

**A30 Chiverton to Carland Cross  
TR010026**

**8.25 COMMENTS ON INTERESTED  
PARTY SUBMISSIONS AT DEADLINE 5**

Volume 8

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# 1 Introduction

## 1.1 Purpose of this document

- 1.1.1 This document has been prepared by Highways England (the Applicant) for submission to the Examining Authority (ExA) at Deadline 6 of the Examination of the A30 Chiverton to Carland Cross Development Consent Order (DCO) scheme (the scheme).
- 1.1.2 This document provides Highways England's comments on submissions made by Interested Parties (IPs) to the Examination at Deadline 5, including:
- Interested Parties' comments on Statements of Common Ground;
  - Additional submissions and representations made by Interested Parties; and
  - Comments on responses to hearing action points from ISH4 Chybucca junction.
- 1.1.3 Natural England submitted a response to the ExA's second written questions. Highways England has no comment on this response.
- 1.1.4 This document also provides the Highways England response to Hearing Action Point 4 arising from the Issue Specific Hearing on Chybucca junction. The Hearing Action point requested Highways England to comment on the review of traffic modelling data submitted by Mr Tofts on behalf of Mr Parker at Deadline 5 [REP5-036]. This is provided in Section 2.3 of this document.
- 1.1.5 Highways England has only provided comment where it is deemed necessary or relevant to the Examination.

## 2 Comments on Deadline 5 Submissions

### 2.1 Responses to Comments on Statements of Common Ground

2.1.1 Table 2-1 below provides Highways England's response to comments on Statements of Common Ground (SoCG) as submitted by Interested Parties at Deadline 5.

**Table 2-1 Highways England response to IP comments on SoCGs made at Deadline 5**

Interested Party	Comments on Statement of Common Ground	Highways England Comment
<b>Historic England (HBMCE)</b>	<p>As referred to in our Written Representations, the Historic Buildings and Monuments Commission for England is generally known as Historic England. However, due to the potential for confusion in relation to "HE" (Highways England and Historic England), we have used "HBMCE" in our formal submissions to the examination to avoid confusion.</p> <p>HBMCE offer the following update on the draft Statement of Common Ground (SoCG), to assist the Examining Authority.</p> <p>HBMCE are currently awaiting a final draft of the SoCG from Highways England.</p>	<p>Since Deadline 5, an updated <b>Statement of Common Ground</b> with HBMCE was issued for signing. HBMCE has since requested further information relating to the Outline WSI (1 July 2019). Highways England will respond to this and intends to submit the requested information and a signed SoCG with HBMCE at Deadline 7.</p>

## 2.2 Responses to representations made at Deadline 5

2.2.1 Table 2-2 below provides Highways England's response to representations as submitted by Interested Parties at Deadline 5.

**Table 2-2 Highways England response to IP representations made at Deadline 5**

Interested Party	Representation	Highways England Comment
<p><b>Scottish Power Renewables (SPR)</b></p>	<p>ScottishPower Renewables (SPR) and Highways England are continuing to engage in respect of the A30 Chiverton Cross to Carland Cross DCO in order to find a solution to mitigate the impacts that the scheme is likely to have on SPR's Carland Cross Wind Farm.</p> <p>Both parties are currently negotiating a legal agreement intended to protect SPR's position in the event that the A30 Scheme goes ahead. Much progress has been made and the technical aspects of SPR's objection are now largely agreed between the parties however the legal mechanisms to ensure delivery of the technical solutions and to ensure protection for SPR and SPR's infrastructure particularly following the transfer of the works to the local highway authority after completion of the scheme are still to be agreed.</p> <p>Given the complexities of the matters still to be agreed, SPR is concerned that a legal agreement may not be concluded prior to the end of the Examination. SPR therefore requests that protective provisions are included in the DCO for the protection of SPR's Carland Cross Wind Farm.</p> <p>SPR intends to submit some proposed protective provisions at Deadline 6 on 4 July 2019. SPR will also seek to share these with Highways England in advance of Deadline 6.</p>	<p>Highways England agrees that much progress has been made with the legal agreement and so is surprised that SPR has submitted this representation at Deadline 5. The current draft agreement was provided to SPR on 13 May and at the time of writing comments from SPR are still awaited despite repeated requests for a response. Up until SPR's representation was received Highways England was confident that agreement would be reached prior to the end of the examination due to the very extensive engagement between Highways England and SPR up until 13 May.</p> <p>Draft protective provisions were provided for Highways England's review on the afternoon of Tuesday 2 July. Highways England considers that SPR's request for the inclusion of protective provisions in the draft DCO has been submitted very late in the process. Highways England will provide its detailed comments on the protective provisions at Deadline 7 and will also make submissions on the appropriateness of protective provisions in favour of SPR being included in the DCO at all. Highways England can confirm at this stage that the draft protective provisions submitted by SPR are not acceptable. Highways England is disappointed to see that in several respects the draft protective provisions are not reflective of the discussions that have taken place with SPR during the examination.</p>

