Suffolk County Council

SEA LINK

EN020026

Post-Examination Submission: Review of 6.3.2.7.A (B) Environmental Statement Appendix 2.7.A Transport Assessment Note [REP6-039]

Suffolk County Council

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1 Purpose of submission

1.1 The purpose of this submission is to provide the Secretary of State with the review of the Applicant's junction modelling commissioned by Suffolk County Council. As explained during the Council's response to the ExA's Rule 17 letter dated 21 April 2026 [REP7-368], the late nature of the Applicant's submission of the junction modelling meant it was not possible to submit the commissioned review during the examination period. However, the review has now been completed and the Council requests that the Secretary of State accepts the submission in order for it to be considered during the decision period for the application.

1.2 The Council has sought engagement with the Applicant following the completion of this review. However, it has not been possible for a meeting to take place as of the submission of this document. The Council has decided to submit this review in any case in order to maximise the opportunity for it to be considered during the decision period. The Secretary of State may, for instance, wish to issue questions based on the contents of this document. The Council will continue to seek engagement with the Applicant regarding the contents of this review.

1.3 It should be noted that the issues raised in the enclosed review range in severity using a RAG grading system. Certain concerns graded in the lower severity categories include questions of clarification which may be possible to resolve through engagement with the Applicant. More serious concerns, however, are unlikely to be resolved without changes to the junction modelling itself, which includes technical aspects such as scope, methodology and conclusions. As a result, the Council considers that engagement alone cannot resolve the issues raised in this review and that further assessment work and revision to the modelling submission [REP6-039] is necessary for there to be a robust evidence base to justify conclusions made in the Environmental Statement.

1.4 This document should be read in conjunction with the Council's submissions made during examination, particularly in relation to previous comments made about the Applicant's junction modelling. The Council made preliminary comments criticising the modelling for reasons such as the scope of junctions included at several points during the examination. The relevant parts of the Council's submissions include the response to questions 7.7 and 7.12 of the Rule 17 letter dated 21 April 2026 [REP7-368], section 4 of the Council's post-hearing submission following ISH 3 [REP6-182], response to Action Points 11, 22, 23 and 24 arising from ISH 3 [REP6-184], paragraphs 3.33 to 3.38 of [REP7-367] and table 3.15 of the signed Statement of Common Ground [REP7-355].

M GROUP
Transport

Transport Assessment Review

Sea Link Nationally Significant Infrastructure Project, Suffolk

Version	Purpose	Originated	Checked	Reviewed	Authorised	Date
1.0	Transport Assessment Review	SP	SP	SP	SP	**21/05/2026**
2.0	Post-SCC discussion revision	SP	SP	SP	SP	**30/06/2026**

Background

The document reviewed is a Transport Assessment (TA) submitted to Suffolk County Council (SCC) in April 2026 by National Grid Electricity Transmission plc (National Grid). The primary focus of the review is on the modelling (and supporting evidence) undertaken.

The application is for a Nationally Significant Infrastructure Project (NSIP) seeking development consent to reinforce the electricity transmission system in the South-East and East Anglia, through reinforcing the High Voltage Direct Current (HVDC) Link between the proposed Friston substation in the Sizewell area of Suffolk and the existing Richborough to Canterbury overhead line close to Richborough in Kent. The TA focuses on the effects of construction traffic (**not** traffic associated with operation and maintenance, which are deemed negligible). It should be noted that this TA makes heavy use of references to other documents associated with the applications such as Application Document 7.5.1.1 Outline CTMTP - Suffolk and Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport. This review therefore refers to information from these documents as well.

For ease of interpretation the review is presented in the form of a table, where each row describes an aspect of the assessment, provides M Group's commentary, and then assigns a RAG rating. The RAG rating acts as a guide for the acceptability of information, and should be interpreted as follows:

Rating	Description
Red	Critical – information is not deemed acceptable or violates current guidance. The assessment will require revision with likely impact on findings.

Rating	Description
Amber / Red	Information is not likely to be acceptable and strong justification is required.
Amber	Information may be acceptable but greater clarity or justification is required.
Amber / Green	Information is likely to be acceptable, but some clarification would be welcome.
Green	Sufficient information is provided and no action is required.

