

## **IPSWICH FUEL POINT – BUREAU VERITAS TECHNICAL REPORT**

### **COMMENTS OF RAMSEY PARK RESIDENTS**

The Report makes four main conclusions, namely:

- A. Activity at the Ipswich Fuel point and sidings is likely to increase if the Order is permitted.
- B. Elevated levels of noise can occur for extended periods on a Sunday night, and on weekends generally.
- C. Weekday night time noise levels have not deteriorated since the surveys in the 1990s.
- D. Noise levels will reduce by 6-7 dBA by 2023.

#### **1. Activity at Ipswich Fuel Point**

- 1.1 The Report indicates that, on a typical weekend there would be 10 locomotives stabled, and on some Sunday nights up to 13 (paragraph 4.8). Observations have shown that up to 19 locomotives have been stabled at the weekends.
- 1.2 By 2023 there will be a maximum of 14 additional night-time train paths for a normal weekday night. Stabling of locomotives at Ipswich Fuel point will continue. The Report assumes that 50% of the new business will be won by Freightliner i.e. an additional 7 night time train paths, requiring an additional 6 locomotives (paragraphs 5.1 and 5.2). As currently over 80% of freight usage of the Branch Line is by trains hauled by Freightliner, this estimate is unrealistic.
- 1.3 The Report, therefore, has significantly underestimated the likely increase in activity at the Ipswich Fuel point.

#### **2. Evidence of Elevated Noise Levels**

- 2.1 Paragraphs 6.13 and 6.14 confirm that long periods of elevated noise occur on Saturday nights and Sunday nights and early mornings. These results were obtained in weather conditions which were not severe.
- 2.2.1 Freightliner winterisation procedures indicate that, at temperatures at or below 0 degrees C all diesel locomotives, which are stabled/stored in the open air shall have their engines started and idled on the basis of 1 hour in every 4 hours. The impact of this on noise and fume levels, with between 13

(Freightliner's figure) and 19 (our observed figure) stabled during the weekend, must be significantly greater than the levels identified in the Report.

### **3. Weekday Night Time Noise Levels**

- 3.1 Comparisons with the two surveys undertaken in the 1990s are spurious.
- 3.2 The 1991 and 1995 surveys were relatively short, the first was undertaken over 2 weekday 24 hour periods in June 1991, and the second over a period of 24 hours in April 1995. They can only provide a snapshot of the noise conditions for those limited periods.
- 3.3 The surveys are unacceptable for comparison purposes due to a) timescale limitations i.e. length of time to be able to draw valid conclusions about the extent of noise pollution over a year, and b) effect of climate variations i.e. the surveys, undertaken in April and June, did not cover the winter period December – March, where noise and fume pollution is greatest due to temperature variations.
- 3.4 It is impossible to say if the recent and previous surveys were carried out in similar conditions. Quite apart from whether the information was gathered in comparable ways, we know that noise conditions are extremely variable and there is no reason to believe the conditions were the same.
- 3.5 The recent survey was undertaken during a period of unusually mild weather. We have always made it clear that the noise conditions are variable and are at their worst during cold weather conditions. Therefore, the survey is not representative of the real noise problem. The validity of its results is low.
- 3.6 The sources and reasons for the measured noise are based on operational and technical information provided by Freightliner. There is no suggestion that this information has been tested either by examining Freightliner's operational records or monitoring Freightliner's operations at Ipswich.

### **4. Noise Levels will Reduce**

- 4.1 The projections are partly based on the recent survey the validity and relevance of which, for the reasons given earlier, are dubious.
- 4.2 The projections are based on operational and technical information provided by Freightliner. There is no suggestion that this information has been tested, either by examining Freightliner's operational records or monitoring Freightliner's operations at Ipswich. The projections are based on various assumptions the basis for which has not been supported by any objective evidence.
- 4.3 Even given the working assumption contained in paragraph 5 of the survey concerning new business, the Report's 'best case' scenario will mean an increase from a maximum of 13 to 19 locomotives stabled at Ipswich Fuel Point. Our observations of the current number of locomotives using the sidings

indicate that the numbers would increase from approximately 19 to 25, or even more if Freightliner obtains more than 50% of new business. These figures suggest that noise and fume levels will increase significantly due to the increase in freight traffic and consequent increase in the numbers of diesel locomotives required.

**5. Additional Points**

- 5.1 It is not only residents of Ramsey Park who have complained about noise and fume pollution. IBC have received complaints from residents of Gippeswyk Road and verbal complaints from residents of Willoughby road.
- 5.2 The Report brings into question the suitability of Ipswich Fuel Point and sidings. Was it designed to accommodate the number of diesel locomotives projected to use it? Should it be close to members of the public and railway staff using the Station? Will the increased storage and use of fuel in close proximity to residential housing, and related increase in noise and fume emissions, comply with health and safety regulations?
- 5.3 The concentration of the Report on the earlier noise surveys undertaken in the 1990s, and related planning applications, is irrelevant other than the use of earlier survey information for comparison purposes.
- 5.4 We understand the Report was commissioned by Hutchison Ports (UK) Limited. It is not, therefore, an Independent Report.

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