

**Application by Highways England for an Order  
Granting Development Consent for the A428 Black Cat  
to Caxton Gibbet Road Improvement scheme**

**Summary of Written Representation**

**Prepared by**

**Central Bedfordshire Council**

**In response to Examining Authority's (ExA)**

**First Written Questions dated 20 August 2021**

**&**

**Hearing Actions Points from Hearing on 18 August  
2021**

**August 2021**

Central Bedfordshire Council (CBC) maintains its overall support for the proposal in principle, however, to assist the Examination listed below are details/areas of concern and/or matters outstanding to the CBC.

### **Construction impacts**

The Transport Assessment (APP-241) identifies significant daily increases in traffic on a number of east-west routes, as traffic is predicted to be displaced from the existing A428 during the works (Phases 1 to 4).

There are constraints on a number of the routes within the authority area which make them unsuited to accommodating significant changes in traffic flow and/or composition.

The displacement of traffic onto local roads will therefore result in considerable and ongoing local concerns, resulting in a significant increase in the resource required from CBC to monitor/manage the effects of displaced traffic.

An appropriate fund contained in the Development Consent Obligation or secured in some other manner in connection with the DCO should be allocated and payable to CBC for addressing resulting safety, capacity, or amenity issues. CBC would welcome a discussion with HE over the appropriate level of funding.

### **Construction routing**

CBC remains of the view that Station Road is not suited to accommodating additional HGV traffic or extraordinary loads, and as such CBC requests that this is addressed in connection with the DCO (whether as a DCO requirement, incorporated documents listed in Schedule 2 or some other mechanism). CBC would welcome discussion with HE.

### **Diversion Routes**

The A603, west of the A1 is identified within the Outline Construction Management Plan (APP-244) as being a signed diversion route when the A1 north of Sandy is closed to traffic. This route has a recognised road traffic collision history which may be exacerbated by increased flows, with the 1.2km section between Hatch Road and the centre of Moggerhanger having 12 recorded injury collisions, including 4 serious injury collisions, within the most recently available 5 years' data. The junction onto the A603 from Vinegar Hill is also known to be difficult for right turners, which will be the predominant flow for diverted northbound traffic. As such temporary or permanent signal control or other works are expected to be required to regulate traffic flows. As this junction is outside the confines of the DCO, CBC would welcome a discussion with HE to agree an appropriate contribution to deliver these works as part of the Development Consent Obligation or a S278 highways agreement.

Due to the considerable diversion route for the Wyboston to Black Cat junction, traffic travelling between the A1 and the A428 is likely to select to route via Barford Road rather than following the diversionary route.

The timing of any closures and any associated diversions should also be considered in the context of the proposed works to Barford Road to ensure no conflict between the two.

CBC would welcome discussion with HE on measures to mitigate the traffic and safety impacts of other diversion routes and incorporating them into the DCO requirements (or incorporated documents listed in Schedule 2).

## **Operational Phase impact**

The Transport Assessment Annex (APP-243) highlights exceptions to predicted daily reduced levels of traffic, with expected increases in flow on the A1 and A421, south of the scheme.

The Monitor and Manage proposal has a role to play in addressing the short term impacts of the scheme, yet the Council is concerned that a solution to mitigate additional pressure on this key route is not being put forward and, there is no specific requirement within the wording of the Draft Development Consent Order (dDCO) for this, nor is there any detail as to how any such Monitor and Manage approach would operate in practice and who would provide the funding for any management/mitigation measures if identified in the monitoring.

CBC would welcome a discussion with HE as to whether this is something that could be covered by a Development Consent Obligation, for example, or in some other manner in connection with the DCO.

It is requested that certainty is provided in terms of additional provision within the DCO and a Development Consent Obligation (regarding funding and mitigation) so as to specify and control the 'Monitor and Manage' process, including timing, frequency, methodology, governance, triggers for intervention (including detriment to the operation of local road approaches), and funding.

Whilst outside the scope of this DCO to deliver, this further highlights the need for a comprehensive solution to the treatment of the A1 to be secured within forthcoming Highways England Road Investment Strategies to identify and deliver appropriate mitigation.

CBC requests that funding for maintenance of assets by CBC is paid by HE to CBC and secured by the Development Consent Obligation or other statutory agreement.

## **Barford Road Bridge**

Need to ensure access over/under the A428 is easy as possible for people to access without using their cars, in particular securing sufficient width on the bridge deck for the Barford Road works to allow for pedestrian and cycle provision and allowing for future pedestrian and cycle provision under the East Coast Main Line Rail Bridge. CBC would welcome discussion with HE regarding securing as a DCO requirement (or incorporated documents listed in Schedule 2).

## **A428 Connection**

The application needs to take into account a proposed EWR station in the Tempsford/Barford area. The Council considers a vehicular link off the proposed A428 route to the east of Little Barford should be provided, to enable traffic to divert off this road to the new EWR station, and potentially to new homes, prior to it reaching the A1. CBC would welcome a discussion with HE regarding funding or provision in connection with the DCO.

## **Air quality**

The applicant has predicted an adverse impact on our Sandy AQMA but are not proposing to undertake any mitigation to counteract or offset that, and this should be incorporated into the draft DCO requirements.

The applicant has not factored in the cumulative impacts on AQ when combined with the EWR proposals. The applicant needs to resolve this to ensure an accurate assessment of cumulative impacts to accompany the DCO application is reflected in its prediction of air quality impacts. The impacts on the Sandy AQMA are paramount in this respect, along with securing any necessary mitigation as a DCO requirement (or incorporated into documents listed in Schedule 2).

## **Noise and Vibration**

Further baseline monitoring that was due to be carried out but “postponed” due to Covid 19. CBC have subsequently been advised that further monitoring will not be taking place but are unclear as to the justification for this, particularly as there was clearly an identified need for the further monitoring in the first place. The justification is requested from HE and additional monitoring is requested.

Level of impact during construction predicted for R16 above the SOAEL in itself is a concern even if this is of very short duration concern. +9dB increase will be present even with the embedded mitigation in place.

Not acceptable to expect existing residents, no matter how small in number, to be subjected to such significant long-term adverse noise impacts as a result of the operation of the new road scheme and not identify and incorporate further noise mitigation measures that could be implemented, with mitigation secured as a DCO requirement (or incorporated documents listed in Schedule 2).

## **Archaeology**

The applicant is in possession of our comments on the Archaeological Mitigation Strategy (APP-238). CBC understand that the applicant is working on a revised document which will take these comments into account.

There are elements of the current version of the Archaeological Mitigation Strategy that CBC feel need revision and will review the revised documentation when available.

## **Flood Risk**

Provision of a detailed maintenance plan which outlines the ownership, techniques and required frequency of maintenance is pivotal.

## **Conclusion**

CBC remains supportive of the proposal in principle, but would welcome further discussion with HE to address its concerns set out above and the incorporation of associated requirements into the DCO (or incorporated documents listed in Schedule 2) and any

Development Consent Obligation (or highways agreements may be an option in some instances) and necessary mitigation, particularly regarding:

- Construction phase traffic impacts affecting Central Bedfordshire;
- Construction routing;
- Diversion routes;
- Operational phase traffic impacts affecting Central Bedfordshire;
- Barford Road bridge, particularly in relation to sustainable transport;
- Requested A428 vehicular link to the east of Little Barford;
- Air Quality including the Sandy AQMA; and
- Noise & vibration.