Transport Assessment Comments

Section No.	Description	Comments	RAG Rating
1.2.5	The Proposed Project is expected to generate a low level of vehicle movements during the operational and maintenance phase, and a review of operational phase transport effects has been excluded from the scope of the assessment. This is consistent with the advice received from the Planning Inspectorate in the Scoping Opinion published in December 2022 (Application Document 6.15 Scoping Opinion 2022).	This information is welcomed.	G
Section 2	Outlines the history of meetings and decisions between stakeholders and the applicant and the rationale behind various documents contents.	This information is welcomed.	G
Section 3 / 4	Outline where national and local policy contexts can be found among other documents.	NPPG, NPPF, Suffolk's LTP (2025 – 2040), the Suffolk Coastal Local Plan and Waveney Local Plan are referenced within Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport, which covers national and local policy contexts.	G
Section 6 / Application Document 6.2.2.7 Part 2 Suffolk	Describes the personal injury collision data used. The period covers November 2018 through October 2023, and it is	Although three typical years of data are represented in this period, there are conclusions about locations being sensitive if there are five collisions recorded over five years.	A

Section No.	Description	Comments	RAG Rating
Chapter 7 Traffic and Transport para 7.7.7	acknowledged that Covid-19 restrictions occurred in this period.	An additional two years' worth of collision data should be used and the Covid-19 affected years excluded. This would appropriately satisfy national guidance on transport assessments which states that five years should be used if the site is within a high accident area. A reference to the commitment to monitor collisions as part of the CTMP could be made here.	
4.1.1 / Application Document 6.3.2.7.G Appendix 2.7.G Traffic Flow Diagram	The Traffic Flow Diagram showing distribution of trips generated under different scenarios and time periods.	The values have been reviewed and appear to be logical and appropriate.	**G**
5.1.3	Rationale is provided for the exclusion of some junctions from modelling. This is primarily based on whether the junction receives 30+ PCUs as per withdrawn guidance from DfT.	The use of the 30+ two-way PCUs trigger is still commonly used for determining locations to investigate and is considered appropriate. The A12 / B1119 priority junction and A12 / Carlton Rd priority junction have been eliminated on the basis that vehicles associated with the site will not use the minor arm, and therefore not need to turn or interact with other vehicles. This is not a suitable rationale, as the site traffic will be contributing to the opposing flow for the minor arms at each junction, potentially making it more difficult for them find gaps to join the A12.	**R**
5.1.4	Rationale has been given to eliminate junctions from further assessment on the basis that they are outside of the study area agreed with SCC.	It is noted from conversations with SCC that the final study area has not been agreed as such in writing, and it is expected that it is grounded in the quantum of traffic. It is recommended that the traffic distributions form the basis for establishing the study area, with all junctions and links experiencing 30+ two-way PCUs as a result of the development being considered for the assessment and thus forming the study area.	**R**
Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport **Para 7.9.10**	Outlines the construction programme, working hours, and assessment parameters	The weekday assessment uses 07:00 – 08:00 and 18:00 – 19:00 peak shoulders Monday to Friday. It is stated that this has been done rather than following the expected majority 06:00 – 07:00 arrival and 19:00 – 20:00 departure patterns. Given there are other NSIPs in the area, which will use similar assumptions in working patterns (where workers are expected to arrive just outside the traditional network peaks) – an analysis should be undertaken to determine if the network peak hour is at risk of shifting, therefore	**A / R**

