

Member of ESCEP representing many towns and parishes in East Suffolk from Lowestoft to Woodbridge

Personal Introduction

I spent 30 years within the police service in Suffolk, both operational and as a senior officer and after retirement committed to be a Community Speed Watch volunteer for the Constabulary. In that context I want to emphasise the importance of the limited and fragile road infrastructure to all of our communities and particularly all the blue light services. I can only echo some of the previous personal accounts you have heard This is an issue that has been under-considered previously and the Applicant's DCO continues that.

I could expand but there is limited time. I feel it should be covered in any transport ISH.

Consultation

Concerns have been flagged by a significant number of our communities in East Suffolk around the general cumulative impact and specifically traffic and transport impacts of what can be termed the NSIP energy projects from 2018 onward. Initially with the consented Scottish Power and Sizewell C projects but since then with the National Grid (NG) Nautilus project and more recently both Sea link and Lion link NG/NGET projects. Those concerns remain unaddressed in our view with the Applicant despite repeated assurances at non statutory and statutory consultations that the issue of cumulative impact would be addressed comprehensively within this DCO.

As communities we have also repeatedly asked for recognition of the need to coordinate the NSIP projects and have asked to be able to have some form of representation at some of those meetings. We are not aware that any real progress has been made with any meaningful coordination nor with our repeated requests through DESNZ and the projects to participate in any dialogue. At various times at the existing SZC traffic and transport forums there have been specific requests from members for input and engagement from NG around Sea Link and Lion Link. This has been declined. We note that both Suffolk County Council (SCC) and East Suffolk Council (ESC) reflect in their representation's disappointment with NG engagement or lack of it.

ESCEP communities have repeatedly raised concerns around the mental health and wellbeing issues impacting on our communities particularly now given the sheer number and complexity of the projects and consultation. Specifically, this impacts on the small but significant number of members acting as town and parish councillors attempting to represent their communities with no or limited resource. That was clearly evident at the hearings. To that end we note the Suffolk County Council (SCC) submission flags the need for the project promoters to work collaboratively and that this should apply across the group of companies that sit within the NG structure. As with both East Suffolk (ESC) and SCC we have repeatedly raised this point and there is no evidence of it being addressed in the DCO.

Transport

In the view of ESCEP the DCO (Chapter 7) is a deeply unsatisfactory document around transport and traffic issues.

Principally, in our view, it does not reflect the detailed research, analysis and suggested mitigation that we had expected from meetings, feedback and submissions that we as towns and parishes have made over a number of years.

The DCO contains no full traffic assessment document but rather a Traffic Assessment Note (TAN), which given the scale and complexity of the projects would appear contrary the National Planning Policy Framework (NPPF). It is also of concern that the baseline figure research reflected in the DCO was carried out in winter 2024 which is not regarded in professional highway assessments terms as neutral months for traffic analysis. Further it completely avoids the repeated requests made by many communities of the need to recognise significant tourist impact on traffic over the standard peak traffic period of July and August.

The traffic analysis as outlined in the DCO has no specific junction analysis which is again a matter that many of our communities and SCC and ESC have raised as being potentially significant to both congestion and road safety.

The DCO does not reflect the real potential of NSIP related and other construction work to impact on driver behaviour to find and use alternative routes (rat running) in the event of delay and congestion both on the A12 but also on more minor roads. That is happening currently with satnav systems flagging routes other than the A12, exactly as predicted.

Although the DCO references the need to manage construction and workforce traffic and there are suggestions as to how that would be managed there is limited detail, and in particular no recognition of the existing SZC traffic forums nor Transport Review Group, which was set up under the SZC DCO and could be adapted as part of the coordination work which should recognise the potential impact of parallel train line work planned for SZC.

The projected construction traffic and cumulative impact is highly likely to affect further the ability of emergency services to attend both urgent and routine incidents as you have heard.

Cumulative Impact

ESCEP notes that Chapter 13 of the DCO on cumulative impacts has an extensive list of other projects, both planned and consented, which it purports to assess. ESCEP is concerned that despite specifically, and from an early stage, asking for consideration of the potential cumulative impact of this project and all the others listed (Chapter 13), the DCO document holds no real detail on the potential impact of concurrent development. It is striking that there is frequent reference to ongoing work and the need to continue it, but no real reflection or recognition of the issue and arguably the issue is dismissed as not being significant, which is at odds with the original SPR and SZC hearings, which reflected significant concerns around traffic for those projects alone, as you have heard from others.

