



Submission of oral statement at OFH 21/5/2021 by Felixstowe Town Council

Introduction

My name is Andy Smith

I speak today on behalf of Felixstowe Town Council (FTC), of which I have been a member for 38 years.

However the Panel may care to note that I was previously a member of Suffolk Coastal District Council (SCDC) for 28 years to 2019, and a Cabinet member 20 years, much of that with responsibility for Planning.

In that context I have an SZC involvement right back to the Nuclear Review in 2007. I chaired the first period of the SCDC & SCC Joint Local Authority Group and remained a member until 2019, so I have been involved in detail with the SZC issue for 15 years.

Statement by FTC

I talk today about concerns of FTC.

May I first emphasise that FTC takes no stance of principle in relation to nuclear power generally, or whether the coastal site at Sizewell may be an appropriate location.

However, FTC has fundamental reservations in regard to the inadequacy of the Transport Assessment (the TA) so far as it affects both Rail and Road capacity in the southern part of the County, and in the case of rail, national shortage of network freight capacity.

We have made some detail comments in regard to these, but I wish to use today's opportunity to put those in a wider and more strategic context.

The Town Council's 3 concerns from our local perspective are around the proposals for freight movements, namely:

- The rail strategy, and the potential negative effects on available freight capacity from the Port of Felixstowe to the west and south of Ipswich – which is currently fully utilised.
- 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

However, those, alongside many others from parties further north who are much more seriously affected by road and rail impacts, derive from the minimal information on and justification for the various proposals in the so-called Freight Strategy (the FS) contained in the TA. That omission has meant that little meaningful debate has been possible around the basics of the impacts of freight supplies to the SZC site.

We would suggest the FS is not really a strategy at all, but rather a range of outcomes, and some potential mitigations of those, arising from a wholly undefined range of requirements for servicing the construction, for which minimal information is available, and by implication have been given relatively little attention by the applicant. This applies equally to the original TA and to the limited changes in the Revised TA.

Section 4.5 of the TA mentions only:

- The project will “require large volumes of freight to be transported to the main development site.”
- An aim to “to reduce the volume of materials that requires movement off-site” by re-use of materials where possible
- “to seek to move bulk materials and containerised goods by sea or by rail where this is practical or cost effective.”
- “where movement of materials by road remains necessary, to manage this” to minimise local impacts

The passenger traffic aspects are analysed in detail as to their geography, scale and timing during the construction phases, which has allowed a constructive educated public debate on those issues.

However there is no such analysis of what freight types and volumes are required, which would enable Interested Parties to understand or comment on how those could be better managed and especially how the Modal Split could be optimised, or for IPs to judge validity of the many assumptions made.

The effective assumption throughout is that only bulk materials such as aggregates and similar are candidates for rail or sea delivery, and that all other goods must go via road on HGVs or LGVs. We submit that that is a deeply flawed misconception.

Critically, while the above mention is made of “containerised goods”, that remains the only reference to containers throughout the range of documents, so far as we can identify. We suggest that this is a fundamental flaw in the so-called Freight Strategy. It is self evident that a wide range of goods are routinely moved, very efficiently, in containers, which lend themselves flexibly to all modes of transport, be that road, rail or sea.

This omission came into focus much more prominently when the Proposed Changes were published, with the option of the Temporary Beach landing Facility (the BLF) becoming a jetty of 400m or more, into significantly deeper water. We suggest that

this does give a practical option via some modifications of that jetty to allow for berthing of small container ships.

Similarly, no data is given on likely sources for materials, whether bulk or manufactured items. For aggregates in particular the source locations, whether from marine sources or if from land whether from Somerset, Derbyshire or elsewhere are fundamental to the traffic patterns, certainly for rail in the latter case.

The Town Council mentioned containerisation only very briefly in our response to EDF's consultation. However, with more time available up to the deadline, I separately personally submitted a document under the heading "TRANSPORT STRATEGY – AN ADDITIONAL MARINE DIMENSION?". FTC will submit an enhanced version of that as part of our comments on the Proposed Changes. (Later note: it is intended to comment only briefly on the "EDF Changes" submission form, but to incorporate this aspect in a consolidated Written Representation on the TA as a whole, as currently presented in its revised form.)

That document seeks to address issues such as

- The type of small container vessel which could be accommodated in the depth of water available.
- The practicalities of unloading and moving containers on the BLF
- The required shore end facility for ongoing container movements into the construction site
- The feasibility in regard to potential sea and weather conditions
- The conclusion that such a facility if implemented imaginatively could allow a major reduction in both HGV and rail movements required, throughout the construction period.

