



Snape Parish Council

Written Submission following Issue Specific Hearing 3, Item 4 – Traffic and Transport

We hope it is in order to comment on statements from the Applicant at ISH3 on this topic, as we were, although present at the meeting, unable to speak at the appropriate time. We were taken aback by the Applicant's steadfast opposition to any change in their traffic impact assessment methodology, and take this opportunity to rebut their arguments on the timeliness of their submission on junction modelling and on the impact of their defective baseline assumptions.

Junction Modelling and cumulative assessment of impacts against the baseline.

1 The Applicant has maintained throughout the Application and the Examination the position that since the *relative* contribution of their construction, operation and maintenance traffic flows will be small in comparison to the total, cumulative traffic generated by the local community and the various energy (and road improvement) schemes which it takes into consideration, its impact will not be significant.

2 This position was stated clearly several times during ISH3 – Sea Link traffic impact will be ‘...small...’, or ‘...pretty negligible compared to total traffic flows.’ (Mr Flanagan, for example, referring to the Kent Onshore scheme). As a result of this assumption, the Applicant has restricted its Environmental Assessment to a ‘Note’ rather than a full ‘Assessment’, and has resisted strongly any requests for formal junction modelling. Even after they have reluctantly agreed to junction modelling exercises in Kent and Suffolk, they are delivering less than Suffolk County Council has requested¹ and delivering it late. Mr Flanagan, speaking for the Applicant, at one point during the hearing suggested that in ‘going above and beyond’ by modelling just three junctions in Suffolk, NGET were also generous in stretching their capacity so as to deliver what had been asked for throughout the Examination, and specifically by the ExA in time for Deadline 5 (March 10th) instead by April 1st. The claim that this would allow SCC Highways time to review the new information by Deadline 6 was surely in contempt of the ExA's lenience in setting the extended timetable in the first place, and inefficient in the context of the Examination. It also effectively prevents any substantive comment from Interested Parties in this Application.

3 The question of NGET's chosen baseline has been extensively raised, and the ExA will be clear that local communities consider the choice of January and February defective and wilfully obtuse. But the lengths to which the Applicant went during this hearing to deny that the choice of baseline could be in any way influential on their case for the insignificance of their construction traffic was surely alarming. We quote first of all Mr Belton, who claimed that changing the baseline ‘...wouldn't change the outcomes of the impacts as a result of our schemes on the community schemes, that will just *push*, you know, the baseline slightly higher potentially..’ – this seems to say that changing the baselines would not have any effect on the overall impact of the ‘schemes’; but

¹ [REP3-101 Appendix A] notes that ‘A1094/B1069 Snape Crossroads Snape’ will have issues of ‘Capacity, delay, road safety’, and that ‘Cumulative increases in traffic , including that from Sealink will aggravate existing problem’.

perhaps ██████ meant to say merely that it would have no impact on NGET's *assessment* of the impact? It's hardly clear.

4 ██████, however, made the Applicant's position very clear indeed. He said, in answering a point on the choice of January and February as baseline months: 'If the argument is the seasonality factor, the surveys were done in the Winter of 2024. That gives *more* difference between the impact of the scheme because you've got a lower baseline, so actually although the conclusion is 'No Significant Effects', *if the baseline is higher it would be even less effect.*' (Our emphasis). Mr Dowd is saying that as the baseline increases, the impact of Sea Link *decreases*. He means – the impact relative to the total traffic numbers. But he does not say that.

5 Sea Link have also referred in the Examination to the impact of Sizewell C Construction traffic as 'background noise'. It is the same error. To put it as simply as possible: if a road is safe and efficient at 100 vehicles per hour, but unsafe at more than 100 vehicles per hour, and the baseline community traffic plus (say) SZC traffic produce in total 99 vehicles per hour; then if Sea Link (say) add 5 vehicles per hour to the load, then it does not matter that their traffic is a mere 4.8% of the total – the road is now unsafe, and **they are part of that problem**. SZC traffic is not part of the 'background noise', it is part of the moving and cumulative baseline against which they ought to be modelling their own corporate impact, and then, preferably *with* the highways authority and the other NSIPs, finding better solutions.

6 We ask the ExA to ensure that Sea Link's modellers clearly understand that relative impact is not the key issue here. There are junctions within the Sea Link construction routes that are already at or above capacity, and adding even 1% more will have **significant** effects. Even if they are caused by trivial *percentages* of the overall traffic.

Snape PC

11/04/2026