Section No.	Description	Comments	RAG Rating
		changing the timeframe that should be considered for analysis. During the weekday, LGV movements have been distributed across a 07:00 – 19:00 based on a flat profile. Is this based off any particular evidence source or logic? Is there a likelihood that LGVs will arrive in a cluster in any particular period, such as at the beginning of the day? Are crew buses considered in this estimate?	
6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport **Para 7.9.12**	2028 forecast traffic flows have been used as the forecast baseline against highest construction traffic flows for each part of the network – which varies throughout 2026, 2027, and 2028.	This would appear to be appropriate and prudent.	**G**
6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport **Para 7.7.33 & 7.7.34**	Future network improvements have been identified including A12 bypass, Yoxford Roundabout, Sizewell Link Road, and Junction improvements along A12 associated with East Anglia ONE and TWO offshore wind farms. None of these improvements have been included to demonstrate robustness.	Although these schemes are expected to improve network capacity in their own right, this can often mean that traffic flows redistribute as a result of these schemes. The scheme locations may be bottle-necking flows in their current state, and new trips may be drawn from alternative routes as the improved route becomes more attractive. Furthermore, the proposed schemes may only be designed to a certain capacity, either on the basis of not over-engineering or for controlling traffic. Have these schemes been assessed to determine these possibilities, and if so can any associated reasoning be provided? It is expected that the strategic model of Suffolk would be able to provide forecast flows that include schemes of appropriate certainty (typically those regarded as "Near Certain" or "More than likely" as per definitions in TAG Unit M4 Table A2).	**A / R**
Section 9	Outlines the Cumulative Developments considered as part of the TA and how they have been applied to the modelling. These include: The Sizewell C – Main Development Site (ID1) – construction phase; East Anglia ONE North Offshore Windfarm (ID5) – construction phase;	The derivation of trips associated with Sizewell C, East Anglia ONE, East Anglia TWO, LionLink, and Sizewell A appear to be appropriate. Trips are based on the construction phase of each development. For the Leisure and Residential developments, the operational phase has been assumed. For the Leisure and Residential developments (ID221, ID240 & ID245), the estimated completion dates from the applications would clarify the assumption that they would be operational by the time the proposed project is in the construction phase. It may be the case that some developments are partially built out, and therefore it would be	**A**

Section No.	Description	Comments	RAG Rating
	East Anglia TWO Offshore Windfarm (ID6) – construction phase; High Lodge Leisure (ID221) – operational phase; Residential Development, Brightwell Lakes (ID240) – operational phase; Residential Development, Darsham Station (ID245) – operational phase; LionLink Offshore Interconnector (ID287) – construction phase; and Sizewell A Power Station (ID305) – construction phase.	appropriate to assume a proportion of the trips generated by the full site. The level of certainty should also be ascertained – usually based on the planning permission status of the site – to determine if these should be included as part of the core forecast and therefore be removed from TEMPro forecasts via the Alternative Planning Assumptions (APA) tool.	
10.2.1	The "One Hour" option within Junctions 11 has been used to generate the flow profile across the modelled hour.	Assuming appropriate survey durations have been undertaken, demand in the Junctions models should be entered using the DIRECT method, which allows a site accurate multi-day average 15-minute profile of demand to be used.	**A / R**
10.2.2	Queue length surveys have been referenced.	Details of all surveys including queue length surveys, such as dates, duration, intervals, results, and relevant observations / conditions (such as weather, lighting, if any queues exceeded fields of view) should be detailed.	**A / R**
10.2.3	The method of determining how closely modelled queues reflect observed queues is outlined. The GEH statistic has been used, consistent with Application Document 6.3.3.7.A Appendix 3.7.A Kent Transport Assessment Note which itself states it is consistent with other consented development applications.	The GEH statistic within DfT's Transport Analysis Guidance is typically only used for comparing modelled vs observed link flow in model validation. Guidance for appropriately comparing modelled and observed queue length is notably non-prescriptive in TAG, and the use of GEH for this purpose is not necessarily incorrect but is also not considered widespread practice. A comparison between the modelled and observed maximum queue (i.e, the greatest queue in the entire period) and the modelled and observed average queue (calculated at regular intervals throughout the hour) is considered appropriate for determining if the model is calibrated for queues, along with verification that the pattern of queuing (i.e the queue on each movement in comparison to each other movement) is a good fit. TfL guidance uses the following means to determine if queues are accurately represented in a Junctions model: are modelled queue lengths within 2 PCU of	**A**

