway at Woodbridge Station. To our knowledge the only other

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line signals not related to crossings are at Westerfield and Saxmundham. If there is a delay on an upline freight train the only possible position on the line to halt the train is at a signal at Woodbridge as the previous signal is at Westerfield station and any train held there would block all trains to Felixstowe. With a train held at Woodbridge the train engine unit will sit idling in very close proximity to bedrooms in both houses, the station guesthouse and houseboats. Given the passage time from Saxmundham to Woodbridge of circa 50 minutes for a freight train 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 between Saxmundham and Woodbridge. For upline trains the signal show a red signal if the previous train has not cleared the signal just east of the Felixstowe branch at Westerfield, either due to delay of that train or obstruction/delay by Felixstowe uptrains or signal failure. There is no intermediate signal.

In both such cases trains will be idling at Woodbridge station with the associated noise and air pollution impact. Further 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 to Tide Mill Way. This is an unacceptable position for those residents on the river side of the line and exposes a Grade 1 timber building to no fire control.

For the downline whilst the signals have recently started to be operated remotely, avoiding the previous manual system requiring a complete stop, I am uncertain if it still requires every train to brake to await the signal switch and power back up to 10mph. If so, this induces higher noise and air pollution levels on each passage.

In addition, there remain one crossing, Kingston Farm, where there is no crossing alarms and train klaxons are often used as a warning. These are also used at other crossing if the driver is concerned about possible transgressions and, as residents throughout much of Woodbridge can hear this, occurs quite frequently. Rail standards compliant train klaxons emit sound measured at between 86 - 94dBa 25m distance from the line, roughly 110dB line side 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 appears to have been taken in noise assessment to the impact of klaxons.

At Consultation 3, 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 and that 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, which would require substantial other works. The Council however do not understand why the use of two passing loops, one downline and one upline of Campsea Ashe or a longer section of dual tracking of this formerly dual tracked line was apparently not considered feasible to overcome these issues and provide a lasting benefit to the community through East Suffolk. Such an improvement would allow the 20mph freight train line speeds to be maintained with passenger trains running to their present timetable.

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We consider that for all residents in proximity to the railway the imposition of frequent and long-term freight train use is unacceptable when rail improvement works could reduce or render unnecessary the use of the line at night on a near continuous basis. Woodbridge Town Council calls for greater effort to be made to deliver a day only freight train transport strategy.

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 of 70dB (73dB at the façade) rather than the current 80 dB. The Council however considers even at 70dB this remain too high considering the normal very low night-time noise levels in a rural town like Woodbridge.

The Applicant has advised it is the peak value that drives the mitigation as the 8hr average EIA significance night-time dB level limit of 55dB will not be breached or critical. However, that level is not in compliance with latest 2018 WHO guidance on such levels. That guidance strongly recommends a level of 44dB, over one magnitude lower. The word 'Strong recommendation' reflect the support to that limit being deemed significant on human impact grounds. Given the reasonable likelihood of significant delay to some trains at Woodbridge and the use of train klaxons during the night Woodbridge Town Council seeks Examiners to request that the Applicant base its mitigation strategy taking that into account such potential delays and the impact on 8hr average levels at 2018 WHO levels as well as the peak levels. Monte Carlo or similar simulation techniques could be employed.

The freight management strategy change proposal accepted by Examiners does aim to reduce road freight transport use but the current usage of the A12 northbound frequently, even outside peak periods can lead to queues at the A12/A1438 roundabout in designated A12 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 A1152 bound HGV traffic, to traverse Woodbridge through the conservation area on roads of non-standard width and locally substandard width pavements with only one formal pedestrian crossing. Further an air pollution hotspot is already present at the traffic lights on the A1438 along the Thoroughfare. The addition of significant additional HGV traffic on the A12 will only exacerbate the issue of other traffic diverting. Mitigation however has been proposed for Wickham Market for similar impact. The Council seeks the Examiners to require that mitigation is provided for such extra traffic in Woodbridge either by way or limiting traffic speeds and/or by way of widened pavements or providing additional crossings to access more suitable pavement widths along the route.

Woodbridge Town 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 which is part of the A12 north of the A12/B1078 roundabout.

Finally, Woodbridge Town Council understand that the Applicant's intention is not to allow diversion of Sizewell HGV traffic off the A12 onto roads such as the B1438 and

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we would request that that applies even where police divert traffic to use that route, the Sizewell HGV traffic returning to Seven Hills.

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