

SIZEWELL C - WRITTEN REPRESENTATIONS BY SIGNIFICANT OTHERS

CONTEXT

1. Planning Committee members might find it helpful to know what Suffolk County Council (SCC) and Dr Thérèse Coffey MP have said in their Written Representations (Deadline 2) about SZC freight transport issues. In common with MPC, both:
 - prefer a modal freight strategy based on Sea and Rail, over Road
 - appear to regret that EDF's refusal to invest in a capacity upgrade of the East Suffolk Line would mean the trains run at night
2. Unlike MPC, neither insist EDF be required to upgrade the East Suffolk Line to allow trains to run in day-time. SCC seems to have conceded reluctantly that the running down of the clock now means there is insufficient time to make this sort of investment.
3. SCC's statement is particularly interesting as it consists mainly of a history of EDF's ever-changing freight strategy and the missed opportunities over the long period of consultation – much to SCC's disappointment and exasperation.
4. SCC considers the latest proposals for road and rail to be sub-optimal. It also has concerns about their deliverability.
5. The extracts from these two Written Representations confirm, in my view, that MPC's own Written Representation is positioned as it should be.

WB, June 2021

EXTRACT FROM WRITTEN REPRESENTATION by Dr Thérèse Coffey MP - DEADLINE 2

Transport

As well as supporting the new marine-led approach, I also back EDF's proposal to increase the frequency of freight train movements to facilitate additional material imports by rail, as it will take further pressure off our highway network. Unfortunately, as EDF are still not proposing a passing loop a majority of these additional freight journeys will take place using overnight trains. In fact, the number of overnight trains increases from 5 to 7 movements. I previously raised my concerns about the impact this would have on the residents that live close to the East Suffolk line. I declare an interest as I live less than 250 metres from the line though I am making this point on behalf of residents rather than myself in this regard.

Having held a meeting with Network Rail, I suggested that there was a range of mitigation measures EDF should put in place to reduce the impact of noisy trains and train screech. I am pleased that EDF have taken on board those suggestions and are now proposing an investment in continuous long-welded track to reduce vibrations as well as looking at quieter rolling stock which operate at slower speeds. These mitigations need to form part of the final DCO whether or not a passing loop is provided. There are further considerations that could be made for those residents near the crossings (of which there are multiple along this line) for consideration of local lighting issues or other aural notifications (eg use of the whistle or horn at certain places in Woodbridge) and the consideration of triple glazing and blackout blinds.

Two-Village Bypass

I strongly support this scheme by-passing the villages of Stratford St Andrew and Farnham and it is absolutely essential this is put in place prior to construction. It has been a longstanding ambition to upgrade the A12 in this location, albeit on a larger scale. I welcome the bypass of the two villages, rather than the solution of only bypassing Farnham proposed in earlier consultations.

EXTRACT FROM SUFFOLK COUNTY COUNCIL'S WRITTEN REPRESENTATION – DEADLINE 2

Rail-based deliveries

2.10. The rail transport strategy promoted by the Applicant in the DCO, and in the change application, continues to fall short of SCC's aspirations, by not investing in rail infrastructure to enable day time movement of rail freight, and thus requiring night time train deliveries with their noise and vibration impacts on local communities. This position is reflected in the SCC's responses to the DCO application and the pre-submission consultations, which is further discussed in this section. SUFFOLK COUNTY COUNCIL WRITTEN REPRESENTATION DL2 SIZEWELL C DCO Page 8

2.11. Up to the Stage 3 pre-submission consultation, the Applicant was considering maximising material deliveries by rail which were envisaged to be primarily day time train movements. At Stage 1, a new passing loop on the East Suffolk Line at Campsea Ashe was proposed to allow for additional freight trains, which was reiterated under the rail proposals at Stage 2 alongside other upgrades to the East Suffolk Line. However, the Stage 3 consultation indicated that there were significant risks associated with the timescales for the rail led strategy. The response, jointly submitted by Suffolk County Council and Suffolk Coastal District Council (now East Suffolk Council), noted that it was disappointing that the required work had not been undertaken in the two years following the Stage 2 consultation, and that at that point "the public should have far greater assurances of any option being presented. This work should have been completed by EDF Energy before Stage 3 to ascertain exactly what infrastructure is required to deliver the rail option and that it is deliverable within the required timescales."

