

Draft Input to the Enquiry on the "Proposed Felixstowe Branch Line and Yard Improvement Order"

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I am opposed to increasing the rail traffic on the Felixstowe Branch line and will give my reasons for this by initially discussing how much the traffic is likely to be increased by, then discussing the potential impact caused by the increased vibration, noise and pollution. I will finish off by proposing an alternative solution.

Lets first consider the increase in rail traffic. From the figures stated in the proposal, the number of goods trains will increase from 44 to 80 in total (taken from twice the stated figures as these are for each direction). In addition, the length of each train is also likely to increase by 50%. Using simple maths, we can calculate that the total number of goods wagons will increase by a factor of 2.8 times – almost 3 times that we are getting at the moment.

So what does this mean in terms of the overall impact on the local environment. Firstly, I would like to consider the vibration and its potential damage.

In a reply to my initial letter of objection, Mr Cann reminded me that paragraph 4.3.82 stated, and I will quote "No significant increase in ground-borne vibration relating to structural integrity is forecast". This, in my opinion, is at best misleading and at worst, you can guess. The amount of vibration, not the vibrational intensity, will be directly proportional to the number of laden wagons passing a particular point, assuming that all of the trains have an equal load. Therefore increasing the number of wagons by almost a factor of 3 will also increase the total vibration by the same amount. I therefore dispute Mr. Cann's comments. In addition, I had noticed that about the time the vibration measurements were taken there were many trains that were not fully loaded, and some of these were completely unloaded. I do not know, and it is not reported, how the trains were loaded during the period of the measurements. We have also noted recently that the noise and vibration has increased significantly, again pointing to the belief that since the measurements were taken, there has been an increase in the average weight of the passing goods trains. It should be noted that in the vibration report, no mention was made of the goods train loading.

Where on the Old Felixstowe Road were the vibration measurements taken? Well on the 'Old Police House'. This property was originally built for the local constabulary to a high specification, and as such is not really representative of the local properties. It is worth noting that properties along this stretch of road have a wide variety of constructional techniques. The only common denominator is that they are all built on very sandy soil and all have cesspits and soakaways. The foundations range from the current modern practice of deep concrete trenches to concrete rafts, with some properties having a mixture of several types and specifications. All of this adds to the uncertainty and the possibility that soil borne vibration may affect the properties on this stretch of the road and to the potential damage to the foul water drainage systems.

To sum up the this section, the vibration measurements are not characteristic of the entire area and any extrapolation from these figures is likely to give an underestimate of the potential problems and risks for the following reasons:

1. There was no indication from within the report as to the loading of the goods trains. It is perfectly feasible that the trains were unusually lightly loaded due to seasonal variations or other reasons. Heavier trains will result in a higher vibrational intensity.
2. Only a spot measurement has been taken along this section of the road, despite there being very large variations in the construction of the properties.

3. The results bear no relationship to the potential damage of cesspits or across the wide range of building structures.

Now lets consider the noise form these trains. The report states that the noise at night is likely to be 3dB higher at night – ie twice the intensity! However, I would like to point out that it is odd to note that part of the area in Ipswich through which the trains will pass is also restricted to the night passage of lorries (between 10 pm and 7am). I assume that the lorries are restricted due to the noise that they make. I know that goods trains are not subject to the same laws as lorries, but shouldn't there be some restrictions to night time operation in a residential area as I am sure that they have a bigger noise impact? It should be noted that the plans are for about 1 goods train every 20 minutes assuming that they run 24 hours per day. If we are given a few hours respite, then the frequency will be higher. This is a major intrusion on the life of the local population.

The amount of pollution generated by these trains is going to be roughly proportional to the number of trains and their effective load. In a similar argument to the vibration, the amount of pollution from the diesel locomotives will be approximately 3 times the existing level. I should point out that there are current concerns about the health hazards from diesel fumes, with ongoing research programmes in place particularly in the USA. I do not believe that this potential risk has been quantified within the submitted documentation.

An alternative solution.

Part of the justification for the increase in volume of traffic in the rail link is that it is more environmentally friendly than transporting the goods by road. It is also stated that rail transport is in line with current EU directives. What is doesn't say is that water borne transport is likely to be less polluting than rail. Again the EU policy does state that water transport should be considered. As everyone knows, the UK is completely surrounded by water, with several good ports on the East Coast that could potentially take additional containers possibly shipped from Felixstowe.

The proposal states that 22% of the container load is currently carried by sea and that there are no plans to increase this percentage.

Mr. Cann, in a letter to me, presented an example of the potential CO2 savings of sending cargo from Felixstowe to Leeds by rail as opposed to road. Using the same example, it is estimated that if the containers were shipped further up the coast then delivered by road to Leeds, this would result in a significant further reduction in CO2 compared to sending this solely by rail. CO2 savings will be an increasingly important consideration owing to the future effects of global warming. The current government has recently been encouraging businesses to look carefully at techniques for making further reductions in their CO2 footprint.

It should be noted that one of the ports that could be used, notably Teesport, has proposals for expansion on a brownfield site. Part of their case is based on the fact that this expansion will alleviate congestion on the main East Coast Rail link, and I assume that this would also have an impact on the Felixstowe Branch Line. Other ports also have expansion plans.

Transporting the containers by sea has many advantages as it doesn't unduly increase the noise, vibration and pollution to the local community. It also does not require extra rail capacity to be put in place further up the East Coast rail link as is suggested within the proposal documents.

This option should be actively considered rather than the existing proposal..

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