

# **East Suffolk Communities Energy Partnership (ESCEP)**

## **ID No SF96BBD26**

### **Deadline 2 Representation**

This representation comprises four sections

Section A on Traffic and Transport (pages 1-8),

Section B on Local Road pressures Snape, (pages 9-11)

Section C on B1121 Benhall Rail Bridge and A12/B1121 junction (pages 12-16)

Section D on Socio-economic, recreation and tourism effects (pages 17 & 18)

### **Section A - Traffic and Transport**

ESCEP reiterates the points made in its Relevant Representation and its broad view that the Applicant's DCO Chapter 7 (APP-054) is a deeply unsatisfactory document around traffic and transport issues – principally that it does not reflect the detailed research, analysis and suggested mitigation that ESCEP members had expected from meetings, feedback and submissions made over a number of years.

ESCEP has reviewed the Applicant's Thematic Response to the Relevant Representations (REP1-116) and regrettably find that it offers no substantive reactions/responses to the multitude of traffic and transport concerns raised by ESCEP and the individual Town and Parish Councils in their Relevant Representations and oral presentations; it offers little more than provided in the DCO and we accordingly offer no comment to them here. Consequently, this section of ESCEP's Deadline 2 submission will focus on Suffolk County Council's Principal Areas of Disagreement Summary Statement (AS-083) (PADSS) and the Traffic and Transport chapter of its Local Impact Report (REP1-130) (LIR).

### **General comment**

ESCEP agrees with much in the PADSS and the LIR, including broadly, the LIR conclusions. However, whilst the LIR presents a reasonable assessment of impacts within the Applicant's defined traffic study area, it is less detailed in regard to the significant impacts outside of that study area. The assessment of local impact and required mitigation is therefore inadequate as it does not fully address traffic and transport impacts in communities to the north, south and west of the Applicant's defined traffic study area. We agree with SCC that the Applicant's junction modelling methodology is deficient or highly deficient and accordingly underplays the impact of Sea Link's construction traffic on the highway network. Furthermore, the base survey traffic data was captured by the Applicant during January and February 2024 - these are not recognised "neutral months" and the data is thought to show traffic flows below those that would be expected in neutral months. There is therefore a built-in underestimate of current traffic in the area.

# East Suffolk Communities Energy Partnership (ESCEP)

ID No SF96BBD26

## Deadline 2 Representation

Listed below is a list of traffic and transport PADSS and LIR paragraphs (italicised) with which ESCEP particularly agrees, with ESCEP comment in some cases (bold) .

*PADSS: The proposed peak construction date for Sea Link (2027) will be close to the peak construction of Sizewell C (2028) with a likelihood that there will also be an overlap with SPR projects East Anglia One North and Two and East Anglia THREE), and also LionLink. There is a*

*lack of cumulative assessment regarding the impacts of traffic from the respective projects. The Council is concerned regarding the cumulative impacts on the road network and expects the Sea Link proposals to contribute to the considerable effect to traffic on the routes leading to, and in proximity to the Suffolk Coast (including subsequent associated impacts to air quality, noise, and vibration) local housing and services. The sequential delivery of NSIPs on the Suffolk coast will create successive impacts at the same locations and be detrimental to residents, local businesses, and tourism.*

*PADSS: The Council regards the inclusion of core working hours which spans seven days a week and Public Holidays as unacceptable due to the lack of respite for local residents from the impacts associated with construction activities including disruption to local roads and public rights of way (PRoW) used for recreational activities at a time when they are most frequently used. Regarding the potential delivery of the substation in Friston under the Sea Link DCO, the Applicant has not committed to undertake construction under the working hours agreed under the SPR consent which does not include Public Holiday and Sunday working.*

*PADSS: The Council is concerned regarding the level of detail submitted within the draft management plans. For example, the Construction Traffic Management and Travel Plan lacks rigorous controls on Heavy Goods Vehicle (HGV) routing and a cap on numbers in line with what has been assumed in the submitted assessments and what has been accepted in previous DCO consents. There is also no commitment that can be enforced in terms of worker shift patterns that form part of the embedded mitigation. The definition of 'workers' is also unclear and does not state whether it includes other visitors to site.*

*PADSS: The Council is deeply concerned regarding the apparent lack of meaningful discussion between Sea Link and other NSIP projects in the same locality, to find opportunities to coordinate activities to reduce the impact of construction (e.g. on the highway network) of multiple projects on host communities on the East Suffolk Coast. As a result, differing landfall and cable routes have been selected by separate*

# East Suffolk Communities Energy Partnership (ESCEP)

ID No SF96BBD26

## Deadline 2 Representation

*projects which will increase the impacts of construction on the host communities, landscape, and ecology.*

