Introduction

East Suffolk Energy Communities Partnership (ESCEP), a group of over 30 parish and town councils in East Suffolk, wishes to highlight its, and its partners, continued concerns at multiple aspects of the Sealink project as presented to Examiners and IPs.

These concerns include our assessed impacts of this project on the local parishes and towns and on the cumulative effect of adding yet further construction work and associated impacts on the local environment, economy, resident human population and societal and physical infrastructure. The following is the primary list of impacts

- **traffic**, both locally north and south of the Sealink site on the A12 from the A14 at Seven Hills and on public transport.
- **the AIL access route via Benhall Bridge** on local residents of Benhall and Sternfield, in nearby villages and Saxmundham and the disruptive impact on the public transport system and residents access to essential services
- **loss of countryside** the urbanisation of the landscape
- **mental health and wellbeing** arising from prolonged and major changes to day to day living
- **economic impact** the indirect and direct impact on tourism and market towns
- **operational noise** – ESCEP defer to SEAS on the assessment of this matter and the potential for long term impact of low frequency sound
- **security** – the risk by placing a vast array of energy projects, of which Sealink is one, on a restricted with no defence to third party state attack by modern systems

Traffic and transportation

- **Traffic issues**

  The highway network is dominated by a single major highway, the A12 between the A14 at Seven Hills and Lowestoft which, north of Wickham Market to Blythburgh is a single carriageway road with very limited laybys and 30 and 40mph limits except for a short section of 50mph at Glenham Hall and a section on the very short remnant of dual carriageway at the B1121 Benhall junction with the national speed limit only around Saxmundham and north of the A144 junction to the Blackheath (Hazel's Lane) junction.

  Aside from that route all other A and B class routes from south to north to the east of the A12, the B1438, A1152, B1078, B1079, B1121, B1122 and B1125, and those to the west, are locally narrow, have unkerbed verges, poor sightlines at numerous junctions and pass through residential areas of villages and towns with, in many instances, houses directly onto the pavements. These roads do not fit well with increased use by modern, wider, cars, vans and HGV and any

significant additional traffic on them poses considerable issues with safety and damage to both the highway, verges and drainage.

For these reasons the roads are not part of the SCC official diversion routes for A12 closure or major roadworks.

However, as these official diversions are generally over 50 miles long the local roads off the A12 do get used heavily by traffic avoiding the official diversion routes and this can include use of some C and unclassified roads. When delays or blockages occur on the A12 due to accidents or major roadworks the subsidiary roads carry vastly greater traffic volumes.

Evidence since Sizewell C started is that this leads to severely damaged verges and blocked drainage. HGVs which do not follow the official diversions divert onto them sometimes becomes stuck as they struggle to pass other HGVs or large tractors.

Sizewell C has recognised this issue and, where the diversion is due to Sizewell C funded highway works or closures, it is assisting SCC Highways in repairing these unofficial diversion roads despite no obligation to do so under the DCO/DoO. ESCEP seeks assurances that the ExA will ensure the Applicant for Sealink accepts a similar obligation for such repairs but also seeks means of minimising such routes being used.

ESCEP also seeks the ExA to place the same restrictions as are on Sizewell C, on all Sealink HGV traffic i.e. to only use the A12 from the A14 up to the site access road and when traffic is queuing or other delays occur on the A12, to hold HGVs at a facility until the route is clear. Ther latter is crucial for the following reasons

- Alternative classified routes alongside the A12 to/from the A14 to Woodbridge do not exist.
- From Woodbridge to/from the north end of the Wickham Market bypass the only route is the B1438, A1152 and B1069 which pass through narrow villages and town streets with residences directly onto the highway or onto narrow pavements.
- The single lane A12 from Wickham Market to Benhall has very limited laybys and, in the case of sudden road closure due to accidents or emergencies HGVs can become marooned and a small number can thus block the A12 to emergency services.

ESCEP consider effective management of the above could be achieved by cooperation with Sizewell C in using its Freight Management Facility, the Orwell Logistics Park, on the A14 at Nacton, some 1km from the A12/A14 Seven Hills junction.

The impact of Sealink traffic and its component to the cumulative effect is influenced by the at Wickham Market.

North of the Sizewell C Southern Park & Ride the most significant additional vehicle component of traffic northbound during peak Sealink commuting hours, probably 0615 - 0645 will be Sealink related workers vehicles, up to 221 as Sizewell C workers will occupy some 50 buses. Southbound, at probably 1900-1930, the most significant additional vehicle component of traffic will again be Sealink related workers vehicles (up to 221). In 2028 on the assumption made above for Lionlink worker traffic, assuming identical working hours, the combined Sealink and Lionlink related workers vehicles will be up to 450. At Saturday evening and Sundays all additional traffic will be Sealink and Lionlink.

