



Together Against Sizewell C

APPLICATION BY NNB GENERATION COMPANY (SZC) LIMITED
FOR A DCO GRANTING CONSENT FOR THE SIZEWELL C PROJECT

TOGETHER AGAINST SIZEWELL C (TASC) IP NO. 20026424

SUMMARY OF ORAL SUBMISSIONS & COMMENTS

RELATING TO ISH 2 and 3 : Traffic and Transport

TASC made various oral submissions at the two transport hearings and have found it easier to divide our comments into our own headings rather than replicate the agenda and trust this is in order.

Rail Strategy

The first section has been prepared by our rail expert, Clive Lovelock whose oral statement and related **comments** are as follows:-

"I am Clive Lovelock and I am appearing today on behalf of TASC. I am a retired railway signal engineer with experience of managing railway infrastructure projects to support power station supply and other freight supply schemes.

Can I say at the outset that I am disappointed to be presented with yet another rail strategy document only days before this meeting which has limited my time to examine the document in detail.

Issue Specific Hearing 3 (Part 1) Rail Strategy

We are now only months away from a decision on this planning application. Yet we still don't have the details of how the rail freight service will be delivered. I don't think it's unreasonable at this stage of the inquiry to expect:

1. A final list of the materials to be delivered by rail. (**Reinforcing steel and Tunnel segments are mentioned but there is no information about where they will be sourced from. What happened to the aspiration to bring containerised goods in by rail?)**
2. Draft timetables for the rail movements (**The latest rail strategy document has produced timetables for the section from Sizewell/Leiston to Westerfield, but it has ducked the really critical issue of the capacity between Westerfield and Boss Hall Junction)**
3. A draft signalling plan to show the extent of the signalling alterations required at Saxmundham, and new and upgraded level crossings on the Leiston branch and Green route. (**This should answer a number of outstanding questions e.g. Will freight trains stop and restart at Saxmundham Junction**

and where exactly are “Waiting Position A” and Waiting Position B” as shown in table 11.1 Indicative timetable for early years rail operation?)

4. A measure of reliability of the rail movements (e.g. is there a 90% probability of all the 3tpn paths being delivered, 70% probability that 4tpn being delivered) What steps will be taken to maximise the reliability of the train paths?

5. What happens if all the train paths proposed do not materialise. (An earlier submission by EDF claimed each train is equivalent to 67.5 HGVs. EDF have already scaled down their peak number of trains from 5/day to 4/night, is this an additional 135 HGV movements /day in 2025/6?)

6. EDF have looked at rail only for heavy flows, have they made any efforts to reduce the number of “white van” movements? (e.g. by Orion trains, these are designed to take small loads and use converted passenger trains so can run on the ESL at full line speed)

Issue Specific Hearing 3 (Part 2) Park and Ride Sites traffic modelling

1. In relation to the Northern Park and Ride site what assessment has been made of the risk of road traffic “blocking back” over Darsham Automatic Half Barrier Crossing (AHBC) at shift change times. (Has the effect of a northbound car on the A12 waiting to turn right into Darsham filling station against the flow of southbound traffic at shift change times been modelled?)

2. In relation to the Northern Park and Ride site what assessment has been made of the volume of construction workers cars that will use Willow Marsh lane as a “Rat Run”? (In relation to Willow Marsh Automatic Barrier Crossing (ABCL) is the width of the carriageway on the approaches to the crossing adequate for the increase in traffic volume envisaged?)

Following discussions at ISH 2 and ISH 3 Clive Lovelock on behalf of TASC would like to raise the following questions:

Rail Strategy

Q.1 Can the applicant now provide a comprehensive list of all the rail freight flows he envisages using over the life of the construction project?

Q.2 Can the applicant break down these flows by year and by originating point of each flow?

Q.3 Can the applicant supply evidence that a reliable train path for each of the traffic flows identified exists?