Section No.	Description	Comments	RAG Rating
		average observed queue, where the average observed queue is 10 PCUs or less? Are modelled queue lengths within 20% of average observed queue, where the average queue is greater than 10 PCUs?	
10.3.3 / 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport para 7.7.6	Traffic surveys including ATC and MCC have been undertaken in January & February 2024.	Further details about the surveys should be provided such as the survey dates, durations, time intervals, on-site conditions (such as weather and lighting) and classifications collected. Analysis should be presented to show that the MCC sites are considered to have been undertaken on representative days – the supporting ATCs, or the MCCs themselves if undertaken over multiple days, can be used to demonstrate this.	**A / R**
10.3.3 / 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport para 7.7.29	The derivation of growth factors using TEMPro V8.1 and NRTP 2022 is outlined.	The use of the "all roads" factors as opposed to by road type appears to apply up to an additional percentage point of growth and it is therefore considered appropriate to use (as it is unlikely to make a significant difference and errs on the side of caution). This section indicates a factor calculated for car driver / passenger trips only. Has the background growth in LGVs / HGVs been considered? It is typically expected to use National Road Traffic Projection (NRTP) values for calculating LGV and HGV growth, with TEMPro used to calculate car driver growth. It is unclear how or why the NRTP has been used to adjust TEMPRo, when TEMPRo figures alone would be appropriate for capturing growth. Residential & employment sites considered separately in the assessment (such as those in the cumulative assessment) may be appropriate to remove from TEMPro calculations using the Alternative Planning Assumptions (APA) function. Any numbers used in these calculations should be set out.	**A / R**
10.3.6 / 10.3.8	A sensitivity test has been undertaken that considers likely annual seasonality applied to the January / February based traffic surveys. Long-term traffic data is unavailable, and so the Seasonality Index value for the non built-up Principal network classification roads has been used from DMRB.	This sensitivity test continues to build on the worst-case scenarios in a manner consistent with other areas of the analysis. 10.3.8 argues that higher baseline flows should not be adopted as this would reduce the proportional impacts identified. It is stated that long term traffic data is unavailable. Can it be confirmed if data has been sought from SCC? Given the seasonality analysis indicates that there should be a 5 – 15% uplift applied to reflect average conditions across the year, a factor as such should	**A**

Section No.	Description	Comments	RAG Rating
		be considered as part of the core assumptions. This is regardless of the reduction in the proportional impact. It is acknowledged that the sensitivity test will provide a more pessimistic view than this.	
10.4.4, 10.5.4	The geometry for the A12 / B1121 junction and A1094 Aldeburgh Road / B1121 Aldeburgh Road junction have been calculated using OS mapping & satellite imagery with measurements made in AutoCAD.	This method is typically appropriate. However, it has been flagged that some locations in Suffolk have been poorly represented by OS mapping on other projects. A drawing illustrating the measurements taken would help determine that they are appropriate. Ideally topos or on-site measurements of geometries would be undertaken for the greatest accuracy.	**A / G**
10.6.11	For the A1094 Aldeburgh Road / B1069 Snape Road junction, mitigation measures in the form of construction worker traffic management have been proposed.	The CTMP paragraph 6.2.6 states that the Applicant will consider measures to reduce the number of peak year construction workers travelling during the development peak hours. The likely effects of this measure should be reflected in an appropriate modelling scenario to demonstrate the efficacy of the mitigation.	**A / R**
	Additional points identified from model proformas.		
All Models	A Default PCU value of 2.0 has been used to represent HGVs.	A more accurate PCU conversion factor should be calculated using the survey data, taking into consideration the mix of OGV1 and OGV2 classifications, which can be cross referenced against Table 7 of TAG Unit A5.4 Marginal External Costs.	**A / R**
A1094 Aldeburgh Road / B1096 Snape Road Model	An intercept adjustment of -95 PCU/Hr has been applied to stream B-AC, in order to calibrate to observed queueing. Discussions have also been undertaken around measurements of the minor arm – which are based on previous modelling undertaken for Sizewell C site.	The queue comparisons should be provided to make the reasoning for the adjustment clear, and potential reasons for significant departure from defaults (-95 is an approximate 15% reduction) should be set out. Although the minor arm geometry has been taken from a previously accepted model, given intercept adjustments have been applied anyway, it is suggested that this is also addressed as part of any model updates.	**R**

Conclusions and Recommendations

The table below summarises the RAG ratings for this review.

RAG	Quantity
R	3
A / R	8
A	4
A / G	1
G	5