2.12. At Stage 4, the Applicant appeared to not have had made progress on pursuing the rail improvements, and introduced, alongside a road-led and rail-led scenario, an “integrated strategy” (which was also included in the original DCO submission) with a much more limited amount of rail deliveries compared to the railed scenario. The response, jointly submitted by Suffolk County Council and East Suffolk Council, to the Stage 4 consultation stated that “The Councils are exasperated by the lack of progress in pursuing the rail-led option and associated improvements during and after the Stage 3 consultation, and the Councils believe that flexibility and collaboration can be improved to deliver the rail strategy”, and noted the concern that, according to the Stage 4 material, the Governance for Railway Investment Projects (GRIP) process ‘option selection’ only commenced that year (in 2019).

2.13. At the DCO submission, the “rail-led strategy” was discarded by the Applicant. As SCC noted in its Relevant Representation [RR-1174]: “The discarding of the railed strategy has not been robustly justified, and the Council strongly notes its disappointment that the applicant has missed opportunities over the past two years to work with Network Rail to further pursue a rail-led approach, especially one that could operate during day time hours, (as proposed in Stages 2, 3 and 4), with upgrades to the East Suffolk Line. The rail-led strategy proposed previously would have resulted in allowing a minimum of five rail deliveries per day (which would all have been at day time), compared to the now proposed three rail deliveries per day, mostly at night time.” SCC’s Relevant Representation was informed by a study SCC commissioned from Aecom and Cadenza (see WR Appendix 1), which indicated that, at that late stage, it was difficult to significantly accelerate the delivery of the required rail improvements, but was suggesting that additional night time trains could be delivered. SUFFOLK COUNTY COUNCIL WRITTEN REPRESENTATION DL2 SIZEWELL C DCO Page 9

2.14. SCC welcomes in principle that, in the (now accepted) change application, the Applicant has increased the proposed rail movements to 4 (possibly 5) deliveries per day by using mostly night-time deliveries, which had been suggested as an option in SCC’s Relevant Representation (informed by the above mentioned study by Aecom and Cadenza).

2.15. However, we 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. As the LIR [REP1-045] states (para 16.127), “SCC’s regret that the significant rail legacy benefit, that of a passing loop between Woodbridge and Saxmundham, as proposed in the stage 3 consultation, is no longer deliverable.”

2.16. While SCC understands from discussions with the Applicant and Network Rail that they consider it impossible at this late point to deliver infrastructure investments to allow for day time freight trains in the required timescales, we consider opportunities to do so were missed. As a result, SCC, other stakeholders and the local communities are forced into a position where they are responding to two unpalatable options forced upon them: Night time trains versus an increase in HGVs on the roads.

2.17. SCC considers that adequate mitigation that reduces the impacts of both rail and road movements where these are identified is essential. SCC and East Suffolk Council remain concerned about the noise impacts of night time trains. Both SCC and East Suffolk Council are working together to seek from the Applicant a comprehensive noise mitigation package. Such a mitigation package has to be seen as fundamental to enable moving rail freight at night and needs to be secured through requirement and obligation. Suitable controls need to be put in place to prevent severe adverse noise impacts from night time trains before this mitigation is implemented.

2.18. The impacts of noise and vibration of rail and road need to be carefully balanced. However, additional matters such as road safety, severance, delay, fear and anxiety, and carbon footprint arising from HGV movements need to be included in the assessment, which underpins SCC's principle to seek maximisation of rail and sea transport over and above HGV deliveries.

2.19. There is still no certainty that the rail proposals can be delivered in the time suggested and further clarity on this is sought from Network Rail and the Applicant.