## 2.3 Hearing Action Point 4: Comments on Mr Tofts' (on behalf of Mr Parker) response to Hearing Action Point 2

### Background

- 2.3.1 Following the Issue Specific Hearing on Chybucca junction held on 12 June 2019 at 10am, the Examining Authority published the Hearing Action Points for Deadline 5 and Deadline 6. Hearing Action Point 2 required that Mr Tofts, on behalf of Mr Parker, submitted comments at Deadline 5 relating to a review of traffic modelling data for the scheme carried out by traffic modelling consultants instructed by Mr Parker.
- 2.3.2 The comments were submitted by Mr Tofts on behalf of Mr Parker at Deadline 5 [REP5-036] in the form of a technical note by Connect Consultants Limited (CCL) and a covering email by Mr Tofts.
- 2.3.3 Hearing Action Point 4 requires that Highways England submit any comments arising from Mr Parker's submission by Deadline 6. These comments are provided below.

### Comments on REP5-036

- 2.3.4 This response addresses points raised in the Technical Note produced by CCL and also the accompanying email from Mr Tofts to the Planning Inspectorate on 20 June 2019. The CCL Technical Note is addressed first, followed by the additional points raised by Mr Tofts in the email. For ease of reference this response adopts the same sub-headings as are used in the CCL Technical Note.

### Introduction

- 2.3.5 In response to Paragraph 1.3 of the Technical Note produced by CCL, the actual demand for east facing slip roads has been considered at all stages of the assessment work undertaken by Highways England. The information provided in the suite of transport modelling documents produced for the A30 Chiverton to Carland Cross DCO submission (as detailed in the **Transport Report** (Document Reference 7.5) [APP-049] and the further information set out in this response), presents the evidence to demonstrate the accuracy of the transport modelling and traffic forecasts undertaken to assess the scheme.
- 2.3.6 Following the Issue Specific Hearing on Chybucca junction held on 12 June 2019 at 10am, Mr Tofts was provided with the following reports;
- PCF Stage 3 Traffic Data Collection Report. WSP produced this report as part of their modelling work in 2017 (REP5-030).
  - PCF Stage 3 Local Model Validation Report. WSP produced this report as part of their modelling work in 2017 (REP5-028).
  - PCF Stage 3 Traffic Forecasting Report. WSP produced this report as part of their modelling work in 2017 (REP5-031).
  - PCF Stage 3 Appraisal Specification Report. Produced by Arup in 2018 on receipt of the above documentation from WSP (REP5-024).
  - PCF Stage 3 Combined Modelling and Appraisal Report (ComMA). Produced by Arup in 2018 on receipt of the above documentation from WSP (REP5-025).
  - PCF Stage 3 Distributional Impacts Report. Produced by Arup in 2018 on receipt of the above documentation from WSP (REP5-027).

- Operational Assessment Technical Note produced by Arup in 2018 on receipt of the above documentation from WSP (REP5-029). Some supplementary operational technical notes were also included to reflect modelling work undertaken to address comments raised by Cornwall Council on the original 2018 Operational Assessment Technical Note.

2.3.7 It should be considered that these documents were produced at different points in time and as the modelling work progressed through to the DCO process some of the earlier reports were superseded and the updated work reported on in the PCF Stage 3 ComMA [REP5-025] and **Transport Report** (Document Reference 7.5) [APP-049]. This is particularly pertinent to the PCF Stage 3 Traffic Data Collection Report produced by WSP in 2017 [REP5-030].

2.3.8 It is noted that the observations made by Mr Tofts, Mr Parker and CCL are focussed on the PCF Stage 3 Traffic Data Collection Report [REP5-030] produced by WSP in 2017 and the PCF Stage 3 Local Model Validation Report [REP5-028] produced by WSP in 2017 (LMVR). It is therefore assumed that in the absence of any criticism of the **Transport Report** (as submitted with the application in August 2018) and the ComMA (provided after the hearing), Mr Tofts, Mr Parker and CCL accept the conclusions of these documents.

### Review of Documents

2.3.9 In response to paragraphs 2.5 – 2.8, regarding the use of the traffic data used in the calibration/validation process of the 2015 base year model, full details of this process are presented in Section 3 (Summary of Data Collection) in the PCF Stage 3 Local Model Validation Report [REP5-028]. This includes sections on traffic count data and journey time data.

2.3.10 In response to the point raised in Paragraph 2.8 as follows: *'It is unclear whether "updated to a 2015 base year" means that the 2015 junction turning counts detailed in the TDCR are fully reflected in the SATURN model, although it would be a reasonable assumption that the most recent traffic counts are utilised'*, Section 3.2.1 of the PCF Stage 3 Local Model Validation Report [REP5-028] states that the 2014 surveys were considered acceptable for use in the model calibration as there was minimal growth between 2014 and 2015. The process for 'scaling' up the 2009 trip matrices to 2015 trip matrices is set out in Section 4.2.5 of the PCF Stage 3 Local Model Validation Report [REP5-028].

### General Observations

2.3.11 In response to Paragraph 3.1, the A30/Chybucca Junction has been modelled as two separate three arm junctions in the A30 SATURN model as these two junctions are located approximately 300 metres apart. These two junctions act independently of each other and were therefore treated separately in terms of data collection.