### **LIR – General Description of Network**

*§11.77: The road network to the east of the A12 is primarily made up of B, C and unclassified small local roads which are narrow and/or winding in nature. With the exception of some elements of the B1122 between Yoxford and Leiston there has been little improvement to the network. Due to the local environment, they are heavily used by agricultural vehicles, and also recreationally by walkers and cyclists. There are several B class roads linking the local settlements.*

- **§11.77 avoids mention of the A1152 which has some local improvements between Rendlesham and Eyke as part of development of Rendlesham Business Park where there are HGVs that use the route to the A12. It also fails to state that the B road through Snape and Tunstall to the A1152 is a tourist, alternative commuter and local vehicle route to Aldeburgh from the A12 and an elective diversion route when the A12 has delays. The project will result in an increase in traffic on this road because of project worker, project LGV or elective diverted traffic and so will be the cause of road safety, congestion and air pollution impacts.**
- **§11.77, like the Applicant, fails to mention B roads to the north of the planned site likely to be used by worker traffic. The B1125 from Middleton to Blythburgh is already experiencing a traffic uplift of 45% + during peak hours as a consequence of SZC and while this may reduce once the Northern Park and Ride is fully operational, additional worker traffic for this and other energy projects will compound the road safety, congestion and air pollution impacts currently being imposed on these communities.**
- **Equally, §11.77 fails note that as traffic increases, a series of alternative routes to the south will be used, as we know from formal diversions for roadworks or flooding. Traffic through Snape is affected by five junctions with the A12 to the south of the B1121 – Friday Street, Farnham, Tinker Brook, Church Road at Little Glemham and the Lower Hacheston junction via Campsea Ashe; also, the B1069 leads to the A1152 at Rendlesham and leads on to Woodbridge. If drivers opt to avoid the A12 because of weight of traffic or because of delays at the Friday Street Junction/roundabout, there will be increases in traffic:**
  - **from Saxmundham and north-east of Saxmundham using Sternfield Road and crossing the A1094 at Church Common to the B1069 south for access to the A1152 and the A12;**

# **East Suffolk Communities Energy Partnership (ESCEP)**

**ID No SF96BBD26**

## **Deadline 2 Representation**

- on the A1094 from Leiston, Aldeburgh and eastern villages turning left initially at the B1069 junction but then perhaps later via the quiet lane Priory Road to join the B1069 in Snape Village, again for access to A1152 and A12;
- from the A12 using the A1152 through Eyke and Rendlesham to join the B1069 northwards and then on to cross the A0194 at Church Common or via a quiet lane rat-run.

**ESCEP considers these traffic increases will be the cause of road safety, congestion and air pollution impacts.**

*§11.79: During the examination for EA1N and EA2, SCC and the applicant agreed that neither the B1121 nor the B1119 were suitable routes for construction traffic. That applicant committed to restricting its HGV movements to avoid use of the B1119 and B1121. The ExA for those projects noted that the local road network is generally unsuitable for the number and type of construction traffic but was satisfied with the applicant's approach to minimise impacts.*

**ESCEP agrees that the B1119 and B1121 are not suitable for construction traffic, neither for EA1N and EA2, nor for Sea Link.**

### **LIR - Construction Phase impacts**

§11.85: ESCEP agrees that there will no positive traffic and transport impacts during the construction phase.

### **LIR – Network Resilience**

§11.88: *The main issues are:*

- i. Closure of the A14 Orwell Bridge due to collisions or high winds resulting in traffic being diverted through Ipswich*
- ii. Closure of the A14 or the A12 (north and south of the A14) and lack of suitable diversions.*

**On 4 November 2025, the A12 at Saxmundham was shut because of a fatal road accident at the A12/B1119 junction. Long traffic queues resulted and A12 traffic was diverted by the police through the centre of Saxmundham for a 3+ hour period, while sat-navs were directing northbound traffic onto B and C roads to the west of the A12. Generally, unplanned A12 road closures divert traffic onto the local B and C roads causing road safety, congestion and air pollution impacts.**

# **East Suffolk Communities Energy Partnership (ESCEP)**

**ID No SF96BBD26**

## **Deadline 2 Representation**

**Planned closures officially divert traffic on lengthy journeys, but local drivers and those using sat-navs use the local road networks. Traffic increases are notably experienced in the parishes of Snape, Tunstall, Eyke, Ufford, Melton, Blythburgh, Westleton, Middleton and Theberton and are the cause of road safety, congestion and air pollution impacts.**

*iii. Capacity of junctions on the strategic and major road networks, particularly if delivery of multiple NSIPs coincide.*