The Applicant's data in EN020026-000303 shows the A12 northbound south of the A1094 on weekdays, at 0700-0800, has a 2028 baseline 1376 vehicles (two way) but does not provide data for 0600-0700 when its workforce will be travelling on it. ESCEP believe it is likely when at peak staffing the 221 worker vehicles will create a double morning peak with traffic between 06:40 – 06:50 probably being a sharp peak. The Applicant's report similarly does not cover the 19:00-20:00 period but ESCEP believe that will probably a similar peak between 19:15-19:30. Evening traffic appears to be considerable lighter with 18:00-19:00 baseline as 755 vehicles so Sealink traffic will form a very significant additional traffic flow.

The substantial additional traffic at these times will have a large impact on local vehicles wishing to join the A12 from side roads as none are light controlled, sand this will particularly affect Button's Road at Glemham Hall as it sits within a 50mph zone.

South of the Wickham Market Park & Ride there will be large number of Sizewell C workers vehicles travelling to/from the Park & Ride as Sizewell C increases staff numbers vastly in 2027 and 2028. The Park & Ride has the capacity to hold some 2,500 workers non-HGV vehicles and is expected to be close to fully utilised by mid to late 2027 with a very substantial proportion of workers travelling to and from the Park & Ride on the A12 to/from the A14 with small volumes seeking to use the B1068 to the A14 at Needham Market and the A1214 into Ipswich. This Sizewell C worker traffic will be supplanted by up to 221 Sealink staff vehicles and, in 2028, ESCEP anticipates that if Lion link is approved, a similar number of Lionlink staff vehicles will add to that total. Given site working hours are 07:00 to 19:00 (18:00 on Sizewell C) this level of traffic will be present outside normal peak hours both in the morning and evening, Monday to Saturday with the peak Sizewell C and other energy project leaving traffic

being the early afternoon of Saturdays due to no Saturday afternoon or Sunday working on those projects.

The number of vehicles on the A12, excluding any energy project HGV/HDVs will far exceeds the normal peak hourly traffic flows at existing A12 junctions from the A14 to B1068 junction at Wickham Market. Some junctions up to the A1152, and the single lane section between the B1438u and B1079, are already approaching, or exceeding, capacity with normal peak A12 traffic levels c.f. SCC Strategic traffic model for the A12 MRN project from which extracts have been added below.

The primary reason for the A12 MRN scheme was the impact of traffic from already approved development works such as Sizewell C and East Anglia ONE North and East Anglia TWO Offshore Windfarms. The A12 MRN was intended to be completed by 2027 as the Suffolk County SATURN strategic traffic model assessment, in the Transport Assessment document, for the A12 MRN planning application is based on that assumption. https://suffolk.planning-register.co.uk/Document/Download?module=PLA&recordNumber=7188&planId=134455&imageId=22&isPlan=False&fileName=70120294-WSP-HGN-XX-RP-TR-001%20-%20Transport%20Assessment.pdf

The A12 MRN is now stated by SCC ([redacted] OFH3) to hopefully receive planning approval no earlier than this summer. Construction will be from mid-2027 (earliest) to mid-2029.

The reporting on the modelling assessment in Chapter 7 does include modelling for a 2027 Do Minimum (DM) scenario which is pertinent to the early years for Sealink and Lionlink and delay details for key junctions and the single carriageway section between the B1438 and B1079 (confusingly referred to as A12 northbound and Southbound Dual Carriageway in the Figure 7-7, reproduced below, with peak hours am between 08:00-09:00 and evening 17:00-18:00.

Table 7-7 – Average junction delay (seconds) – 2027

Junction	DM AM	DS AM	DM PM	DS PM
A12-A14 Seven Hills	33	12	23	9
A12-Foxhall Road	21	9	43	11
A12-Adastral Park access	17	18	16	17
A12-Barrack Square-Eagle Way	16	12	13	10
Barrack Square - Gloster Road	7	8	5	8
A12-Anson Road-Eagle Way	6	10	30	13
Anson Road-Beardmore Park-Tesco	6	13	7	18
A12-Main Road-P&R	20	19	19	19
A12-B1438	8	6	9	6
A12 Northbound dual (south of Grundisburgh Rd)	16	1	20	1
A12 Southbound dual (south of Grundisburgh Rd)	61	2	20	1
A12-B1079 Grundisburgh Road	9	16	9	13
A12-A1152 Woods Lane	9	6	8	7

Table 7-7 illustrate the single carriageway section between the B1438 and B1069 (referenced as A12 Northbound Dual and A12 Southbound Dual in the above extracted table) forms a marked capacity constraint during peak hours and, given that the combined Sizewell C and Sealink traffic will form a second higher peak each day at earlier and later hours delays can be expected to be even more marked than illustrated in the figures.

Table 10-37 shows under RFC the % of traffic capacity utilised and with Sizewell C and East Anglia ONE North and East Anglia TWO Offshore Windfarms traffic capacity is slightly exceeded. Thus, additional Sealink traffic will have a significant impact.