2.3.12 Detailed junction turning counts have been undertaken for both junctions and details of the surveys are set out in section 5.1.1 of the PCF Stage 3 Traffic Data Collection Report [REP5-030]. Section 5.4.3 of the PCF Stage 3 Local Model Validation Report [REP5-028] presents the model calibration at key junctions within the study area, including the Chybucca junctions. Annex D of the PCF Stage 3 Local Model Validation Report [REP5-028] presents the observed turning movements at those junctions which have been used to inform the model calibration process.



- 2.3.13 Detailed junction turning counts were undertaken in 2014 and 2015 and the observed results are presented in Annex D of the PCF Stage 3 Local Model Validation Report [REP5-028]. This demonstrates a comprehensive data collection exercise was undertaken at this important part of the network to inform the development of the traffic model. Comparison of the observed data and the modelled data demonstrates the close fit in accordance with WebTAG criteria. This demonstrates the model is an accurate tool which validates well and is therefore an appropriate tool to inform the decision regarding non-provision of east facing slip roads at Chybucca.
- 2.3.14 In response to the point raised in Paragraph 3.3, the junction turning counts undertaken at the Chybucca West and Chybucca East junctions were undertaken on different days. Detailed analysis was undertaken during the data collation stage to reconcile the difference in observed flows between the two junctions. The analysis showed there were minor differences in flows between the junctions, but these were well within the 10% difference generally considered in the transport modelling industry as due to daily traffic variation and therefore not considered as significant.

### Comparison of Traffic Data

- 2.3.15 In compiling the response to Section 4 of the CCL Technical Note, it has been noticed there was an error in the data presented in Annex A of the PCF Stage 3 Traffic Data Collection Report [REP5-030] submitted to Highways England by WSP in August 2017. Revised versions of the diagrams included in Annex A of the PCF Stage 3 Traffic Data Collection Report [REP5-030] have been included as Appendix A of this response.
- 2.3.16 As stated in the supporting email at the time the PCF Stage 3 Traffic Data Collection Report [REP5-030] and all other documents were issued to Mr Tofts and Mr Parker on 12 June 2019, some of the work undertaken by WSP in 2017 has since been superseded. The traffic flow diagrams presented in Annex A of the PCF Stage 3 Traffic Data Collection Report [REP5-030] are a case in point.
- 2.3.17 In taking over from WSP, Arup used the raw observed traffic data to inform the modelling work rather than the summary flow diagrams created by another consultant. As stated in Section 4.6.10 – 4.6.14 of the **Transport Report** [APP-049], reference is made to Appendix B of the ComMA Report [REP5-025], which is the raw observed data, no reference is made to summary flow diagrams.
- 2.3.18 Analysis of the raw observed flow data at the Chybucca Junctions, as presented in the observed data sections (Annex D) of the PCF Stage 3 Local Model Validation Report [REP5-028], and the revised PCF Stage 3 Traffic Data Collection Report [REP5-030] Annex A diagrams included as Appendix A of this response, demonstrate the observed traffic flows support the data presented in the PCF Stage 3 Local Model Validation Report [REP5-028], the PCF Stage 3 ComMA [REP5-025] and the **Transport Report** (Document Reference 7.5) [APP-049]. The error highlighted in Annex A of the PCF Stage 3 Traffic Data Collection Report [REP5-030] only impacts on the diagram presented in Annex A produced by WSP in 2017. The diagrams included in Annex A were produced as a summary and were not used as part of the A30 model development process.
- 2.3.19 To address the queries raised in Paragraphs 4.3 – 4.9 comparisons should be made to the revised observed traffic flow diagrams included in Appendix A of this response.

- 2.3.20 In response to the point raised in Paragraph 4.3 of the CCL Technical Note, the right turning traffic at Chybucca (W) from the A30 westbound to the B3284 "Perranporth" northwest bound the figure quoted should be 41 movements (as shown in the updated traffic flow diagram in Appendix A of this document) instead of the 384 movements quoted in Annex A of the PCF Stage 3 Traffic Data Collection Report [REP5-030].
- 2.3.21 The 41 movements compare to 39 movements observed as stated in the PCF Stage 3 Local Model Validation Report [REP5-028]. The slight difference between the observed figure in the LMVR and the revised traffic flow diagram in Appendix A is due to factoring to allow conversion of the flows to passenger car units (pcus). The modelled turning movement for this movement across the junction in the A30 base year traffic model is 96 movements. The difference between the observed and modelled flow is within the threshold (being individual flows within 100 vehicles per hour (veh/hr) of the observed flow) which is required by the WebTAG model validation criteria for this turning movement, demonstrating that the model validates at this location.
- 2.3.22 The updated observed traffic movement diagram for the AM peak (as shown in Appendix A of this document) addresses the issues raised in Paragraphs 4.3 – 4.7 of the CCL Technical Note.
- 2.3.23 In response to Paragraph 4.8, regarding the 'zero' modelled flows at the Chybucca East junction for movements A-C and C-A on the PCF Stage 3 Local Model Validation Report [REP5-028] Annex D Junction Turning Flow diagrams, the observed turning movements for these junctions are 13 and 26 respectively. Modelling extremely low turning movements is recognised as being challenging in the development of strategic transport models. For this reason, the acceptability guidelines of the fit between observed and modelled flows, as stated in WebTAG guidance (Unit M3-1 – Highway Assignment Modelling, Table 2) are as follows: *'flows must be within 100 veh/h of counts for flows less than 700 veh/h'*. Given the differences between the observed flow and modelled flow at this junction are 13 and 26 respectively, the specific turning movements raised in the CCL Technical Note pass the WebTAG model validation criteria.
- 2.3.24 In response to Paragraph 4.9, the responses provided above and the content of the PCF Stage 3 Local Model Validation Report [REP5-028], PCF Stage 3 Traffic Data Collection Report [REP5-030] and **Transport Report** (Document Reference 7.5) [APP-049], demonstrates the A30 base year traffic model accurately reflects the most recently collected traffic turning count data in the AM peak period at the Chybucca Junctions. The most recent observed turning count data demonstrates the A30 traffic model validates well across the modelled network and is therefore an appropriate model for testing forecast schemes across the study area. The observed data also supports the decision not to include the east facing slips due to the low number of vehicles observed making the turning movements which east facing slips would provide for. The observed turning movements show the higher demand for west facing slips than east facing slips.

