SEAS D7 RESPONSE to D6 sumbissions

TRAFFIC & TRANSPORT

SEA LINK: EN020026 SEAS IP: [redacted]
DEADLINE: 6 – 29 April 2026 Date: 29 April 2026

Introduction

1. Suffolk Energy Action Solutions (SEAS) submits this response to the Applicant's Deadline 6 submissions to highlight a number of fundamental and unresolved deficiencies in the highways and transport evidence. Despite further material being provided, the core concerns raised by SEAS throughout the Examination remain largely unaddressed.

2. The Applicant's assessment continues to rely on flawed baseline data, unrealistic assumptions, and a limited scope of analysis, and where impacts are identified, effective and enforceable mitigation is often absent. As a result, the Applicant has failed to present a robust or credible assessment of the likely impacts of the proposed development on the local highway network and surrounding communities. Taken together, these shortcomings create a clear and unacceptable level of uncertainty, and SEAS considers that the current evidence base cannot be relied upon to support the application.

3. Set out below is the SEAS traffic and transport expert Richard Ellams' PJA report on D6:

Technical Note

Project: **Suffolk Energy Action Solutions**

Subject: **Deadline 6 submission review**

Client:	Suffolk Energy Action Solutions	**Version:**	D
Project No:	07705	**Author:**	RE
Date:	29/04/2026	**Approved:**	CA

1 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 Sealink DCO application.

1.1.2 This Technical Note considers the information submitted at Deadline 6, which is considered in detail in the remainder of this note.

2 Updated Transport Assessment Note

2.1.1 The updated version of the Environmental Statement Appendix 2.7A Transport Assessment Note (TA) (ref: ENO20026 – 003230), contains the detailed junction modelling which SEAS have requested be undertaken in previous submissions.

2.2 General comments on the approach

2.2.1 Whilst the preparation of some limited junction modelling is welcome, concerns remain about the general approach adopted, the scope and also the initial results presented. In respect to the general approach, we would note the following:

Peak spreading

2.2.2 The junction modelling carried out considers the development peak hour and the network peak hour, the former typically being the hour before or after the busiest period on the wider network. It is evident at each of the three junctions modelled that assumptions are heavily weighted to Sealink trips being pushed outside the busy network peaks and thus avoiding this clash with peak conditions. As illustrated in Figure 1 , which presents an extract of Table 10.1 from the TAN.

Figure 1: Extract of Table 10.1 from the TAN

Scenario	AM Dev Peak (07:00-08:00)	AM Network Peak (08:00-09:00)	PM Network Peak (17:00-18:00)	PM Dev Peak (18:00-19:00)
2028 Base	1,004	1,186	945	569
Proposed Project (Busiest Day)	177	36	19	175
Total	1,180	1,221	964	744
% Increase	**17.6%**	**3.0%**	**2.0%**	**30.8%**
Cumulative	333	307	288	356

2.2.3 As can be seen the vast majority of Sealink traffic (c90%) is pushed outside the network peaks, on the premise that access times will be controlled via the CTMP. This is an overly favourable assumption and one we would doubt in practice will be able to be managed to anywhere near this extent. This is repeated all locations and has a considerable impact of the percentage impacts of the application and the subsequent impacts at key junctions.

2.2.4 The Applicant continually references low percentage impacts at peak times, and thus suggests relatively limited impacts, but this is because it is assumed the majority of development trips are simply pushed outside the peak hours.

2.2.5 If this is to be relied upon to manage the impact of the development, as a minimum there should be considerable planning controls put in place to ensure this is the case. Caps on peak hour trips at the moment are largely aspirational and not firm, controlled commitments.

Sensitivity tests

2.2.6 The Applicant has sought to present a sensitivity test to address long standing concerns about the base data used from the non-neutral months of January and February, using seasonality factors calculated based on the COBA Manual. It is unclear why they have used theoretical COBA factors rather than actual data, which is available and presented in our June 2025 report. Nevertheless, the sensitivity tests present a 20% increase in base flows. We would suggest this is not a sensitivity test but actually the correct baseline position, rectifying the error of conducting surveys in non-neutral months.

Scope and extent of junction modelling

2.2.7 The Deadline 4 submission made by the Council identifies 14 junctions for consideration as part of the junction modelling exercise. Only three of these have been taken forward for assessment, mainly on the basis of the relative impact of the application on each.

2.2.8 As noted previously, our fundamental concern relates to a failure to understanding the existing situation and then the absolute impact of this development and the extensive commitment development upon these locations. This remains absent at all these other 11 locations, and they are largely discounted on relatively low percentage changes from application site trips. There remains no understanding of the existing performance of these junctions and their sensitivity to small changes in additional trips nor the need for mitigation. Again, the low percentage impact is often down to trips being pushed outside the peak hours.

2.3 Junction of the A12/B1121

2.3.1 The junction modelling of this major junction with the A12 in the TAN shows very modest levels of queuing, delay and congestion at the junction. However, of particular concern is the volume of base traffic included in the model runs, which seem so low, we would question whether they are correct.