Q.4 Can the applicant confirm that the train paths identified have been secured? i.e. the paths are for the exclusive use of the applicant or its contracted Freight Operating Company.

In the course of the hearing the applicant indicated that:

Q.5 They envisaged bringing materials from North Wales. I cannot find any previous reference to this. Can the applicant confirm the nature of this flow?

Q.6 The Harwich branch might be used as a “reservoir” to hold freight trains waiting to travel to/from the East Suffolk Line (ESL). Can the applicant supply details of the holding point (Parkestone

Quay?) and details of the noise assessments carried out relating to the properties adjacent to this route? (It would seem there could be up to eight additional train movements overnight)

Q.7 During the course of the hearing a representative from Felixstowe Council raised the issue of train paths between Westerfield and Boss Hall Junction (just north of Ipswich) in relation to container traffic to/from Felixstowe Port. The port owner, Hutchinson Ports, has recently made a substantial contribution to a £60.4 million scheme to improve rail capacity between Felixstowe Port and Westerfield. Can the applicant confirm that the Sizewell C rail traffic flows will not impact on the Port's current aspirations for rail container traffic to/from Felixstowe Docks?

The following detailed questions relate to the Applicants "Consolidated Transport Assessment Section 11 Rail Strategy in document 8.5 [REP4-005]

Q.8 11.2.7 Why does the applicant persist in wanting to operate the "Green Rail Route"? The safe and efficient use of the "divisible train staff system" would be better served by the Network Rail signaller at Saxmundham having control of the "Green Rail Route" up to and including the Abbey Road level crossing.

Q.9 11.3.6 Relating to the early years rail operation, this paragraph states that a "At the waiting positions the driver would remain on board the train so no trackside facilities are provided" Does this mean that the locomotives will not be shut down so that heating and lighting can be maintained in the driver's cab?

Q.10 11.3.8 Table 11.1 refers to "Waiting Position A" and "Waiting Position B". Can the applicant supply the mileages of these "Waiting Positions" and are they the same in both the Up (towards Ipswich) and Down (towards Leiston) directions. Bearing in mind that most of these movements will take place during the hours of darkness, what precautions will be taken to prevent the second train running into the back of the first? (The current One Train Working using a divisible train staff is not appropriate for the service described).

Q.11 11.3.17 This refers to the three trains per day situation. Table 11.2 shows the first outbound train arriving at Saxmundham Junction at 22.00. This train cannot proceed until the last down passenger train has arrived at Saxmundham at 22.54. Will this train stand on the branch during this period or will it stand at signal ES2028 at Saxmundham station? In either case will the locomotive's engine be shut down?

Q.12 11.3.21 This states "Depending on the operational requirements of the main development site it may be necessary to operate the additional (fourth) train to the LEEIE siding" This statement was dropped in the applicants previous submission but has now reappeared! How does the applicant propose to operate the service so that the risk of collision between a train on the "green route" and a train on the Leiston route does not occur at the junction of these two routes?

Q.13 11.4.3 Operating five trains per day. Can the applicant confirm the statement made at ISH that they no longer intend to proceed with this proposal and indicate how the materials that would have been carried on the fifth train will now get to site?

Abnormal Loads and upgraded level crossings on the Saxmundham to Leiston branch line and the new green rail route

Q.14 Currently a significant part of the Saxmundham signaller's workload relates to answering phone calls and instructing users of the numerous crossings on the ESL as to whether it is safe to cross. What assessment has been made of the increase of signaller's workload in respect of the number of abnormal loads and the increase in the number of automated crossings on the Leiston branch/Green route from which members of the public may call to get permission to cross?

Park and Ride sites traffic modelling

Q.15 In response to questions about the risk of road traffic "blocking back" over Darsham automatic half barrier crossing, the Network Rail spokeswoman indicated that they still were not happy about this site and were still looking at additional mitigation measures. Can Network Rail say what these "additional mitigation measures" might be?