Table 10-37 – Existing A12/ Grundisburgh Road Roundabout (2027 Do Minimum)

	Queue (PCU) AM	Delay (s) AM	RFC AM	Queue (PCU) PM	Delay (s) PM	RFC PM
A12 N	14.7	25	92.9%	16.3	29	94.1%
B1079 E	6.1	67	78.0%	3.2	44	67.5%
A12 S	49.5	86	103.3%	34.4	62	100.2%
B1079 W	28.1	257	98.8%	4.3	43	61.0%

Even in the absence of the A12 MRN construction works in early 2027 ESCEP's view is that capacity exceedance issues and associated additional delays with additional Sealink traffic this will lead to driver elective diversion along the B1438 through the centre of Woodbridge, Melton and Ufford raising traffic levels significantly. Once A12 MRN construction works commence delays will inevitably be greater due to traffic management and the works office access along that length They will be particularly severe when the B1069 roundabout junction is remodelled from two to three lane and tie ins for the new offline dual carriageway are built.

Whilst ESCEP Sealink's traffic will be lower in volume than Sizewell C and East Anglia ONE North and East Anglia TWO Offshore Windfarms traffic it is 'the straw that will break the camel's back' leading to substantive volumes of traffic diverting onto the B1438. Further ESCEP consider at peak Sealink worker traffic levels it will raise impact on the B1438 from driver elective diversion to medium to large as defined in Table 7-10 of APP-054 and medium to large significance as defined in Table 7-13.

ESCEP understand the impact of the additional worker traffic for Sealink, let alone Lionlink, has not modelled by the Applicant or by SCC via the SCC Strategic traffic model thus there is no assessment of the wider impact of Sealink's traffic on the local highways network remote from the very limited area where the Applicant has examined junction movements. It is ESCEP understand the Applicant has declined to undertake such an assessment for the A12 or other roads south of the A1094 or the A1094/B1078 junction.

For all the above reasons ESCEP's view is that during Sealink's peak staffing periods the Applicant should be required to set up a temporary Park & Ride at the Martlesham Park & Ride. This has been a Sizewell C temporary solution under it recently opened an initial part of its Southern Park & Ride site.

AIL access route via Benhall Bridge

In the vicinity of the site, the Applicant appears to maintain a preference to construct and dismantle a 'mini bridge' over the Benhall rail bridge for each AIL vehicle accessing the site via access road across the River Fromus. Its sister company, National Grid Ventures, is also intending to use the same option for Lionlink. The construct/dismantling the 'mini bridge' each time will led to significant traffic diversion as the B1121 will be closed at the Benhall Bridge for a period of days each time. Traffic to/from the A12 to/from Saxmundham will primarily divert via the B1119 into/out of Saxmundham increasing traffic volumes crossing the unrestricted (60mph) A12 including HGV and buses.

Additional traffic is also likely to use the A1094, and then the unclassified and narrow Sternfield Road/Church Hill, to reach Benhall and Sternfield. It is unclear whether, with the option of constructing/dismantling a 'mini bridge' for each AIL crossing of Benhall Rail Bridge Sealink HGVs will use this route to reach the River Fromus access road.

ESCEP is strongly of the opinion that the Applicant should be required to strengthen the Benhall bridge to avoid repeated traffic diversions or preferably utilise the alternative northern route proposed by SCC at Deadline 4.

With respect to public transportation the Applicant preferred proposal to construct and dismantle a 'mini bridge' over the Benhall rail bridge for each AIL vehicle will severely impact residents without cars as one of the principal East Suffolk bus service, the 64 from Ipswich to Aldeburgh passes along the B1121. It is likely that the bus will divert via the A12 and B1119 and there is no suitable alternative route. There would be no alternative bus stop for residents of Benhall during the periods the B1121 is closed, they would have to walk to/from Saxmundham. A bus stop on the A12 is not a viable option. Whilst ESCEP understands the Applicant has proposed free taxis for residents of Whitearch during these periods ESCEP consider such a service should also be made available to other local residents of Benhall and Sternfield.
The Applicant preferred proposal to construct and dismantle a 'mini bridge' over the Benhall rail bridge for each AIL vehicle will also severely impact the East Suffolk line passenger rail service. ESCEP believe that Network Rail will require line closure for the constructing and dismantling of the 'mini bridge' and given the commitment to rail freight to Sizewell C the closures are likely to be daytime. Whilst rail replacement buses would be provided by the rail operator there would be significant delay as the rail time from Saxmundham to Ipswich is 35-40 minutes. A rail replacement bus calling at Campsea Ashe (Wickham Market station), Melton and Woodbridge stations takes 75-90 minutes even outside peak traffic times.

These impacts could be avoided if a northern AIL route is required by the DCO and be to a degree minimised if bridge strengthening was adopted for Benhall Bridge. However, the proposed continuous 28 period for those strengthening work would severely impact rail passengers particularly daily commuters.