

**Sizewell C Development Consent Order ('DCO') Application**  
**Woodbridge Town Council (IP20025891) – Deadline 3 Submission**  
**Comments on Deadline 2 Written Representations by Others**  
**Summary**

**1. Freight Management Strategy ('FMS')**

- 1.1. From the NR Deadline 2 submission WTC has grave concern that approval of the DCO submission, if given under current timescales, would proceed without the impact of the use of the East Suffolk Line through Woodbridge being fully understood or assessed with regard to timetabling, safety and mitigation of impacts both on the operational railway and residents along the line.
- 1.2. Further NR will be unable during the Examination to decide if it is practicable, to timetable all the required freight trains without impacting on passenger services as the scheduling has to take account of movements on the wider network.
- 1.3. The impact of this goes far beyond the rail aspects of the FMS as it is conceivable that even the Applicant's now reduced level of freight trains from that at Change 1 may not be feasible. This will impact on the other means of freight movement and most probably road movements on the A12.
- 1.4. WTC contend the Applicant is demonstrating by its failure to provide details to NR, as well as other IPs, that it has advanced its DCO Application too early. The FMS is insufficiently developed to represent a reasonably accurate representation of the strategy it will be capable of adopting.

*B. Suffolk County Council ('SCC')*

- 1.5. SCC has also expressed its concerns about the deliverability of the rail-based transport strategy, the lack of exploration by the Applicant of maximisation of the delivery of materials by modes other than road and has missed the opportunity to improve the East Suffolk line. WTC agree with these comments.
- 1.6. WTC however disagree with SCC statement in §2.16 that it is now impossible to develop alternatives to allow for day-time freight movement.

- 1.7. NR has demonstrated it can deliver even major complex railway engineering operations in under 3 months.<sup>1</sup>
- 1.8. Further NR's work on the reopening the Dartmoor line has shown it can react quickly to reinstate track when funding is provided.<sup>2</sup>
- 1.9. WTC consider the Applicant was aware of NR normal procurement process and that rail transport of freight would be a strategically important factor. Despite this the Applicant, in WTC's view, has failed in its project management to advance this crucial aspect of the project with vigour.
- 1.10. As SCC state the current options are unpalatable and WTC contend so poorly developed that the ExA are being presented with a FMS that is incomplete and is demonstrably not robust.
- 1.11. In WTC's view the Applicant may have prevaricated in providing information and studies to NR and local authorities so that it could force their hand.
- 1.12. WTC consider this could be deemed an abuse of process. WTC consider that the ExA should require the Applicant to expedite using all its best endeavours options to minimise overnight freight use of the line and to bring its FMS to a degree of certainty that can allow ExA to approve.
- 1.13. In WTC's view the Applicant should be required to investigate and put a Change forward for dualling of part, or the whole of the single-track section, of the East Suffolk Line.
- 1.14. SCC has supported its WR with a September 2020 report by AECOM which highlights that at that time the Applicant had not started NR's GRIP 3 process and the East Suffolk Line is unlikely to be ready for use before March 2026. Thus diversion of rail freight to road at the early stage of the project's construction is inevitable and not covered in the Change 1 revision to the FMS.

*C. Felixstowe Town Council ('FTC')*

- 1.15. FTC has pointed out the deficiencies of the detail that the Applicant has provided as summarised by NR and some of the wider issues which NR has to assess.

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<sup>1</sup> [The Dawlish rail disaster - what happened and where do we stand now? - Plymouth Live \(plymouthherald.co.uk\)](https://www.plymouthherald.co.uk/news/the-dawlish-rail-disaster-what-happened-and-where-do-we-stand-now/) and [Dawlish Sea Wall - Network Rail](#)

<sup>2</sup> [Record breakers! - The Dartmoor Line.](#)

- 1.16. WTC support the contentions of FTC regarding all aspects of the FMS and its critical assessment of the limitations and deficiencies of Transport Assessments undertaken by the Applicant.

## **2. Noise from night-time use of Rail for Freight**

- 2.1. The deadline 2 WR submissions of numerous town and parish councils along the East Suffolk Line have raised specific concerns in relation to night-time noise by freight trains.

- 2.2. Two councils have consulted residents. They consider there will be a strong adverse impact on the quality of life and /or oppose the use of night-time trains.

- 2.3. MPC records that its residents consider:

*“their real-world experience of train noise and vibration is more profound and intrusive (and carries further) than EDF’s interpretation.”* WTC supports that view.

- 2.4. In WTC’s view MPC rightly points out that there is a dichotomy in the Applicant’s approach in that

*“Night movements are banned for all road freight, and for rail freight movements in Leiston, on the grounds the noise and vibration would be an unacceptable disturbance to residents”.*

- 2.5. Town and Parish councils concur that the Applicant should be required to develop use of daytime trains by upgrading the single-track section of the East Suffolk line.

- 2.6. WTC note that unlike the Applicant and ESC, PHE in its Deadline 2 WR, makes extensive use of WHO’s 2018 Environmental Noise Guidelines on Railway Noise as used in WTC submission at Deadline 2.

- 2.7. WTC concur with the views expressed in §18.65, 18.68 and 18.68 of ESC’s Deadline 2 submission in that the current proposals for rail noise and vibration mitigation would not adequately protect residents, lower thresholds must be adopted and the uncertainty in the Applicant’s ability to deliver mitigation measures must be resolved before night-time freight train use.

## **3. Issues with use of the A12 for road freight**

- 3.1. The Deadline 2 WR submissions of the SCC and various town and parish councils mention issues with capacity of the A12 around Woodbridge.

- 3.2. SCC, acknowledging the issues, has proposed works along the A12 at all roundabouts between the A12/A14 junction and the A12/ A1152 junction and

also dualling of the single lane section between the A12/B1438 roundabout and the A12/B1078 roundabout.

- 3.3. These improvements are unlikely to be completed until 2026. Further SCC's consultant AECOM consider that the East Suffolk line will not be ready until 2026. Thus in early years, Sizewell C freight traffic on the A12 which will include diverted rail freight, will be significant higher than in the change 1 details, and will have to contend with passage through the roadworks on the A12 around Woodbridge.
- 3.4. It is inevitable road works will impose speed restrictions of 30mph or locally less. This will inevitably reduce capacity and increase TMI (Traffic Management Incidents') which will contribute to greater diversion of traffic to the B1438.
- 3.5. WTC reiterates its view that the Applicant and SCC are failing to adequately consider the impacts along the B1438 which remains the only viable diversion route for TMI closing the A12 north of the B1438 junction and for elective diversion when queues develop.