**Of particular concern to ESCEP are the A1094/B1069 junction (which is already dangerous). Other junctions of concern are A12/A1094, A12/B1121 (south) and A1094/Sternfield Road/Church Road, A12/A1120 and the A12/Westleton Road; the A12/B1387 is likely to become a junction of concern once Blythburgh has been blocked-off for SZC mitigation. The dynamics of the A12/Westleton Road junction will change when construction of a 110-property development starts (and is then occupied) on the field between the two roads: Scott Properties achieved an allocation in the Suffolk Coastal Local Plan and received a resolution to grant planning permission at the Planning Committee in May 2024. It is expected that the development will require A12 works for pedestrian access.**

*iv. Restrictions placed on the ability to maintain the highway network during normal working hours due to the higher volume of construction movements.*

**Significant increased use of the highways by HGVs will require more frequent maintenance.**

*v. Lack of laybys or other suitable parking, rest, or stopover facilities east of the A12.*

**Residents are reporting inappropriate use of laybys by SZC traffic even though signage is in place to deter use.**

### **LIR – Network management**

*§11.89: The intended DCO powers in article 13 may inhibit the authority in performing its duties as the local highway authority by removing control on the highway within the 'works' or associated with implementation of the traffic regulations in article 50.*

*§11.90: The presence of construction traffic on the network for 7 days a week will hamper routine highway maintenance or increase delays and disruption. The authority may also incur increase costs if forced for operational or safety reasons to undertake more work outside normal working hours.*

# **East Suffolk Communities Energy Partnership (ESCEP)**

**ID No SF96BBD26**

## **Deadline 2 Representation**

**Additional delays and disruption because of increased wear and tear to the network will further impact road safety and congestion.**

### **LIR – Road users**

*§11.91: Key issues facing road users include:*

- i. Delay to public transport and other road users including emergency services and public services.*
- ii. Safety, fear, intimidation and severance as constriction traffic impacts pedestrians and cyclists where provision of sustainable transport infrastructure or alternatives and limited.*
- iii. Loss of amenity both on rights of way but also highways used to link or access these.*
- iv. Lack of breaks in construction with seven days a week working.*

### **LIR – Road Safety**

*§11.96: Of the junctions assessed the one of greatest concern to SCC would be the A12/B1119 junction. Although minor improvements are planned by SZC these are only to mitigate their impact. Of concern is the use of this junction by the Applicant when the B1121 is closed at Benhall.*

**ESCEP agrees. Please note the information above about the fatal accident at this junction on 4 November 2025. Additionally, ESCEP is particularly concerned about junctions and property exits in the villages of Marlesford, Little Glemham and Blythburgh which straddle the A12. High traffic volumes will make entering A12 traffic even more dangerous and might lead to riskier behaviour by frustrated drivers and so impact road safety.**

*§11.97: Links of concern would be the B1069 through Knodishall where 3 serious and 3 slight collisions have occurred within the settlement and the B1119 in its rural section between Saxmundham and Leiston where 1 serious and 10 slight injury collisions have occurred. The B1069 does not feature in the Sea Link assessment but they do concur regarding the elevated rate of collisions on the B1119 east of Saxmundham and that the B1121 through Frison also has higher than expected collision rates. This supports SCC's view regarding the unsuitability of the latter two roads as routes for construction traffic. In SCC's opinion the safety issues on the B1119 are due to the combination of reasonably long stretches of straight road*

# **East Suffolk Communities Energy Partnership (ESCEP)**

**ID No SF96BBD26**

## **Deadline 2 Representation**

*where drivers can travel at speed interspersed with severe bends or changes in geometry which catch out the unwary. Improvements such as removing tight bends could improve safety but would require acquisition of land to do so and come with environmental impacts.*

**ESCEP believes that these concerns and those about the Benhall Bridge (see separate section) alone should give the ExA reason to recommend that the plan is not adopted.**

### **LIR – Junction capacity**

**§11.102-11.125: SCC highlights concerns with numerous junctions.**

**ESCEP agrees with each concern. Additionally:**

**SCC notes that some of the listed junctions are a part of the A12 MRN project and so are due for upgrades. However, this project remains at the planning application stage and documents remain undeclared on SCC Planning website. There is thus no certainty as to approval or to adequate funding for the construction of these works. If the works go ahead, as SCC LIR states in §11.175 the start date effectively coincides with Sea Link's programme for construction works. It also coincides with a major (£250m) earthworks contract for SZC recently announced in the press, ongoing other works on SZC and other DCO consented energy projects in construction as listed in §11.176. These works will impact on SZC, Sea Link and other energy project traffic, worsening congestion, compromising safety and with a knock on effect of pushing non-project traffic off the A12 and onto local roads.**

