

Comments on the Joint SIR of East Suffolk and Suffolk County Council as the contents apply to Woodbridge

1. Introduction

It must be recognised that Woodbridge sits at a critical point in the main transportation network for deliveries to Sizewell C, with the A12 on its western boundary, the East Suffolk Rail Line on its western, and with access to obvious rat-running routes to avoid delays on the A12 to the north passing through the town.

Whilst the Joint SIR addresses the issues of road-based travel, and train traffic generally, there are specific issues which impact on Woodbridge, a town of around 7,500 residents.

Any change in the volume of freight movements from road to rail, and vice-versa, affects Woodbridge significantly – paragraph 15.1 includes this statement “The uncertainty of delivering additional train movements on the East Suffolk Line poses a risk of a significant increase in the number of HGV movements on the road network, which would further exacerbate these impacts unless controlled.”.

2. Freight by Rail

The East Suffolk Line passes through Woodbridge at street level. There are a significant number of domestic dwellings within 50m of the railway, and even more so within 100m. The current service on the East Suffolk Line provides a (roughly) hourly service between 0615 and 2215, with no trains overnight. Although the nature of the line through Woodbridge restricts the speed of trains, noise from trains is still audible within these properties, particularly if idling whilst waiting to access the single track north of Woodbridge, or when using their warning horns at the numerous access crossings.

Although noise emissions from trains are governed by EEC regulations, there has not been a full conversion of stock, particularly freight, to the full EEC standards, and the acceptable threshold noise level at night is far below the daytime threshold. After the introduction of new passenger stock to the line in 2020 the number of complaints to the Council about noise from the warning horns increased significantly, due in part to the horns being set to the maximum permitted level and not being directional.

So noise from trains, both passing and waiting, particularly at night, is an issue.

The Joint SIR identifies this in paragraph 15.35 where it is noted that “The principle of increasing freight movements by rail and marine is supported by the Councils. At the time of finalising this LIR, there remains a lack of clarity around the deliverability, timing and impact of the proposals of additional train movements and timing of the construction of a second beach landing facility, which would be of concern to the Councils if not resolved. The Councils will continue to work proactively with the Applicant, Network Rail and other relevant organisations to aim to resolve these matters.”

It is clear that the applicant has failed to provide the clarity needed to enable a full assessment of the impact of additional (nighttime) train noise to be made. Woodbridge would argue that without this full assessment no decision should be reached.

- i In paragraph 15.41 the SIR notes that “As part of the revisions to the transport strategy proposed in the Applicant’s change application, the Applicant now intends to run four/five trains per day as set out in the ES Addendum [AS-188]; this would be an increase of one/two trains per day compared to what was proposed in the original DCO submission (three trains with six movements - five at night and one during the day). According to the Applicant, the operation of four/five trains per day might consist of:
- ii i. six train movements at night with two movements during the day; or
 - iii ii. seven freight train movements at night with three movements during the day; or
 - iv iii. eight movements during the night (with two movements during the day). “

There is no assessment made as to whether, within the hourly (two-way) service which currently exists it is physically possible to position additional daily freight movements. South of Woodbridge the East Suffolk Line shares tracks with the Felixstowe Branch. The passenger service on that branch is one of the most-disrupted passenger services in East Anglia, having to work around freight to/from Felixstowe Docks, and to add to the congestion two further freight movements each way on the East Suffolk Line will inevitably result in trains having to wait.

On the East Suffolk Line the last place to wait northbound is in Woodbridge. It is not acceptable to residents to endure the noise, and air pollution from idling trains.

The SIR at paragraph 15.44 and 15.45 states that “However, the Applicant has not demonstrated what improvements are required to the East Suffolk Line or the wider rail network. A GRIP 3₁ Feasibility Study is being undertaken by Network Rail to identify the capacity and level crossing improvements needed on the East Suffolk Line, but this will not be completed until July 2021. In addition to this, although the Applicant has referenced from where materials are likely to be sourced within the UK, no commitment has been given as to the origins or rail routes and capacity available.

Without this evidence, it is not clear whether the Applicant can operate additional trains on the East Suffolk Line and the wider railway network, nor the potential impact on current passenger services operating on the line and freight rail services to the Port of Felixstowe. This creates substantial risks not only that the number of HGVs on the road network will need to be significantly greater than indicated, with the associated impacts arising from that increase, but also that it could cause disruption to rail passengers using the passenger trains and the operations of the Port of Felixstowe, which uses part of the East Suffolk Line for the transportation of goods.

Woodbridge would contend that without sight of the GRIP3 Feasibility Study by Network Rail, AND importantly, a commitment by the Applicant to fund the required improvements, no decision on freight movements by rail can be made. Even with this commitment we would expect no freight movements by rail to occur until after the improvements have been implemented.

It may be that dualling the track north of Woodbridge may enable additional daytime trains to be run over the East Suffolk Line; given that every train significantly reduces HGV movements (and congestion on the A12 north of Woodbridge) this move, which will provide a residual benefit for the town (no need for trains to be held at Woodbridge) would be welcomed.

