

**SEAS summary of outstanding issues on Applicants D4 responses
following ISH2 and on ExQ2**
TRAFFIC & TRANSPORT

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Summary of outstanding Traffic and Transport issues following ISH2 and ExQ2

1 Introduction

SEAS and its expert advisors have reviewed the adequacy of responses from the Applicant at Deadline 4 to issues raised at Issue Specific Hearing 2 (including the summary [REP4-159] of matters raised by SEAS at that hearing) and to the Examining Authority's questions to the Applicant in ExQ2. The relevant documents are:

REP4-039; REP4-061; REP4-083; REP4-085; REP4-086; REP4-099; REP4-101; REP4-236

The last of these documents [REP4-236] contains at table 3.4 the Applicant's principal commentary on our own submissions.

2 Late and selective responses from the Applicant. A number of the key points made in previous representations continue to be ignored and remain unaddressed. This includes the validity of the **base survey data, the impact of seasonality, road safety impacts** and the **lack of physical mitigation**. The applicant continues to ignore these concerns, and whilst the Applicant acknowledged at ISH2 the need to carry out detailed junction modelling and consider the cumulative impacts further, it is still of significant concern that such fundamental issues in respect to traffic and transportation have not yet been duly considered.

3 Junction modelling – incomplete scope.

3.1 In [REP4-086] the Applicant notes the proposed scope of junction modelling, restricting the scope to three junctions (A12/B1121, A1094/B1121, A1094/ B1069), claimed to be the '*...key junctions which will be used by construction traffic associated with the Proposed Project...*' This ignores the key A12/A1094 junction, which SEAS specifically suggested be included in this exercise.

3.2 The selection of 'affected' junctions in any case seem to be arbitrarily based on the requests of Suffolk County Council, rather than a considered scoping and trip generation exercise, demonstrating the potential impacts at the numerous other junctions within the

study area. There are potentially other junctions that are materially affected that have still not been duly considered.

4 Junction modelling – cumulative impact, journey time analysis.

4.1 In AP61 and AP62 [EV6-033], it is noted that *'The Applicant has received an updated list of additional cumulative schemes for consideration from both KCC Highways and SCC Highways. In addition to this, the Applicant is undertaking a review of the cumulative project long list.'* - and that the work considering the cumulative impacts of development will be redone and submitted at Deadline 5. **It is of considerable concern that the cumulative impacts of development are being re-assessed at this stage.** We also note that the work to date presented in this area is simply the presentation of forecasted traffic flows. There was repeated reference at the ISH to *'modelling'* of cumulative impacts. It should be noted that **there has been no detailed modelling of cumulative impacts**, merely reports on the levels of traffic flow.

4.2 In AP62, reference is made to the request, at the ISH from various parties, for **journey time analysis**. The NGET response implies that this will be considered in the very limited junction modelling, the applicant is now proposing to undertake. This is not an adequate response to the issue raised, nor what was meant by the original request; **it will only consider queuing time** at the approaches to the three locations identified for junction modelling across the entire study area.

5 **Benhall Bridge.** We have reviewed the revised CTMP and other submissions in respect to the Benhall bridge, and make the following summary notes:

5.1 The applicant concludes a maximum of 28 days would be required to repair the bridge to satisfactory standards. Despite the clear need for inspections and assessment to assess the repair work required. It seems **highly unlikely that a construction programme can be identified** when the works haven't been identified.

5.2 Similarly, NGET acknowledge that possessions are completely at the discretion of Network Rail and that the applicant will have no control over that – this adds substantially to the uncertainty of bridge closures for longer periods of time. Alternative options to build a mini bridge alongside it are clouded with similar uncertainties.

5.3 In this context, our advisors have reviewed the Crossing feasibility study and Suffolk County Council's post CAH1 hearing submission on alternative access routes should the Benhall route not be feasible. The council's preference is for a northern route from the B1122.

5.4 As with much of the transport evidence base to date, there has not yet been a comprehensive assessment and detailed analysis of options considered. If the Benhall Bridge option is not feasible, then once again a full, detailed and timely analysis of other options is absolutely essential.

End