### Review of the PM Peak

- 2.3.25 In response to paragraph 4.11, reviewing the left turning traffic at Chybucca (W) from the B3284 "Perranporth" southeast bound to the A30 eastbound, the figure quoted should be 54 movements (as shown in the updated traffic flow diagram in Appendix A of this response) compared to the 326 movements quoted in Annex A of the PCF Stage 3 Traffic Data Collection Report [REP5-030]. The 54

movements compare to 56 movements observed as stated in the PCF Stage 3 Local Model Validation Report [REP5-028]. The slight difference between the observed figure in the PCF Stage 3 Local Model Validation Report [REP5-028] and the revised traffic flow diagram is due to factoring to allow conversion of the flows to passenger car units (pcus). The same modelled turning movement in the A30 base year traffic model is 108 movements which is within the threshold required by the WebTAG model validation criteria for this turning movement, demonstrating that the model validates at this location.

- 2.3.26 The updated observed traffic movement diagram for the PM peak (as shown in Appendix A) addresses the issues raised in Paragraphs 4.11 – 4.16 of the CCL Technical Note.
- 2.3.27 In response to Paragraph 4.16, regarding the ‘zero’ modelled flows at the Chybucca East Junction for movements A-C and C-A on the LMVR Annex D Junction Turning Flow diagrams, the observed turning movements for these junctions are 21 and 5 respectively. Modelling extremely low turning movements is recognised as being challenging in the development of strategic transport models. For this reason, the acceptability guidelines of the fit between observed and modelled flows, as stated in WebTAG guidance (Unit M3-1 – Highway Assignment Modelling, Table 2) are as follows: “flows must be within 100 veh/h of counts for flows less than 700 veh/h”. Given the differences at this junction are 21 and 5 respectively, the specific turning movements raised in the CCL Technical Note pass the validation criteria.
- 2.3.28 In response to Paragraph 4.17, the response provided above and the content of the PCF Stage 3 Local Model Validation Report [REP5-028], the PCF Stage 3 Traffic Data Collection Report [REP5-030] and **Transport Report** (Document Reference 7.5) [APP-049] demonstrates the A30 base year traffic model accurately reflects the most recently collected traffic turning count data in the PM peak period at the Chybucca Junctions. The most recent turning count data supports the decision not to include the east facing slips due to the low number of vehicles observed making the turning movements which east facing slips would provide for. The observed turning movements also show the higher demand is for west facing slips than east facing slips.

## Conclusion

- 2.3.29 In response to the conclusions of the CCL Technical Note, the revised Annex A diagrams from the PCF Stage 3 Traffic Data Collection Report [REP5-030] included as Appendix A of this response explain the differences between the figures quoted in the PCF Stage 3 Traffic Data Collection Report [REP5-030] and the observed PCF Stage 3 Local Model Validation Report [REP5-028] counts. The flows presented through these revised diagrams and the information set out in the PCF Stage 3 Local Model Validation Report [REP5-028], PCF Stage 3 ComMA [REP5-025] and the **Transport Report** (Document Reference 7.5) [APP-049] clearly show there is not sufficient demand for inclusion of east facing slips at Chybucca as part of the scheme.

## Accompanying email from Mr Tofts

- 2.3.30 In addition to the points raised in the CCL Technical Note, Mr Tofts also raised a number of points in his email to the Planning Inspectorate on 20 June. The points made by Mr Tofts regarding traffic turning movements, journey times, junction analysis and EIA are addressed in turn below.

### Traffic turning movements

- 2.3.31 The point raised regarding turning movements at the Chybucca Junctions are addressed in Paragraphs 2.3.4 - 2.3.24 of this response. The information set out above, the suite of transport modelling documents that informed the **Transport Report** (Document Reference 7.5) [APP-049] submitted with the application, and the up to date observed traffic flow diagrams set out in Appendix A of this document, demonstrate the model is fit for purpose and justifies the decision not to provide east facing slips at Chybucca on the basis of low traffic flows.