**SCC's LIR fails to recognise that construction workers for Sea Link and Sea Link LGVs will not be constrained to the A12. Those drivers may well choose to electively divert particularly during A12 MRN construction works to avoid delays, in part related to Sea Link HGVs adding additional slower traffic and/or reduce speed limits and lane widths at A12 junctions for a period of 2 years.**

**§11.103 notes that the Applicant has only assessed delays at junctions in terms of the IEMA guidance, not through modelling. ESCEP agrees, but also notes that there is no assessment outside the Applicant's defined area which is a notable omission.**

**SCC notes other major developments which will increase traffic flows through junctions but does not reference the 110-property development which has outline planning permission at the A12/Westleton Road junction (see above).**

# **East Suffolk Communities Energy Partnership (ESCEP)**

**ID No SF96BBD26**

## **Deadline 2 Representation**

**All of the above will be the cause of road safety, congestion and air pollution impacts.**

### **LIR – Abnormal Indivisible Loads**

**§11.137-11.151: The project is expected to require at least 124 AIL journeys. These are planned to occur during SZC peak years. AILs are the cause of congestion which pushes non-project traffic off the main roads on to local B and C roads with the consequent congestion, road safety and air pollution impacts imposed on local communities. The question as to whether the AILs will be able to reach the site remains open given the concerns about the use of the Benhall Bridge (see separate section).**

### **LIR – Environment Assessment Methodology**

**§11.156-11.162: ESCEP agrees fully with all the concerns noted.**

### **LIR – Inter and Intra Cumulative effects**

**§11.167-11.204: ESCEP agrees fully with all the concerns noted. Additionally, the 110-property development by the A12 between Yoxford and Darsham (see above) should be referenced.**

*§11.265 SZC is undertaking periodic traffic surveys in East Suffolk which may assist in determining if the concern is valid.*

**ESCEP believes that Sea Link should participate in the monitoring and contribute to the costs.**

### **LIR – Mitigation**

**§11.221-11.224: ESCEP supports SCC's proposed mitigation. Additionally:**

**ESCEP supports Woodbridge Town Council's detailed mitigation proposals regarding the A12 MRN works, and all other mitigations proposed by Town and Parish Councils in their Relevant Representations;**

**The speed limit on the A1094 between Snape Watering and the B1069 Leiston junction and on the B1125 should be reduced to 40mph to compensate for the higher traffic volumes which are affecting road safety;**



# **East Suffolk Communities Energy Partnership (ESCEP)**

**ID No SF96BBD26**

## **Deadline 2 Representation**

### **Section B - Local road pressures - Snape**

Snape PC noted in its RR and OFH1 WR (REP 1A-179) that the Applicant (NGET) were making a completely unrealistic claim that its project will have so little impact on traffic and transport issues that they do not even need to prepare a Transport Assessment. The Applicant's error was at least partly due to their using a study area that excludes from consideration local roads south of the A1094 that are already bearing the pressures of diversionary tactics by drivers trying to avoid traffic pressures from SZC and to an extent SPR construction. This situation allows ESCEP and Snape PC to make very accurate predictions about where the further pressures that Sea Link will be adding will be felt.

Whilst ESCEP and Snape's PC concerns centre on the dangerous and already overburdened junction at Church Common between the A1094 and the B1069 Church Road, the wider picture includes four traffic 'nodes' where diversionary tactics, mostly by local drivers, will have significant impacts. These are Church Common itself, Friday Street, the Tunstall junction(s) of the B1078 and B1069, and the roads around the station at Wickham Market. Not all of these are 'Snape' roads, but a look at the annotated map (attached below) will show that (excluding of course Friday Street) they are all 'attractors' for traffic wishing to find a practical route away from the A1094 and towards either the A12 south or the A1152 towards Rendlesham and Woodbridge; and all of them will bring traffic directly through Snape Village and of course Snape Maltings.

As traffic increases, a series of alternative routes open up, as experienced from formal diversions for roadworks or flooding. There are five feasible junctions with the A12 south of the B1121 that affect Snape roads – Friday Street, Farnham, Tinker Brook, Church Road at Little Glemham and the Lower Hacheston junction via Campsea Ashe; and the B1069 leads to the A1152 at Rendlesham and leads on to Woodbridge. On the assumption that for the foreseeable future the Friday Street junction (and indeed the A12 between Lower Hacheston and Kelsale) become options to avoid, then there will certainly be increases in:

- Traffic from Saxmundham and north-east of Saxmundham using Sternfield Road and crossing the A1094 at Church Common to the B1069 south for access to the A1152 and the A12;
- Traffic on the A1094 from Leiston, Aldeburgh and eastern villages turning left initially at the B1069 junction but then perhaps later via the quiet lane Priory Road to join the B1069 in Snape Village, again for access to A1152 and A12;

# **East Suffolk Communities Energy Partnership (ESCEP)**

**ID No SF96BBD26**

## **Deadline 2 Representation**

- Traffic from the A12 using the A1152 through Eyke and Rendlesham to join the B1069 northwards and then on to cross the A0194 at Church Common or via a quiet lane rat run.

