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30 August 2021
Letter Sent By Email To:
A428.Blackcat@planninginspectorate.gov.uk

Dear Sir/Madam

Ref: TR010044 - A428 Black Cat to Caxton Gibbet Road Improvement Scheme

Please find below the Written Response of CPRE Cambridgeshire and Peterborough as requested.

Q1.11.1.3 Campaign to Protect Rural England Comments on transport modelling RR-023, on behalf of CPRE, refers to the modelling undertaken by the Applicant as not being adequate, explain why this considered to be the case.

CPRE Cambridgeshire & Peterborough Response:

1. Modelling in a Multi-Modal Context + MRN/SRN Impacts

Considerably more evidence is required to demonstrate adequate transport modelling has been undertaken which illustrate clearly the wider traffic impacts of the proposed scheme. These include calculation of induced demand in a multi-modal context.

There appears to have been no proper traffic modelling of the effect the scheme will have on traffic volumes on the Strategic Road Network, (SRN), and Main Road Network, (MRN), routes adjoining and away from the immediate vicinity of the proposed route. It is totally unacceptable that the use of the SRN and MRN routes has been classified by Highways England as “rat-running”. These are major roads and used as such. There is no traffic modelling of the effects the scheme will have on other local roads, some of which despite their ‘B’ or ‘C’ designation are a very important component of rural and long-distance transport in South Cambridgeshire.

Extensive research published by the CPRE national charity in March 2017 which reviewed previous major road schemes and by-passes across the whole of England demonstrates that the short-term, mid-term and long-term effect of major new routes has been to substantially **increase** traffic flows on other local roads. See the report “**The Impact of Road Projects in England**” here:
<https://www.cpre.org.uk/resources/the-impact-of-road-projects-in-england/>

It is unacceptable that any new transport scheme designed in the 21st century should adopt a mid-20th century approach to transport integration and to the claimed economic and social benefits of such schemes. Further research by CPRE nationally, also published by CPRE in March 2017, debunks many of these claims. See the report “**The end of the road? Challenging the road-building consensus**” here:
<https://www.cpre.org.uk/resources/the-end-of-the-road-challenging-the-road-building-consensus/>

2. Smarter Working

In the light of the recent and ongoing COVID19 pandemic and the fundamental strategic re-alignment of future workplace models, CPRE argue that the modelling should be re-examined to take into account reduced commuting. There is a clearly developing modal shift to home-working and

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intermittent workplace attendance using digital infrastructure and tools which has reduced and will likely further reduce the need to commute and which has accelerated the introduction of SMART working across many sectors of employment which will see people returning to offices at a potential maximum of 2 days a week. This is exemplified by the Civil Service:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/935990/Smarter_Working_-_learning_lessons_from_COVID-19.pdf

and within Cambridgeshire:

<https://www.connectingcambridgeshire.co.uk/smart-places/smart-cambridge/>

Within Cambridgeshire we know of many companies and other organisations, small and large, which are already either closing or reducing their office space or which are converting it to accommodate fewer people each day in a COVID-safe working environment. These include:

Royal Society of Chemistry:

<https://www.rsc.org/covid-19-response/>

Arthur Rank Hospice Charity

<https://www.arhc.org.uk/latest-news/more-colleagues-return-to-the-hospice/>

Major retailers such as John Lewis are closing their stores completely in favour of online retailing:

<https://www.cambridge-news.co.uk/news/local-news/peterboroughs-john-lewis-store-close-20917269>

All this is in addition to the nation-wide closure of many bank branches in favour of online services which has led to many less journeys for financial purposes.

<https://www.santander.co.uk/personal/support/ways-to-bank/our-branches>

<https://www.tsb.co.uk/our-branches/>

In Cambridge, Cambridgeshire County Council who are the local highways authority, recently deferred a major transport decision for additional park-and-ride capacity at the A10/M11 junction until the effects of COVID on commuter car-traffic demand has become clear. The Minutes of this decision taken on 29th July 2021 are yet to be published.

Clearly, COVID is going to have a long-lasting and probably permanent effect on peak traffic flows. It therefore seems sensible to model these effects properly before spending large sums of public money, rather than relying on out-of-date and questionable data to justify additional and already-strained government borrowing.