2.3.2 The base 2024 flows adopted show the following total volumes of traffic at this junction, as shown in Table 1 .

Table 1: Modelled Base flows at the junction of the A12 and B1121

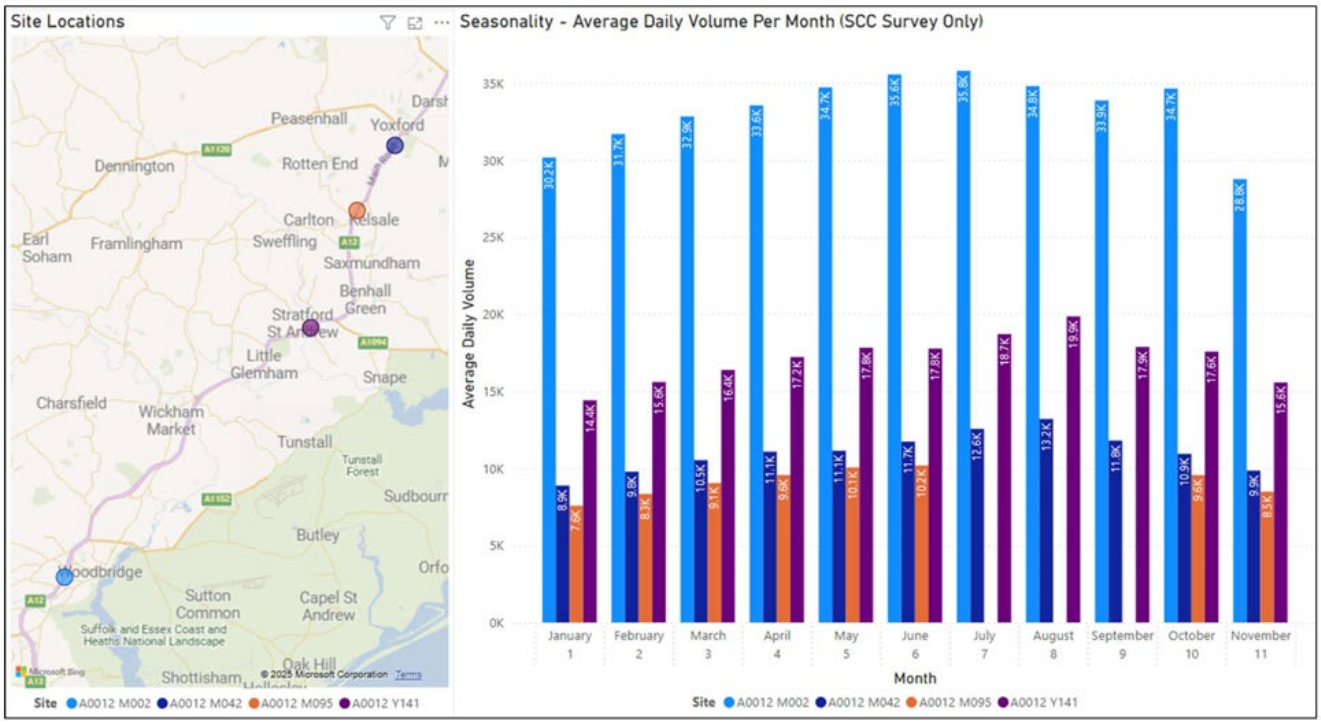
	Total junction flow
2024 AM Base Development Peak flow	969
2024 AM Base Network peak flow	1,145
2024 PM Base Development Peak flow	882
2024 PM Base Network peak flow	539

2.3.3 Using the general rule of thumb that the peak hour flows would be 10% of the daily flow, based on these levels of demand the flow on the A12 would be between 5,000 and 11,000 trips per day.

2.3.4 As set out in our June 2025 Transport Report (***document reference 07705/A)***, which informed the SEAS Relevant Representation ***[RR-5210***]. Flows on the A12 in the vicinity of the junction appear much higher than forecast in the junction modelling.

2.3.5 Figure 2 below, extracted from our June 2025 report shows typically daily flows on the A12.

Figure 2: A12 Seasonality – SCC ATCs



2.3.6 Flows at the nearest ATC location to this junction range from broadly 14,000 to 20,000. With an average flows of 17,000 vehicles per day at this location, again using the 10% rule, one would expect flows at the junction to be c1,700 vehicles per hour. In the busy summer months this would increase to c2,000 vehicles per hour.

2.3.7 This discrepancy is such we would question if the base flows used are correct. Notwithstanding that, even if they are, it is evident that the use of non-neutral January/February data is considerably underestimating traffic flows at this particular location.

2.4 Junction of the A1094 Aldeburgh Road/ B1069 Snape Road

2.4.1 The junction modelling of this location shows it to be operating **over capacity in all scenarios**. To the point in the scenarios with both proposed and committed development it is operating considerably over capacity with significant adverse and severe impacts.

2.4.2 As we noted above and in other representations for SEAS, it is critical when assessing relative impacts to understand the baseline position, rather than rely on just relative percentage changes as the barometer of impact.

