

ISH 2 Transport

Oral and Supplementary Comments

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23.7.2021

## **Transport Strategy and Traffic Issues: DCO Parameters, Mitigations and Compensation**

### **1 Examination issues so far**

Following the fundamental infrastructure planning principles of sustainable development and good design, we note that the main focus of examination so far has been on the early construction period in respect of road, rail and sea transport. We therefore trust that further examination will be provided with IP participation on cumulative and combined impacts.

In pursuit of EIA requirements, we are concerned in this note about legal means to secure major mitigations – maximum use of rail and sea materials transport – and equally full monitoring systems for local communities and other road users. We state the case for access to data, including identification of developer vehicles, and finally look at compensation rights on the assumption that available mitigations while in principle welcome will not be adequate to address for lost transport amenity and environment damage.

We also note the absence of fully resolved strategic transport mitigations in the draft Deed of Obligations and associated Schedule of Certified Documents. We have further concerns about the parameters approach embedded in the DCO schedules which might provide negative flexibilities about transport infrastructure obligations/mitigations.

Specifically we note

- Pledge 4 of the EDF SZC Community Pledges to “transport the majority of materials by land and sea”, and while this is only an elementary quantification, it should be sufficient to be enacted as a planning requirement or obligation, subject to legal advice about drafting.
- the strong indication in the Deed of Obligation Explanatory Memorandum of the developer’s reliance on the legal authorities constraining stringent planning requirements
- a specific indicator of serious underestimation of traffic impacts in the Environment Statement’s Assessment of Magnitude of Impact for Transport (Vol 2, Ch 10 Transport, Table 10.2). This shows that a “high” impact rating requires a 90% change in total traffic. This places a mitigation threshold at an implausible level.

We therefore suggest that considerable further examination of the transport strategy and its major – infrastructure - mitigations is required with a view to securing, through mitigation, monitoring and compensation, the transport rights and amenities of the affected communities over an appropriately defined cumulative period including post construction re-instatement.

We assume that the project’s delivery will have substantial, long lasting and costly negative impacts on communities and businesses and that, unlike in the developer’s assertion about ecology impacts, that there is recognition of the need for very substantial road transport mitigation. Our question is how might this be designed into the project with security and transparency and appropriate enforcement at community level, in addition to what might be done by the local authorities through S106 provisions.

Here we wish to point out the compensation regime applied by Suffolk County Council for the chronic local problem of potholes – creating damage running into several hundred pounds per incident in some cases. This has been made, for a variety of reasons, directly available to road users. It establishes a county wide precedent, going

well beyond monitoring delegated to remote joint bodies and is well used. It illustrates the problem of designing compensation mechanisms: to be effective they need to be able to reach to the level of the impact which in the case of lost traffic amenity is at a personal resident's level or an individual enterprise level.

## **2 Some proposals**

- The Deed of Obligation should, in addition to commitments in the S106, incorporate Community Pledge 4 as a basis for direct access to redress for attributable negative traffic impacts (breaches) from the project.
- That in addition to the Deed of Obligation being supplemented, DCO Schedules 6 & 7 (Parameter Plans and Approved Plans) be revisited to encompass the mitigations in Pledge 4.
- That Parameter Plans be reviewed to ensure that a minimum (high) level of rail and sea use is secured, not a maximum level, or that this Pledge is exempt from a planning parameters approach.
- That locally controlled governance and resources be arranged directly for communities and other road users to monitor traffic impacts through standard real-time information and media services (local radio, apps, helplines etc) on SZC designated traffic movements. This would need to be supported by contractor badging for HGVs and LGVs and routine contracted site and associated site visitors.

We find implausible the view expressed during the ISH that GPS and Sat Nav and Geo-screening cannot provide online data for effective real-time monitoring of traffic freely available in suitable form to other road users. Badging and fully tracked delivery by the logistics industry is now a daily doorstep reality well within the capability of the developer and its contractors.

Note: *Our request for full details about designated inward and outward (return) routes for HGVs and worker travel routes be made available stands. We also request traffic assessments for known pinch-points on the A12 and its junctions, for the much cited A12 “corridor” and for the main east-west B routes. We further note that amongst indicators of likely cumulative and combined traffic patterns, Ipswich Town’s recent forecast that white van traffic is likely to grow by an annual level of 4% for commuting and business reasons is relevant. Over 12 years that makes a 60% increase. Also given an over average national quota of new house building in coming years, we conclude that the road infrastructure is not suitable for the project, notwithstanding major mitigations which may not be deliverable and/or of legacy value to the impacted communities.*

### **3 Road and rail infrastructure mitigations – some comments**

- **Rail Freight Centre** We have a simple set of questions about the developer’s proposed 4 (or 5) freight trains per night during the week. How much time will it take to unload them or house the decoupled wagons, and is there space for storage, or is instant unloading assumed as a working method. If the trains cannot return in the night they arrive, what does 4 trains per night mean ? When could they return if there is no double track and daytime is not available which means the arrivals will block the returners. We look forward to a movements specification as the basis of appropriate assessment on EIA matters.

- **Wickham Market Case Study** Familiarity with the various routes around WM and access to and from the A12 suggests that the Park & Ride facility may prove inoperable. We note for the record the withdrawal of an early stage bypass proposal, the complex and limited flow allowed by the five ways roundabout, the virtual impossibility of alternative traffic

routes should the A12 be out of commission. We hope the ExA will look closely at the suitability of this P&R siting.

*ends*