3. Climate Change

With the declaration of a UK Climate Emergency and the intended UK transition to net zero carbon by 2050, the implications of this on the modelling need to be re-examined. The argument being made is that the proposed road improvement scheme is being put forward to 'unlock' future housing growth and therefore induce road demand and at the same time arguments for growth in the Ox-Cam corridor are being made.

However, In the Government's announcement of the Oxford-Cambridge Arc Advisory Panel it is stated that the panel will be focusing on the area between Bedford and Cambridge... including potential settlements linked to East West Rail stations.

<https://www.gov.uk/government/groups/oxford-cambridge-arc-expert-advisory-panel>

This implies a modal shift away from the car and onto rail as any potential development would be linked to Cambridge and Bedford via the rail network. The implications of this on the modelling, and

the resulting viability and cost-effectiveness of the proposed road-based improvements need to be re-examined.

There is also an assumption that car-based travel will remain possible and feasible because existing oil-based fuels will be replaced by battery-powered transmission systems. This assumption is not borne out by the future availability of materials to continue building such vehicles.

<https://www.iom3.org/resource/sustainability-in-mining-lawrence-morris.html>

<https://www.newscientist.com/article/mg24933190-400-why-using-rare-metals-to-clean-up-the-planet-is-no-cheap-fix/>

4. Cancellation of the Oxford – Cambridge Expressway

A key change to modelling for the A428 has been delivered as a consequence of the government's cancellation of the western component of Ox-Cam Expressway on 18th March 2021.

<https://www.gov.uk/government/news/oxford-to-cambridge-expressway-project-cancelled-as-transport-secretary-looks-to-alternative-plans-for-improving-transport-in-the-region>

The proposed section of the road between Oxford and Milton Keynes was deemed not to be cost effective. The Department for Transport concluded that the costs associated with the road projects outweighed the benefits.

The A428 formed part of this 'Expressway' link between Oxford and Cambridge as recognised in the current A1 improvement study, see below. Transport Secretary Grant Shapps said: "*Our analysis shows the expressway cannot deliver such links in a way that provides value for money for the taxpayer, so I have taken the decision to cancel the project*".

This cancellation will have a major impact on the forecast modelling for the A428 as a component of the overall Oxford-Cambridge Expressway. For this reason, the justification for the A428 Road Improvement Scheme should be re-examined and fresh modelling completed.

5. Wider concerns across Cambridgeshire

CPRE supports the concerns of the joint local authorities within Cambridgeshire at the lack of a joined-up approach to transport planning in this proposal and in the other aspects outlined in the proposed draft response of the councils listed as Item 4 in the Meeting Papers of the July 2021 meeting of the Cambridgeshire County Council, (CCC), Economy and Environment Committee entitled: "*Appendix A: Draft response to Highways England's consultation on the A428 Black Cat to Caxton Gibbet proposals*". We wish to draw particular attention and to express support in relation to the following statements made in the above CCC document:

4. However, we also wish to emphasise the critical importance of the A428 being considered as part of a coherently planned local and regional transport network, that of necessity should interact and integrate with capacity being provided elsewhere. This includes:

- The East West Rail Central Section between the Bedford area and Cambridge,

- The Greater Cambridge Partnership's programme in the Cambridge area, and

- The Cambridgeshire and Peterborough Combined Authority and Greater Cambridge Partnership's Cambridge Autonomous Metro proposals.

5. While this represents a significant opportunity, if there is not integration between these schemes and programmes, the net result of the additional highway capacity that is planned may ultimately be counterproductive, as it feeds additional traffic into areas that cannot cope with it, exacerbating congestion in those areas and negating the nominal benefits of the A428 scheme.

19 The old A428 between Great North Road and Barford Road is shown as taking 29,000 vpd in the 2038 'with scheme' scenario, which is 1,000 vpd more than 2016 traffic flows on the road, and only 6,000 vpd less than the 'without scheme' scenario. For the 'with scheme' scenario, this implies a very significant re-routing of traffic from within St Neots, or a very significant degree of induced traffic, or both.

