SUFFOLK ENERGY ACTION SOLUTIONS (SEAS)
WRITTEN REPRESENTATION

TRAFFIC and TRANSPORT

SEA LINK DCO

PINS Ref: EN020026 **SEAS IP:** [redacted]

Date: 18 November 2025 **WR: Deadline 1**

Introduction

1. Suffolk Energy Action Solutions (SEAS) provided a Relevant Representation (RR-5210) specifically on Traffic and Transport dated 23 June 2025 (the SEAS Traffic/Transport RR) [1], and another of the same date concerning Cumulative Effects, which has a significant traffic/transport component (AS-038) (the SEAS Cumulative Effects RR).
2. The SEAS Traffic/Transport RR was informed by, and attached, a detailed piece of expert work in the form of a report prepared by Phil Jones Associates traffic/transport consultants (the PJA Report). The PJA Report also supported the traffic/transport element of the SEAS Cumulative Effects RR.
3. Since submission of SEAS Relevant Representations, the Applicant has provided no further traffic/transport information has come to light, and the Examining Authority's Procedural Notices and the Applicant's (non-substantive) responses to them, the Suffolk Open Floor Hearings (OFH1) and the Issue Specific Hearing One (ISH1) held on 11 November 2025, have been highly illuminating.
4. Matters rest with events at ISH1. There, following questions from Inspector Regan seeking to understand why, given EN-1, the Applicant has not supported the Application with a Transport Appraisal, only a "Transport Assessment Note" (one of PJA's many key concerns), Inspector Regan set out his understanding that the Applicant would be providing some detailed traffic/transport assessment work at Deadline 1. In response to Inspector Regan, the Applicant's King's Counsel stated that the Applicant would be providing something, but that it would not be new information.
5. Inspector Regan indicated that representations from Interested Parties in response would be for Deadline 2.
6. In these circumstances, SEAS:

   (1) Relies upon the SEAS Traffic/Transport RR in full, including the PJA Report attached to it.

[1] https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN020026-000626-07.%20SEAS%20Traffic%20&%20Transport%20RR%20FINAL%20-%20combined_Redacted.pdf

(2) Relies upon the traffic/transport element of the SEAS Cumulative Effects RR in full.

(3) By this traffic/transport written representation focuses on matters that merit comment in light of events, information or evidence arising since those Relevant Representations and the PJA Report, including reflecting on evidence given at OFH1. In other words, matters additional to the SEAS Traffic/Transport RR and the traffic/transport element of the SEAS Cumulative Effects RR.

(4) Otherwise, awaits the Applicant's further evidence promised for Deadline 1.

7. For ease of reference, the SEAS Traffic/Transport RR and the PJA Report are appended to this written representation (see Appendix B below).

8. The Applicant's Proposals, along with other energy NSIPs in the area (not to mention additional major projects), will have very long lasting impacts on the affected communities. For many individuals, the impacts will be life-defining.

9. Traffic is a stand out problem, with communities facing the prospect of drawn out years, even decades, of traffic impacts from these Proposals and the others.

10. As such, it is essential that the examination process is conducted with the benefit of best evidence, full transparency, and scientific and forensic rigour, along with independent technical oversight as necessary.

11. These written representations are provided in an effort to assist the Examining Authority, in addition to SEAS' relevant representations (and oral evidence at the PM, OFH1 and ISH1) to date.

Matters arising since the Relevant Representations that merit comment (matters *additional* to what SEAS has already presented in the SEAS Traffic/Transport RR and the traffic/transport element of the SEAS Cumulative Effects RR)

12. As noted in SEAS Traffic/Transport RR and numerous comments at OFH1, and also discussed at ISH1, the Applicant's traffic/transport evidence, such as it is, suffers from fundamental flaws; traffic baseline survey data is for the wrong time of year; no junction modelling; misreported HGV figures; key roads omitted from the study area; extreme HGV increases on rural corridors unjustifiably play down; severe cumulative impact from multiple NSIPs ignored or under-assessed; similarly with emergency access and strategic resilience risks; human health impacts unassessed.

13. Certain of these have had further light shed on them, picked up below.

14. In addition, since the SEAS Traffic/Transport RR and the PJA Report, we can add procedural uncertainty created by reason of the Applicant's proposed, but presently unassessed, changes – notably concerning the Benhall Bridge.

A. Inadequate/inappropriate/unrepresentative Baseline Traffic Data

15. The Applicant's transport "Note" relies solely on winter survey data gathered in January and February. As PJA have explained, there is therefore a failure to use neutral months, and a particularly egregious failure to capture the marked summer tourism peak period.

16. Using these months alone very significantly depresses true traffic flows, and so leads to a wildly skewed picture of total traffic for the crucial tourist summer months once the Proposals' traffic is added on, let alone the cumulative traffic from multiple NSIPs and other major projects.

17. To the evidence in the SEAS Traffic/Transport RR and the PJA Report, can now be added the evidence given at OFH1, in particular.

18. Throughout OFH1, Suffolk residents repeatedly confirmed that the timing of the surveys was inappropriate and could not represent typical conditions. From the outset, therefore, the Application Environmental Statement is built on an unsound evidential and methodological foundation as regards basic traffic numbers.

B. Applicant's unsustainable attempt to excuse the inadequacy of the Baseline Traffic Data, and Applicant's misunderstanding of why it matters

19. In addition to SEAS, the Examining Authority raised the Applicant's reliance on January-February baseline traffic data.

20. The Applicant's response is set out in its letter of 16 September 2025 (**AS-106**).

21. Remarkably, rather than gather the missing data, the Applicant sought to justify its absence and present it as a matter of no importance.

22. This begins at p.19 of **AS-106**, and continues onto p.20 and p.21, as follows:

> ***Traffic baseline data***
>
> *The Applicant recognises that traffic flows vary across the year and are higher at certain times such as the Summer due to tourism and local events for example. Although the traffic surveys within Suffolk and Kent were carried out in January and February, the Baseline traffic flows which have informed* ***Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]*** *and* ***Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport [APP-067]*** *are based on agreed survey methodologies with SCC and KCC Highways respectively, and are considered to be appropriate and robust for the purposes of the assessment work. Had higher Baseline traffic flows been adopted to consider seasonal fluctuations during the Summer for example, then the percentage increases as a result of forecast construction traffic associated with the Proposed Project would have been lower than the levels reported and assessed for the majority of the assessment criteria in* ***Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]*** *and* ***Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and***

Transport [APP-067]*, resulting in fewer potential impacts being identified (except for the assessment of driver delay – see below). In addition, the majority of seasonal traffic (during summer months) is likely to be less peaked but instead expected to be spread across the day and will therefore be less impactful during the typical (assessed) network and shoulder peak hours. Therefore, no seasonal adjustments were made, as increasing the baseline would have generally offered a less robust approach.*

In terms of road congestion and junction performance, the assessments of driver delay within Suffolk and Kent were informed by queue length surveys at junctions within the Study Area during the network peak hours. As set out above, the majority of seasonal traffic (during Summer months) is likely to be less peaked but instead expected to be spread across the day and will therefore be less impactful during the typical network and shoulder peak hours. Nonetheless, following feedback received for the assessment work in Suffolk, a sensitivity test has since been explored for the assessment of driver delay within Suffolk (as originally reported in ***Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]****) by reviewing the potential outcome of increasing the sensitivity level of each junction to driver delay by a single category (e.g. from medium to high) to reflect higher vehicle flows and queuing at the busiest times of the year. This results in seven junctions reporting either a very high or high sensitivity level for driver delay within Suffolk. The same conclusion is reached, that the likely impact of the Proposed Project on driver delay for all junctions within the Study Area (in Suffolk) is considered to be negligible or minor adverse (not significant) based on the increased sensitivity levels and small/negligible magnitudes of change identified for these junctions as a result of the Proposed Project. The proposed working hours within both Suffolk and Kent are designed to minimise additional construction worker vehicle trips on the surrounding highway network during the weekday network peak hours.*

In terms of the assessments of road safety, Personal Injury Accident data was obtained separately from SCC and KCC for the agreed Study Area, covering the most recently available five-year period when the data was obtained. The collision rates identified for highway links ***within Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]*** *and* ***Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport [APP-067]*** *would have been lower had these been based on higher Baseline flows (to consider seasonality), given that the same number of collisions would have been recorded and compared against higher traffic volumes (resulting in fewer collisions per vehicle mile). Therefore, the sensitivity levels assigned to the receptors for the assessment of road safety are considered to be robust, with no adjustments deemed to be required.* …(and so on)

23. These are bizarre responses from the Applicant.

24. They inexplicably fall into the trap of treating these figures as a pure maths problem, rather than as representing real world consequences.

25. Contrary to the Applicant's approach, it is not an "answer" to the lack of representative baseline data, missing the summer tourism peak months, to point out that had the summer tourism peak months been used, then in percentage terms the addition of the Proposals' traffic would have been less.

26. Or, similarly, that the collision "per vehicle mile" would have been proportionately fewer.

27. The real world consequence of higher baseline traffic than the Applicant has assumed, is that when the Proposals' construction traffic is added, congestion will be even worse than with the unrepresentative (inappropriately low) baseline traffic data the Applicant has used to date.

28. Similarly, the real world consequence of higher baseline traffic in terms of accidents, is that there will be more accidents.

29. SEAS has pointed this out in our response to the Examining Authority's Rule 6 letter (the SEAS' response is **PDA-055**).

30. The Applicant should provide the necessary baseline information, and asses on that basis.

Absence of Junction Modelling

31. Despite the scale of HGV traffic anticipated and the existence of well-known pinch points at the A12/A1094, the B1121/B1119, Aldeburgh Road and within Friston village, the Applicant has undertaken no junction modelling at all. This omission is contrary to TAG, the NPPF, CIHT guidance and the requirements of EN-1.

32. At OFH1, residents and local authorities gave clear and consistent evidence of existing congestion problems, along with collision risk and amenity impacts (noise, vibration, air pollution etc), underlining the importance of such modelling.

Understated and Misreported HGV Traffic

33. The Applicant repeatedly stated in public that the Proposals would generate only 68 daily HGV movements. However, the documents themselves confirm a true peak of one 173. This discrepancy is significant and materially undermines confidence in the reliability of the Applicant's transport evidence.

Omission of Key Roads from the Applicant's "Note"

34. The Applicant's "Note" has excluded, amongst others, the Snape–Tunstall–Rendlesham corridor from the study area. This route functions as a major local distribution corridor and has already become a rat-run during Sizewell C's A12 improvement works. Its omission leaves yet another substantial gap in the assessment (such as it is).

Severe HGV Impact on Rural Roads and Villages

35. The SEAS Traffic/Transport RR and the PJA Report have already explained the Applicant's underestimation of the effect of the Proposals' traffic, particularly HGV traffic, on rural roads and villages.

36. Local parish councillors have now explained at the hearings that more than 50 homes in Marlesford and Little Glemham lie within twenty metres of the A12. Saxmundham is due to accommodate 800 new homes and Benhall more than 40 within the next few years. Against this backdrop of rising baseline sensitivity, the PJA report identifies HGV increases of more than 150 per cent on the B1121, and 148–193 per cent at the B1121/B1119 junction. These are highly sensitive rural receptors that will experience disproportionate harm.

Cumulative Impacts

37. The Applicant's Environmental Statement dismisses what are plainly Moderate to Major cumulative impacts. Traffic from Sizewell C, EA1N, EA2, LionLink, Helios Solar, more than 850 new homes, the East Suffolk Water infrastructure scheme and proposed A12 improvements will all converge on the same fragile road network. Evidence at OFH1 demonstrated that the A1094 and A12 are already close to operational capacity. Suffolk County Council's Deputy Leader, Richard Rout, described the situation as placing "unprecedented pressures" on local communities.

38. In addition, the Examining Authority has already heard, since the Application and SEAS Traffic/Transport RR were submitted, there have been at least two further NSIP projects announced: Helios Solar Farm and Suffolk Water Recycling, Transfer and Storage (SWRTS) which will impact on the road network, including the strategic road network. (See Appendix A map)

39. As regards works to the road network itself, SCC has recently announced a package of A12 works that impinge on the A14 Seven Hills junction (which have let to National Highways becoming involved in this Examination).

40. As regards other projects that will affect the road network, adding yet more traffic, we now know of the following additions not known/considered at the time of the SEAS Traffic/Transport RR:
    - Suffolk Water Recycling, Transfer and Storage (SWRTS) NSIP [2]
    - Helios Energy (Solar) Park NSIP [3]
    - Suffolk County Council Highways A12 improvements[4]
    - National Highways, A12 South Improvements [5]

[2] https://suffolkwaternetwork.co.uk/about.html
[3] https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN020026-000593-Helios%20%20SEAL%20Link%20Relevant%20Representation%20230625_Redacted.pdf
[4] https://www.suffolk.gov.uk/council-and-democracy/consultations-petitions-and-elections/consultations/a12-major-road-network-improvements
[5] https://nationalhighways.co.uk/our-roads/east/a14-between-junctions-47-and-55-copdock-interchange-essential-maintenance-work/

- Benhall Railway Bridge – AS-138[6]
- South Saxmundham Garden Neighbourhood - 800 housing development – further advances.[7]
- Benhall - 41 housing development approved – Planning Application is East Suffolk Council ref: DC/21/2503/OUT
- A number of 49MW Solar & BESS farms go under the radar via the local East Suffolk Council planning authority until they spring up and become visible.

41. The cumulative effects are revealing themselves as even worse than we had feared.

Emergency Access and Strategic Resilience

42. At the OFH1, former senior Suffolk Police officer Tim Beach provided compelling testimony that the rural road network is fragile, quickly becomes congested and cannot absorb additional NSIP traffic without compromising emergency response times. Residents gave first-hand examples of delays and blockages during OFH1. No equivalent assessment exists within the ES, leaving a critical safety issue unaddressed.

Human Impact Evidence

43. Residents across the Suffolk Coastal area have repeatedly raised concerns about constant noise and vibration, disturbed sleep, heightened stress and anxiety, and increased danger for walkers and cyclists. None of these direct human impacts has been properly evaluated within the Applicant's Environmental Statement.

What the proposed changes reveal about the inadequacy of the Applicant's "assessment" (such as it is)

44. The exchanges regarding the Applicant's proposed changes to the Proposals have further underlined the inadequacy in the Applicant's "assessment" to date.

45. The proposed changes relating to Benhall Bridge, in particular, plus B1119 access and adjustments to the Friston Order Limits are particularly revealing.

46. Even before the Examining Authority's Rule 9 letter was issued, Suffolk County Council's survey work in January 2025 had already identified major constraints at Benhall Bridge, which PJA also highlight.

47. It is apparent the Applicant launched into these Proposals without grappling with these issues, and that the Applicant's "assessment" work has failed to capture their wide ranging traffic/transport impacts – even before consideration is given to the actual changes proposed.

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[6] https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN020026-000807-9.19%20Sea%20Link%20DCO%20notification%20of%20change%20to%20DCO%20application.pdf

[7] East-Suffolk-Council-Suffolk-Coastal-Local-Plan.pdf (eastsuffolk.gov.uk), pp. 290-304, Accessed 16 Nov 2025,;Saxmundham NP Adopted July 2023 (eastsuffolk.gov.uk), Accessed 16 Nov 2025.

48. The failure to properly assess the obvious issue posed by the Benhall Bridge is also another example of fatal flaws in the Applicant's approach to alternatives: it is a major failing that it has assessed alternatives as if there is no real issue at Benhall Bridge to weigh in the balance.

Further new evidence from the hearings to date

49. The hearings to date have introduced further evidence which must now be integrated into the assessment.

50. Parties raised fresh concerns about landfall traffic and its impact on the local road network, as well as the vulnerability of local transport infrastructure and the need for upgrades.

51. Participants also referenced the precedent of Hinkley Point C, where underestimated construction traffic has severely affected rural communities.

52. This provides a clear and real-world example of the consequences of methodological errors similar to those now present in the traffic/transport "assessment note" supporting these Proposals.

53. We are heartened by the Examining Authority's recognition during ISH1 that key traffic and access issues remain outstanding and will have to be revisited once further material is provided by the Applicant.

Policy/guidance Non-Compliance

54. The failures and inadequacies in the Applicant's "assessment" work to date when set against relevant policy and guidance have already been enumerated in SEAS Traffic/Transport RR and the PJA Report.

55. Information acquired since then have underlined those failures and inadequacies, and identified more.

56. The Applicant's transport "assessment" remains striking non-compliant.

SEAS Requests of the Examining Authority

57. Therefore, SEAS respectfully asks the Examining Authority to require National Grid to produce a compliant Transport Assessment. This must include baseline data for neutral months and the summer tourist months, junction modelling, corrected HGV forecasts, seasonality adjustments, full cumulative NSIP and major projects modelling, an emergency-access assessment and a robust account of landfall logistics, along with full incorporation of the implications of the Benhall Bridge issues, enforceable mitigation measures—including HGV caps, routing controls, junction improvements and non-motorised use (NMU) protections—and a meaningful assessment of offshore and grid-based alternatives.

58. Environmental Statement Chapter 7 should then be reissued for consultation.

59. In due course (once the Applicant formally applies for the proposed changes) SEAS will further request full assessment of the proposed Rule 9 changes, including a structural and operational evaluation of Benhall Bridge.

Conclusion

60. The technical evidence provided by PJA has now been supplemented and supported by the testimony of residents and others in the OFHs (as well as their Relevant Representations).

61. The Applicant has further revealed that it simply does not understand the issues in its responses to the ExA seeking to justify the absence of summer tourism peak baseline data.

62. The Applicant did the same at ISH1.

63. All roads point to the same conclusion: the Applicant's traffic/transport "assessment" work, such as it is, is fundamentally deficient.