### Journey times

- 2.3.32 In response to the points raised regarding journey times with the scheme in place, information is set out below to demonstrate the time savings which would be experienced by road users through the study area. The number of trips which would benefit from these time savings are also included for reference.
- 2.3.33 In the 2038 forecast year journey times between Carland Cross and Chiverton Cross in the Do Minimum scenario are as shown in Table 1 below. An approximate number of trips which are making this journey is also included to demonstrate the number of vehicles which would benefit from the scheme in each of the modelled peak hours.

**Table 1 – 2038 Do Minimum Model Scenario – Journey Time between Carland Cross and Chiverton Cross via the existing A30 route**

Direction	Time Period	Do Minimum	
		Journey Time	Vehicle Flows
Carland Cross to Chiverton Cross (Westbound) – via existing A30	AM	13:55	1,015
	Inter-peak	13:15	1,177
	PM	14:07	1,243
Chiverton Cross to Carland Cross (Eastbound) – via existing A30	AM	15:18	1,097
	Inter-peak	14:01	1,071
	PM	16:10	1,130

**Table 2 – 2038 Do Something Model Scenario – Journey Time between Carland Cross and Chiverton Cross via the scheme**

Direction	Time Period	Do Something	
		Journey Time	Vehicle Flows
Carland Cross to Chiverton Cross (Westbound) – via the scheme	AM	07:03	1,848
	Inter-peak	06:55	1,554
	PM	07:00	1,692
Chiverton Cross to Carland Cross (Eastbound) – via the scheme	AM	07:09	1,870
	Inter-peak	07:00	1,686
	PM	07:20	2,156

2.3.34 Comparison of the journey times shown in Table 2 with Table 1 shows the considerable journey time benefits which would be experienced with the scheme in place. The journey times on the section of the new A30 between Chiverton Cross and Carland Cross would be unaffected by proposals for reduced speed limits as part of Cornwall Council de-trunking measures on the existing section of the A30 between Chiverton and Carland Cross. These journey times, and the number of vehicles which are modelled to experience this benefit, should be considered against the points raised by Mr Tofts in the 'Journey Times' section of his email.

**Table 3 – 2038 Do Something Model Scenario – Journey Time between Carland Cross and Chiverton Cross via the existing A30 without Cornwall Council de-trunking measures in place**

Direction	Time Period	Do Something	
		Journey Time	Vehicle Flows
Carland Cross to Chiverton Cross (Westbound) – via the existing A30	AM	10:42	124
	Inter-peak	10:33	150
	PM	10:43	169
Chiverton Cross to Carland Cross (Eastbound) – via the existing A30	AM	10:31	100
	Inter-peak	10:27	143
	PM	10:45	182

2.3.35 Comparison of the journey times shown in Table 3 with Table 1 shows the improved journey times vehicles which choose to route via the existing A30 would experience once the scheme is in place. These journey times are less than those which are shown for the 2038 forecast year do minimum which demonstrates that vehicles which choose to remain on the existing A30 route once the scheme is in place would have a benefit. The number of vehicles choosing to route via the existing A30 is much lower due to the reassignment of trips to the scheme but nevertheless these trips would have a journey time saving.

**Table 4 – 2038 Do Something Model Scenario – Journey Time between Carland Cross and Chiverton Cross via the existing A30 with Cornwall Council de-trunking measures in place**

Direction	Time Period	Do Something	
		Journey Time	Vehicle Flows
Carland Cross to Chiverton Cross (Westbound) – via the existing A30	AM	13:09	32
	Inter-peak	13:01	57
	PM	13:05	62
Chiverton Cross to Carland Cross (Eastbound) – via the existing A30	AM	13:05	7
	Inter-peak	13:02	61
	PM	13:34	239

- 2.3.36 Comparison of the journey times shown in Table 4 with Table 1 shows the improved journey times vehicles which choose to route via the existing A30 would experience once the scheme is in place. This assumes the current de-trunking proposals being considered by Cornwall Council are implemented on the existing A30. These journey times are less than those which are shown for the 2038 forecast year do minimum which demonstrates that vehicles which choose to remain on the existing A30 route once the scheme, and the Cornwall Council de-trunking measures are in place, would still have a journey time benefit compared to the do minimum scenario (Table 1). The number of vehicles choosing to route via the existing A30 is much lower due to the reassignment of trips to the scheme.
- 2.3.37 Mr Tofts comments regarding journey time savings for trips likely to use east facing slips should they be provided can be assessed using the example of the forecast journey times between Callestick and Carland Cross. Table 5 below shows the forecast journey times between these locations via the existing A30 in the 2038 do minimum forecast year scenario.

**Table 5 – Forecast Year Journey Times between Callestick and Carland Cross via the existing A30 in the Do Minimum scenario**

Direction	Peak	Journey Times (mm:ss)
		2038 DM
Westbound	AM	15:06
	Inter Peak	13:47
	PM	15:05
Eastbound	AM	13:14
	Inter Peak	14:05
	PM	16:40

- 2.3.38 Table 6 below shows the forecast journey times between Callestick and Carland Cross via the existing A30 in the 2038 do something forecast year scenario with the current Cornwall Council de-trunking proposals in place.