The TAN concludes:

The assessment of committed developments within 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."

Frankly we find that is an almost incredible statement.

The Applicant's development will generate a significant additional level of vehicle trips onto the local highway network for a period of 60 months at least. The volume of HGV traffic will be up to 346 HGV movements per day plus workforce traffic.

This will in our view result in material changes in the make-up and behaviour of traffic movement in the surrounding towns and villages and with-it road safety and traffic risks which have not been meaningfully assessed by the Applicant.

Additionally, the Applicant has failed to assess the impact on the A12 south of Friday Street and how the additional traffic

impacts on the junction capacities and thereby potential delays and rat running between Friday Street A1094 and the A14. Further due to capacity issues at A12 junctions between the A14 and A1152 SCC are promoting substantial improvements to cope with Sizewell C and EA 1 and 2 traffic, construction of which is planned to be in 2026-2028. ESCEP considers the Applicant should be required to assess the traffic impact of its proposal on those works and revised junction capacities. We feel that ISH hearings on cumulative impacts need to take place and should separate out the geographic areas of Suffolk and Kent.

Mitigation

ESCEP requests that if the DCO is consented that the Applicant be required to fund road signage and other traffic calming measures on all roads and junctions where it is perceived that there is an increased risk to motorists, cyclists, pedestrians and horse riders arising from the increase in traffic (particularly HGVs) as a result of its scheme and the cumulative impacts.

A programme of traffic monitoring is already in place as the result of an obligation placed on SZC in its Deed of Obligation. ESCEP requests that the Applicant be required to contribute to and engage with this existing monitoring and to fund enhancements where these are deemed necessary.

Parishes and town councils in this area are under very significant pressure to monitor existing NSIPs and respond to those that are emerging. We ask that a fund is set up into which this Applicant and Applicants of future projects pay to provide support directly to town and parish councils.

It is essential that the Applicant undertakes to appropriately engage with the local communities and parish and town councils through local forums on a continuing basis if the development is consented. The issue of the impact on wellbeing will be felt across this area for many years but will be intensified in communities which have been subject of previous NSIPs proposals.

The Applicant undertakes with SCC and ESC an enhanced travel and transport review to supplement the existing ESC strategy that seeks to increase and integrate levels of travel by train, cycle and walking. This could include expansion of green and "Quiet Lane" structures in East Suffolk; increased parking capacity as well as improved facilities at railway stations and an increase in train service at peak periods.

NG should appoint a team of local and contactable senior representatives within East Suffolk present throughout the planning and construction phases which mirrors SZC structures.

Conclusion

ESCEP has sought to engage with the Applicant's proposals in a constructive manner (and other parties including DESNZ over years), but given the lack of information and real detail, omissions and arguably flawed analysis, the DCO cannot be regarded as putting the ExA, residents and communities in a position to properly understand the full impact of the proposals, nor therefore what meaningful mitigation could be carried out so further and more detailed representations need to be submitted and considered through this process.

At the recent ISH hearings in the 11th November 2025 there were two significant statements on behalf of the Applicant that we would wish to flag as having not been addressed appropriately.

1. The Applicant contended when pressed on need that there was a need to export power given over capacity in East Anglia whilst avoiding the point that it is NG intending to import then export a great deal of that power. When pressed on the oft proposed potential solution, of an off shore power grid and connections (as made by SEAS and others over years) the applicant just resorted to the bald statement that this was "unfeasible". That phrase has been used repeatedly by NG over years without ever providing evidence of a detailed feasibility study.

2. Many representations have raised the issue of the inadequacy of the traffic assessment and the reliance on a TAN in apparent contravention of the NPPF. When the ExA raised that specific point the Applicant merely offered to provide additional information without addressing the specific question of the need for a full traffic assessment, including junction analysis and up to date traffic and HGV movement analysis.

Final point: given our joint history of constructive engagement whenever asked by the Applicant or by local and central Government we are neither blockers nor NIMBYS.

East Suffolk Communities Energy Partnership (ESCEP)