64. SEAS submits that the DCO cannot lawfully or responsibly be approved unless and until a complete and accurate evidence base is provided, covering both the direct impacts of these Proposals, and their cumulative effects with other projects.

APPENDIX A

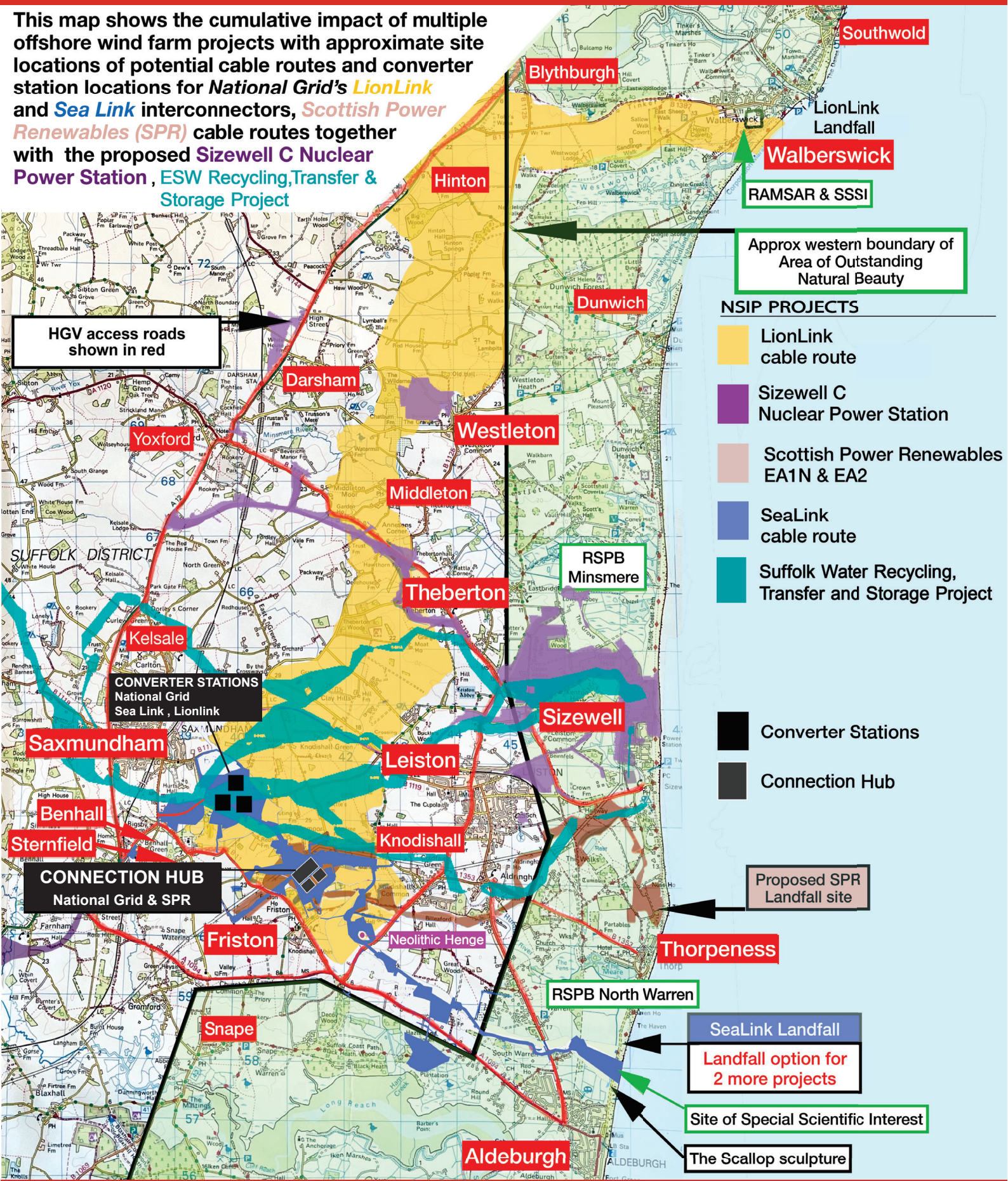
Cumulative Impact map of Suffolk Coast

APPENDIX B

SEAS Relevant Representation (RR-5210) on Traffic and Transport, dated 23 June 2025 including transport report prepared by Phil Jones Associates, dated June 2025

APPENDIX A

CUMULATIVE IMPACT MAP of COASTAL SUFFOLK



APPENDIX B

SUFFOLK ENERGY ACTION SOLUTIONS (SEAS)
Relevant Representation (RR):

TRAFFIC & TRANSPORT
SEA LINK DCO

PINS Ref: EN020026 **IP Ref:** [redacted]

Date: 20 June 2025 **RR Deadline: 23 June 2025**

RELEVANT REPRESENTATION: TRAFFIC & TRANSPORT - SEA LINK (EN020026) Submitted by Suffolk Energy Action Solutions (SEAS) - [redacted]

Executive Summary

Suffolk Energy Action Solutions (SEAS) objects to the Sea Link NSIP (EN020026) on the grounds of serious and inadequately mitigated adverse impacts on the local highway network and transport environment. The application is fundamentally flawed in both its evidence base and its treatment of impacts, and fails to comply with the requirements of NPS EN-1, the National Planning Policy Framework (NPPF), and relevant local policy.

The proposed development would generate up to 346 HGV movements per day during peak construction (2027), and a total of 638 construction-related vehicle movements per day in 2028. These volumes would dramatically alter traffic patterns on constrained rural routes, leading to increases in HGV traffic of up to 157% on some roads (non-numbered page 3), more than 100% at multiple junctions (pages 3 & 6) and greater than 700% at weekends (page 6) (APP-129, non-numbered tables, Non numbered pages 3-6); APP-147, Tables, pp. 3-5). Despite this, National Grid has submitted no full Transport Assessment, conducted no junction modelling, and proposed no physical highways mitigation (APP-122, para 1.2.1, p. 1; APP-337, Section 5.4, pp. 16–17; Section 7.4, pp. 32–37).

Critically, National Grid's baseline traffic data was gathered in January and February 2024, months known to be unrepresentative of typical or peak conditions (APP-054, para 7.4.3, p. 35). Traffic volumes in the summer are up to 25–33% higher than in the applicant's dataset, as evidenced by SCC Automatic Traffic Count (ATC) data (PJA Final Report, Table 7-1; Figure 7-1). The failure to apply any seasonal adjustment undermines the credibility of the entire impact assessment and makes it impossible to lawfully apply the policy tests under NPS EN-1 or NPPF paragraph 116.

Expert review by PJA (Final Report, June 2025) concludes that the application:

1. Ignores seasonal traffic peaks and underestimates real impacts due to flawed baseline data (APP-054, para 7.4.3, p. 22; APP-122, para 9.10.1, p. 23)

2. Dismisses junction impacts as negligible without analysis, including at A12/A1094, A12/B1121, and A1094/Sternfield Road, all high-sensitivity locations (APP-129, Non-numbered Table, Non-numbered p. 3; APP-054, Table 7.41, p.96)
3. Provides no meaningful mitigation, nor enforceable controls on vehicle volumes or queuing (APP-337, Sections 5.4, and 5.5 and 7.4; APP-342, Table 1.1, entries GG02 and GG10, pp. 3 & 6)
4. Assesses PRoW severance and closure impacts inadequately, despite major permanent diversions (APP-131, non-numbered tables on multiple pages, PJA Final Report, Section 9.2).
5. Fails to properly assess or mitigate cumulative traffic impacts from Sizewell C, EA1N/EA2 and LionLink, contrary to EN-1 paragraph 5.14.18 and Planning Inspectorate guidance on cumulative effects (APP-060, para 13.4.9, p.187; APP-142, non-numbered tables, pp. 3–5)

1. Invalid Baseline Data and Omission of Seasonality

1.1 National Grid's traffic assessments rely on traffic survey data collected in January and February 2024, which are non-neutral months, contrary to Department for Transport guidance (APP-054, para 7.4.3, p. 22).

1.2 No seasonal adjustment has been applied to reflect the fact that traffic volumes in the affected area are substantially higher in summer, due to tourism and farming activity. SEAS-commissioned analysis shows flows in summer are 25–33% higher than those observed in the DCO baseline (PJA Final Report, Table 7-1; Figure 7-1).

1.3 This methodological flaw undermines the validity of all percentage increase calculations, impact assessments, and cumulative traffic judgments made in the ES and Transport Assessment Note ((APP-129, non-numbered tables, Non numbered pages 3-6); APP-122, para 9.10.1, p. 24).

1.4 As a result, it is impossible to determine whether impacts on junction capacity, road safety or PRoW amenity meet NPPF paragraph 116 or EN-1 paragraph 5.14.21 tests.

1.5 National Grid's baseline traffic data collection fails to comply with established national guidance. The Department for Transport's **Transport Analysis Guidance (TAG) Unit M1.2** requires that traffic counts be undertaken in "neutral months" — typically **March, April, May, September or October** — to ensure representativeness and comparability. **January and February**, the months used by National Grid, are explicitly recognised as **non-neutral** and unsuitable for baseline data collection unless adjusted (TAG Unit M1.2, Table A.1 and Section 2.3). This is a clear failure to follow national guidance in the design of the baseline assessment.

2. Inadequate Capacity and Safety of Rural Roads

2.1 B1121 Saxmundham Road (N. of Grove Road) is rated as high sensitivity to severance, pedestrian delay, NMU amenity, and intimidation (APP-124, Table p. 3).

2.2 HGVs on B1121 Main Road (east of A12) are forecast to increase by 157.4% (APP-129, Table p. 3, S-RL5).

2.3 Narrow, winding village roads are used as main access routes, with no

committed physical mitigation proposed (APP-337, Section 6.2, p. 25-26).
2.4 Traffic Flow Diagrams confirm weekday peak movements through highly constrained links (APP-128).
2.5 PJA identifies elevated risks to vulnerable road users including cyclists, walkers and equestrians, particularly on narrow links where carriageway width is insufficient for safe passing (PJA Final Report, para 6.2.2).

3. Underestimation of Impacts on Junctions
3.1 Forecast traffic increases at A12/B1121 (South) and B1121/B1119 (Saxmundham) junctions exceed modelling thresholds but are dismissed without analysis (APP-129, Table Reference S-RJ2, Non-numbered p. 3, APP-142, Non-numbered tables pages 3-5).
3.2 All junctions are classified as “negligible or small” despite known queuing and safety issues (APP-130, Table, p. 3).
3.3 No use of capacity modelling (e.g. ARCADY, PICADY) is provided, and operational impacts on already constrained junctions are not evaluated (APP-122, Section 4 , pp. 6-8).
3.4 PJA highlights the absence of any analysis of vehicle delay, turning movement conflicts, or visibility splay adequacy at multiple junctions, including A1094/Sternfield Road (PJA Final Report, paras 5.3.3–5.3.6).

4. Insufficient Mitigation and Weak Commitments
4.1 The Outline CTMTP sets out forecast movements but includes no binding caps on daily HGV volumes or time-of-day limits (APP-337, Section 5.4, pp. 16–18).
4.2 Proposed mitigation measures are framed as “anticipated” and subject to further design, leaving enforcement undefined (APP-337, Section 7.4, pp. 32–34).
4.3 The REAC includes no secured commitments, using only broad “to be agreed” phrasing (APP-342, Table 1.1, GG02 p3 and GG10, pp. 6).
4.4 PJA concludes that the applicant’s mitigation proposals are superficial and lack enforceable mechanisms to manage routing, volume, or PRoW interface (PJA Final Report, Section 11.2).

5. Cumulative Impact Is Critically Underplayed
5.1 Cumulative HGV increases from Sea Link, Sizewell C, EA1N/EA2 and LionLink are substantial: +187.7% on B1121 Main Road, Saxmundham (east of A12), 164.8% on A1094 (between A12 and Snape Road Junction), +195.4% at B1121 Main Road/B1121 Church Hill Junction, 148.3% at A1094 Aldeburgh Road/B1121 Aldeburgh Road Junction (APP-142, Table, p. 5)
5.2 Despite this, cumulative effects are dismissed as “not significant” without quantified assessment (APP-060, Table 13.41, pp. 168-178, para 13.4.9, p. 186).
5.3 No combined mitigation strategy or multi-developer traffic coordination is proposed (APP-060, Section 13.41, pp. 168–177).
5.4 PJA confirms the applicant has adopted a project-isolated approach, omitting any shared transport impact model across overlapping NSIPs (PJA Final Report, Section 10.1).

6. Severe and Prolonged Disruption to Public Rights of Way (PRoWs)
6.1 Permanent diversions affect PRoW E-354/006/0 and E-491/005/0, both rerouted by more than 400m, but dismissed as “not significant” (APP-131, 15 non-numbered sheets refs S-P9, S-P15).

6.2 E-491/006/0 is closed throughout construction (APP-131, Third Sheet, ref S-P14) and yet this is designated as “not significant”
6.3 Other key footpaths (e.g. E-354/002/0, E-260/013/A) are subject to multiple temporary closures and haul road crossings (APP-131, Second Sheet) and yet regarded as “not significant”
6.4 This materially degrades the Sandlings Walk, which is an important tourism attraction (APP-234, Figure 6.4.2.7.4, Sheet 4).
6.5 PJA maps PRoW impacts and finds multiple instances where safety and accessibility are significantly reduced without mitigation (PJA Final Report, para 9.2.5).

7. Deficient Use of Policy Tests
7.1 Sea Link fails to meet the transport policy tests in EN-1 paragraph 5.14.18 and NPPF paragraph 116, which require cumulative transport effects to be assessed and mitigated.
7.2 The project lacks a Transport Assessment (only a Transport Assessment Note is provided, which is substantively inadequate, both on its own and in combination with the ES as a whole) and omits required transport modelling and appraisal (APP-122, para 1.2.1, p. 1-2; APP-054, para 7.4.3, p. 22).
7.3 Routing through constrained villages such as Friston, Aldringham, Sternfield and Knodishall is incompatible with established local planning policy objectives to protect rural road character, limit traffic intrusion, and safeguard pedestrians and cyclists. This undermines the integration of active travel, road safety and amenity priorities that local plans are required to deliver (APP-234, Figure 6.4.2.7.4, Sheet 4; APP-337, Section 7.2, p. 29-31).
7.4 PJA concludes that the scheme falls short of best practice and fails to meet established national transport guidance on data collection, impact significance, and mitigation design (PJA Final Report, Section 12).

Conclusions

SEAS submits that the Sea Link DCO application must be refused on the grounds that it fails to assess or mitigate severe and unacceptable impacts on the local transport network, in breach of national and local planning policy.

1. Baseline traffic surveys were undertaken in non-neutral winter months, without any seasonal adjustment, contrary to DfT guidance and standard practice (APP-054, para 7.4.3, p. 22; PJA Final Report, Table 7-1).

2. All traffic impacts, including HGV uplift, junction stress and PRoW safety, are understated as a result ((APP-129, non-numbered tables, non-numbered pages 3-6); APP-122, para 9.10.1, p. 23).
3. No modelling of junction performance or cumulative congestion has been undertaken (APP-122, para 4.1.1, pp.7- 8; APP-060, para 13.4.9, p. 187).
4. There are no enforceable traffic controls, no local highway mitigation, and no coordination with other NSIPs (APP-337, Sections 5–8; APP-342, Table 1.1, pp. 3–5).
5. PRoW severance and amenity degradation has been materially under-assessed (APP-131, non-numbered sheets; PJA Final Report, Section 9.2).

The proposal fails the tests under NPS EN-1 paragraph 5.14.21 and NPPF paragraph 116. It would result in residual cumulative impacts that are severe and unmitigated, and should be refused development consent.

End

I. DCO Examination Library Documents cited in-text

1. **APP-054** – Environmental Statement, Volume 6, Chapter 7: Traffic and Transport
2. **APP-122** – ES Appendix 2.7.A: Transport Assessment Note
3. **APP-124** – ES Appendix 2.7.C: Receptor Sensitivity Levels
4. **APP-128** – ES Appendix 2.7.G: Traffic Flow Diagrams
5. **APP-129** – ES Appendix 2.7.H: Preliminary Highway Impact Assessment
6. **APP-130** – ES Appendix 2.7.I: Magnitude of Change
7. **APP-131** – ES Appendix 2.7.J: Traffic and Transport Assessments (PRoW Impacts)
8. **APP-142** – ES Appendix 2.13.B: Preliminary Cumulative Highway Impact Assessment
9. **APP-234** – ES Figures, Chapter 7: Traffic and Transport
10. **APP-337** – Outline Construction Traffic Management and Travel Plan – Suffolk
11. **APP-342** – CEMP Appendix B: Register of Environmental Actions and Commitments (REAC)
12. **APP-060** – Environmental Statement, Volume 6, Chapter 13: Inter-Project Cumulative Effects

II. Other Documents cited in-text

1. **PJA Final Report** – *07705-R-01-A – Sea Link DCO Review SUBMISSION* (18 June 2025)
2. **DfT TAG Unit M1.2: Data Collection Guidance**
3. **National Policy Statement for Energy (EN-1)**
4. **National Planning Policy Framework (NPPF)**

Suffolk Energy Action Solutions

Transport Report

Sea Link DCO Review

June 2025

Project Code: 07705

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Version Control and Approval

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Prepared for

Suffolk Energy Action Solutions

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1 Executive Summary

1.1.1 Phil Jones Associates (PJA) has been appointed by the Suffolk Energy Action Solutions (SEAS) to carry out a technical review of the transport evidence prepared in respect to an application by National Grid Electricity Transmission for an order granting Development Consent for the Sea Link project in Suffolk (Planning Inspectorate Reference: EN020026). This technical review considers the highways and transport implications of the proposed development and associated Development Consent Order (DCO).