**Table 6 – Forecast Year Journey Times between Callestick and Carland Cross via the existing A30 in the Do Something scenario with Cornwall Council de-trunking measures in place**

Direction	Peak	Journey Times (mm:ss)
		2038 DS
Westbound	AM	11:58
	Inter Peak	11:54
	PM	12:04
Eastbound	AM	12:02
	Inter Peak	11:58
	PM	12:23

- 2.3.39 Comparison of the journey times presented in Table 5 and Table 6 shows that vehicles travelling between Callestick and Carland Cross have a journey time benefit with the scheme in place and assuming the Cornwall Council de-trunking measures proposed are also in place, compared to the do minimum scenario.
- 2.3.40 Table 7 below shows the forecast journey times between Callestick and Carland Cross via the A30 scheme, accessing the scheme via east facing slips at Chybucca.

Direction	Peak	Journey Times (mm:ss)
		2038 EFS
Westbound	AM	10:04
	Inter Peak	09:54
	PM	10:00
Eastbound	AM	10:24
	Inter Peak	10:17
	PM	10:31

- 2.3.41 The data shown in Table 7 shows that there would be some benefit for vehicles making this trip compared to the do minimum scenario shown in Table 5 and the do something scenario (plus the Cornwall Council de-trunking measures proposed) as shown in Table 6. It should however be put in the context that the 2038 forecast year AM peak model shows approximately 10 vehicles would make this journey in the eastbound direction and approximately 12 vehicles would make this journey in the westbound direction. So, the overall benefit of the inclusion of the east facing slips on the overall assessment of the journey times resulting from the scheme would be negligible.
- 2.3.42 It should be stated that all of these trips would benefit in terms of journey times from the scheme as currently proposed compared to the forecast year do minimum scenario.
- 2.3.43 It should also be stated that all of these trips would still benefit in terms of journey times from the scheme with the inclusion of the proposed Cornwall Council de-trunking measures compared to the forecast year do minimum scenario.
- 2.3.44 Therefore, given the very low forecast usage of the east facing slips, and the forecast journey time data showing that trips which could use the slips should they be included, would benefit from the scheme without their inclusion, there is simply no justification for inclusion of east facing slips as part of the scheme.

#### Junction analysis

- 2.3.45 In response to the second point raised in the covering email of Mr Tofts [REP5-036] regarding junction analysis at the Chybucca West Junction in Annex B of the ComMA Report, Arms B and C were incorrectly labelled on the diagram presented. The labelling is correctly referenced in the table. This does not affect the validity of the traffic model.

#### EIA

- 2.3.46 As clarified to the ExA at the ISH in relation to whether the environmental effects of a detrunked road have specifically been considered in the assessment:

*“The emerging proposals for the de-trunking of the existing A30 (such as possible changes to speed limits) do not form part of the Scheme and therefore have not been specifically considered in the assessment. For the purposes of the assessment it has been assumed that the current speed limit will continue. The reason for this is that these are emerging proposals on a road that will be under the control of Cornwall Council and which could change at any time. It is a moving target that the Applicant cannot reasonably be expected to keep revisiting, and it is also in the context of a very substantial predicted reduction in traffic on the existing A30.”*

- 2.3.47 As confirmed to Mr Tofts at the ISH regarding the environmental impacts of east facing slips, the environmental assessment of the potential addition of the east facing slips was a high-level assessment that focused on the changes in vertical level of the mainline and the junction and the associated land take. From the existing baseline information available Highways England considered the potential approaches to providing east facing slips. Highways England considered that the significance of effects would be potentially altered in the following topics reported in the ES: landscape, noise, people and communities (in terms of impacts on agricultural land and businesses) and materials.