Given Felixstowe's situation as the largest container port in the UK, there is of course a large and thriving local (logistics) business infrastructure in the area to support a container-based strategy which could be very flexible and very cost-effective, including not only the availability of the port itself, but all of the wide range of skills and resources in the local logistics economy. It is not for FTC to be specific about detailed aspects of that but commend to EDF and hence to the Panel the advantages to be gained from an innovative use of the resources available.

We therefore request that the Examining Authority request EDF to fully examine this possibility for incorporation into the final Order, to the benefit of many communities in the area. That would necessarily include the supply of significantly more detailed information on the profile of freight types, volumes and sources.

Having concentrated my main comments today primarily to the fundamentals of the Transport Strategy, I would like also to briefly make a couple of more specific comments.

Firstly, in regard to the proposed Freight Management Facility at Nacton, there is a provisionally scheduled Accompanied Site visit to that site on Thursday 10th June, at

which FTC have requested to be represented, and also that the scope of that be slightly widened to investigate what we believe to be a much superior access route to the site for HGVs than is currently proposed. So I would like to take this opportunity for that request to be sympathetically considered by the panel.

I would also like to direct Panel Members' attention to the major issues unaddressed by the TA in regard to the absence of any spare capacity on the national rail freight network to the west and south of Ipswich. A simple assumption is made that additional capacity for either 2,3 or 4 trains daily, beyond the currently unused 1 train path dedicated to servicing decommissioning to the SZA site, can be simply acquired. That could we believe only be at the expense of reducing the capacity fully used by the Port of Felixstowe, (36 trains per day) to the detriment of the competitive position of the Port and indeed the national economy, wherein Felixstowe's provision of 40% or more of total UK container movements is highly significant. It is disturbing that after years of this issue being discussed, the Addendum to the TA still leaves this matter undefined as to the number of trains, and the resulting rail freight issues, unanswered. Network Rail have been talking of a significant project in the Ely area to increase capacity, but that remains 8 years off at the most optimistic, so beyond the SZC peak years.

In the meantime, I ask that Panel Members carefully consider the fundamental omission of containerisation from the TA.

Thank you for your time, I am of course happy to answer any questions the panel may have.

A panel member requested that a document detailing the FTC suggested alternative traffic route to the FMF be submitted with this submission – see below. This will again also be integrated into our Written Representation.

HGV and LGV access route to Nacton Freight Management Facility

The currently Proposed Route accesses the FMF from the North onto the Old Felixstowe Road, via A14 junction 58, Seven Hills, and a short stretch of the A1156 (the main local access road into central Ipswich), via a T-junction ("the Crematorium Junction") only slightly offset from the entrance the Ipswich Crematorium.

FTC, and a number of other local Parish Councils in their Relevant Representations, have major concerns about this route, most notably the very awkwardly sited and potentially dangerous Crematorium junction.

Also FTC have concerns about adding to the constantly growing traffic, with congestion at some times of day, by use of the Seven Hills junction on both Inbound and Outbound trips, which can only be exacerbated by SZC LGV and LGV traffic using the junction on both inbound and outbound trips.

We believe that a much preferable option from a local traffic management perspective is to route inbound by SZC traffic remaining on the A14 to the very lightly

trafficked Trimley overpass roundabout (J59), and then westbound on the A14 to the existing full standard off-slip at Levington.

And similarly, to route outbound traffic briefly eastwards to the Levington (local standard) A14 on-slip, then via Seven Hills roundabout to the A12 northbound.

