

Comments on the *Deadline 2* Written Representation from Suffolk County Council - for MPC's *Deadline 3*, Thursday 24 June 2021.

Glossary of Acronyms

MPC	Melton Parish Council
ExA	Examining Authority
EDF	The Applicant
DCO	Development Consent Order
WR	Written Representation
SCC	Suffolk County Council
ESC	East Suffolk Council

1. MPC wishes to express its serious concerns on reading the "Rail-Based Deliveries" section (paragraphs 2.10 to 2.19) in SCC's WR for Deadline 2. SCC's WR explains EDF's ever-changing rail strategy over the various stages of consultation (and post-DCO) and its failure to make timely investment decisions.
2. SCC describes how, at the Stage 1 and Stage 2 consultations, EDF's strategy was for freight to be moved mainly by **train in daytime**, involving a capacity upgrade to the East Suffolk Line. A good start. SCC then describes how it then all went wrong because of EDF's failure to invest in the 2 years following the Stage 2 consultation.
3. SCC talks of it's (and ESC's) "exasperation" at EDF's failure to invest and its many "missed opportunities". SCC/ESC's experience of working with EDF confirms one of the themes in MPC's WR, in that *"we think it reasonable to expect a proportionate investment in the transport infrastructure necessary to serve such a large project – and, when construction is over, that investment would become a hard-earned beneficial legacy for the community. MPC's view is that SZC's transport strategy fails to deliver investment that is proportionate or adequate."*
4. SCC reports that EDF has so run-down the clock on the option to invest in a capacity upgrade to the East Suffolk Line that they (EDF) are now saying it is *"impossible at this late point to deliver infrastructure investments to allow for day time freight trains in the required timescales"*.
5. SCC/ESC say they *"remain disappointed that opportunities have been missed to improve the East Suffolk Line so that freight deliveries could have occurred at day time, significantly reducing the adverse impact on our communities."* SCC also regrets the lack of legacy benefit that would have flowed from a capacity upgrade of the East Suffolk Line.
6. EDF has now presented the community with a transport strategy that would deliver between 70% to 90% of all freight by Night Train and Road, the two most environmentally damaging options and the ones least favoured by Melton residents who prefer Sea (first) and Day Trains (second).

7. MPC's main concerns about EDF's failure to make timely investment decisions are:
- we question whether it is within the spirit (or, possibly, the letter) of the planning regulations for EDF, by inaction, to time-out a preferred transport alternative to the option in the DCO;
 - that residents, not EDF, would pay the penalty for the latter's inaction – residents would suffer significant adverse impacts and be denied a legacy benefit.
8. MPC therefore asks the ExA to require EDF to invest in the capacity upgrade of the East Suffolk Line, regardless of whether the completion of that work coincides with their required timescales.

Melton Parish Council
24 June 2021