1.1.2 My name is Richard Ellam. I am a Chartered Engineer (CEng) and a Member of the Institution of Highways and Transportation, with over 27 years' professional experience in the Transport and Development Planning field.

1.1.3 The proposed development will generate a significant level of new vehicular trips onto the local highway network for a period of 60 months. In my view, the approach adopted in appraising the impact of the proposed development is not robust, has not followed correct and proper procedure and provides no comfort that the development will not have a significant adverse impact on the surrounding local communities.

1.1.4 The volume of HGV traffic will be increased by 346 HGV movements per day from this single development. This will result in significant material changes in the constitution of traffic flows in the surrounding towns and villages, which have not been properly or rigorously considered.

1.1.5 Despite this level of impact, the DCO application is not supported by a full and robust Transport Assessment. The documentation prepared lacks detailed junction modelling, in depth and proper consideration of the impacts of the scheme and assessment of the need for any meaningful mitigation, of which none is proposed. This is unacceptable for a development of this size and one in an area of other major planned development, the cumulative impacts of which are significant and should be collectively considered.

1.1.6 The base traffic survey data, upon which the DCO evidence has been based, was carried out in the non-neutral months of January and February 2024. Traffic volumes in these months, in this location, are much lower (5-10%) than both a typical neutral month and in the busy summer months (25% lower). The surveys used cannot thus be considered a representative sample of data upon which to base such an exercise. This undermines the entire transport evidence base and its subsequent conclusions.

1.1.7 The assessments conducted have also given no consideration to the implications of seasonality in this specific location. The study area experiences much higher levels of traffic during the summer months than January/February (25%) and the assessments to date simply do not reflect or consider this at all. The implications of seasonality are not acknowledged in the DCO evidence base, this is a

critical oversight in a location where it is clearly a key concern for residents and the local community.

1.1.8 There is a complete lack of any detailed junction modelling in the DCO evidence base to assess its impact properly and robustly on key junctions and their safe operation. With such a major oversight, it is not clear how key junctions function now and how they will be affected by the proposal, with its large proportion of HGVs, and if mitigation is required. It is therefore not possible to conclude whether mitigation will be required.

1.1.9 The development is one of several major new developments within the surrounding area. As is set out in this report the cumulative impacts of these are considerable and material and they have not been considered robustly or from a basic quantitative perspective in the DCO evidence. My own estimates of cumulative impacts, which don't consider the full range of committed development so understate cumulative demands, show several significant adverse highway capacity issues. These have been ignored and are not examined in the DCO evidence base.

1.1.10 The assessments conducted on the impact of the proposal on road safety also fail to adequately consider the development's impact (and again the cumulative impacts of development) on key existing safety concerns such as the junctions with the A12, the B1121 and the A1094 corridor. The proposed development and the other cumulative developments will increase the number of HGVs using the local roads within the study area significantly. The assessment on road safety of these impacts is only very superficially assessed and consistently dismissed as negligible or minor, without proper detailed exploration and consideration.

1.1.11 The Environmental Statement frequently assigns "minor" or "negligible" significance to impacts even when receptor sensitivity is high and percentage increases are large. The assessment of impacts is consistently light touch and without proper rigour and supporting evidence.

1.1.12 The development proposal proposes no meaningful highways mitigation to offset its impacts on the network.

1.1.13 Overall, the submission is based on inappropriate and weak baseline data, doesn't not properly or robustly explore key issues and areas of concerns, repeatedly dismisses impacts as insignificant and ignores significant adverse impacts, notably from the cumulative impacts.

1.1.14 Given the above, the proposal thus fails to demonstrate compliance with NPS EN-1 para 5.14.18 or NPPF para 116, due to the inadequacy and incomplete nature of the work presented in the DCO submission.

2 Introduction

2.1 Overview

2.1.1 Phil Jones Associates (PJA) has been appointed by the Suffolk Energy Action Solutions (SEAS) to carry out a technical review on their behalf in respect to an application by National Grid Electricity Transmission for an order granting Development Consent for the Sea Link project in Suffolk (*Planning Inspectorate Reference: EN020026*). This technical review considers the highways and transport implications of the proposed development and associated Development Consent Order (DCO).

2.1.2 My name is Richard Ellam. I am a Chartered Engineer (CEng) and a Member of the Institution of Highways and Transportation, with over 27 years' professional experience in the Transport and Development Planning field. I also have a Bachelor of Civil Engineering (BEng) Degree from the University of Liverpool.

2.1.3 I am a Director with PJA, one of the UK's leading Transport consultancies. I am familiar with the area and transport network surrounding the proposed site and have reviewed the relevant transportation document prepared in support of the DCO application.

2.1.4 The scope of this considers the transport impacts of this major development on the local highway network and surrounding towns and villages of Saxmundham, Benhall, Friston, Leiston, Aldeburgh and other smaller settlements. The area surrounding the proposed development comprises rural towns and villages, with single carriageway roads which connect to the A12, to the west. The region is part of the Suffolk Coast and Heaths Area of Natural Beauty (AONB), and to the north is RSPB Minsmere.

2.1.5 The Sea Link proposal, considered as part of the order, adds to the significant energy related development proposals within Suffolk including:

- Two new nuclear reactors, forming Sizewell C.
- A National Grid connection hub.
- The East Anglia One North (EA1N) and EA2 Windfarms.
- Cable routes associated with each of the above schemes.

2.1.6 My technical review on behalf of the SEAS, consider the impacts of the proposal and also the cumulative impacts of the proposal and other committed development on the transport network and its operation.

2.2 Report Structure

2.2.1 This report is structured as follows:

- **Section 3** reviews the relevant transport related DCO documents submitted for the Sea Link proposal.
- **Section 4** reviews relevant national and local policy relating to transport that should be considered when considering the application.
- **Section 5** provides an outline of the development proposal.
- **Section 6** summarises the main transport related concerns of the SEAS regarding the proposal.
- **Section 7** sets out the implications of seasonality on the conclusions of the DCO evidence base.
- **Section 8** considers the impact of the proposal on local key junctions and their operation.
- **Section 9** details concern about the cumulative impacts of developments on the local roads and connections.
- **Section 10** sets out the impact on road safety.
- **Section 11** sets out the mitigation proposed to support this development.
- **Section 12** provides a summary and conclusion of my review.

3 DCO Document Review

3.1.1 The Sea Link DCO documents, prepared by National Grid, considered pertinent to transport are outlined in **Table** 3-1**.** In preparing this review document, I have reviewed these submissions.

Table 3-1: Sea Link DCO Documents Reviewed

ID	File Name	App Ref
7.5.1.1	EN020026-000185-7.5.1.1 Outline Construction Traffic Management and Travel Plan - Suffolk.pdf	APP-337
6.2.2.7	EN020026-000239-6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport.pdf	APP-054
6.2.2.12	EN020026-000244-6.2.2.12 Part 2 Suffolk Chapter 12 Suffolk Onshore Scheme Intra-Project Cumulative Effects.pdf	APP-059
6.2.2.13	EN020026-000245-6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects.pdf	APP-060
6.3.1.5.A	EN020026-000273-6.3.1.5.A ES Appendix 1.5.A Cumulative Effects Assessment Methodologies.pdf	APP-091
6.3.2.7.A	EN020026-000300-6.3.2.7.A ES Appendix 2.7.A Transport Assessment Note.pdf	APP-122
6.3.2.7.B	EN020026-000301-6.3.2.7.B ES Appendix 2.7.B Traffic and Transport Thematic Meeting Minutes.pdf	APP-123
6.3.2.7.D	EN020026-000303-6.3.2.7.D ES Appendix 2.7.D Baseline Traffic Movements.pdf	APP-125
6.3.2.7.E	EN020026-000304-6.3.2.7.E ES Appendix 2.7.E Construction Worker Trip Distribution.pdf	APP-126
6.3.2.7.F	EN020026-000305-6.3.2.7.F ES Appendix 2.7.F Saturday Trip Generation Tables.pdf	APP-127
6.3.2.7.G	EN020026-000306-6.3.2.7.G ES Appendix 2.7.G Traffic Flow Diagrams.pdf	APP-128
6.3.2.7.H	EN020026-000307-6.3.2.7.H ES Appendix 2.7.H Preliminary Highway Impact Assessment.pdf	APP-129
6.3.2.7.J	EN020026-000309-6.3.2.7.J ES Appendix 2.7.J Traffic and Transport Assessments.pdf	APP-131
6.3.2.13.B	EN020026-000320-6.3.2.13.B ES Appendix 2.13.B Preliminary Cumulative Highway Impact Assessment.pdf	APP-142
6.4.2.7	EN020026-000461-6.4.2.7 ES Figures Suffolk Traffic and Transport.pdf	APP-137

3.1.2 The key documents (supplemented with the appendices) within **Table** 3-1 are summarised as follows.

Outline Construction Traffic Management and Travel Plan – Suffolk (APP-337):

3.1.3 Outlines the anticipated construction transport movements during the peak vehicle and HGV periods.

Part 2 Suffolk Chapter 7 Traffic and Transport (APP-054):

3.1.4 The Traffic and Transport chapter of the Environmental Statement (APP-054) presents the impacts of the proposed project and focuses on the construction impact (albeit in this case that is five years), where the project would require staff (commuting journeys), deliveries of materials/equipment to site by LGVs and HGVs and the removal of debris from the site by HGVs. The project would also include abnormal indivisible loads for the delivery of cable drums and transformers. It will cause disruption to local roads as a result of construction traffic and PRoW as a result of closures/diversions, and various very limited measures are proposed to mitigate these potential impacts during construction.

3.1.5 The Chapter 7 assessment is carried out in accordance with the 2023 IEMA Guidelines for the Environment Assessment of Traffic and Movement, this includes;

- Severance of communities;
- Pedestrian delay (incorporating delay to all non-motorised users);
- Non-motorised user amenity;
- Fear and intimidation on and by road users;
- Road vehicle driver and passenger delay;
- Road user and pedestrian safety;
- Hazardous/large loads; and
- PRoW diversions and closures (both temporary and permanent effects)

3.1.6 The assessment is carried out in the following stages:

- Traffic Receptor Sensitivity: Each traffic receptor within the study area is assessed for the level of sensitivity to additional traffic for each assessment category. The sensitivity is defined as 'Negligible', 'Low', 'Medium', 'High' and 'Very High'.
- Magnitude of Effect: Based on a defined criteria set out within the chapter the level of magnitude the proposed project will be apply to each traffic receptor is categorised based on a 'Negligible', 'Small', 'Medium' and 'Large' system.
- Significance: The proposed project significance is then assessed based on the Significance Matrix which utilises Stage 1 and Stage 2 above. The categories are defined as 'Negligible', 'Minor', 'Moderate' and 'Major.
- The assessment is undertaken for the peak construction period for total vehicles (expected to occur in 2028) with the construction trips distributed based on 2021 census data and the use of Google Maps routing.

3.1.7 Ultimately, the assessment concludes in section 7.11.1 and 7.11.2 (APP-054):

> ***"As described above, no additional mitigation measures are necessary to avoid or reduce likely significant effects on traffic and transport receptors, therefore residual effects are as discussed in Section 7.9."***
>
> ***and***
>
> ***"No likely significant effects have been identified as a result of the Proposed Project on transport and access during any phase with the proposed mitigation in place, as <u>all effects have either been categorised as minor adverse or negligible</u>."***

Part 2 Suffolk Chapter 12 Suffolk Onshore Scheme Intra-Project Cumulative Effects (APP-059):

3.1.8 The intra-project cumulative effects assessment considers the potential cumulative impact that may arise when multiple aspects of a proposed project impact a single receptor.

3.1.9 The intra-project cumulative effects assessment followed a three-stage process: pre-screening to identify receptors exposed to multiple effect types, screening to evaluate the significance of each effect, and a final assessment to determine if combined effects result in greater overall significance. Only receptors experiencing more than one significant effect progressed through each stage.

3.1.10 With regards to traffic and transport the following is concluded in paragraph 12.2.2:

> ***"Whilst no significant intra-project cumulative effects were identified for most of the receptors reviewed, significant adverse effects were identified for the following receptors:***
>
> ***For transport and transport users, there is potential for a significant intra-project cumulative effect during construction, operational and maintenance and decommissioning as several visual amenity effects were assessed as significant for people using cycle paths and, roads and rail and there will be a number of temporary and permanent PRoW diversions and closures. Whilst noise and vibration and impacts including severance, pedestrian delay, fear and intimidation are minor the combination of all these impacts could have a significant effect upon transport users. No mitigation has been confirmed at this stage."***

Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects (APP-060)

3.1.11 This chapter of the Environmental Statement outlines the assessment of potential significant cumulative effects arising from the Suffolk Onshore Scheme in combination with other developments. The methodology is based on guidance from the Planning Inspectorate's 2024 advice on cumulative effects assessment and considers all aspects of the proposal.

3.1.12 The methodology outlines four stages:

1. Identify a Zone Of Interest (ZOI): The ZOI was defined by doubling the largest study area from the environmental topic chapters to capture potential overlaps with other developments, using professional judgement to ensure flexibility and avoid a strict boundary when identifying relevant projects for cumulative assessment.
2. Refine the 'Long List' of 'Other Developments': The 'long list' of other developments identified in the Scoping Report was reviewed and updated based on changes to the Zone of Influence, stakeholder feedback, and guidance from the Planning Inspectorate, with detailed updates and assessment matrices provided in the relevant Application Documents. A refined 'short list' was then determined using professional judgement and criteria such as development timing, scale, and potential overlap with the Proposed Project, with developments kept under review until the

end of November 2024 to account for possible delays and ensure a robust cumulative effects assessment.

3. 'Other Development' Review: Stage 3 involved collecting detailed information on shortlisted projects—including design, location, timelines, operations, and environmental effects—which is documented in the relevant appendices of the Application Documents.
4. Cumulative Assessment: At Stage 4, technical specialists carried out the cumulative effects assessment for each shortlisted development relevant to their topic area. The significance of cumulative effects was determined using criteria such as duration, extent, type, frequency of effects, receptor resilience, and the effectiveness of proposed mitigation.

3.1.13 The assessment concludes in paragraph 13.4.9:

> ***"In summary no significant cumulative effects on traffic and transport receptors are expected as a result of construction traffic associated with the Suffolk Onshore Scheme when combined with construction/ operational traffic associated with each of the other developments in isolation. In addition, no significant cumulative effects are expected when considering construction/ operational traffic associated with all committed developments combined on the same basis, given that the peak construction phases for each scheme are unlikely to fully overlap. In terms of PRoW closures/ diversions, these will be coordinated with other committed developments where possible (as identified above) to reduce the potential for significant cumulative effects. In view of the above, no additional mitigation is expected to be required to that already outlined within Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport, Application Document 7.5.1.1 Outline Construction Traffic Management and Travel Plan – Suffolk (Outline CTMTP – Suffolk) and Application Document 7.5.9.1 Outline Public Rights of Way Management Plan – Suffolk (Outline PRoWMP – Suffolk)."***

Transport Assessment Note (APP122):

3.1.14 The Transport Assessment Note (TAN), identifies where typical Transport Assessment content is located across other documents related to the Suffolk Onshore Scheme.

3.1.15 The TAN concludes in Paragraph 9.10.1:

> **"*The assessment of committed developments within Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects is considered to be robust based on the schemes and parameters adopted to identify forecast committed development trips on the highway network within the study area. Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects***

***concludes that no significant cumulative effects on traffic and transport are expected as a result of construction traffic associated with the Suffolk Onshore Scheme when combined with construction/ operational traffic associated with other committed developments in isolation or when considering all committed developments combined. In terms of PRoW closures/ diversions, these will be coordinated with other committed developments where necessary (as identified above and within Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects) to reduce the potential for significant cumulative effects.*"**

3.1.16 EN-1 requires in paragraph 5.14.5, that projects with significant transport implications should include a "***transport appraisal***" and that the relevant guidance contains "***guidance on modelling and assessing the impacts of transport schemes***". I note the DCO submission includes no modelling nor what I would consider a transport appraisal.

3.1.17 The recently updated National Planning Policy Framework (NPPF), requires in paragraph 118 that development that generate significant volumes of traffic - "***should be supported by a transport statement or transport assessment".*** Given the scale of development and level of vehicular trip generation, I would expect the proposal to be supported by a full Transport Assessment.

3.1.18 The application is not supported by a full and robust Transport Assessment, Instead, the application is supported by what is described as a "Transport Assessment Note", on the following basis in paragraph 1.2.1:

"This Transport Assessment Note (TAN) forms Application Document 6.3.2.7.A Appendix 2.7.A Suffolk Transport Assessment Note and has been prepared to identify where the information that would typically form part of a standalone Transport Assessment (TA) can be found in other chapters and reports that have been prepared for the Suffolk Onshore Scheme. This approach is designed to reduce repetition between documents".

3.1.19 The "Transport Assessment Note" provided, whilst containing some limited typical aspects of a full TA, is not a full comprehensive TA and includes no junction modelling. The justification for this TAN approach is that the EA Chapter 7 Traffic and Transport is effectively the bulk of the transport evidence, and the "Transport Assessment Note" includes some supplementary information.

3.1.20 In my view, an EA chapter on Transport and a full Transport Assessment are fundamentally different exercises and consider the full range of the development's potential impact. The EA considering the proportionate impacts of the proposal on people and the TA taking a more detailed revised of the operation of the transport network. The lack of a full and robust TA supporting the application, as I set out later in this report, is not consistent with the key relevant national policies, notably in respect to the complete lack of any junction modelling and the general light touch dismissive

approach to considering any impacts or mitigation. The lack of a comprehensive submission makes it impossible to apply the relevant policy tests in EN-1 and the NPPF, due to the lack of a robust evidence base.

