



**SEAS WRITTEN REPRESENTATION OF THEIR**  
**ISH2 ORAL REPRESENTATION on**  
**TRAFFIC & TRANSPORT**

**SEA LINK: EN020026**  
**DEADLINE: 4 – 10 February 2026**

**SEAS IP: [REDACTED]**  
**Date: 10 Feb 2026**

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This document constitutes SEAS oral representation at ISH2 on Sea Link Traffic & Transport

### Introduction

SEAS Council Mr. James Burton attended the Issue Specific Hearings (ISH2) on January 28, 29 and 30 January and introduced transport expert Richard Ellam from PJA to speak on behalf of SEAS. You already have Mr Ellam’s credentials.

Whilst we understand that the DCO examination is mainly a written process, it was extremely concerning that Traffic and Transport was truncated at an early point and Mr Ellam was not able to fully present his evidence orally.

We therefore, as requested, present Mr Ellam’s written evidence as follows:

We trust that this submission will assist the ExA in its ongoing consideration of the application.

SEAS – WR of TRAFFIC Oral Rep at ISH2 - Deadline 4 – 10 February 2026

AI Disclosure & Responsibility Statement: This submission is human-authored and human-verified. In preparing its evidence, SEAS in some instances utilises AI tools (ChatGPT, Google Gemini, Microsoft Co-Pilot) for the summarisation of Examination Library documents and for organisational assistance. SEAS maintains full responsibility for the factual accuracy of this content.

**National Grid Electricity Transmission for an order granting Development Consent  
for the Sea Link project in Suffolk  
(Planning Inspectorate Reference: EN020026)**

**Summary Statement for Richard Ellam in respect to Transport Matters  
on behalf of Suffolk Energy Action Solutions (SEAS)**

- 1.1 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. I am a Director with PJA, one of the UK's leading transport consultants.
- 1.2 PJA were 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. The technical review considered the highways and transport implications of the proposed development.
- 1.3 The proposed development and others in the area will generate a significant level of new vehicular trips onto the local highway network over a number of years. In my view, the approach adopted in appraising the impact of the development is not robust, has not followed correct and proper procedure, proposed very limited mitigation and provides no comfort that the development will not have a significant adverse impact on the surrounding local communities. I have explained this in more than one written contribution, which I know SEAS has previously supplied to the Examination, this includes the following documents:
- RR-5210  
[https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN020026-000626-07.%20SEAS%20Traffic%20&%20Transport%20RR%20FINAL%20-%20combined\\_Redacted.pdf](https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN020026-000626-07.%20SEAS%20Traffic%20&%20Transport%20RR%20FINAL%20-%20combined_Redacted.pdf)
  - REP1-275  
<https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN020026-001296-SEAS%20WR%2007.Traffic%20and%20Transport-Deadline1-18%20Nov%202025%20-%20Combined.pdf>
  - REP2-120  
<https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN020026-001901-7.%20SEAS%20REBUTTAL%20of%20NGET%20TRAFFIC%20AND%20TRANSPORT%20Responses%20-%20DL2%20Dec%209%202025.pdf>
  - REP3-138  
<https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN020026-002328-SEAS%20comments%20to%20the%20Applicants%20Responses%20to%20SEAS%20WR%20Traffic%20&%20Transport%20DL%203A%20DRAFT.pdf>



- 1.4 The responses from the Applicant at the hearing, acknowledged these deficiencies and noted that further work was being carried out to seek to address them. Whilst this is welcome, it remains of great concern that such fundamental issues around traffic impacts are unresolved at such a late stage in the process.
- 1.5 In summary of the previous issues, the Applicant has failed to survey correctly by not using data from non-neutral months; failed to carry robust and detailed junction modelling, not adequately assess cumulative impacts and not proposed proper and robust mitigation.
- 1.6 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.
- 1.7 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 and this undermines the entire transport evidence base and its subsequent conclusions. The Applicant continues to ignore this matter.
- 1.8 The assessments conducted have also given no consideration to the implications of seasonality in this specific location. The summer months generate 25% more traffic than those surveyed in the application.
- 1.9 There has been 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. The impacts on key corridors such as the A12, the B1121 and the A1094 corridor, are not modelled in detail and consider only on a relative level.
- 1.10 At the hearing it was finally acknowledged in respect to comments from SEAS and the County Council, that detailed junction modelling to assess the impact at key locations is to be carried out. It is disappointing that such a fundamental issue had not been addressed at the outset of the DCO Application, but I await the results.
- 1.11 In the absence of detailed junction modelling and a proper level of appraisal, it is impossible to conclude whether mitigation is required (indeed no significant mitigation has been proposed to date) and that the impact of the development is acceptable. This is a fundamental issue, also identified by the County Council, that remains unanswered and is compounded by the issues with the base survey data, which as noted the applicant continues to ignore.

- 1.12 The development is one of several major new developments within the surrounding area. The cumulative impacts of these are considerable and material and they have not been considered robustly. The cumulative increased in HGV movements in the area from these are significant. This needs to be properly considered in any revised assessments, to date it simply has not been and the work carried out superficial.
- 1.13 There remain major concerns over the proposed use of the railway bridge at Benhall for the use of construction traffic. There is a lack of clarity in the Applicant's proposed mitigation measures in respect to the Bridge.
- 1.14 Overall, the submission to date is based on inappropriate and weak baseline data, does 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.
- 1.15 At the hearing, it was finally accepted by the applicant that this is the case and further work is ongoing. I would respectfully request that SEAS are provided with any updated information, as soon as this is available, in order that SEAS may pass it to me for consideration.
- 1.16 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.