A12: The Two Villages Bypass and the previously considered Four Villages Bypass

2.20. SCC's Local Transport Strategy has had a longstanding objective of delivering a new road to by-pass the villages of Farnham, Stratford St Andrew, Little Glemham and Marlesford on the A12. SCC referred to the bypass proposal as part of the Suffolk Energy Gateway (SEGWay) concept, which was a package of measures designed to address existing lengthy and variable journey times on the A12 which have a negative impact on the Lowestoft economy, to support housing development in the Suffolk Coastal Local Plan [REP1-062] and to support Sizewell C and the other energy NSIP developments. The Suffolk Energy Gateway concept was designed primarily to address the pinch points around the four villages, but it also included measures to address numerous other A12 transport locations identified in conjunction with the Chamber of Commerce.

2.21. At the outset of the pre-examination consultations the Applicant did not commit to any by-pass at all, but by Stage 3 of the consultations the proposal included a two village bypass around Farnham and Stratford St Andrew, thus a partial solution to the SEGWay four village bypass proposals.

2.22. SCC considered the Two Village Bypass as the minimum required mitigation for Sizewell C. We have accepted that whilst a two villages bypass is not the best option, considering the cumulative impact of all the proposed development in the area, it is a proposal that is proportionate to the Applicant's proposal when Sizewell C is considered in isolation.

2.23. SCC initially responded to the Applicant's Two Village Bypass proposal by proposing that the Applicant should contribute the cost of a two village bypass towards funding a four village bypass; SCC proposed to make a contribution itself and then sought the balance of funding from the Department for Transport (DfT) to make a SEGWay four village bypass

possible. The DfT saw the merit of the SEGWay proposal and was initially supportive, providing the funds to develop a business case for DfT funding. Unfortunately, at the next stage of the funding process, the DfT was unable to prioritise funding for this scheme, partly because Sizewell C was not certain, and DfT was unwilling to underwrite the developer contribution in the event that the Applicant did not proceed.

2.24. The Two Village Bypass will in effect preclude the building of the SEGWay four village bypass proposals on the desired alignment as set out in the SEGWay business case, and it does not deliver the full improvements required to address future congestion on the A12 to support the Lowestoft and east Suffolk economy, support the housing development in the Suffolk Coastal Local Plan and the other energy NSIP developments in the area

2.25. SCC retains the view that the SEGWay four village bypass would have been the best solution, and a two village bypass is, in strategic terms, suboptimal and SUFFOLK COUNTY COUNCIL WRITTEN REPRESENTATION DL2 SIZEWELL C DCO Page 11 precludes the scheme that should have been delivered. However, with the absence of DfT funding rendering the SEGWay impossible, we are of the view that the Two Village Bypass is considered the essential minimum mitigation for the construction traffic of Sizewell C, and is an important improvement to the current road provision, with legacy benefit for Suffolk.

2.26. Local representatives continue to advocate for SEGWay but SCC has neither the funds nor is there at this stage enough time to deliver the preferred solution in a timescale that would fulfil the transport requirements, as stated by the Applicant, for the construction of Sizewell C.

2.27. In the light of the above, SCC now believes that the Two Village Bypass proposed by the Applicant should be agreed as an acceptable, though sub-optimal, option that can provide the essential mitigation at this location for the construction traffic of Sizewell C, and that it is still an important improvement in comparison to the status quo, and does have legacy value.

Further improvements along the A12

2.28. SCC, as local Highway Authority has identified a number of remaining locations on the A12 suffering from adverse impacts of the Sizewell C construction, as well as from other growth planned for the area, which we require to be adequately addressed and mitigated.

2.29. All locations with concerns cannot be identified at this stage as methodology is still to be agreed; however, those locations where SCC currently considers mitigation for traffic impacts are (or may be) required, including for severance, are set out in Tables 3 and 4 in LIR Annex M [REP1-058], as well as in our Relevant Representation [RR-1174] and Table 13/14 of the LIR [REP1-045].

2.30. It is noted, particularly for the A12 improvements required between Seven Hills and Melton, that the entire responsibility for these improvements does not fall to the Applicant but a proportionate contribution must be made.