All of these routes are already well known to local drivers, and Snape residents have seen traffic increases through the village steadily over 2025. None of the routes mentioned, however, falls within the 'study area' and therefore we reject the claim of 'no significant transport implications'.

The critical impacts for ESCEP and Snape PC include:

- Increased risk to drivers and pedestrians and settlement separation at the Church Common junction, which has poor visibility and has already been identified by SPR's EA1N and EA2 project as requiring safety upgrade; Snape PC's view is that at a minimum the A1094 speed limit between Snape Watering and (at the closest) the B1069 Leiston junction should be reduced to 40mph throughout, and signage at the junction adapted to the new stress on the junction that 346 daily Sea Link HGV movements will bring;
- Traffic congestion through the village will have negative impacts on air quality, noise, severance and road safety generally - Bridge Road, between the Village and Snape Maltings will be particularly impacted, affecting tourism and local employment;
- Specifically, increased and heavy traffic will have a potentially severe impact on the safety of children and parents at Snape Primary School in Church Road – it is essential that the present national speed limit between Church Common and the entrance to the village is reduced to a maximum of 30mph, and preferably 20mph through the upper Village;
- Rat-running through the minor rural road network cannot be eliminated entirely, but on behalf of all villages with Quiet Lanes, we feel strongly that action should be taken to preserve this amenity, and to save at least one opportunity for village residents not to be driven out of their rural environment by industrial pressures on local traffic;
- Local residents have already reported serious damage to local roads used as temporary diversions whilst SZC preliminary works are carried out; this damage to verges, hedgerows and the local ecology will become a permanent scar on our environment if we allow this project to add yet more to the pressure on the local network.

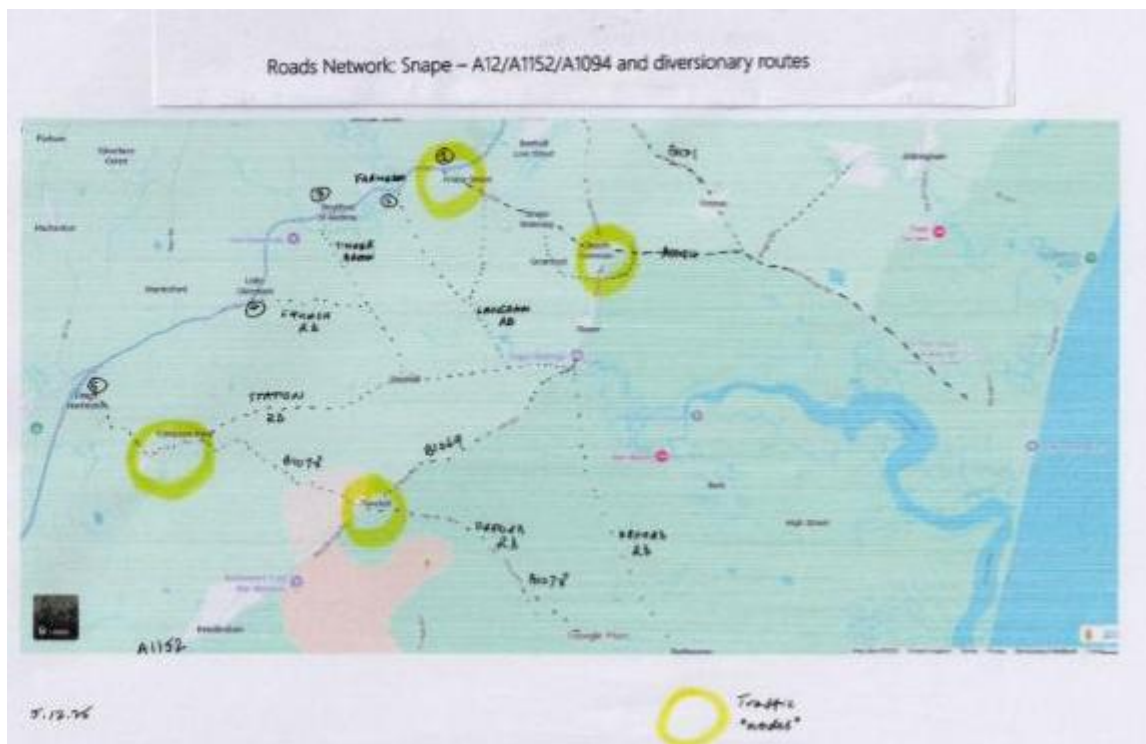
## East Suffolk Communities Energy Partnership (ESCEP)