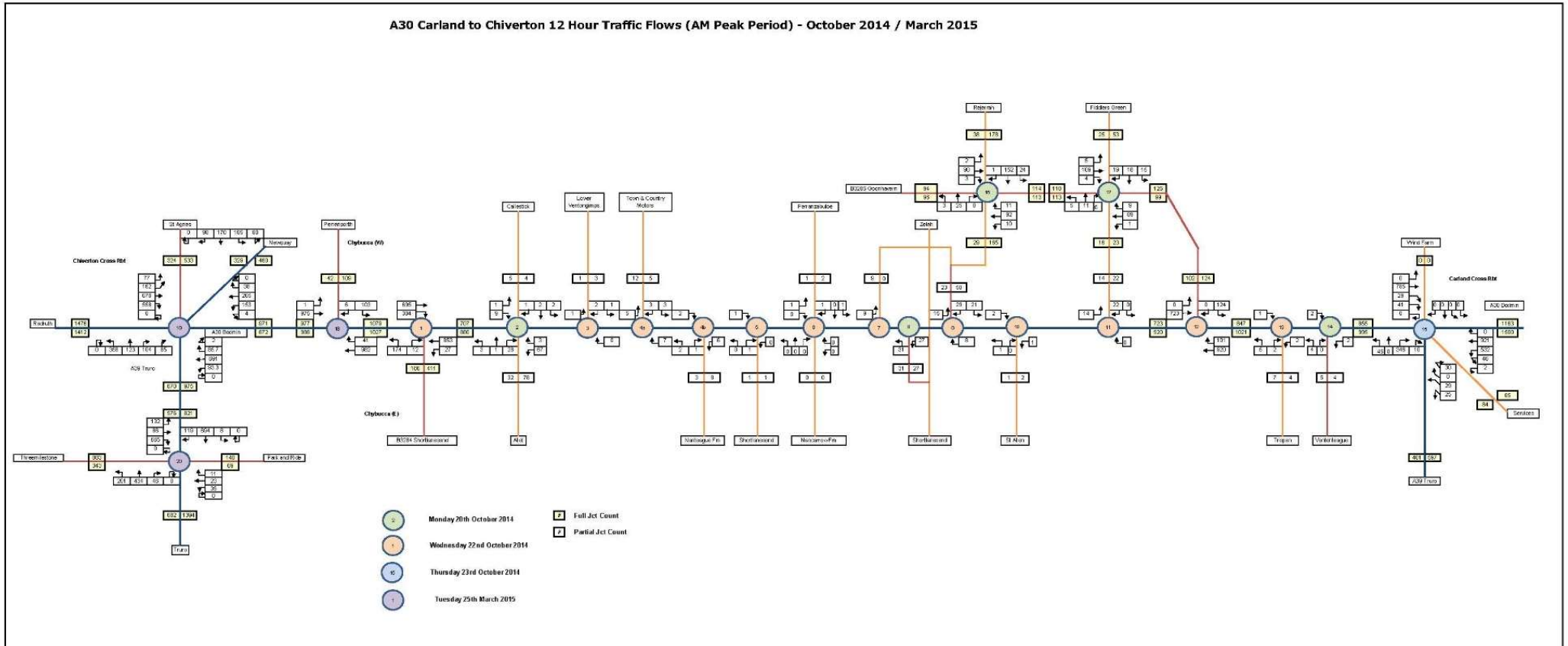
### **Conclusion**

- 2.3.48 As stated at the ISH, and with the relevant clarifications now provided to the transport consultants belatedly appointed by Mr Parker, there is no justification for the inclusion of east facing slips. All of the journey times for the trips in this area would benefit from the scheme as it stands and this remains the case when the current de-trunking measures proposed by Cornwall Council are taken into account.
- 2.3.49 The conclusion of CCL in their Technical Note is far from definitive, merely stating that the alleged discrepancies warrant further explanation and “possibly” the inclusion of east facing slips. The further explanation highlighted by CCL has been provided in this response. The inclusion of east facing slips is not and never has been warranted. This position has been maintained by Highways England in response to each round of pre-application consultation, as part of the application documents, in submissions throughout the Examination, at ISH4 on Chybucca junction, and in the conclusions of this submission.