4 Policy Review

4.1 National Policy

National Policy Statements for Energy

4.1.1 EN-1 is the overarching National Policy Statement for Energy in the UK. It sets out the government's objectives for the energy system to ensure our supply of energy always remains secure, reliable, affordable, and is consistent with meeting the UK net zero target by 2050 for a wide range of future scenarios. In respect to transport impacts, EN-1 sets a modified version of the NPPF test, as follows at 5.14.21:

"The Secretary of State should only consider refusing development on highways grounds if there would be an unacceptable impact on highway safety, residual cumulative impacts on the road network would be severe, or it does not show how consideration has been given to the provision of adequate active public or shared transport access and provision."

4.1.2 Whilst that is very similar to the NPPF transport test, that is said after EN-1 has first made clear that other options should be explored first, including requiring additional infrastructure, by 5.14.18-5.14.20:

"5.14.18 A new energy NSIP may give rise to substantial impacts on the surrounding transport infrastructure and the Secretary of State should therefore ensure that the applicant has sought to mitigate these impacts, including during the construction phase of the development and by enhancing active, public and shared transport provision and accessibility.

5.14.19 Where the proposed mitigation measures are insufficient to reduce the impact on the transport infrastructure to acceptable levels, the Secretary of State should consider requirements to mitigate adverse impacts on transport networks arising from the development, as set out below.

5.14.20 Development consent should not be withheld provided that the applicant is willing to enter into planning obligations for funding new infrastructure or requirements can be imposed to mitigate transport impacts.272 In this situation the Secretary of State should apply appropriately limited weight to residual effects on the surrounding transport infrastructure."

4.1.3 In that context, it is important to not only consider the impact on highways safety or the severe residual cumulative effects of the development, but also that it needs to provide additional infrastructure and mitigation. I note the application, proposes no meaningful highway mitigation.

4.1.4 EN1 also notes in paragraph 5.14.5:

"5.14.5 If a project is likely to have significant transport implications, the applicant's ES (see Section 4.3) should include a transport appraisal. The DfT's Transport Analysis Guidance (TAG) and Welsh Governments WelTAG267 provides guidance on modelling and assessing the impacts of transport schemes."

4.1.5 As I set out later in this review, the development is not supported by a full Transport Assessment report nor what I would consider a Transport appraisal.

National Planning Policy Framework (NPPF)

4.1.6 The revised National Planning Policy Framework (NPPF) was updated on 12 December 2024 and sets out the government's planning policies for England and how these are expected to be applied.

4.1.7 Paragraph 118 notes that ***"all development that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed"***.

4.1.8 The application is supported by a Transport Assessment Note, of which there is no reference in the NPPF.

4.1.9 Paragraph 115 of the NPPF states that:

> ***"In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:***
>
> a ***appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;***
>
> b ***safe and suitable access to the site can be achieved for all users;***
>
> c ***the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code; and***
>
> d ***any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree."***

4.1.10 Furthermore, Paragraph 116 states:

"Developments should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe."

4.1.11 I note the NPPF makes specific reference to residual cumulative impacts, which is particularly important in this location given the number of proposals. I also note the no meaningful mitigation is put forward to offset the impacts of the development and consider this later in this review.

4.1.12 As set out in Paragraph 117, within this context, applications for development should:

a "***Give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;***

b ***Address the needs of people with disabilities and reduced mobility in relation to all modes of transport;***

c ***Create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;***

d ***Allow for the efficient delivery of goods, and access by service and emergency vehicles; and***

e ***Be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations."***

4.1.13 For a development of this nature, sustainable access and public transport access is of relative limited importance. But my review, considers further the impact of the development on pedestrians, cyclists and vulnerable road users, given the level proportion of HGV traffic generated by the proposal and other committed development.

Nationally Significant Infrastructure Projects - Advice on Cumulative Effects Assessment

4.1.14 The Planning Inspectorate has recently updated, March 2025, its advice on the "Cumulative Effects Assessment (CEA)". The CEA advice includes, of relevance, that:

"other existing and, or approved development' is taken to include existing developments and existing plans and projects that are 'reasonably foreseeable".

4.1.15 This is of course relevant to the cumulative impacts in transport terms and is very pertinent to this location, where there are so many committed developments. As is the assessment of cumulative effects required by the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017.

National Planning Policy Guidance (NPPG)

4.1.16 The National Planning Policy Guidance (NPPG) stipulates the scope and level of detail that is needed in a Transport Assessment or Statement will vary from site to site, but the following should be considered when settling the scope of the proposed assessment:

- ***"Information about the proposed development, site layout, (particularly proposed transport access and layout across all modes of transport);***
- ***Data about existing public transport provision, including provision/frequency of services and proposed public transport changes;***
- ***A qualitative and quantitative description of the travel characteristics of the proposed development, including movements across all modes of transport that would result from the development and in the vicinity of the site;***
- ***An assessment of trips from all directly relevant committed development in the area (i.e. development that this is a reasonable degree of certainty will proceed within the next three years);***
- ***Measures to improve the accessibility of the location (such as provision/enhancement of nearby footpath and cycle path linkages) where these are necessary to make the development acceptable in planning terms;***
- ***A description of parking facilities in the area and the parking strategy of the development;***
- ***Ways of encouraging environmental sustainability by reducing the need to travel; and***
- ***Measures to mitigate the residual impacts of development (such as improvements to the public transport network, including walking and cycling facilities, physical improvements to existing roads).***
- ***The primary purpose of a TP is to identify opportunities for the effective promotion and delivery on sustainable transport initiatives e.g., walking, cycling, public transport and telecommuting, in connection with both proposed and existing developments and through this to thereby reduce the demand for travel by less sustainable modes."***

4.1.17 Whilst a full TA has not been prepared in support of the application, the hybrid TAN document prepared in its place fails to consider the highway impacts and need for mitigation sufficiently and robustly.

4.2 Suffolk Local Transport Plan 2011-2031

4.2.1 The County Council, as the Local Highway Authority, has prepared the Suffolk Local Transport Plan 2011-2031. The local transport plan sets out Suffolk County Council's long-term transport strategy

for the next 20 years. The key focus of the plan is to support Suffolk's economy as it recovers from the recession and to support future sustainable economic growth.

4.2.2 The plan shows, in Section 1, page 6 , how transport will play its part in supporting and facilitating future sustainable economic growth by:

- ***Maintaining (and in the future improving) the local transport networks;***
- ***Tackling congestion;***
- ***Improving access to jobs and markets;***
- ***Encouraging a shift to more sustainable travel patterns.***

4.2.3 In Suffolk, the transport plans will support business and growth with a focus on (Page 11)*:*

- ***The challenge of maintaining the highway network in good condition***
- ***Tackling congestion in the larger towns by more efficient management of traffic, reducing the demand for car travel and promoting more sustainable means of travel***
- ***Improved connectivity and accessibility in rural areas***
- ***Seeking improvement to the A11, A12 and A14 trunk roads connecting businesses in Suffolk to each other and to their markets seeking improvement to the rail network for freight and passengers***
- ***relief for our market towns suffering from high levels of through traffic***
- ***recognising that securing high speed broadband throughout Suffolk is very important at present in addressing accessibility and connectivity issues throughout Suffolk and supporting business growth.***

4.2.4 I note the LHA's desire to improve the A12 and also to provide relief to the market towns in respect to through traffic. Both are important considerations in appraising the impact of the proposed DCO application.

4.3 East Suffolk Council – Suffolk Coastal Local Plan (September 2020)

4.3.1 The East Suffolk Local Plan sets out the level of growth required for the Suffolk Coastal area including the locations and how the growth should be delivered. The local plan covers 2018-2036; noting a few of the key policies relating energy infrastructure and sustainable transport as follows:

Policy SCLP3.4: Proposals for Major Energy Infrastructure Projects (page 55)

"In its role either as determining authority for development under the Town and Country Planning Act, or as consultee on Nationally Significant Infrastructure Projects, the Council will take into

consideration the nature, scale, extent and potential impact of proposals for Major Energy Infrastructure Projects, including cumulative impacts throughout their lifetime, including decommissioning of existing plant and facilities."

The Council will work in partnership with the scheme promoter, local communities, National Grid, Government, New Anglia Local Enterprise Partnership, service providers, public bodies and relevant local authorities to ensure significant local community benefits and an ongoing legacy of the development is achieved as part of any Major Infrastructure Projects as outlined in Table 3.6.

Proposals for Major Energy Infrastructure Projects across the plan area and the need to mitigate the impacts arising from these will have regard to the following policy requirements:

a ***Relevant Neighbourhood Plan policies, strategies and visions;***

b ***Appropriate packages of local community benefit to mitigate the impacts of disturbance experienced by the local community for hosting major infrastructure projects;***

c ***Community safety and cohesion impacts;***

d ***Requirement for a robust Environmental Impact Assessment;***

e ***Requirement for a robust Habitats Regulations Assessment;***

f ***Requirement for a robust Heritage Impact Assessment;***

g ***Requirement for robust assessment of the potential impacts on the Suffolk Coast and Heaths Area of Outstanding Natural Beauty;***

h ***Appropriate flood and erosion defences, including the effects of climate change are incorporated into the project to protect the site during the construction, operational and decommissioning stages;***

i ***Appropriate road and highway measures are introduced (including diversion routes) for construction, operational and commercial traffic to reduce the pressure on the local communities;***

j ***The development and associated infrastructure proposals will seek to deliver positive outcomes for the local community and surrounding environment;***

k ***Economic and community benefits where feasible are maximised through agreement of strategies in relation to employment, education and training opportunities for the local community;***

l ***Measures to ensure the successful decommissioning and restoration of the site through appropriate landscaping is delivered to minimise and mitigate the environmental and social harm caused during operational stages of projects;***

m ***Cumulative impacts of projects are taken into account and do not cause significant adverse impacts; and***

n ***Appropriate monitoring measures during construction, operating and decommissioning phases to ensure mitigation measures remain relevant and effective.***

4.3.2 Policy SCLP3.4 identifies a number of pertinent points in respect to this technical review, namely the need for robust assessments and that cumulative assessments are considered.

Policy SCLP7.1 – Sustainable Transport (page 132)

4.3.3 Policy SCLP7.1 goes on to add:

"Development proposals should be designed from the outset to incorporate measures that will encourage people to travel using non-car modes to access home, school, employment, services and facilities.

Development will be supported where:

a ***Any significant impacts on the highways network are mitigated;***

b ***It is proportionate in scale to the existing transport network;***

c ***All available opportunities to enable and support travel on foot, by cycle or public transport have been considered and taken;***

d ***It is located close to, and provides safe pedestrian and cycle access to services and facilities;***

e ***It is well integrated into and enhances the existing cycle network including the safe design and layout of new cycle routes and provision of covered, secure cycle parking;***

f ***It is well integrated into, protects and enhances the existing pedestrian routes and the public rights of way network;***

g ***It reduces conflict between users of the transport network including pedestrians, cyclists, users of mobility vehicles and drivers and does not reduce road safety; and***

h ***The cumulative impact of new development will not create severe impacts on the existing transport network Developments should connect into the existing pedestrian and cycle network.***

Development will be expected to contribute to the delivery of local sustainable transport strategies for managing the cumulative impacts of growth.

In consultation with the Highway Authority, the scale, location and nature of development will be considered in determining how the transport impacts of development should be assessed. As indicative thresholds a Transport Statement will be required for development of 50 -80 dwellings and a Transport Assessment and Travel Plan will be required for developments of over 80 dwellings. Non residential development will be considered on a case by case basis dependent on the volume of movements anticipated with the use proposed."

4.3.4 As I set out in Section 11 of this report, the mitigation proposed to support this development is very limited and the conflicts and impacts on the local transport network have not been fully and robustly considered.

5 Sea Link Development Proposals

5.1.1 The Sea Link Project involves building a new converter station within 5 km of the proposed Friston substation. This station will connect to Friston via underground High Voltage Alternating Current (HVAC) cables. From the converter station to the coast, the connection will continue using underground High Voltage Direct Current (HVDC) cables, linking to a new offshore HVDC cable at the Suffolk coast.

5.1.2 With regards to transport, the key impact of the proposal is during the construction phases when the development will generate significant volumes of traffic and a large proportion of HGV traffic.

5.1.3 With the busiest HGV period calculated to be in 2027 (554 total daily movements including 346 HGVs) and busiest overall vehicles in 2028 with (638 total daily movements including 136 HGVs). The hourly splits of the peak days are presented in **Table** 5-1 and **Table** 5-2 respectively.

Table 5-1: Forecast peak daily total HGV movements (all accesses, weekday profile, 2027)

Time	Staff		LGVs		HGVs		Total vehicles		
	Arr	Dep	Arr	Dep	Arr	Dep	Arr	Dep	Total
07:00-08:00	72	0	3	2	0	0	75	2	77
08:00-09:00	0	0	3	3	20	20	23	23	46
09:00-10:00	0	0	2	3	20	20	22	23	45
10:00-11:00	0	0	3	2	19	19	22	21	43
11:00-12:00	0	0	3	3	19	19	22	22	44
12:00-13:00	0	0	2	3	19	19	21	22	43
13:00-14:00	0	0	3	2	19	19	22	21	43
14:00-15:00	0	0	3	3	18	18	21	21	42
15:00-16:00	0	0	2	3	17	17	19	20	39
16:00-17:00	0	0	3	2	12	12	15	14	29
17:00-18:00	0	0	3	3	10	10	13	13	26
18:00-19:00	0	72	2	3	0	0	2	75	77
Total	**72**	**72**	**32**	**32**	**173**	**173**	**277**	**277**	**554**

Source: Document 7.5.1.1 Outline Construction Traffic and Management and Travel Plan – Suffolk

Table 5-2: Forecast peak daily total construction vehicle movements (all accesses, weekday profile, 2028)

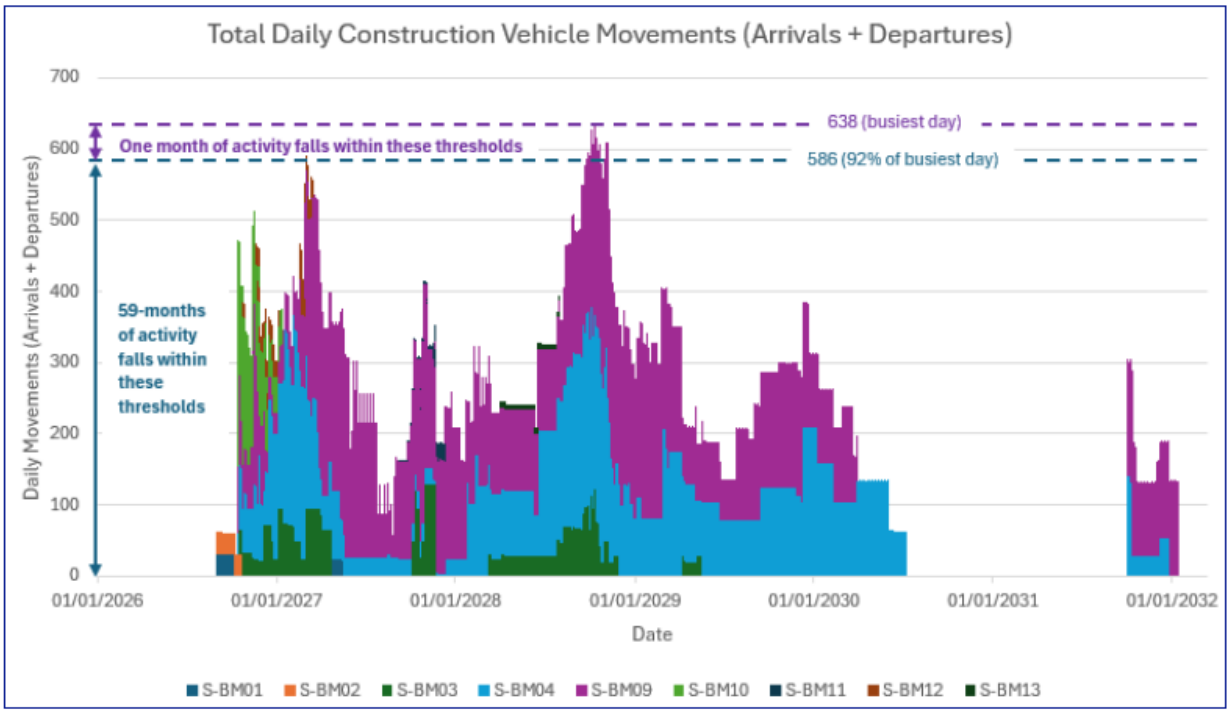
Time	Staff		LGVs		HGVs		Total vehicles		
	Arr	Dep	Arr	Dep	Arr	Dep	Arr	Dep	Total
07:00-08:00	218	0	3	2	0	0	221	2	223
08:00-09:00	0	0	3	3	8	8	11	11	22
09:00-10:00	0	0	3	3	8	8	11	11	22
10:00-11:00	0	0	2	3	8	8	10	11	21
11:00-12:00	0	0	3	2	7	7	10	9	19
12:00-13:00	0	0	3	3	7	7	10	10	20
13:00-14:00	0	0	3	3	7	7	10	10	20
14:00-15:00	0	0	2	3	7	7	9	10	19
15:00-16:00	0	0	3	2	7	7	10	9	19
16:00-17:00	0	0	3	3	5	5	8	8	16
17:00-18:00	0	0	3	3	4	4	7	7	14
18:00-19:00	0	218	2	3	0	0	2	221	223
Total	**218**	**218**	**33**	**33**	**68**	**68**	**319**	**319**	**638**

Source: Document 7.5.1.1 Outline Construction Traffic and Management and Travel Plan – Suffolk

5.1.4 As can be seen from the above tables, the HGV forecast peak in 2027 at 346 is two and a half times the numbers of HGVs (136) during the overall peak in 2028.