**ID No SF96BBD26**

## Deadline 2 Representation

ESCEP repeat here Snape PC's requests made to the ExA at OFH1:

- The ExA requires Sea Link to carry out further, better specified traffic analysis, including detailed junction surveys, and to do this through close working with SZC and SPR; and to make any consequent changes to their traffic planning a requirement of the DCO;
- On roads recognised as being most at most danger from rat running, Sea Link should be required to fund signage to discourage use of unsuitable, easily damaged and potentially unsafe roads and lanes by rat running, and also required to fund the introduction of additional traffic calming or Quiet Lanes;
- ESCEP ask that the Applicant be required to fund and resource local Town and Parish Councils to manage the vast pressures they face with this quite unmanaged NSIP onslaught.



# **East Suffolk Communities Energy Partnership (ESCEP)**

**ID No SF96BBD26**

## **Deadline 2 Representation**

### **Section C – B1121 Benhall Rail Bridge and A12/B1121 junction**

In our Deadline 1A submission of our oral presentation at the OFH (REP1A-045) we commented upon the above bridge and junction. Please note this representation was prepared in collaboration our Chair, Councillor Sanders of Woodbridge Town Council, a Chartered Engineer with over 40 years civil engineering design consultancy experience of major infrastructure works.

This representation document was also prepared before full examination of the Applicant's 26 November Change Request Application document recently issued on the Planning Inspectorate Sealink Project Information web portal. Additional comments may well arise from examination of that document and will be made as requested on or before 19 January 2026

#### **Introduction**

The Applicant's current proposal is to utilise the B1121 through Benhall to form its main site access. Its proposal is to construct a junction north of the B1121 junction with Church Hill, taking the access road across the River Fromus valley south of Saxmundham to the main construction site south-east of Saxmundham and south of the B1119 road from Saxmundham to Leiston.

The B1121 is accessed from the A12 at Dorley's Corner via a ghost island junction on the 50mph A12 southbound single lane carriageway some 1.1km north of the current A12/A1094 junction which will be approximately 900m from the exit/entry slips to the Friday Street roundabout currently under construction. The northbound exit to the B1121 is a parallel slip into the ghost island adjacent to the A12 70mph dual carriageway. The slip is some 85m long (full width length) and turns right across the single carriageway A12 to the B1121. All other slips on or off the A12 are short (<25m) or non-existent. The width of the central reserve at the junction is 10m i.e. well under the length of a standard rigid HGV (12m) and considerable under that for an articulated HGV (16.1m). AIL loads either exceed 3m width or 18.65m length.

The B1121 from the A12 has a rising vertical alignment and left turn before levelling off and becoming straight before crossing the Ipswich – Lowestoft railway line some 35m further north (measured on the road centreline). The railway line is in a cutting and is skew to the B1121 so the road bridge is also skew. The bridge deck length appears to be around 35m in length from Google Earth Pro measurement. The bridge currently has a 46-tonne weight limit.

# East Suffolk Communities Energy Partnership (ESCEP)

ID No SF96BBD26

## Deadline 2 Representation

### The Applicant's Proposal

There are no proposed junction improvements to the A12/B1121 junction by the Applicant.

The Applicant has provided scant proposals for crucial off site works to enable AILs up to 300 tonnes to safely cross over the Ipswich to Lowestoft railway line bridge. These proposals in summary comprise either temporary or semi-permanent overbridging works or the current bridge will be strengthened to allow AILs to cross without overbridging works.

This is set out on page 3 of document CR1a-005, Supporting document to the change request notification – Covering Letter Cat 3 Oct 2025 -see below.

*Our existing proposals are to install a 'mini bridge' overbridge structure on the existing Benhall Railway Bridge, within the highway boundary. The mini bridge would be assembled and removed before and after each AIL delivery. This section of road was not included in our application as these works could be carried out under other planning rights. Further design work has shown that it would be beneficial to have:*

- *an area adjacent to the bridge for materials storage and a compound when the bridge is being installed and removed*
- *land along the railway line near to the bridge to allow for surveys to be carried out.*

*The additional land east of the B1121 reflects our discussions with stakeholders, including the Local Authorities, to allow for two other potential solutions. These are:*

- *the installation of a semi-permanent overbridge*
- *works to permanently repair the bridge. We are proposing to include the land required for all three potential solutions into our Order limits, to provide reassurance on how these works will be approved, following discussions with Local Authorities*

The referenced design work in the above extract from document CR1a-005 has not been published and there is no assessment of the existing bridge structure in documents examined the reason(s) SCC give for the 46-tonne limit for Benhall rail bridge. There are neither outline design proposals nor engineering viability assessments for either of the forms of overbridging works which appear to be the preferred options, yet the use of this route is vital to completion of the whole project.