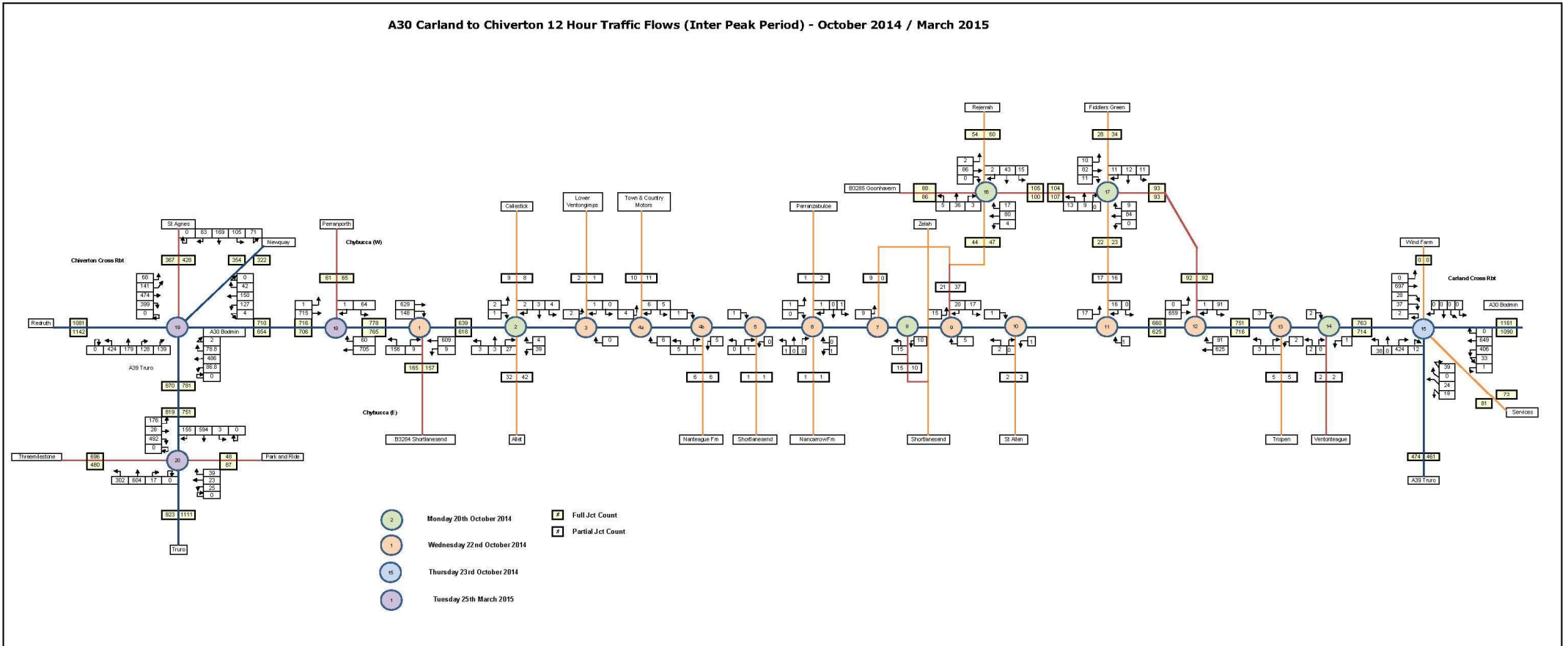


# Appendix A Revised Annex A Summary Flow Diagrams (from the Traffic Data Collection Report)

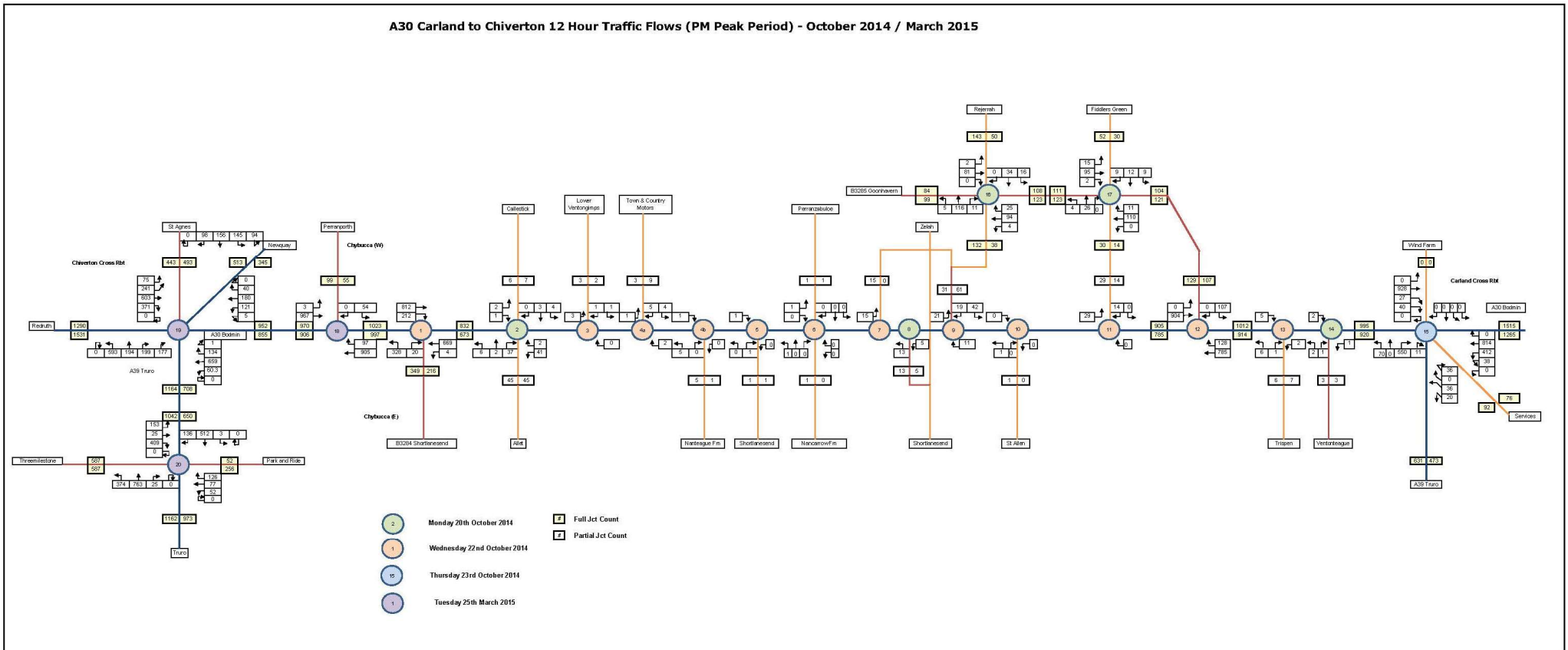
A30 Carland to Chiverton 12 Hour Traffic Flows (AM Peak Period) - October 2014 / March 2015



A30 Carland to Chiverton 12 Hour Traffic Flows (Inter Peak Period) - October 2014 / March 2015



A30 Carland to Chiverton 12 Hour Traffic Flows (PM Peak Period) - October 2014 / March 2015





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