5.1.5 **Figure** 5-1 demonstrates the 60-month construction period with the indicated peaks.

Figure 5-1: Total Daily Construction Vehicle Movements (Arrivals + Departures)

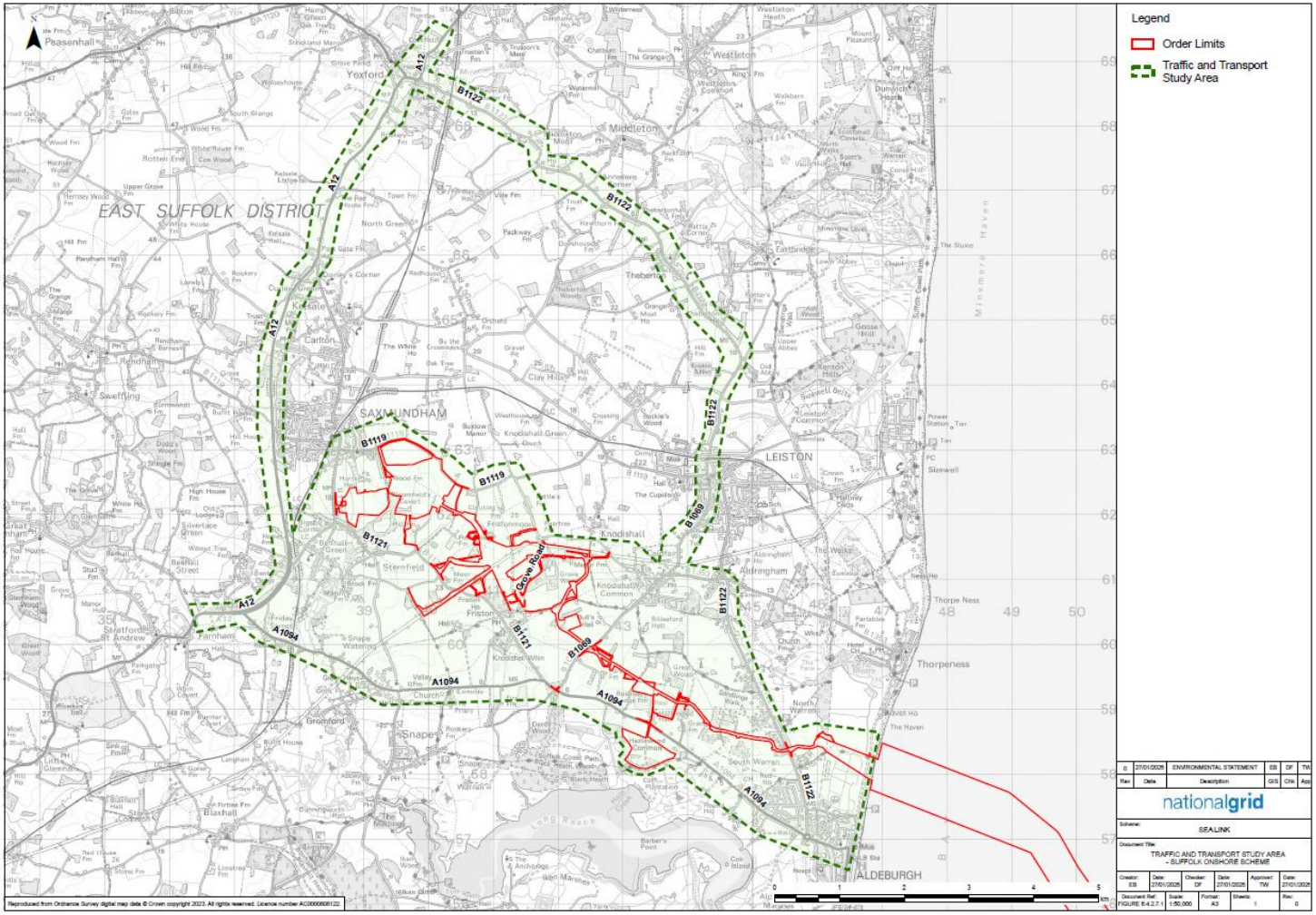


Source: Document 7.5.1.1 Outline Construction Traffic and Management and Travel Plan – Suffolk

5.1.6 As set out above, the development will generate a significant level of vehicular trips onto the local highway network for a period of 60 months. The volume of HGV traffic will be up to **346 HGV movements per day**. This will result in material changes in the constitution of traffic flows in these towns and villages and greatly affect road safety and amenity for the local community.

5.1.7 The study area for the Sea Link transport assessments is outlined in **Figure** 5-2, which includes the Order Limits for the Sea Link project.

Figure 5-2: Sea Link Study Area



Source: Application Document 6.4.2.7.1 Traffic and Transport Study Area - Suffolk Onshore Scheme

6 Summary of Main Concerns

6.1.1 As I set out in the remainder of this report, having reviewed the transport evidence submitted in support of the DCO application, the areas of concerns and objection are as follows:

- **Base survey data** – the base traffic surveys used in the DCO evidence base were carried out in January and February 2024. Neither of which are a neutral month and are thus unrepresentative and not an appropriate basis for assessment.
- **Seasonality** – Regardless of the above there has also been a lack of due consideration to the implications of seasonality in this unique location. The study area experiences much higher levels of traffic during the summer months than January/February and the assessments to date are thus not suitably robust and do not consider, or indeed acknowledge, the impact of season trends in the area.
- **Junction Impacts** – there is a complete lack of any detailed junction modelling in the DCO evidence base to assess its impact properly and robustly on key junctions and their safe operation.
- **Cumulative Impacts** – the development is one of several major trip generators within the surrounding area. The cumulative impacts of these are considerable and have not been considered properly and not clearly demonstrated.
- **Safety Impacts** – the assessment conducted on the impact of the proposal on road safety fails to adequately consider the development's impact on key existing safety concerns in the vicinity of the site.
- **Lack of Mitigation** – the development proposal proposes no meaningful highways mitigation.

7 Base Data and the Impact of Seasonality

Evidence Assumptions

7.1.1 The baseline traffic and transport flows used to inform the transport evidence prepared in support of the application were sourced as follows, as described in paragraph 7.4.3 of APP-054:

> ***"Baseline traffic data for the surrounding highway network, based on Automatic Traffic Counts (ATCs) and Manual Classified Counts (MCCs) carried out in January and February 2024"***

7.1.2 It is standard practice in preparing Transport evidence to collect representative traffic survey data, this should be conducted in neutral months. In accordance with the Government's Transport Analysis Guidance (TAG) Unit M1.2, section 3.3.6, neutral conditions are defined as follows:

TAG Unit M1.2
Data Sources and Surveys

3.3.6 Surveys should be carried out during a 'neutral', or representative, month avoiding main and local holiday periods, local school holidays and half terms, and other abnormal traffic periods. National experience is that the following Monday to Thursdays can be neutral:

- late March and April – excluding the weeks before and after Easter;
- May - excluding the Thursday before and all of the week of each Bank Holiday;
- June;
- September – excluding school holidays or return to school weeks;
- all of October; and
- all of November – provided adequate lighting is available.

This requirement often dictates the timescale of the appraisal. Data processing may also add substantially to the study timescale.

7.1.3 The baseline traffic data, collected in January and February, is thus considered to be unrepresentative of the Suffolk area for both typical neutral month assessment periods (which would be circa 5-10% higher) and peak conditions (which are circa 25% higher). This obviously raises very significant concerns that the assessments within the evidence aren't suitably robust. This is a major flaw which impacts all the subsequent transport related assessments conducted with the DCO evidence base.

7.1.4 Additionally, no seasonality factor or analysis has been conducted within the DCO documents to assess the development's impact at different times of year. The study area is both one of considerable agricultural and farming land use and an area with high levels of tourism. The levels of traffic within the summer months are therefore different to those in neutral months and January/February. In many other areas, traffic volumes would be expected to be lower over the summer period, as the schools are off, in this location the opposite is likely to be the case. This has

been completely ignored in the evidence base. This raises obvious concerns that the impacts in this specific location have not been robustly considered.

Exploring the effects

7.1.5 To assess the impact of seasonality further, Automatic Traffic Count Surveys (ATCs) data was provided by SEAS, sourced from SCC, for the A12 corridor. This took the form of monthly traffic flows over the full year at four different locations.

7.1.6 With four ATCs conducted at different locations along the A12 over the course of 2024. The average daily two-way volume per month is summarised in with the associated factors in **Table** 7-1**.**

Table 7-1: Seasonality Factors

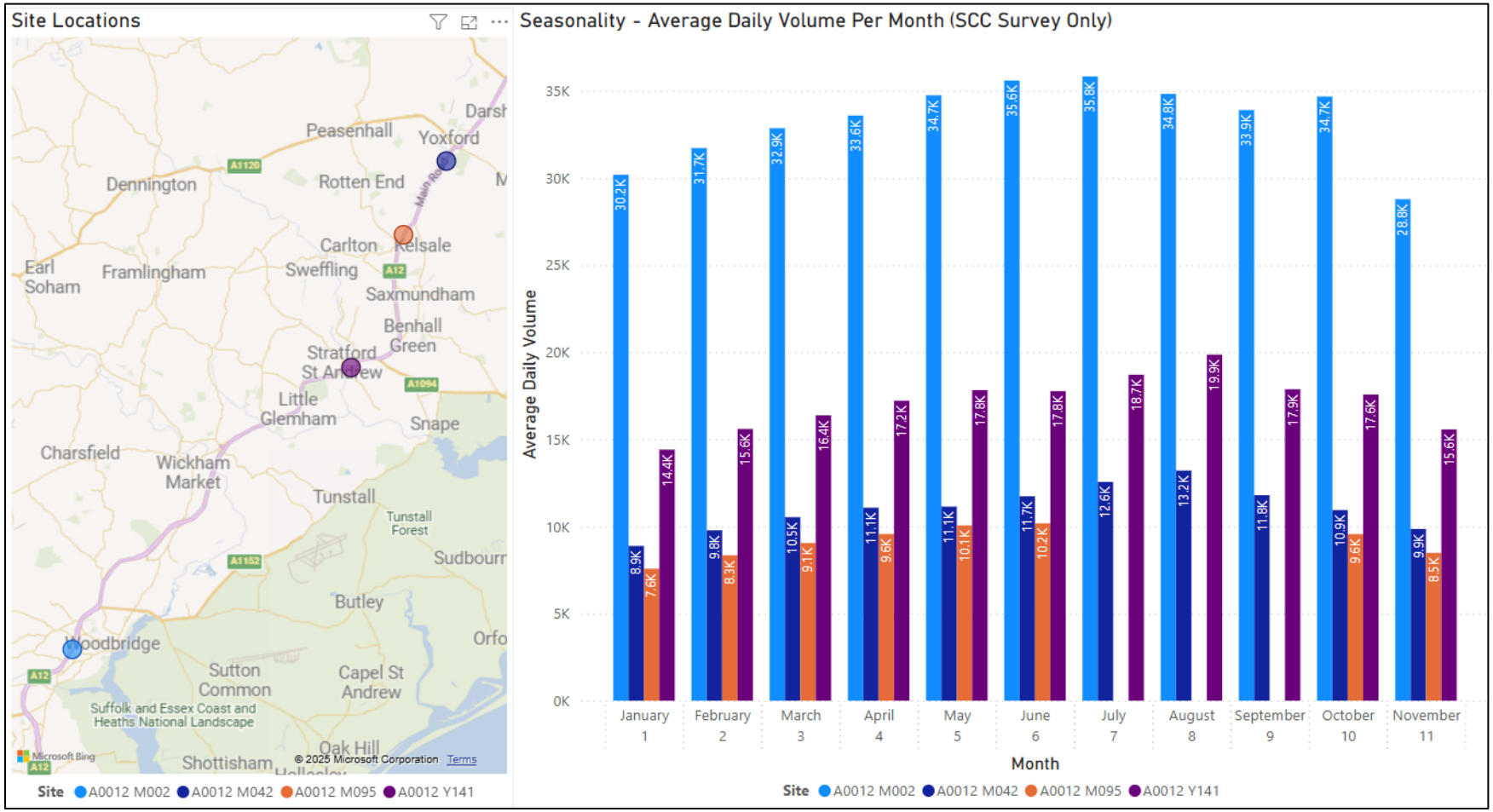
Site		Seasonality Factor										
		Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov
Site 1	A0012 M002	84%	89%	92%	94%	97%	99%	100%	97%	95%	97%	80%
Site 2	A0012 M042	67%	74%	80%	84%	84%	89%	95%	100%	89%	83%	75%
Site 3	A0012 M095	74%	82%	89%	94%	99%	100%	n/a	n/a	n/a	94%	83%
Site 4	A0012 Y141	73%	79%	82%	87%	90%	89%	94%	100%	90%	88%	78%

7.1.7 The ATC data indicates the following:

- January traffic flows are shown to be considerably less than the peak periods with Site 2, Site 3 and Site 4 (the sites closer to the study area) demonstrating only 67%, 74% and 73% of peak flows respectively.
- Similarly, February flows are also shown to be less than the peak period with Site 2, Site 3 and Site 4 demonstrating only 74%, 82% and 79% of peak flows respectively.
- Additionally, the traffic flows for both January and February are recorded in the lowest 3 months across the yearly data, noting that data for December has not been provided.

7.1.8 In summary, the base data used in the DCO evidence is substantially lower than that observed at other times of the year, nor has it been collected in a neutral month. This raises considerable concerns that the existing baseline, the subsequent impacts of the development assessed within the evidence aren't suitably robust. This data underpins all the assessments conducted in the ES and TAN.

Figure 7-1: A12 Seasonality – SCC ATCs



8 Junctions Impacts

8.1.1 As I set out earlier this report, the DCO evidence base does not include a full Transport Assessment report, but a hybrid TAN document. A particular concern about this approach is the subsequent lack of any junction modelling and detailed technical appraisal of existing conditions. Both to consider how key junctions are operating at present and how they will do so once the development is in place. This concern is compounded further by the inadequacy of the base traffic survey data used, as I describe in Chapter 6.

8.1.2 The Sea Link DCO documents (APP-122 Paragraph 4.1.1), justifies this lack of junction modelling with the following:

> ***"the Proposed Project is not expected to result in any significant traffic and transport effects including, with regard to Driver Delay, at junctions (see Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport, Section 7.9 Assessment of Impacts and Likely Significant Effects). Therefore, it is not considered that any junction modelling is necessary, and as a result, none has been undertaken".***

8.1.3 This lack of junction modelling is justified on the basis that the additional trips generated by the proposal are relatively modest and thus don't significantly impact the junctions' operation. My concern about this assumption is that it completely ignores the junctions existing performance, which is highly relevant if it is already operating over capacity and thus small increases will have disproportionate impacts. The proportion of new vehicles that are HGVs is also very significant. This again potentially significantly impacts the junction's future performance.

8.1.4 Paragraph 116 of NPPF identifies the importance of "*severe*" impacts, where junctions are already unsafe or operating over capacity even small amounts of new traffic might be unacceptable and result in disproportionate impacts. Equally significant changes in the amount of much larger HGV vehicles also raise capacity and safety concerns.

8.1.5 The evidence base presented in support of the DCO completely ignores such impacts and the existing performance of key junctions, notably those on the A12 and A1094, and the impacts of HGVs on the operation of these junctions.

8.1.6 Reviewing the 'Driver Delay' assessment conducted in the ES Transport Chapter, multiple junctions have been identified for which I would consider warrant the need, at the very least, for detailed junction modelling. Driver Delay is an effect cited in the 2023 IEMA guidance and relates to incremental increases in traffic. However, traffic delays are only likely to be significant when the

traffic on the network surrounding the development is already at, or close to, the capacity of the system. Whether this is the case now, is unknown, as no modelling has been presented.