3. Freight by Road

All northbound HGV's will pass Woodbridge using the A12. Any delays to traffic, north or south-bound, north of the A12 will increase the possibility of rat-running through Woodbridge, using the B1438, B1079 to access the A1152 and beyond. So it is important that adequate provision is made, both for scheduling "normal" deliveries and abnormal loads towards off-peak times but also for "HGV holding compounds" in the event of blockage of the A12. In addition there must be an easily-implemented programme of diversions in such instances to prevent the roads through Woodbridge becoming a continuous stream of traffic.

The Joint SIR acknowledges (PARA 15.1) that "The proposed development will have a significant negative impact on the highway network, even when the proposals for the second BLF and additional train deliveries proposed as part of the change application have been delivered."

The SIR acknowledges that whilst separate funding has already been obtained for A12 widening and improvement works between Seven Hills and the A1152 junction (north Woodbridge) (paragraph 15.23) "The results from this analysis are that a number of the A12 junctions will be over capacity and/or be subject to significant congestion in future years, which is associated with planned growth and development in the area and **would be further exacerbated by construction traffic arising from the Sizewell C proposal.**"

It remains impossible at this stage to forecast the actual number of HGV movements – the Joint SIR at paragraph 15.49 states "Due to the lack of full detail of rail and sea transport proposals at this time, the Applicant has not conclusively identified the final maximum materials capacity that the rail movements and BLFs could principally deliver." Clearly until the ratio of rail/sea/road volumes have been established any road-based proposals are pure speculation, and no definitive plans can be produced.

The Joint SIR points out in paragraphs 15.59 and 15.60 that the applicant, in all their submissions, only proposes controls relating to the daily total number of HGVs travelling to the Main Development Site, for each of the scenarios (i.e., Early Years, Peak Construction, Operational), and makes no mention of any controls on HGV movements to "associated development sites" – a not insignificant number (466 daily two-way movements).

Because the applicant has not proposed hourly caps on HGV movements, some of the A12 junction modelling may be inaccurate and the impact may be greater than estimated by the Highways Authority. It is essential that hourly caps, particularly for peak periods, are imposed.

Similarly there are no proposed restrictions on the number (or frequency) of abnormal loads, which by their definition, will reduce average traffic speeds and journey times.

There will be significant impacts caused by construction traffic on "the A12 both north and south of the A1152 Woods Lane junction" which have not yet been realised by the applicant. This is the stretch around Woodbridge.

Specific to Woodbridge, paragraph 15.103 states "The increase in HGVs, buses and light vehicles during construction will increase delays, severance, fear and anxiety of vulnerable road users

and reduce amenity along the A12 corridor, most notably at Martlesham, **Woodbridge**, Marlesford, Little Glemham and Blythburgh, as well as prior to the delivery of mitigation at Farnham, Stratford St Andrew, Yoxford, Theberton and Middleton Moor.

The issues and dangers of rat-running due to the increased, and slower, traffic on the A12, are recognised and the link of the A1152 to the A12 specifically mentioned (15.111). In addition, the traffic increases along main roads are likely to encourage more traffic, both Sizewell C related and from local users, using 'rat runs' through local communities on minor roads. This displacement traffic would use less strategic roads which are not designed to accommodate significant levels of traffic. This is likely to put additional strain on these roads reducing residual capacity, increasing delay and negatively impacting pedestrians, cyclists and other vulnerable road users by impacting their ability to enjoy walking / riding such routes because of increased noise and risk of danger. Vulnerable road user includes wheelchair users, horse and riders, young children.

i vi. B1069 (Leiston to A1094, and A1094 Snape to Bentwaters) and A1152 (Bentwaters to Melton/A12), reduced resilience, capacity, vulnerable road user amenity and increased potential for road safety incidents.).

Woodbridge Town Council would argue that there will inevitably be some increased traffic through Woodbridge trying to avoid delays at the A1152/A12 junction and that there should be mitigation measures (HGV restriction ?) at the A1152/B1438 junction, together with 20mph restrictions along the whole of the B1438.

The Joint SIR at paragraph 16.32 states "The proposed Wickham Market Park and Ride includes a Traffic Incident Management Area that has capacity for 100 HGVs in the event of an incident to the north on the A12". Woodbridge would argue that given the high volume of HGV's using the A12 (in both directions) the size of this facility is insufficient – it amounts to less than 5% of daily lorry movements, yet clearing an incident may take several hours.

The Joint SIR states in paragraph 19.20 "The main potential impacts are emissions from construction HGVs across the relevant road network, emissions from NRMM and generators, and the potential effects of dust from construction activities upon neighbouring communities. Also, further information has been requested to ensure that there is no risk of adverse air quality impacts in locations such as Woodbridge AQMA due to traffic diverting as a result of increased congestion on the A12. " This information is still outstanding.