The location of the Benhall Rail bridge, the skew nature and the highway layout as detailed in the Introduction means there are considerable engineering constraints to options which could well prove that far wider/extensive works are required

# **East Suffolk Communities Energy Partnership (ESCEP)**

## **ID No SF96BBD26**

### **Deadline 2 Representation**

particularly along the railway and B1121 than shown on proposed land take drawings in CR1a-006 Supporting document to the change request notification – Change Application Consultation Figures.

We consider it is essential to assess particular AIL loads to determine viability of the overbridging and allowable vertical alignments to determine the overall viability of the route.

ESCEP agree with Suffolk County Council (SCC) comments on the proposals, or lack thereof, in its Local Impact Report (LIR), REP1-130, at §11.149 and 11.152-11.155.

#### **Non-Local Impacts**

Without evidence of viability by a competent engineer or other engineering assessment of the options the impact of the works necessary to enable AIL loads to cross the bridge is uncertain. However, to achieve the ability of AILs to safely cross the railway line there will inevitably be significant disruption to rail services as Network Rail will wish to ensure safe passage of both passenger and freight trains on the single-track railway. Works over and above a railway line, or where lifting equipment have even the remotest risk of toppling onto the railway generally require full occupation of the railway i.e. closure of the line.

There may well be delays imposed on Sealink projected programme as occupations of railway lines are planned and set years ahead and invariably near impossible to add to from Councillor Sanders experience in civil engineering consultancy.

Further the line is in 24-hour use, passenger use between around 0615 and 2245 and freight use by Sizewell C outside those hours except on a Sunday night. The passenger service is an important community and commuter link which has shown very considerable growth in use in the last twenty years and the freight use is crucial to the Sizewell C works where 40% of materials are planned to be moved to and from that site by rail, the only viable route being under Benhall Bridge. With increasing and inevitable longer delays on the A12 due the numerous NSIP and other projects the passenger service will become even busier than at present.

ESCEP is concerned by any disruption to the railway by works at Benhall Bridge as this will inevitably increase HGV road traffic on the A12 as that is the only viable option to use of the railway. There is no alternative rail route. Increased Sizewell C HGVs will further exacerbate the traffic issues already existing and projected for the A12 particularly to the south in 2027 and 2028 when Suffolk County Council CC plan to do major junction improvement works from the A14 to the A1152 at Melton. This assumes those works receive planning permission and are capable of being fully

# **East Suffolk Communities Energy Partnership (ESCEP)**

## **ID No SF96BBD26**

### **Deadline 2 Representation**

funded. ESCEP understand the planning application was submitted on 15<sup>th</sup> November 2025 but the application is as of 9 December not published on SCC Planning Register.

Notwithstanding the likelihood of a positive decision there remains the substantive risk those works are unable to be funded leading to longer term capacity issues on that section of the A12 during the Sealink projected construction programme.

#### **Local Impacts**

Suffolk County Council has made many comments on the viability and impact in its Local Impact Report (LIR) REP1-130 and ESCEP are in broad agreement with its remarks and comments summarised in §11.125 -11.129 of the report.

ESCEP also agree with SCC on the impacts described in the LIR at §11.153 with respect to disruption and delay to traffic that utilises the B1121 to access Saxmundham and to travel south from Saxmundham.

The substantially greater use of the highly skew A12/B1119 ghost island junction is inevitable. This has a short 60m (full width) northbound slip to the B1119 to Saxmundham and no slip from the B1119 southbound on a 60mph stretch of single carriageway road poses considerable safety risk. The B1119 into Saxmundham from Mill Road to the B1121 junction thence to the junction with the B1121/B1119 junction in High Street is highly restricted due to residential parking, tight bends and narrow road widths. ESCEP is also in agreement with Benhall and Sternfeld Parish Council on this matter in its REP1A-078 document (page 2) and WR at Deadline 1 REP1-171 (pages 1 and 2).