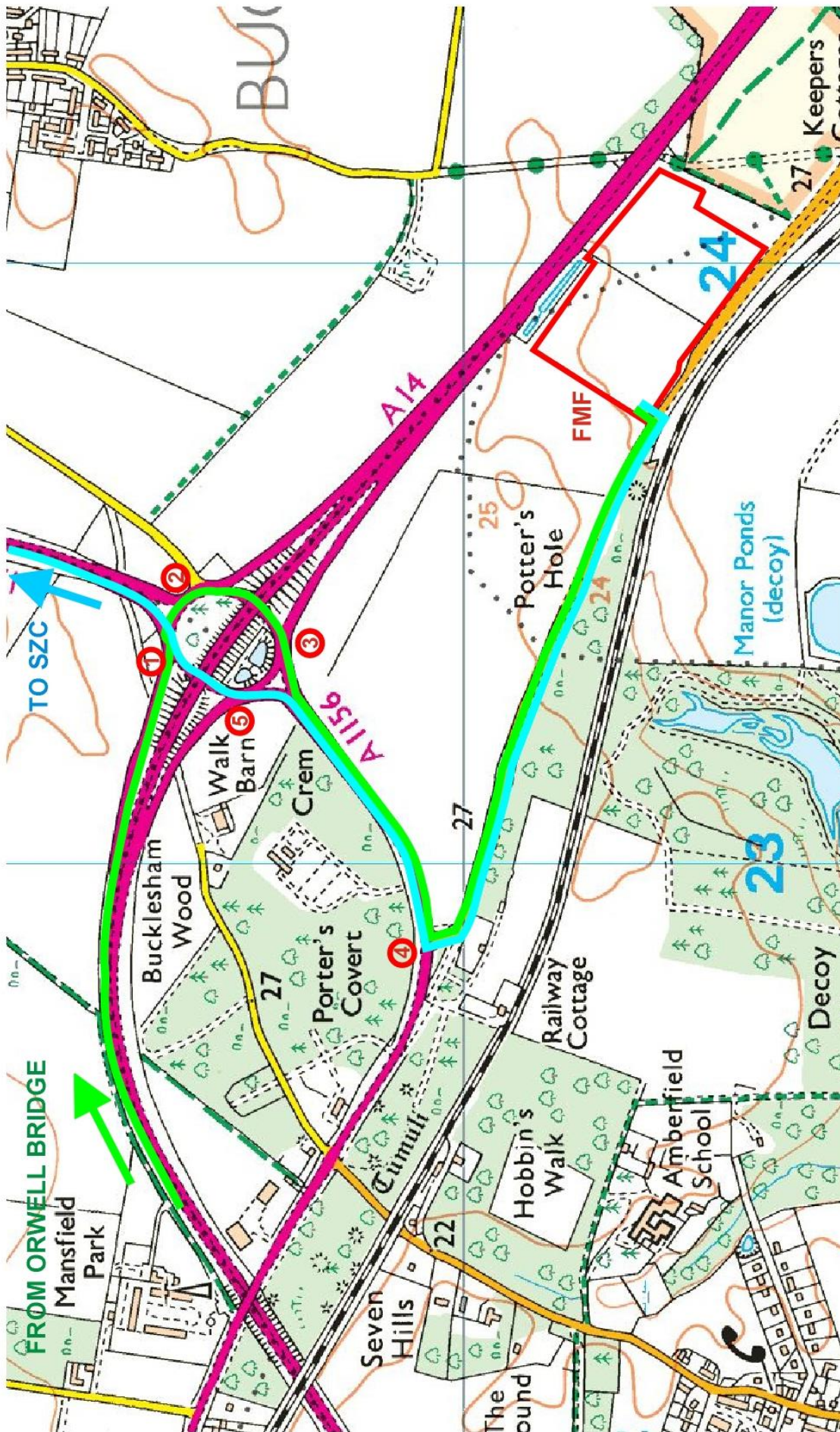
We suggest this can be analysed by defining points at which on each option there are "Traffic Conflicts" on the routes. The 2 diagrams below illustrate this and show that those conflicts could be reduced from 5 to 2 by the alternative route proposal, as well as wholly eliminating the accident potential at Crematorium Junction. In tis context "Traffic Conflicts" are defined as points where the SZC traffic would need to pass in front of or merge with existing significant traffic flows, so potentially either being delayed and / or itself suffering delays. Interference with minor flows, e.g. the single track Bucklesham exit from J58 are not included.

While we recognise that this would involve a small additional mileage on the A14 for HGVs, the negatives on that score would be far outweighed by the benefits of the alternative suggestion, most notably by also avoiding a clear accident potential at the Crematorium junction., where northbound HGVs would have to cross both streams of fast-moving local traffic at this location, on a long but fast bend on the A1156, which has a constant flow of traffic for most of the day, and a heavy flow, often congested, at peak times, particularly eastbound.

The above is illustrated in 2 maps below, showing the above for:

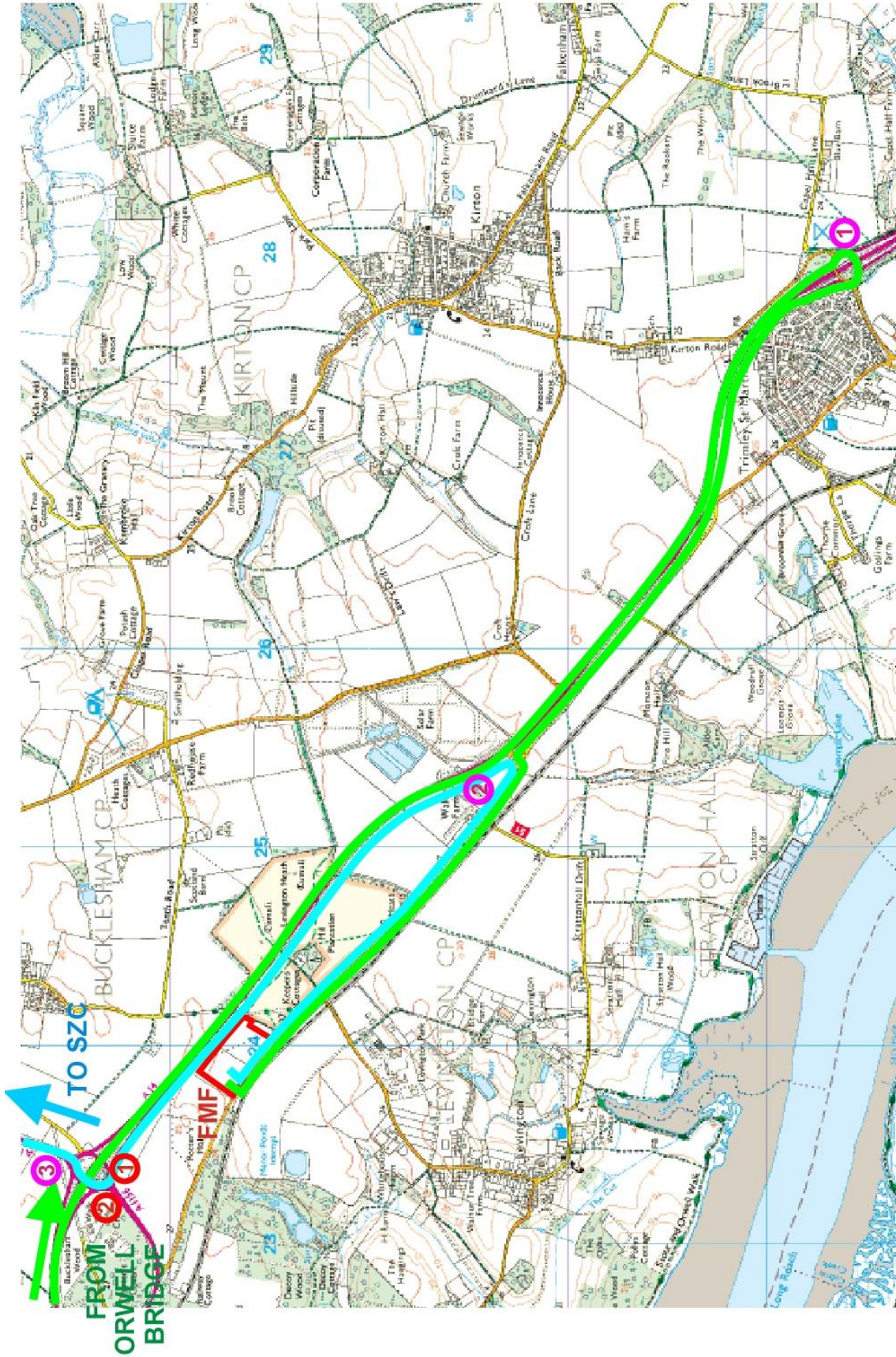
- A) EDF' s submitted Proposed Route
- B) FTC's suggested Alternative Route.

A) TRAFFIC CONFLICTS – EDF PROPOSED ACCESS ROUTE TO FREIGHT MANAGEMENT FACILITY



- INBOUND ROUTE** ———
- OUTBOUND ROUTE** ———
- CONFLICT POINTS:**
- 1 INBOUND A14 OFF-SLIP <-> TRAFFIC ON ROUNDABOUT
 - 2 INBOUND ON ROUNDABOUT <-> A12 SOUTHBOUND
 - 3 INBOUND ON ROUNDABOUT <-> A14 WESTBOUND OFF-SLIP
 - 4 OUTBOUND RIGHT TURN > A1156
 - 5 OUTBOUND A1146 <-> TRAFFIC ON ROUNDABOUT

B) TRAFFIC CONFLICTS – FTC ALTERNATIVE ACCESS ROUTE TO FREIGHT MANAGEMENT FACILITY



- INBOUND ROUTE** —
- OUTBOUND ROUTE** —
- CONFLICT POINTS:**
 - 1 OUTBOUND A14 WESTBOUND OFF-SLIP <-> TRAFFIC ON ROUNDABOUT
 - 2 OUTBOUND ON ROUNDABOUT <-> A1156 EASTBOUND
- NOTES:**
 - 1 NO CONFLICT - TRIMLEY ROUNDABOUT HAS MINIMAL TRAFFIC
 - 2 LEVINGTON LOCAL ON-SLIP IS SHORT, MAY NEED UPGRADE
 - 3 LIMITED CONFLICT A12 NORTHBOUND DUE TO A12 LEFT FILTER LANE