2.4.3 The results for this location are clear example of this concern. In paragraph 10.6.9 of the TAN it notes:

"In summary, the A1094 Aldeburgh Road/ B1069 Snape Road junction is expected to operate over capacity during the peak construction year (2028) with and without the Proposed Project. The junction modelling undertaken as part of Sizewell C also showed this junction to operate over practical capacity (RFC value of more than 0.85) between 7am-8am and 3-4pm, as well as over theoretical capacity (RFC value of more than 1.0) between 5pm-6pm, during the peak construction phase (2028) of Sizewell C."

2.4.4 There is clearly a capacity issue at this location, which isn't just limited to the busiest peak hours but also prolonged over the periods before and after. Indeed, it is observed in all scenarios modelled and is considerable when all developments are included.

2.4.5 In respect to the need for physical mitigation to offset these impacts, the applicant states at paragraph 10.6.10

"In view of the above, it is not considered that peak construction traffic associated with the Proposed Project will materially affect the operation of this junction. Although it is acknowledged that congestion and delays will increase, the junction will already be operating over capacity without the Proposed Project and the modelling software is not well suited to model the impact of additional traffic on approaches already operating above theoretical capacity, tending to exaggerate the resultant increase in queue lengths. The modelling has been carried out for the single busiest day in terms of construction traffic levels associated with the Proposed Project, which also includes an element of double-counting of trips under the cumulative scenarios associated with the construction of Friston substation (i.e. EA1N/ EA2). Average construction traffic levels associated with accesses S-BM03 and S-BM04 during the peak construction phase (2028) will be around 55% lower through this junction than the levels modelled for the busiest day, reducing the potential for impacts to arise as a result of the Proposed Project."

2.4.6 By way of context, in the All-development scenario (i.e. including both all committed development and Sealink) in the PM peak period, queue lengths on the side road approach are in excess of 150 vehicles and with vehicles experiencing a delay of c25 minutes. We would consider this to be a severe impact in the context of the NPPF and warrant physical mitigation. These values increase to 236 vehicles and c40 mins in the equivalent Sensitivity test scenario.

2.4.7 The applicant goes on to suggest non-physical mitigation by staggering construction movements, yet as set out above this is effectively already assumed in the modelling.

"Notwithstanding the above, it is proposed to adopt the same additional mitigation as that adopted by the East Anglia ONE North and East Anglia TWO projects at the A1094/ B1069 junction, to manage construction worker traffic movements through this junction to reduce potential impacts. This would involve managing construction workers associated with accesses S-BM03 and S-BM04 during the AM development peak hour (7am-8am) and the PM development peak hour (6pm-7pm) to reduce potential impacts along the A1094 and B1069 (via the junction) at these times. "

2.4.8 It is not only already assumed in the modelling, but also realistically unlikely to be controlled nor adequately enforced, as there aren't suitable controls in place to enforce it.

2.4.9 Give the junction modelling carried out at this location, we can only conclude physical mitigation measures are required to offset the severe impacts observed.

2.5 Junction of A1094 Aldeburgh Road/ B1121 Aldeburgh Road

2.5.1 The impacts at this junction from a capacity perspective appear modest but our concern regarding the base data used, which underpins the entire exercise and spreading of development trips outside the peak periods remains.

3 Supplement to the Preliminary Cumulative Highway Impact Assessment

3.1.1 *Document 9.105: Supplement to the Preliminary Cumulative Highway Impact Assessment in Suffolk* has been updated to provide further details on the anticipated timing of peak traffic flows associated with the Suffolk Onshore Scheme and cumulative schemes, across the highway network. We would note the document does not include any modelling or consideration of the cumulative impacts, merely a summary of the changes in traffic flows at key locations.

3.1.2 We would note, whilst the change in cumulative traffic flows from this specific development is not clearly set out in the document. It is evident from the Tables in Appendix A and B, there are numerous junctions where traffic flows increase substantially with all of the committed development proposed. As set out in paragraphs 2.3.1 and 2.3.2 above, there needs to be a clear understanding of the existing performance of these junctions and their subsequently performance post development/committed development.

4 Benhall Railway Bridge

4.1.1 Our previous concerns raised about the use of the Benhall Railway bridge as the Applicant's preferred access route remain. The route is constrained by structural uncertainty, untested

mitigation, significant programme risk and permanent environmental and heritage impacts, particularly on the Fromus Valley and the setting of Hurts Hall. It is unclear how the applicant can ascertain the duration of potential mitigation works, when the condition of the bridge hasn't been established.

4.1.2 As with much of the transport evidence base to date, there hasn't been a comprehensive assessment of options considered and detailed analysis. Again, as in our previous concerns about the Benhall Bridge and its feasibility, if this option isn't feasible there is a need to properly consider alternatives.

4.1.3 This has implications not only in the transport appraisal carried out but also in the environmental assessments and EIA. If this route isn't feasible, traffic will be forced to use alternative routes to access the proposal.