Junction Sensitivity

8.1.7 One existing junction has been identified as 'high' sensitivity and three have been identified as 'medium' sensitivity. The sensitivity definitions for these two categories are outlined as follows:

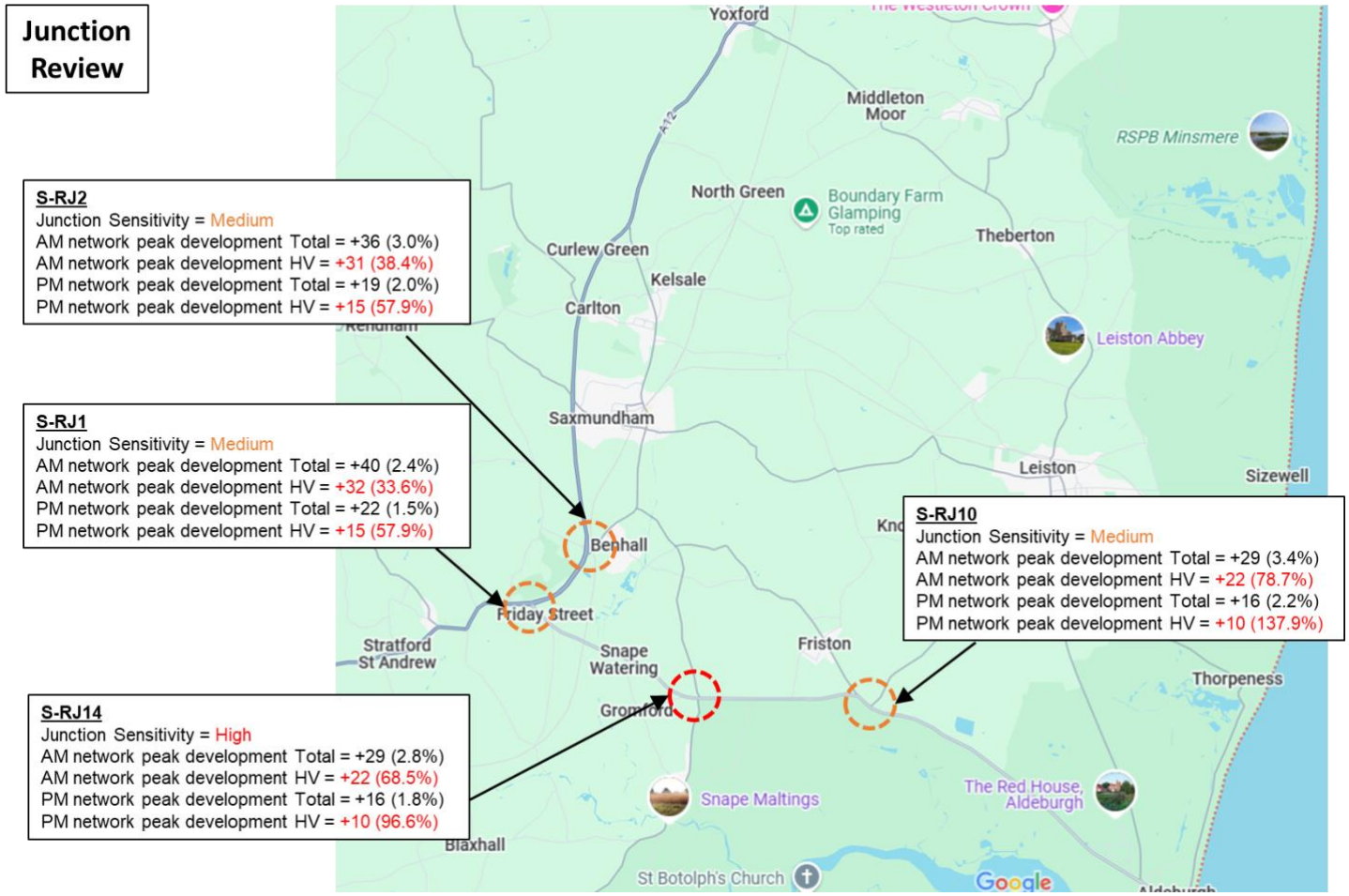
- ***High: High queuing (10+ vehicles) on 1-2 arms of the junction OR moderate queuing (5-9 vehicles) on 3+ arms of the junction during the weekday peak hours. For example, a busy roundabout or signalised junction outside of a built-up area.***
- ***Medium: Moderate queuing (5-9 vehicles) on 1-2 arms of the junction OR low queuing (3-4 vehicles) on 3+ arms of the junction. For example, a roundabout or signalised junction outside of a built-up area or a busy priority junction within a built-up area.***

Development Traffic

8.1.8 The development traffic added to these four junctions has been reviewed during the AM and PM network peaks and is shown in **Figure** 8-1. It is observed that the overall traffic volumes added to the junctions are all over or very close to 30 new trips in 2028; the typical threshold for requiring an assessment. The proportion of these which are Heavy Goods Vehicles (HGV) is also particularly high. On that basis and for consistency with the key policy tests in EN-1 and the NPFF, I would expect a full and proper Transport Assessment to be carried out and this to included detailed junction modelling of these and other locations. This will allow proper consideration as to whether mitigation is required and/or impacts are severe.

8.1.9 It is noted that the development flow volumes quoted are based on the provided 2028 flows from within *Appendix 2.7.H Preliminary Highway Impact Assessment* (APP-129). However, as mentioned in Section 5.1.3 and shown in Tables 5.1 and 5.2, the actual HGV peak is 2027 which is proposed to have a +254% increase in HGV's compared to the 2028 flows.

Figure 8-1: Junction Review



Base map source: Google Maps

8.1.10 In addition to the above, the DCO documentation states the following reasonings behind the assessment of '*minor*' and '*negligible*' effects at these locations, outlined in **Table** 8-1**.**

Table 8-1: DCO Junction Impact Summary

Junction ID	Junction Name	Sensitivity	Impact	Preliminary Magnitude	Preliminary Effect	Significant
S-RJ1	A12/A1094	Medium	When not fewer than 30 hourly movements, <30% total traffic increase (all time periods)	Negligible	Negligible	No
S-RJ2	A12/B1121 (South)	Medium	When not fewer than 30 hourly movements, <60% total traffic increase (all time periods)	Small	Negligible	No
S-RJ10	A1094 Aldeburgh Road/B1069 Snape Road	Medium	When not fewer than 30 hourly movements, <60% total traffic increase (all time periods)	Small	Minor	No
S-RJ14	A1094/Sternfield Road/Church Road	High	When not fewer than 30 hourly movements, <30% total traffic increase (all time periods)	Negligible	Negligible	No

8.1.11 I note two of the junctions have peak hour flows in excess of 30 additional hourly movements, the threshold typically adopted in TAs for deciding if a junction should be modelled and assessed. The others are only very marginally below the threshold. Yet all are discounted from further assessment.

8.1.12 The justification in the ES Chapter behind the '***minor***' and '***negligible***' effects are shown to align with the Institute of Environmental Management and Assessment (IEMA) Guidelines*: Environmental Assessment of Traffic and Movement*, paragraph 2.19:

> ***"2.19: Previous research has identified that the most discernible environmental and population impacts of traffic are noise, severance, pedestrian delay and intimidation (Hedges, 1978). At low flows, increases in traffic of around 30% can double the delay experienced by pedestrians attempting to cross a road. Whether this is significant in absolute terms requires further assessment. Severance and intimidation are, however, much more sensitive to traffic flow and the Department for Transport, historically, has assumed that 30%, 60% and 90% changes in traffic levels should be considered as 'slight', 'moderate' and 'substantial' impacts respectively."***

8.1.13 However, paragraph 2.20 of the same guidance outlines that when a high percentage of HGVs is applied to the network a lower threshold may be appropriate:

> ***"2.20: In summary, it is recommended that, as a starting point, a 30% change in traffic flow represents a reasonable threshold for including a highway link within an environmental***

assessment. Where there are major changes in the composition of the traffic flow, say a much greater flow of HGVs, a lower threshold may be appropriate"

8.1.14 Clearly the potential impact of HGVs and larger vehicles is more significant than smaller vehicles on a junction's safe operation. The increased size and slower manoeuvrability increase the likelihood of delay, reduces theoretical capacity and increases conflict between opposing movements.

8.1.15 Additionally, paragraph 3.20 outlines that delays are likely to be significant when a junction is operating at or close to capacity and can be modelled to determine the impact:

"3.20: These delays are only likely to be significant when the traffic on the network surrounding the development is already at, or close to, the capacity of the system. Values for delay due to these elements can be determined by the use of proprietary software packages such as Transport Research Laboratory's Junctions 10 suite (e.g. ARCADY for roundabouts, PICADY for priority junctions and OSCADY for traffic signalised intersections), JCT's LinSig or other suitable programs. Each package produces estimates of vehicle time and delay through the junction and hence, by testing each intersection for the baseline condition and with the development, it is possible to estimate vehicle delays and determine the sensitivity to development traffic."

8.1.16 In summary, the impacts at these key junctions have not been modelled and it is simply not possible to apply the key policy tests with EN-1 and the NPPF. The lack of any detailed modelling or appraisal beyond discounting the impacts as negligible, simply does not provide any evidence that the impact of the development is acceptable or safe. In fact, these junctions have been provisionally assessed as already having high or moderate levels of queuing and then the developments impact is not explored. Despite the very high proportion of HGV trips added.

8.1.17 I also again note all the appraisal in the DCO evidence, or lack thereof, is based on base data from the non-neutral months of January/February. Thus further compounds the lack of clear appraisal of the schemes impact.

8.2 Further Qualitative assessment

8.2.1 I have also visited and observed existing conditions at these key junctions, to assess the likely impact on their operation. Whilst I set out above that the assessments to date in the DCO evidence base have been superficial and insufficiently robust, there are a number of critical junctions the impact of which is a concern in my professional opinion. Below I consider these locations and identify the main points of concerns.

8.2.2 S-RJ1 – A12/A1094

8.2.3 The junction of the A12 and A1094, is an existing priority T junction. The A12 is a strategically important road and in the general vicinity of where is meets the A1094 is mix of single carriageway (to the west) and dual carriageway (to the east). At the junction, a central reserve is formed and for eastbound traffic on the A12, the approach flares out to provide a dedicated right turn lane and separate straight-ahead lane. In a westbound direction, again a dedicated left turn lane is formed, as the dual carriageway reduced to a single lane. The junction is shown in **Figure** 8-2**.**

8.2.4 In the central island area, both right turners from the A12 and right turns from the A1094 converge, with the A12 right turners giving way to the A1094 right turners. On the minor arm, there are two separate approaches for left and right turning vehicles, for around four car lengths, separated by a small island.

8.2.5 From my observation, this is an extremely busy and complex junction. Vehicles passing straight through on the A12 are often travelling at high speed and it is difficult to judge and turn right from the side road, particularly given the conflicts in the centre island with the high volume of traffic turning right into the side road.

Figure 8-2: S-RJ1 – A12/A1094 – Facing South

8.2.6 This junction is classified as “High risk” in the applicant’s own assessment and is actively signed as an accident site, as shown in **Figure** 8-3. The proposal will add 40 and 22 new trips in the network AM and PM peak hours respectively, of which 33.6% and 57.9% will be HGVs.

8.2.7 It is understood that this junction is proposed to be upgraded to a roundabout as part of the Two Village Bypass upgrade associated with the Sizewell C development agreement. However, no assessment has been carried out on the operational performance of this new form of junction with the development traffic from this proposal.

Figure 8-3: S-RJ1 – A12/A1094 – Accident Site Signage

S-RJ2 – A12/B1121

8.2.8 The junction of the A12 and B1121 at Benhall, is a very similar arrangement to S-RJ1. It is again very difficult to confidently turn right out of the side road, given the speed of vehicles on the mainline, and there is conflict in the central reserve area.

8.2.9 This junction is again classified as “High risk” in the applicant’s own assessment. The proposal will add 36 and 19 new trips in the network AM and PM peak hours respectively, of which 38.4% and 57.9% will be HGVs. This in my view, will result in an unacceptable impact both from a capacity and safety perspective.

8.2.10 No mitigation is proposed at this location, nor has DCO evidence assessed the performance of the junction at present and with the development. It is considered likely that additional vehicular movements, including a high proportion of HGVs, will lead to increase driver frustration and risk taking at this location and other similar locations on the A12.

S-RJ14 – Church Common staggered crossroads

8.2.11 The junction of the A1094 and Church Road/Sternfield Road in Church Common, is an existing staggered crossroads. There is a consistent flow of vehicles on the A1094 mainline and it is difficult at peak times to turn right out of the two side road arms. The existing layout is shown in Figure 7.4. This junction which was classified as "High" sensitivity will again be affected by the proposal.

Figure 8-4: Church Common Crossroads from the north

8.2.12 No mitigation is proposed at this location, nor has DCO evidence assessed the performance of the junction at present and with the development.

S-RJ10 – A1094 Snape Road

8.2.13 The junction of the A1094 and Snape Road is an existing priority crossroads. Whilst one arm experiences limited demand, the other is a key connection. **Figure 7.5** shows the existing layout. Again from my observation, the junction experiences consistent levels of mainline flow which make it hard to end from the side roads. From which visibility is limited by the existing foliage.

Figure 8-5: S-RJ10 A1094 and Snape road junction

8.2.14 No mitigation is proposed at this location, nor has DCO evidence assessed the performance of the junction at present and with the development.

8.2.15 During the late spring, summer and early autumn months, these local rural roads and these key junctions already often suffer from bottlenecks from large farming vehicles, as many of these agricultural machines are considerably wider than one half of the carriageway. The places where this is most evident are:

- the Aldeburgh (Samundham road) /Thorpeness-Knodishall junction ie A1094/B1069 to Knodishall
- The Aldeburgh/Friston Junction ie A1094/B1121
- Snape Crosssroads A1094/B1069 to Snape, Tunstall
- The Friday Street junction (and between those last two junctions near to the Gromford junction)

8.2.16 In summary, the impact of the proposed development and the increase from HGVs from it, will in my opinion have a material adverse impact on the general road user amenity of these routes and locations, particularly for pedestrians and cyclists. The addition of hundreds of HGV vehicle movements per day from this development, and much more from other committed developments,

will materially change the nature of these routes. This will have adverse effects on road safety, capacity, amenity for road users and local residents.

9 Cumulative Impacts

General

9.1.1 The assessments conducted in the EA in respect to cumulative assessment, considers a wide range of developments including Sizewell, in the context of an EA assessment including all subject matters. From a transport perspective, it is largely qualitative assessment, again simply discounting any impacts and thus detailed exploration of them. There is little clear data presented showing the volumes of committed development traffic from each development and analysis of how these might change highway/link capacity or the nature of these routes for local residents.

9.1.2 In my view it is a superficial assessment, that simply discounts any impacts as “negligible” without proper rigour and exploration.

PJA Assessments

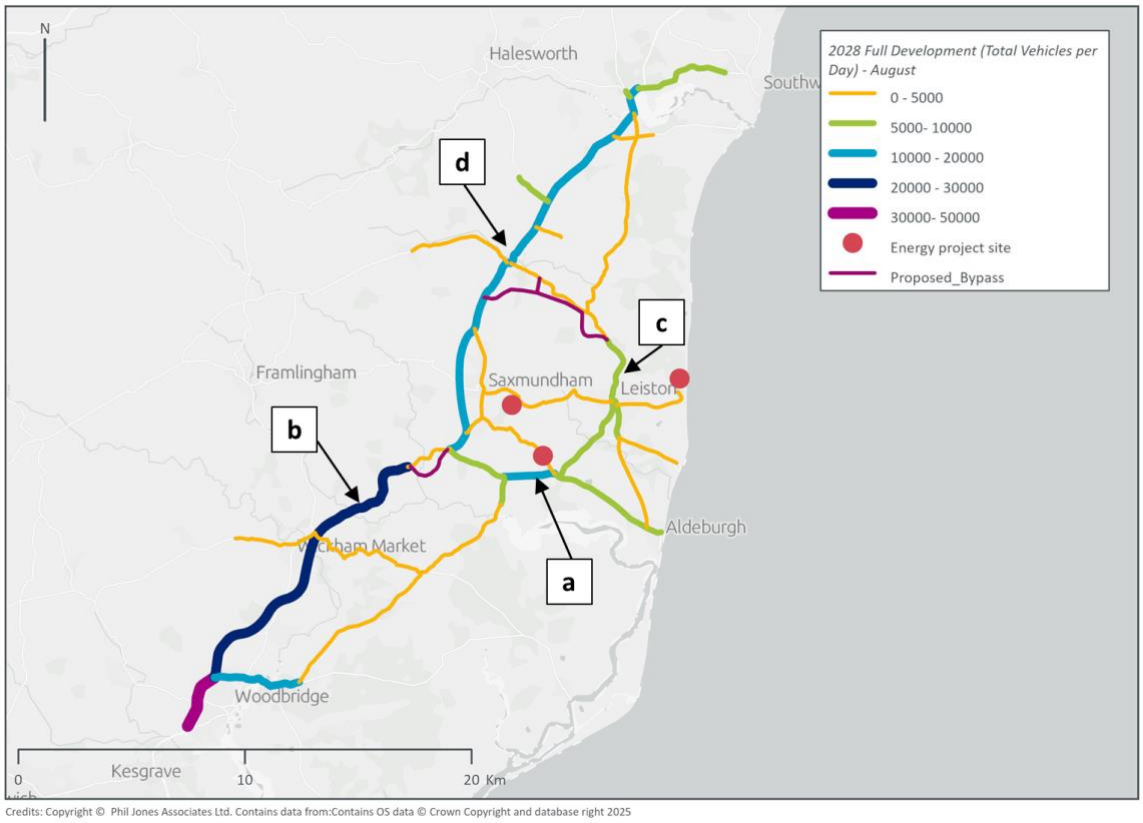
9.1.3 PJA have previously carried out work on behalf of SEAS looking at the cumulative impact of all the development in the area on link capacity, along the key corridors within the vicinity of the DCO site. It is noted that this exercise and the trips pertaining to Sea Link have been updated based on the latest DCO Documentation.

9.1.4 The assessment was limited to the data available, as such the proposed committed schemes included:

- Two new nuclear reactors, forming Sizewell C
- The East Anglia One North (EA1N) and EA2 Windfarms
- Sea Link (updated to reflect to DCO evidence)

9.1.5 Using data from an August 2024 baseline, growth to 2028 (utilising TEMPro v8.1) and then including the trips associated with the above developments provides an indicative overview of the cumulative effects, as shown in **Figure** 9-1.

