



Written Summary of sundry matters outstanding at DL7 – Traffic and Transport

In our submissions at DL6 (REP6-176, written summary of oral statement at OFH3, and REP6-177, Written Statement following ISH3) we raised among other issues the three Traffic and Transport issues set out below; and we are not convinced that any of these have yet been satisfactorily resolved, for the reasons given.

1 Baseline adopted

- The traffic baseline data adopted by the Applicant was taken in supposedly 'neutral' months, January and February, and this unreasonable decision has been heavily criticised by many Interested Parties, including statutory bodies. The Applicant nevertheless claims once again (for example REP6-108 section 4) that 'worst case' data has been used, regardless of this inappropriate choice of baseline. Further, the Applicant at ISH3 and therefore in REP6-108 continues to confuse quantitative impact with relative impact – yet again the claim at ISH3 and since has been that '...in proportional terms, the [traffic] impact would be negligible...', or at greater length: '*In relation to seasonality of the Baseline data, the Applicant confirmed that this matter has been addressed and not disregarded. The Applicant explained that use of a neutral month traffic survey data for the Baseline (in this case winter months) results in a lower Baseline traffic level, which in turn produces a greater apparent scheme impact. Conversely, a higher seasonal Baseline would reduce the relative effect of the Proposed Development...*' (REP6-108 p10).

The *relative* effect is not at issue. Local people will not care which *proportion* of the lorries blocking a junction or delaying their commute belong to which energy project contractor. NGET have failed to explain how having a *higher* baseline and adding HGV traffic to it can result in a *lower* impact overall on the road and the road's users.

2 Junction modelling

- The selection of junctions for modelling remains inadequate and particularly excludes the A1094/B1069 Church Common junction. We note that SCC were unable to submit responses to ExA's written questions on a number of issues (eg 3TT4, 3TT5) owing to the late delivery of modelling data, and thus at deadline 7 this issue remains entirely unresolved for Interested Parties.

3 Secondary traffic impacts outside the study area ('rat-running')

- We have seen no evidence that a proper assessment of the impact of Sea Link's contractors' traffic impacts *on smaller roads outside the study area* has been carried out.

In conclusion, we should stress that the Applicant's *attitude* to these issues is irrelevant – it is the outcomes of their impact assessments as either significant or negligible that is at issue, and therefore the validity of their argument.

But in this regard we were very unimpressed with these two statements on the potential imposition of HGV caps, made in REP6-108 on p14, almost within the same paragraph, and certainly within the same argument:

A *The Applicant noted that **experience on other projects** has demonstrated that fixed caps can be difficult to operate in practice and can have a significant adverse effect on construction programmes and efficiency*

B *The Applicant emphasised that **comparisons with other schemes** are not directly transferrable and that the Proposed Development must be considered on its own merits.*

It really has to be one or the other, and this inconsistent approach to evidential and comparative analysis underlies far too much of the Applicant's arguments, written or otherwise.

At this last Deadline, we would like to express our gratitude to the Examining Authority for their efficient and impartial approach to this Examination, and for the opportunities given for comment and evidence from Interested Parties.

Snape PC

29/04/2026