Q.16 Have Network Rail any data as to the number of road users currently ignoring the requirements of the "box junction" over the crossing?

Q.17 The applicant stated that they did not believe that there was a significant risk of "blocking black" over the crossing. When assessing the likelihood of "blocking back" do the Applicant and Network Rail use the same traffic model?

Q.18 Has the applicant modelled the situation of a northbound motorist on the A12 attempting to turn right into the Darsham filling station/shop at the same time as shift change cars and buses are heading south?

Q.19 In respect of Willowmarsh Automatic Barrier crossing, can Network Rail say whether the width of the carriageway on the approaches to this crossing is adequate for the increased traffic levels?

ROADS

Several issues arose during the ISH and TASC have identified the matters below to be of great concern:-

Motorway distances

Nearest motorways to nuclear builds are: - SZC to M11 - 78 miles. To A1M - 100 miles. To M25 - 88miles. HINKLEY to M5- 8 MILES.

Whatever journey is made, the Suffolk A12 must always be used. The 6.5 metre wide B1122 Middleton/Theberton road must also be used to gain access and egress to SZC, during the absence of the SLR.

Vehicular access to the SZC site in the first 4-5 YEARS

EDF claim two years to build the Sizewell Link single track road (SLR) and Yoxford A12 roundabout, recently adding a vehicle bridge. It is probable, with the complexity of the build and congestion on the A12, B1122 and local area, it will take 4-5 years or even longer.

Main Build and SLR starting together

The SLR and bridge to be constructed as mitigation for B1122 traffic flows is planned to start at the same time as the SZC main develop site build, both using the B1122. Access for **ALL** traffic for many years will be via this 6.5 metre road. Users include locals going about their normal activities to jobs, supermarkets etc, Friston Substation construction workers, Several thousand EDF workers, EDF Coaches from A12 park and rides, tourists, SZB and SZA personnel including a number of SZB additional workers for refuelling outages and repairs etc. All this traffic will accrue whilst attempting to construct the SZC main build, SLR and bridge. In addition, the traffic involved in the provision of worker campuses, borrow pits, jetties, sea defences, earth removal, rail sidings and offloading facilities etc will all be required to use and access a 6.5 metre wide road off the A12. During the ISH, the Applicant confirmed that the first 2/3 years would see at least one AIL delivery per day on the B1122 and that these delivery vehicles are typically 3.5 metres wide. These AILs will cause severe congestion on the B1122 and adjoining roads as the AILs will take over more than half the width of that road. Suffolk Constabulary confirmed that they currently have no resources to accompany the AILs.

Many single-track roads, access/egress roads to SZC and continued A12 congestion

A myriad of single track roads west of the A12 criss-cross large areas of the hinterland of Suffolk and also the coast. It is possible to access Yoxford from some 100 miles directly West, 100 miles N.West and 100 miles S. West through single track roads, not using a dual carriageway. When the A14 or especially the A12 is congested or blocked, when modern satellite navigations redirect from main routes or show faster routes, Suffolk villages will suffer unacceptable congestion. The completion of the SLR and Yoxford roundabout is not the end of the matter. Throughout the year, along the A12, many venues host music festivals, country fairs, seaside revels etc. When coupled with the ever-increasing number of HGVS, buses, vans and normal traffic, the **SZC BUILD APPEARS AN IMPOSSIBILITY ON ROAD TRANSPORT ISSUES ALONE** bringing misery to all local residents and throughout Suffolk.

General Transport Matters

No information was given regarding how the LEEIE Shunting yard and early year's delivery point would deal with material delivered to site. Both of the proposed routes will have an adverse effect on Crown Farm Corner and the existing HGV route into Leiston.

Little attention has been paid to the potential traffic problems associated with the A1120, Yoxford and the planned roundabout at the junction of the A12/ A1120. For any workers living west of the A12, and for deliveries from the north, this road will be the main artery. Any vehicle under HGV size will come this way rather than use the A14/A12 to try to avoid the traffic congestion, making the A1120 a much-used route for site-bound traffic.

