

WOODBIDGE TOWN COUNCIL WRITTEN REPRESENTATION

DEADLINE 5

COMMENTS ON APPLICANT'S ORAL RESPONSES at ISH (2) - TRAFFIC AND TRANSPORT and ISH (6) COASTAL GEOMORPHOLOGY

Woodbridge Town Council ('WTC') has submitted at this deadline its written copy of the oral presentations it made at the above Issue Specific Hearings ('ISH's).

This document is a short commentary of the oral responses from the Applicant during the ISH to our oral presentation at the two ISH's but excludes a specific commentary on the final oral response by Mr Hereward Phillpot QC for the Applicant. A more detailed commentary will be given at Deadline 6 when the WR and Applicant's responses at Deadline 5 are available to review.

We have made a separate Written Representation ('WR') and request to the ExA on the veracity of Mr Hereward Phillpot QC's statement on the role of the person that the Applicant has called upon during the ISH to give commentary in the area of their particular expertise.

ISH (2) TRANSPORT

In our oral presentation at ISH (2) we requested that the Applicant model the impact of the proposed SCC A12 improvements which will be constructed during the Early Years of the Sizewell C construction project. There was no response by the Applicant to this aspect of our oral presentation. The Applicant had been requested by the ExA at previous Hearings to provide a response on the impact of those proposed works but we have neither seen any details, nor any mention of the Applicant's modelling that attempts to assess the impact. Whilst we accept that modelling of the temporary works associated with online road improvements is difficult as it will, in part, be impacted by the methodology of the appointed contractor, it should be feasible to do some sensitivity analysis related to reasonable predictions of reduced highway capacity and speed limitations at the locations of the works. WTC ask the ExA to request that the Applicant does such modelling so that discussion and debate can be undertaken between the ExA, IPs and The Applicant on the basis of a technical assessment of the potential implications. It remains WTC's view that these works will cause diversion along the route mentioned in our oral presentation and we consider this should be considered when the S106 agreement is finalised so that possible mitigation works can be incorporated into those agreement.

WTC do not accept the Applicant's oral response at the ISH on the impact of the night-time freight trains on the passenger services along the East Suffolk line. The specific details in our oral presentation on the Applicant's draft timetable are, in our view, irrefutable.

WTC has during the ISH and earlier hearings come to the view that the Applicant has provided the ExA and IPs with a Freight Management Strategy that fails to minimise impact on the environment and on residents in East Suffolk. This has arisen as a result of what we consider to be the Applicant's inaction and prevarication over many years prior to this DCO Application, which is well detailed in SCC Written Submission at Deadline 3 on the aspect of the East Suffolk Line. WTC considers this behaviour should not be condoned by the ExA giving approval where the Applicant has failed to demonstrate it has exercised all reasonable diligence and put in place measures to minimise impact.

WTC, knowing their area as it does, fears that reliance on an unimproved single-track railway over an extensive section of the East Suffolk line will inevitably lead to delays and disruption that will shift traffic from trains to lorries to meet construction deadlines. This will exacerbate issues with an already congested A12 and lead to non-Sizewell C HGV traffic, seeking alternative back routes to Sizewell on the B1438 and/or A1152 and through the heart of both Woodbridge our neighbours in Melton.

In WTC's view the Applicant should be required as part of any approval of the DCO application to use its best endeavours to instigate the dualling of the railway line between Woodbridge and Saxmundham before use of the line for freight traffic (other than the one daytime available slot), to ensure all rail freight traffic be in the daytime hours and that works to achieve this be undertaken before any freight is moved to Sizewell C by road or rail. In our view this is achievable as demonstrated by Network Rail on other parts of the rail network when there is an imperative and resources to achieve such a goal.

ISH (6) COASTAL GEOMORPHOLOGY

WTC noted that, in the Applicant's response to its concerns and query about the lack of detail on the proposed ground improvements under the HCDF, the Applicant did not advise when such details would be available. The Applicant indicated that it was still evaluating options and undertaking soil testing for one of those options, namely soil mixing. In WTC's view the options mentioned by the Applicant at the ISH, i.e. soil mixing and/or hard inclusions have potential impacts on the buildability of the above ground HCDF embankment and on the coastal environment and geomorphology, short term i.e. during construction and long term i.e. at the end of life particularly if the requirement is for the HCDF to be removed and the ground improvement is exposed when it will impact on future geomorphology of the coastline.

The Applicant has indicated that it will provide certain new details and design revisions on the HCDF, SCDF and BLF at Deadline 5 and also at Deadline 7. The Applicant, in its response to our oral representation at the ISH, did not advise that it would provide ground improvement details during the Examination and therefore WTC ask the EXA to either request that the Applicant provides the details of the ground improvement at Deadline 7 or request the Applicant to advise at which other deadline such details will be forthcoming.