The physical impact on the Whitearch residential park, 35m south of the Benhall Rail bridge will be severe as it has no access other than onto the B1121 or to the rest of Benhall Green village. Further noise and disruption for bridge construction works on the land designated in CR1a-006 Supporting document to the change request notification – Change Application Consultation Figures will severely both impacting the quiet rural residential park as well as residential properties immediate north and east along Shotts Meadow, Festival Close and Forge Close.

#### **Inadequacy of Assessment**

WTC fully agree with SCC statement in §11.225 of the LIR report as detailed below

*“As matters stand, SCC is not persuaded that the applicant has demonstrated that the use of the Benhall Railway Bridge is achievable (for the reasons set out above dealing with that structure). SCC therefore urges the applicant to further consider*

# **East Suffolk Communities Energy Partnership (ESCEP)**

**ID No SF96BBD26**

## **Deadline 2 Representation**

*revisions to its proposals to provide an alternative access route, preferably utilising the SLR if available at the appropriate time or (if not) the B1122."*

### **Alternative Access**

ESCEP consider that the Applicant should be required to consider developing its main access off the Sizewell Link Road (SLR) currently being constructed by Sizewell C Ltd north of Saxmundham. This would avoid the issues with the railway and crossing the sensitive Fromus valley. A route south from the SLR would give access to both Sealink and to the Applicant's sister company NSIP development of LionLink.



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#### **Section D – Socio-economic, recreation and tourism effects**

The Applicant (NGET) has assessed the likely significant socio-economic, recreation and tourism effects of Sea Link over a broader study area being within a 60 minute drive-time catchment from the Suffolk Onshore Scheme Boundary. This effectively covers the whole of East Suffolk.

The base data used is outdated (2022) and the assessment is based on the Sea Link project in isolation, concluding that there are no anticipated significant adverse effects on local businesses, tourism or community facilities and consequently no mitigation measures are proposed. On the other hand, NGET assesses potential beneficial socio-economic effects, all be them minor, during construction in particular by generating jobs and increased workforce spend.

SZC and EA2 are already having a substantial impact, and Sea Link would only add to the potential harm. While it is acknowledged that the projects are creating jobs, local skills are being displaced from towns and villages, and experience of previous projects such as SZB is that workforce spend makes minimal contribution locally.

The economy and community well-being of coastal towns, but also the wide range of tourist attractions across the region, are highly dependent on tourism and visitor accessibility (90% of visitors are day trippers). Local employment, hospitality, retail and seasonal businesses rely on visitors who travel via a limited number of rural access roads. Even modest congestion or journey-time uncertainty leads to measurable reductions in visitor numbers, especially outside peak season when local businesses depend on predictable access.

The A12 north from Woodbridge to Blythburgh is currently plagued by traffic management and closures related to SZC and SPR/EA2, and Sea Link and other consequential projects would only add to and extend the disruption over many years. Traffic accidents are prevalent, travel times and routes are unpredictable, and HGV, abnormal loads and worker traffic are already placing a disproportionate strain on a wider fragile road network with no capacity for diversion or widening. These effects will inevitably discourage day visitors due to uncertainty of travel times, extended queues at pinch points and reduced reliability of travel during bank holidays, festivals and peak season months.

Footfall numbers published monthly by East Suffolk DC for market towns in East Suffolk show total footfall for the year to November 2025 has decreased across the region based on the same period as last year. Aldeburgh for example is 14% down

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year on year. Anecdotal feedback from a sample of High Street retailers and businesses local to the Suffolk Onshore Scheme Boundary is that takings this year are as much as 30% down (there have been a number of shop closures) with holiday bookings also down by 24%.

Taking data produced by Destination Research Ltd using the Cambridge Model for East Suffolk's visitor economy, tourism value for 2024 was £743m and supported 15,500 jobs. Even modest declines translate into significant economic and employment losses concentrated in frontline sectors. A 5% decline results overall in £37.1m lost value and 775 job losses (far outstripping any benefits from Sea Link progressing). Coastal towns are disproportionately reliant on tourism with local economies dominated by hospitality, retail and accommodation sectors and businesses operating on tight seasonal

margins, so a small percentage drop in visitor numbers will have long-lasting economic consequences to these towns with businesses finding it hard to survive.

Tourism underpins local identity and vitality and any decline erodes social cohesion and cultural vitality, destroying the very fabric of East Suffolk as it is today.

Given the above, ESCEP requests that the ExA requires NGET undertake a robust assessment of tourism-related economic harm, both locally to the Suffolk Onshore Scheme Boundary and within the 60 minute drive-time catchment area, on a cumulative basis including consented NSIPs and energy projects with offered connections to the Friston sub-station e.g. Lion Link and Helios solar farm. [This would allow proper consideration for a compensation scheme underwritten by NGET which it asserts is not needed.]