TASC consider a major deficiency to be the lack of a detailed transport strategy and its projected implications, for hauling 12 million tonnes of material on 500 mile round trip journeys for the construction materials alone.

TASC believes that the link road itself could take 4-5 years to construct. If construction work on the Main Development Site is allowed to be carried out at the same time, the cumulative impact of that work will make the conditions intolerable for those living and trying to make a living in the vicinity.

Oral Submission by Jenny Kirtley on behalf of TASC at ISH 3: "On a trip to Hinkley in May 2019, 5 months into the build, I was caught in a horrendous traffic jam on the return trip from Hinkley to Bridgwater. I had dashcam on and have sent in the footage to PINs, which I hope you have seen. It seemed to me, all those in charge of traffic management had not stopped the HGV's and EDF buses, some empty, from joining the congestion, hence making the situation much worse. How would the developer ensure that this would not happen and gridlock the whole area?

I believe this was caused by an accident on the M5, so it could well happen if there was an accident on the A12. If the B1122 gets shut, it is the main route for Doctor's and indeed the bank in Leiston. This would cause complete chaos in the whole of the area."

Mitigation

The definition of 'mitigation' was never identified during the ISH. Mitigation is normally used to describe an action that will lessen an impact elsewhere. Therefore, a mitigation needs to be in place before the activity that needs mitigating takes place. This is not the situation here as construction activities on the main and associated development sites will overlap with building the SLR. It also needs to be recognised that the type of mitigation here, new roads and rail, is purely moving the problem from one person's doorstep to someone else's.

TASC are of the view that it is impossible to adequately mitigate any aspect of the construction of Sizewell C due to the nature of the project, the time over which the construction and the impact of that construction will take place and the unique nature of the area in which the construction is planned.

Urgency

During the ISH, the Applicant stated that any early mitigation measures would delay the project when it is government policy to treat the construction of Sizewell C as a matter of urgent national policy. TASC disagree with this interpretation and points out that:

- Neither in the government's 10-point plan nor in the so-called 'energy review' is Sizewell C identified for such prompt treatment. What has been identified as urgent is the achieving of net zero carbon by 2050 and TASC points out again that the climate change emergency will not benefit from the construction of a nuclear power station which will take at least 12 years to come on stream. On the contrary, the construction of Sizewell C will leave a carbon deficit of millions of tonnes of carbon.
- TASC is disappointed that the issue of 'need and policy' has not yet been the subject of an ISH and urges this issue to be given appropriate time for scrutiny as a future ISH. TASC points to its written representation [REP2-481b] on this matter which demonstrates clearly that EN6 is an inappropriate instrument against which to measure the fitness of Sizewell C to be constructed.

Cumulative impact

TASC consider that there needs to be a comprehensive assessment of the overall transport strategy once the Applicant has finalised its plans. Indeed, it seems incredible that, after 8/9 years of supposed 'front-loaded' consultation and planning as part of a DCO process, there is still no finalised

nor clearly defined transport strategy. The transport strategy is fundamental to the project insofar as its impacts will be felt throughout the east Suffolk area and beyond. Moreover, without a clear and acceptable transport strategy, it is impossible to assess even if the project can practically meet its objectives and interested parties can only be left to speculate on the impacts and what sort of life awaits them should the development be approved. The Applicant needs to provide a finalised sea and rail strategy, to allow the road element of the strategy to become fully evident and for the level of HGV movements to be more precisely identified. Only then can communities make a realistic assessment of how they will be impacted. A finalised sea strategy will then assist with such things as weighing up the harm to the AONB and recreational use of the coast, from the anticipated increase in the volume of sea traffic. TASC believe the Applicants inability to produce an acceptable transport strategy in respect of such an isolated, rural area is clear evidence that such a strategy does not exist.