

SEAS D6 RESPONSE to
ISH3, Action Points and ExQ3
TRAFFIC & TRANSPORT

SEA LINK: EN020026
DEADLINE: 4 – 10 February 2026

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Introduction

1. This submission addresses the Applicant's traffic assessment, having regard to Deadline 5, ISH3, the Action Points and ExQ3.

2. SEAS is concerned by the Applicant's continued resistance to revising its assessment methodology and maintains that key transport impacts remain inadequately assessed, with essential junction modelling for Suffolk still outstanding, the scope of analysis too limited, and cumulative and seasonal effects not properly considered, leaving fundamental questions about network capacity, baseline data reliability, and overall impacts unresolved.

3. Set out below is the SEAS traffic and transport expert report on ISH3, the Action Points and ExQ3.

Technical Note

Project: Suffolk Energy Action Solutions

Subject: ISH 3 Response

Client:	Suffolk Energy Action Solutions	Version:	D
Project No:	07705	Author:	RE
Date:	08/04/2026	Approved:	CA

I Introduction

- 1.1.1 PJA have been appointed by Suffolk Energy Action Solutions (SEAS) to review the highways and transportation evidence submitted by NGET in support of the DCO application.
- 1.1.2 This Technical Note considers the matters raised at Issue Specific Hearing 3, the deadline 5 submissions, the IHS3 action points and the EXQ3 Examiner questions. These are considered in turn in the remainder of this note.

2 Issue Specific Hearing 3 (ISH3)

- 2.1.1 In response to the issues raised at the ISH3 hearing, we firstly note that at ISH2 it was agreed that the applicant would undertake a programme of detailed junction modelling within the study area. It is evident that this work has not been completed and submitted to the examination to date. As we stated at the ISH2 hearings, this is a critical piece of work to understand the impact of the development.
- 2.1.2 However, the equivalent work has been carried out for the Kent study, the modelling for the Suffolk area remains outstanding.
- 2.1.3 We share Suffolk County Council's (SCC) frustrations that despite asking for this modelling work to be carried out on numerous occasions, such a fundamental piece of work and its subsequent conclusions remain completely absent.
- 2.1.4 The need for junction modelling was set out in our June 2025 Transport Report (**document reference 07705/A**), which informed the SEAS Relevant Representation [**RR-5210**]. It was also identified by the County Council in their Local Impact report (**REP1-130**).

- 2.1.5 We also share SCC's concerns that the modelling scope has been arbitrarily limited to just three locations, the applicant has identified. A total of 14 junctions were surveyed as part of the data collection exercise and the proper process would be to consider the impact at all of these and discount those at which impacts are minimal, before determining the scope of detailed modelling.
- 2.1.6 We share the Councils concern that they would like to see junction modelling for a wider range of junctions. This needs to properly consider not only the proposed sites traffic but also the considerable cumulative development trips associated with other proposals.
- 2.1.7 The Applicant is effectively still agreeing the basic scope of the work with the overseeing Highway Authority, at this late juncture in the process. This is of considerable concern along with the absence of what are fundamental questions and impacts of the development transport implications.
- 2.1.8 We understand the junction modelling work is to be released to the Council on the 1st of April and issued before the next deadline. To reiterate this is a fundamental piece of assessment and it's disappointing that the scope of this work hasn't been agreed at this stage, never mind the conclusions.
- 2.1.9 We also note to date the applicant has not explicitly modelled any cumulative impacts, merely presented forecasts of traffic future flows and relied on the application having a low percentage impact to discount further assessment. We note SCC share our concerns about cumulative impacts and this needs to be explored fully in the junction modelling.
- 2.1.10 The Applicant seems reluctant to accept the importance of looking at absolute impacts at key junctions and not just the percentage changes from the proposal. Without understanding the existing performance of the junction and its current capacity, it is impossible to understand the implications of additional traffic. For junctions at or near capacity, even small changes may have severe adverse impacts.
- 2.1.11 Our concerns regarding the adequacy of the base survey data used to underpin the entire exercise and the collection of data in non-neutral months, remains a fundamental flaw in the work to date (and that pending) and one the applicant seems reluctant to explore. Despite data being available to explore the implications of neutral months, peak periods and seasonality, which are available in our June 2025 report.
- 2.1.12 At ISH2, proposed journey time data was to be provided by the Applicant to assist with understanding the impacts of the scheme. We understand this is now not to be provided.

Although the Council have a strategic model that would have provided an appropriate tool to explore this, the Applicant isn't seeking to do so.

2.1.13 In summary, our concerns that we have raised throughout the process remain almost entirely unaddressed by the applicant and fundamental issues around traffic impacts and cumulative impacts simply remain unanswered.

3 Deadline 5 Submissions

3.1.1 We note the Construction Traffic Management Plan (REP5-065) has been updated and reissued. This includes the introduction of some caps on HGV numbers, which is generally welcome. Although this is limited to the junction of the B1121/B1119 in Saxmundham and is in advance of any detailed junction modelling at this location.

4 ISH 3 Action Points

4.1.1 In respect to the ISH3 Action points, given the above we consider items 7, 20 and 24 to be the key issues that require immediate action. These are summarised below:

- **7. SCC and the applicant to meet to discuss whether journey time analysis, particularly for the A12 in the area of the proposed development in Suffolk, could be produced, maybe with the use of the junction modelling. Provide an update at DL6.**
- **20. Provide a joint submission from the applicant and SCC on the junction modelling, with a conclusion of how this influences the overall cumulative traffic assessment for Suffolk and whether this indicates the need for mitigation.**
- **24. Given the winter months the applicant undertook baseline traffic surveys, does there need to be a seasonal adjustment with the junction modelling to take into account busier summer months with tourism traffic? If so, please include with the junction modelling.**

4.1.2 With regard to point 24, we note data exists to allow adjustments to be made to reflect reasonable adjustments. Whilst the surveys were inexplicably carried out in the non-neutral months of January and February, our June 2025 Transport Report (document reference 07705/A), which informed the SEAS Relevant Representation [RR-5210] includes seasonal data.

5 EXQ3 Examiner Questions

- 5.1.1 With regard to the examiner questions, in a similar vein we would identify 3TT3., 3TT4., and 3TT5., as the key questions in relation to action points described above.