Figure 9-1: 2028 with Development Traffic – Peak Period (August) – Total Vehicle



9.1.6 I set out below the additional committed development traffic from each development on a few key links and their development makeup:

Table 9-1: 2028 Peak Period Traffic Flow Links – Total Vehicles

Road Link ID	Road Link name	2028 Base Volume	Sizewell C	EA1/EA2	Sea Link	Total Volume
a	A1094	11,551	603	268	212	12,634
b	A12	19,650	1,192	282	218	21,342
c	B1122	3,575	2,588	311	0	6,474
d	A12	16,081	1,100	197	218	17,596

Table 9-2: 2028 Peak Period Traffic Flow Links – HGV only

Road Link ID	Road Link name	2028 Base Volume	Sizewell C	EA1/EA2	Sea Link	Total Volume
a	A1094	600	0	139	50	789
b	A12	1,021	860	153	62	2,096
c	B1122	175	171	153	0	499
d	A12	513	858	153	62	1,586

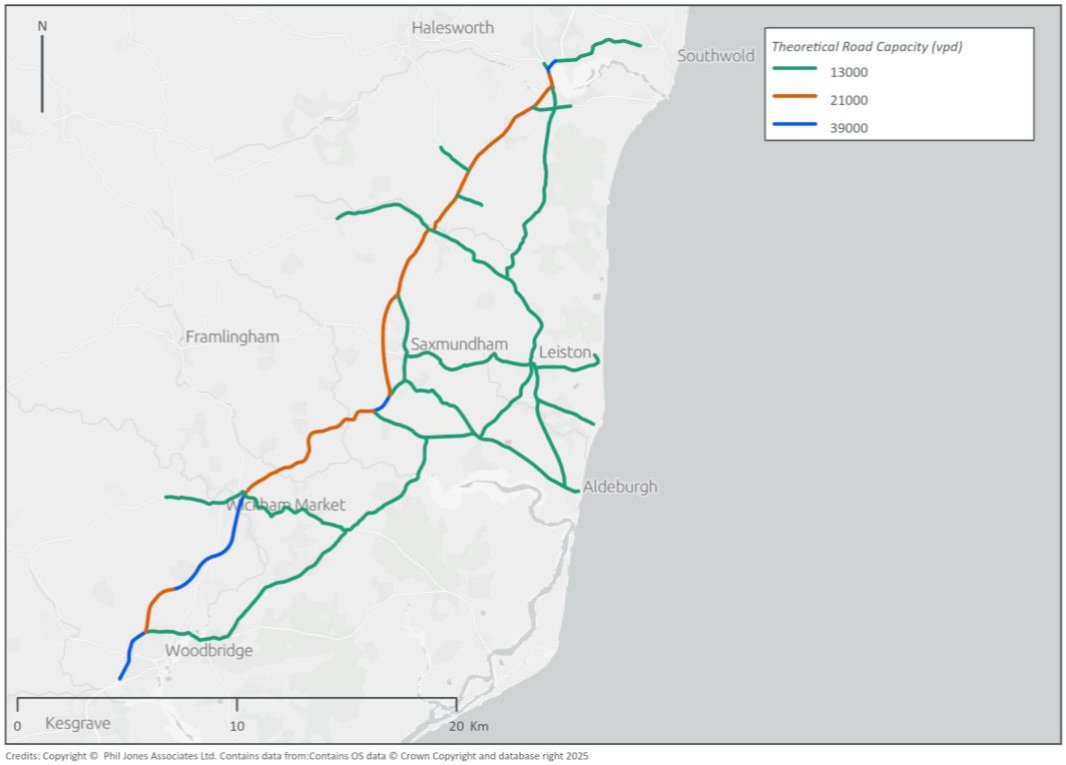
9.1.7 As can be seen from the tables above, there are substantive changes in vehicular flows and HGV movements in the study area from these major developments. I note numerous other smaller developments aren't included within these assessments, because I don't have the full details to be able to continue the exercise to its conclusion. Regardless of this underestimation, the number of peak hour trips on the B1122 for example nearly doubles in the peak periods. These are material changes, and this is not sufficiently considered in the assessments conducted in the DCO evidence base in my view.

9.1.8 To explore the effects of this further, the Volume / Capacity ratio was then assessed for the study area based on the cumulative development volumes. The theoretical road capacities were extracted from Table 2.1 within the Design Manual For Roads and Bridges '*TA 46/97: Traffic Flow Ranges For Use In The Assessment Of New Rural Roads'* as shown in **Table** 9-3 .

Table 9-3: Theoretical Road Capacity

Carriageway Standard	Description	Maximum Capacity
S2	Single 2 lane carriageway	13,000 vpd
WS2	Wide single 2 lane carriageway	21,000 vpd
D2AP	Dual 2 lane all-purpose	39,000 vpd

Figure 9-2: Theoretical Road Capacity



9.1.9 The Volume / Capacity ratio plots are presented in **Figure** 9-3 and **Figure** 9-4 for the 2028 baseline and 2028 with all Development scenarios (during the peak period; August).

Figure 9-3: Volume / Capacity Plot – 2028 Baseline – Peak Period (August)

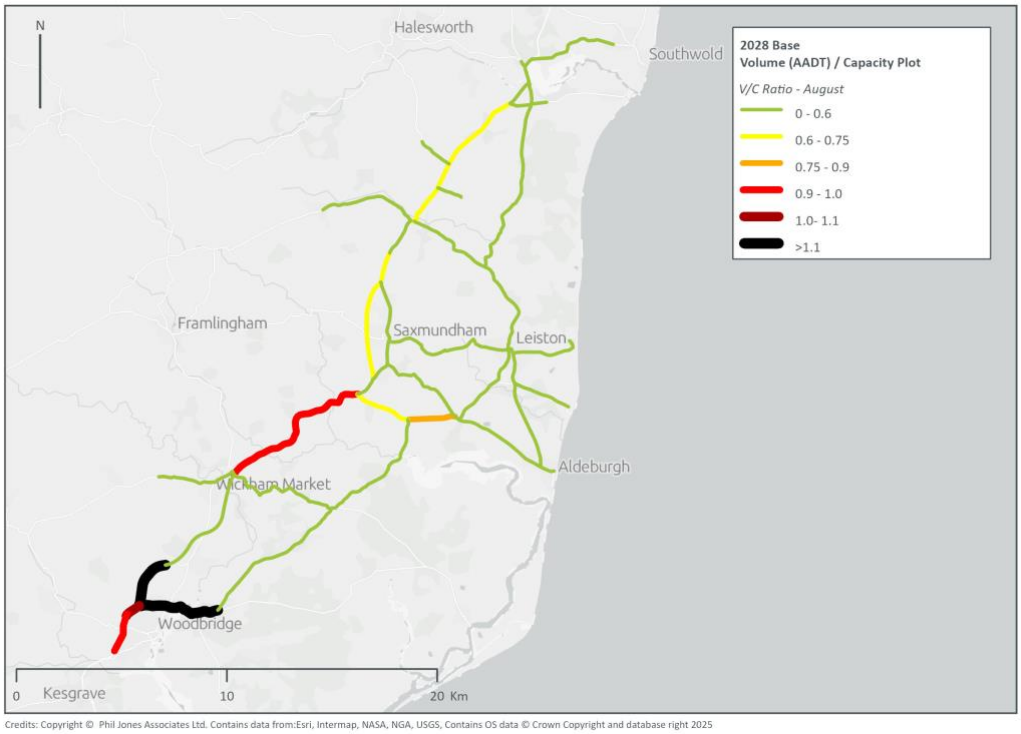
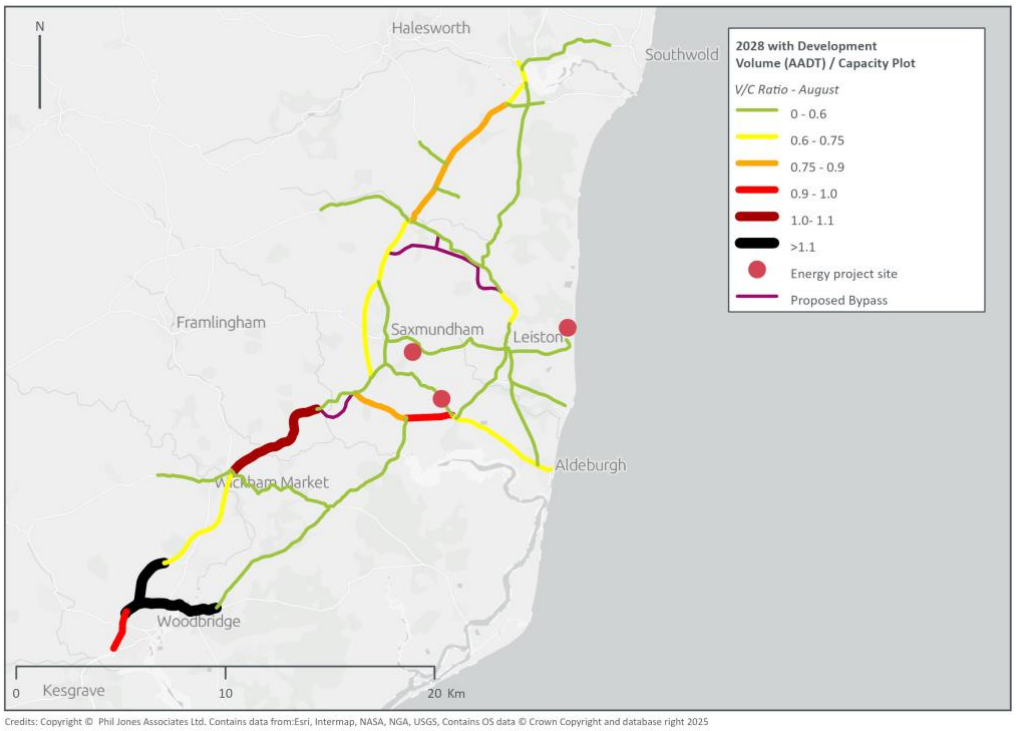


Figure 9-4: Volume / Capacity Plot – 2028 with Development – Peak Period (August)



9.1.10 The Volume / Capacity plots indicate the following:

- The A12 between Wickham Market and the proposed two-village bypass (where the A12 reduces to a single lane in each direction) is forecast to operate just below its theoretical capacity in the future baseline scenario. However, the addition of traffic associated with the proposed development is forecast to result in this section of the network exceeding its theoretical capacity during these peak periods.
- The A12 north of Woodbridge is forecast to operate above its theoretical capacity prior to transitioning into a dual lane carriageway. It is noted that this is observed in both the 2028 'baseline' and 'with development' scenarios. Similarly, this is also observed on Woods Lane (A1152) which runs to the north of Woodbridge in the east-west direction. This link is also shown to operate above capacity in the 2028 baseline and development scenarios.
- The A12 north of Yoxford is forecast to operate under increased pressure compared to the baseline with v/c values of between 0.75 and 0.9 but remains operating within its theoretical capacity.
- An increase in vehicle flow on the A1094 is forecast, particularly the link between Church Common and Friston. This section of the A1094 is forecast to operate close to its theoretical capacity with a v/c > 0.9 within the development scenario. Whilst this remains just within the

theoretical link capacity for the road, it does indicate that a detailed assessment of the cumulative impacts of the proposals in this location should be undertaken to confirm whether the forecast operation close to theoretical capacity results in any significant issues.

9.1.11 As can be seen from these assessments in this section, the impacts of cumulative development on the local road network, are significant. There are several instances, as I describe above, where there are substantive adverse impacts on local link capacity. These have not been explored sufficiently, nor mitigated against in the DCO evidence base. This is not compliant with the key policy tests, which I set out in section 4.

9.1.12 In addition to the capacity aspects of these cumulative developments, the increases in flow predicted will have a considerable adverse impact on pedestrians, cyclists and vulnerable road users using these links.

DCO assessments

9.1.13 The cumulative assessment contained within DCO evidence includes far more developments than the PJA assessments above but fails to consider the effects of these volumes on link capacity, safety and general amenity for pedestrians and cyclists.

9.1.14 The short list of 'other developments' contained within the DCO evidence is presented in **Figure** 9-5 and listed follows:

- Sizewell C
- East Anglia ONE North Offshore Windfarm (ID5)
- East Anglia TWO Offshore Windfarm (ID6)
- High Lodge Leisure (ID221)
- Croft Farm land and buildings (ID228)
- Park Farm Solar Farm (ID233)
- Residential Development, Brightwell Lakes (ID240)
- Residential Development, Darsham Station (ID245)
- Solar Farm, Parham, Suffolk (ID248)
- Reservoir, Grange Farm (ID263)
- Saxmundham to Peasenhall Water Mains Installation (ID266)
- Sizewell B Relocated Facilities (ID270 and ID271)
- Town Farm Solar Farm (ID277)
- UKZ139 BC Wissett Solar Farm (ID279)
- Brundish Manor Solar Farm (ID285)

- LionLink Offshore Interconnector (ID287)
- Norwich to Tilbury (ID288)
- South Saxmundham Garden Neighbourhood (ID291)
- Sizewell A Power Station (ID 305)
- Cockfield Hall Estate (ID 307)
- Marsh View Farm (ID321)
- A12 Major Road Network Improvement Scheme, Seven Hills to Woods Lane (ID520)

9.1.15 **Figure** 9-6 summarises the review of the cumulative assessment, identifying the number of 'other developments' that contain the same flagged shared receptor within the same assessment category (i.e Road Safety, Driver Delay, Severance and Pedestrian Delay and PRoW Closures and Diversions) and the corresponding level of sensitivity (only 'Medium' and 'High' sensitivity receptors have been included in this assessment).

9.1.16 Table 13.41 *Assessment of total cumulative effects for Traffic and Transport* within the Suffolk Onshore Scheme Inter-Project Cumulative Effects document (APP-059) outlines the shared receptor cumulative assessment. The table outlines an overall cumulative impact for each of the identified shared receptors in **Figure** 9-6 as follows:

- S-RL1: Road Safety = Negligible / Minor
- S-RL10: Severance and Pedestrian Delay = Minor
- S-RL12: Driver Delay = Minor
- S-RJ1: Road Safety = **Moderate / Major**
- S-RJ6: Severance and Pedestrian Delay = **Moderate / Major**

9.1.17 As per the above, two junctions are assessed to have a potential '**Moderate / Major'** cumulative impact. However, both junctions are further assessed to be '**not significant'** based on the following justification:

S-RJ1 (Page 173):

"Road Safety: The potential cumulative impact of all schemes is assessed to be Moderate/ Major; however, this is considered to be unlikely to arise given the Proposed Project will be Minor adverse and that the peak construction traffic phases for each scheme are unlikely to fully overlap. No significant cumulative effects are anticipated ***– not significant"***

S-RJ6 (Page 174) :

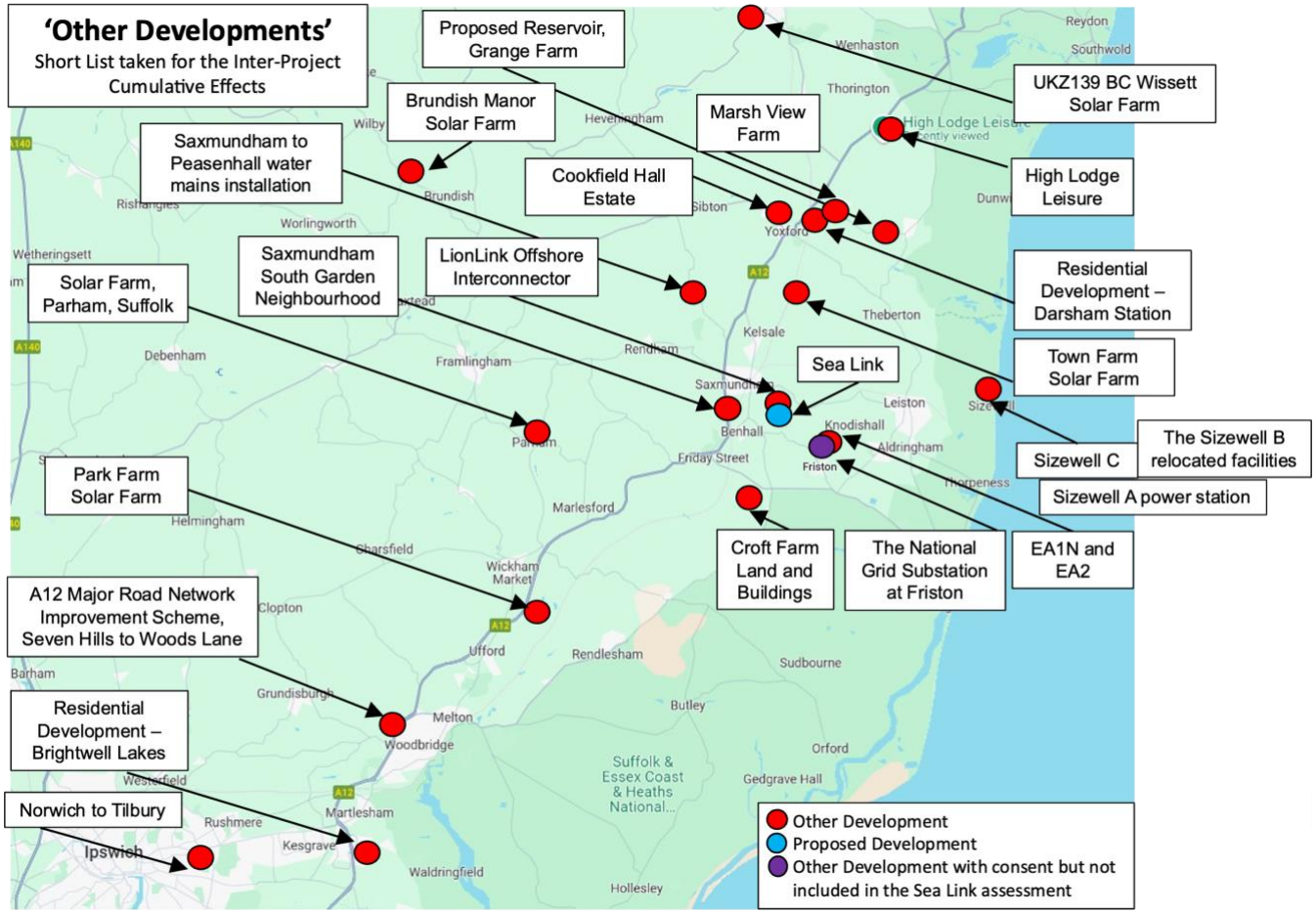
"Severance and Pedestrian Delay: The potential cumulative impact of all schemes is assessed to be Moderate/Major; however, this is considered to be unlikely to arise given the Proposed Project

will be Minor adverse and that the peak construction traffic phases for each scheme are unlikely to fully overlap. No significant cumulative effects are anticipated ***– not significant"***

9.1.18 In respect to S-RJ1, I note the safety review identifies this a "High Safety" sensitive location, the junction assessment identifies it as "Medium" risk location and the cumulative assessment a "High"risk. Yet the junction has not been modelled or the implications of the proposal and the cumulative impacts explored in any detail.

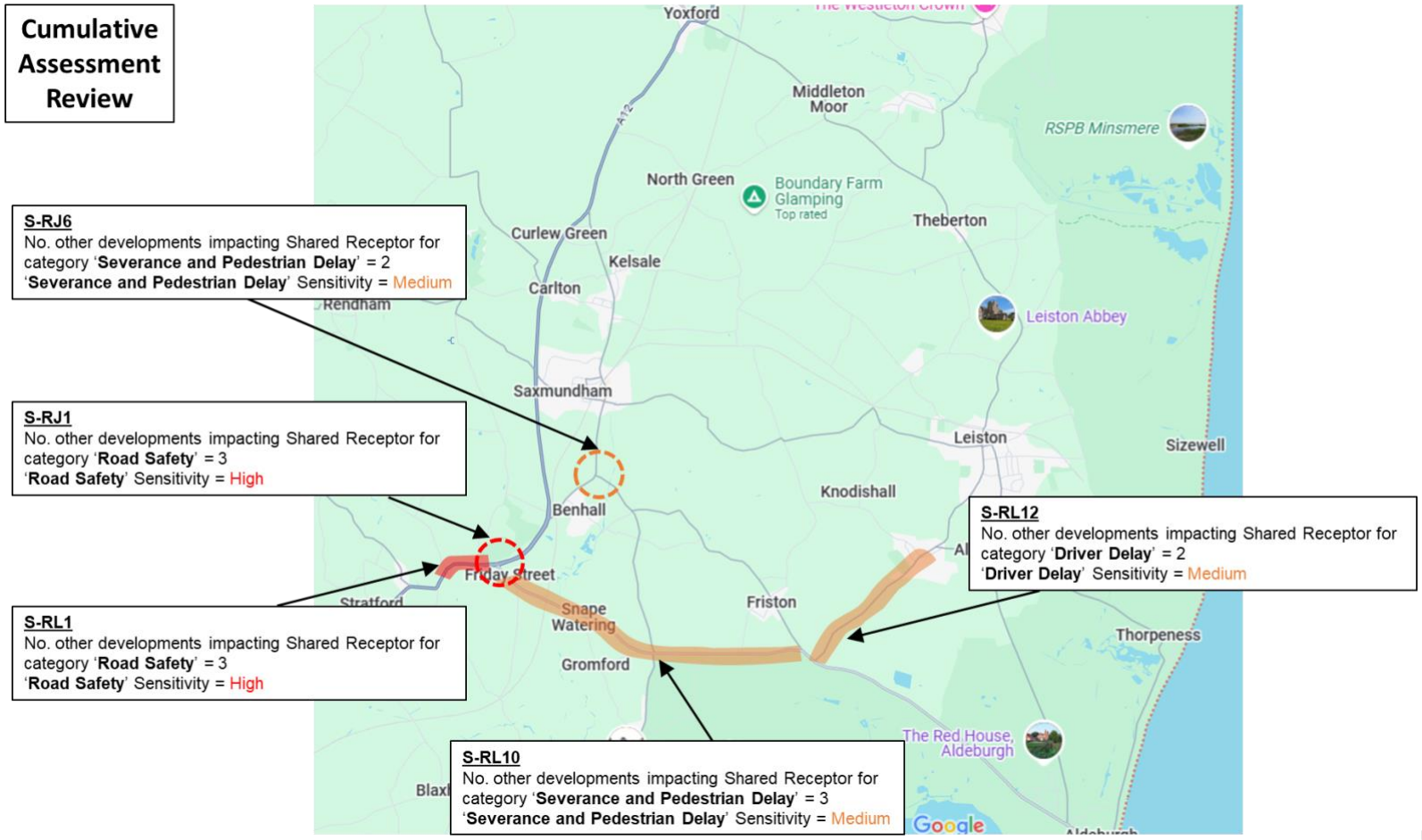
9.1.19 Understandably concerns, given my own assessments in this section, are thus raised about the cumulative impact on the A1094 corridor, not only in respect to junction capacity, link capacity and road safety, but also the generally amenity of this route for other road users and pedestrians. Particularly with the high proportional increase in HGV movements and the general dismissal of the associated impacts in the DCO supporting transport evidence. Even allowing for the fact my own assessments don't include all of the forecast development trips.

Figure 9-5: 'Other Developments' Short List Locations



Base map source: Google Maps

Figure 9-6: Cumulative Assessment Review



Base map source: Google

10 Road Safety Impact

10.1.1 The DCO evidence (APP-054) includes a road safety review on the existing links and junctions and identifies five links and two junctions with a '*high*' sensitivity and one link as '*medium*' sensitivity. The definitions for these sensitivities are as follows:

- **High:** *Road links and road junctions: 4-5 collisions classified as serious or fatal (or two fatal collisions) involving a large vehicle in five years.*
- **Medium:** *Road links and road junctions: 2-3 collisions classified as serious or fatal (or one fatal collision) involving a large vehicle in five years.*

10.1.2 The magnitude of effect for the Road Safety has been classified in the evidence base into two categories:

- **Negligible:** *Increase in total traffic flows of under 30% (or increase in HGV flows of under 10%).*
- **Small/Medium/Large:** *All links estimated to experience increases in total traffic flows of at least 30% or increases in HGV flows of at least 10% are analysed further on a case-by-case basis.*

10.1.3 As the 'Small', 'Medium' and 'Large' magnitudes of effect are analysed case-by-case the DCO documentation (APP-054) states the following reasonings behind the 'minor' and 'negligible' effect to the junction safety impact outlined in **Table** 10-1**.**

Table 10-1: DCO Safety Impact Summary (Table 7.41 of APP-054)

ID	Junction / Link Name	Sensitivity	Impact	Preliminary Magnitude	Preliminary Effect	Significant
S-RL1	A12 (south of A1094)	High	Three time periods are <30% total traffic increase AND <10% HGV increase (negligible), with remaining four periods exceeding one or both criteria	Small	Minor	No
S-RL3	A12 (between B1121 Main Road junctions)	Medium	Majority (five) time periods are <30% total traffic increase AND <10% HGV increase (negligible), with only two remaining time periods exceeding one or both criteria	Negligible	Negligible	No
S-RL4	A12 (north of B1121 Main Road northern junction)	High	Majority (five) time periods are <30% total traffic increase AND <10% HGV increase (negligible), with only two remaining time periods exceeding one or both criteria	Negligible	Negligible	No
S-RL7	B1119 Church Street (east of B1121 Main Road)	High	Fewer than 30 hourly movements (all time periods)	Negligible	Negligible	No

ID	Junction / Link Name	Sensitivity	Impact	Preliminary Magnitude	Preliminary Effect	Significant
S-RL11	A1094 Aldeburgh Road (between B1069 Snape Road and B1122 Leiston Road)	High	Majority (five) time periods are <30% total traffic increase AND <10% HGV increase (negligible), with only two remaining time periods exceeding one or both criteria	Negligible	Negligible	No
S-RL13	B1122 Leiston Road (between A1094 Aldeburgh Road and Aldringham Lane)	High	Fewer than 30 hourly movements (all time periods)	Negligible	Negligible	No
S-RJ1	A12/A1094	High	Three time periods are <30% total traffic increase AND <10% HGV increase (negligible), with remaining four periods exceeding one or both criteria	Small	Minor	No
S-RJ3	A12/B1119 Junction	High	Majority (five) time periods are <30% total traffic increase AND <10% HGV increase (negligible), with only two remaining time periods exceeding one or both criteria	Negligible	Negligible	No

10.1.4 As with its general approach the DCO evidence base simply disregards all impacts as negligible or minor, with little or no detailed appraisal of the impacts at these locations.

10.1.5 **Figure** 10-1 summarises the daily volume increases and the proportional changes in which HGV exceed the 10% on these 'high' and 'medium' sensitivity links and junctions. As can be seen numerous locations experience a daily increased in HGVs of a significant proportion, typically 20-30%. Yet the impacts are dismissed.

10.1.6 The proposed use of rural B-roads and unclassified roads for major HGV movements is of considerable road safety concern. Roads through Friston (B1121 Saxmundham Road), Sternfield (B1121 Aldeburgh Road) and Aldringham are used as main access routes despite being narrow, with tight bends, minimal footways, and poor visibility.

10.1.7 The projected increases in HGV traffic are considerable for rural roads, with many links showing more than double existing volumes:

- the B1121 Main Road (east of A12): HGV increase of 157.4% in the network peaks
- B1121/B1119 Church Hill Junction (Saxmundham): HGV increase of +148.5% and 193.1%, in the AM and PM network peaks respectively.

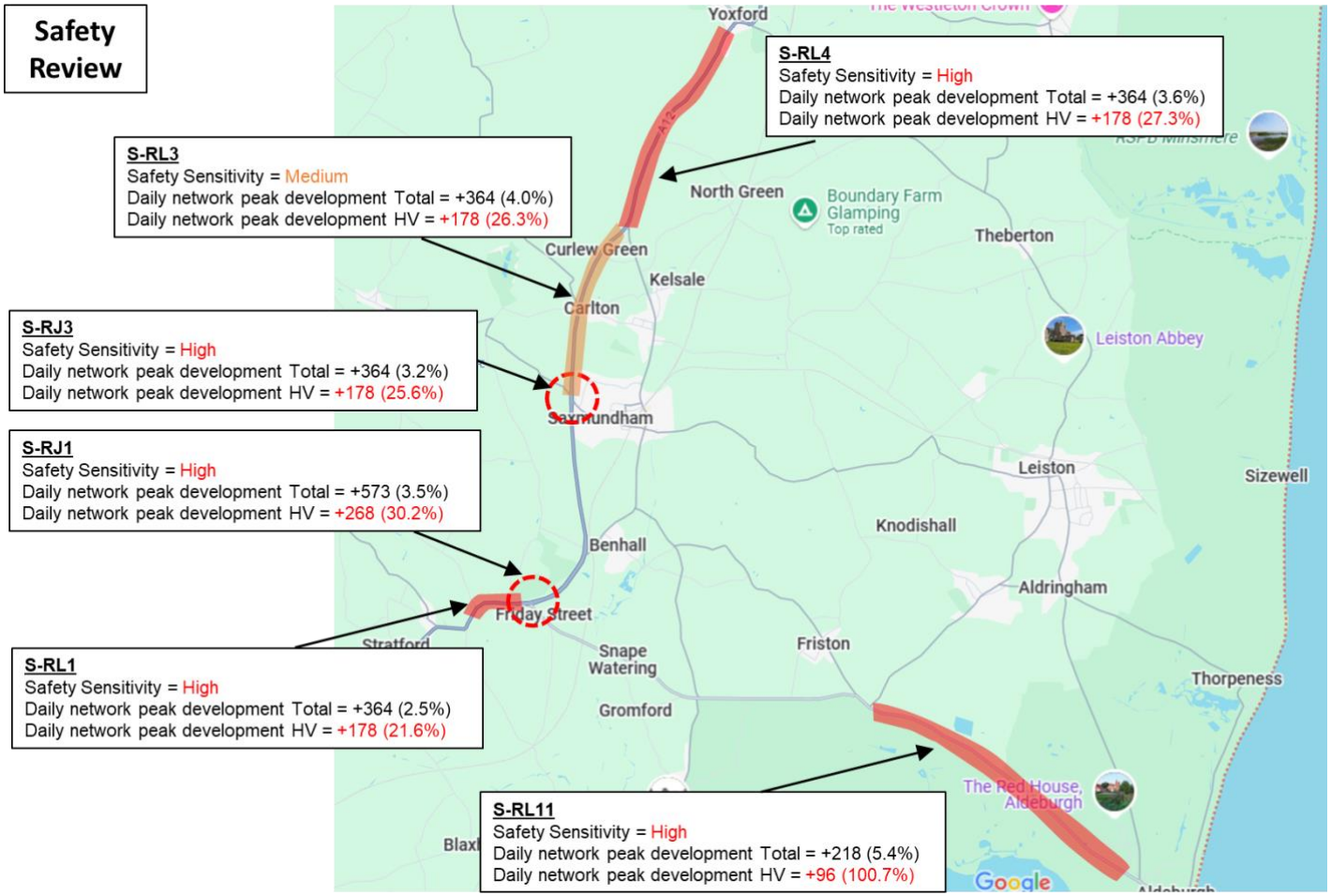
10.1.8 These changes are classed as only "minor" by the applicant, which underrepresents the likely disruption and risk.

10.1.9 I am also concerned about the suitability and safety of the route from the proposed development to the A12, through Benhall and along the B1121 route. The proposed scheme is predicated on this being a key access route. This will have an adverse impact on highway safety and amenity in the existing village, with the reliance on it as a key HGV route.

10.1.10 It is my understanding that the existing railway bridge can also not physically accommodate vehicles of the size proposed. It is the intention to use this route for abnormal indivisible loads , however given the current poor structural condition of the bridge this is potentially not possible. Potential options to address this via traffic management, maybe impact on the nearby A12, via queuing back. Should this bridge not be able to accommodate large vehicles, the pressure will be felt further by competing routes.

10.1.11 National Grid proposes routing large volumes of HGVs through rural roads such as those in Friston, Sternfield, Aldringham and Saxmundham, despite these being physically and contextually unsuitable for such traffic volumes. The routing through rural settlements and disruption of active travel routes is inconsistent with Suffolk's Local Plan policies on safeguarding rural road character and non-motorised users (APP-234, Figure 6.4.2.7.4; APP-337, Section 7.2, p. 29).

Figure 10-1: Safety Review



Base map source: Google Maps

11 Mitigation Proposed

11.1.1 Measures that have been incorporated include:

- sensitive routing and siting of infrastructure and temporary works including to minimise the requirement to close/divert PRoW;
- using trenchless methods at landfall to minimise potential impacts on the highway and walking/cycling routes; and
- potential carriageway widening works, vegetation clearance and street furniture removal to accommodate construction vehicles.

11.1.2 The project thus proposes no meaningful physical mitigation measures from a transport/highways perspective. As I have set out in previous sections, there are considerable concerns about the impacts on key junctions, road safety, link capacity and the volumes of cumulative flows on key links. The key relevant policies in EN-1 and the NPPF, have not been met in respect to the way the assessments have been conducted, their subsequent conclusions and the consideration and need (or lack thereof) for mitigation to offset adverse impacts.

11.1.3 The Outline Construction Traffic Management and Travel Plan (APP-337) sets out indicative vehicle numbers but fails to commit to enforceable limits on:

- Daily HGV movements
- Hourly peak thresholds
- Route-specific caps (e.g. through Friston or Aldringham)

11.1.4 Thus, providing little weight or comfort that there will be any effective control of monitoring.

12 Summary and Conclusion

12.1.1 This technical review report has been prepared by PJA on behalf of the Suffolk Energy Action Solutions (SEAS) to consider the highways/transport matters associated with the Development Consent Order (DCO) application made for the Sea Link project in Suffolk. It considers the highways and transport implications of the proposed development and associated Development Consent Order (DCO).

12.1.2 The proposed development will generate a significant level of vehicular trips onto the local highway network for a period of 60 months. The volume of HGV traffic will be up to **346 HGV movements per day**. This will result in material changes in the constitution of traffic flows in the surrounding towns and villages.

12.1.3 The lack of a full and robust TA supporting the application, notably in respect to the lack of any junction modelling and the general light touch approach to considering any impacts or mitigation means it is not possible to consider the proposals against the key transport policy tests set out in EN-1 and the NPPF.

12.1.4 Having reviewed the transport evidence submitted in support of the DCO application, the areas of concerns and objection are as follows:

- **Base survey data** – the base traffic surveys used in the DCO evidence base were carried out in January and February 2024. Neither of which are a neutral month and are thus unrepresentative. This affects the entire exercise from a transport perspective, as the baseline is underestimated.

- **Seasonality** – Regardless of the above there has also been a lack of due consideration to the implications of seasonality in this unique location. The study area experiences much higher levels of traffic during the summer months than January/February and the assessments to date are thus not suitably robust nor give any due or proper consideration to this matter.

- **Junction Impacts** - there is a lack of any detailed junction modelling in the DCO evidence base to assess its impact properly and robustly on key junctions and their safe operation.

- **Cumulative Impacts** - the development is one of several major trip generators within the surrounding area. The cumulative impacts of these are considerable and have not been considered fully, nor clearly demonstrated. My own assessments, whilst underestimating the levels of demand show significant adverse impacts.

- **Safety Impacts**- the assessment conducted on the impact of the proposal on road safety fails to adequately consider the development's impact on key existing safety concerns in the vicinity of the site.

- **Lack of Mitigation** - the development proposal proposes no meaningful physical mitigation measures from a transport/highways perspective.

12.1.5 Overall, the submission is based on inappropriate and weak baseline data, doesn't not properly or robustly explore key issues and areas of concerns, repeatedly dismisses impacts as insignificant and ignores significant adverse impacts, notably from the cumulative impacts.

12.1.6 Given the above, it is impossible to conclude that the key policy tests in EN-1 and NPPF paragraph 116 policy, broadly that the transport impacts of the development are not severe, are met. Due to the inadequacy and incomplete nature of the work presented in the DCO submission.