29 the information on traffic flows presented in the consultation booklet raise many more questions than answers, and lead to very significant concerns that the local road network may suffer major adverse impacts as a result of the A428 scheme

It is quite clear that Cambridgeshire, a mostly rural county which makes a major contribution to national food supply, is currently subject to a rash of competing, independent, transport schemes, ranging from walking and cycling to busways, railways and expressways with little attempt to model either the need or the complete effects.

6. Multi-Modal Integration

The earlier A428 consultation failed to outline in detail how the A428 proposals form part of a joined-up approach to a multi-modal transport solution. Despite stating that the proposed A428 scheme is part of a sustainable and integrated transport approach (P13 and P47 of consultation) the scheme shows no evidence of detailed interconnection with other transport initiatives or how it forms part of a wider modal shift to more sustainable transport modes.

The current proposals do not address the "last mile" issue and in particular how the scheme will integrate with various local schemes being proposed such as the Greater Cambridge Partnership Programme, the Cambourne to Cambridge Better Public Transport Project.

There appears to be no consideration of the East-West Rail proposals. There is no consideration of the effect of East-West Rail on the volume of local or long-distance traffic demand or the effect of the road on the viability of East-West Rail.

There is no discussion of the effect of East-West Rail route selection on the A428 corridor choice.

There is no consideration of the potential for a new parkway station at Cambourne or for re-opened stations or routes to and from Cambridge and other locations to affect road traffic demand and demand at junctions.

There is no consideration of the effect on the route of the major new communities planned at Bourne, Northstowe or Waterbeach or the employment effects of research and industrial developments around Cambridge.

The effect of the recent announcement by the Mayor of the Cambridgeshire and Peterborough Combined Authority that the CAM Metro project planned by his predecessor has been halted and is to be scrapped needs to be taken into account in the A428 modelling as do his clear plans to implement bus franchising in the county and to increase bus routes and improve bus services.

7. Integration of the Scheme with the A1 Proposals

The A428 scheme continues to fail to relate to the ongoing study into the A1 and fails to demonstrate how it interconnects and forms part of a joined-up delivery of schemes. The "**A1 East of England Strategic Study Stage 3 Report**", Page 4 and Page 39 states: "*The optimal package should ensure compatibility with planned and potential schemes, and consider potential efficiencies which can be made through concurrent delivery of multiple schemes. The planned route for East West rail will intersect the study area in the vicinity of Sandy. The Oxford to Cambridge Expressway, if delivered, could intersect the A1 at a similar location. Potential and planned improvements to east west*

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connectivity within the study area raise important strategic questions about the level and location of future growth."

Option A of the A1 proposals in the above document includes a realignment of the A1 route which would not connect with the proposed new Black Cat roundabout. This issue has not been addressed from our earlier submission.

When questioned at public exhibitions about this issue, Highways England personnel either could not answer the question or gave obfuscating responses. There is minimal explanation in the A428 scheme documentation as to what effect the new/upgraded road will have on the A1 corridor or the likely resulting increase of traffic in the A1 corridor, as outlined on Page 38 of the "**A1 East of England Strategic Study Stage 3 Report**" which states: "*Planned transport schemes, mentioned in Section 1.2, will impact on the study area and on the A1 route. Planned improvements to East West connectivity, notably East West rail, the A14 Cambridge to Huntingdon A1(M) upgrade, the A428 A1 to Caxton Gibbet scheme, and potentially the Oxford to Cambridge Expressway (if the scheme is to go ahead) will be likely to increase demand on the A1 corridor thus supporting the case for intervention.*"

We would have expected as a minimum at this stage of the project more detailed modelling of the traffic increase on the A1 arising from the A428 proposals and detailed commentary on the effects upon the safety of the existing A1 and upon communities north and south of the Black Cat junction, in particular the impact on Buckden and Sandy roundabouts.

Page 29 of the Consultation Booklet states that the new layout of the Cambridge Road junction "*will give greater access for drivers travelling to and from St Neots and will provide better connections into the town and to the train station*" but the plan shows the route will utilise the existing roundabout and B1428 Cambridge Road. So how exactly does this improve access for drivers travelling to and from St Neots who, depending on their direction of travel, will have to negotiate two or three fuel-burning roundabouts instead of the existing one?

There is absolutely no evidence that in preparing for this scheme Highways England has adequately examined all the local development proposals along the proposed route.

There is a lack of detailed information as to how the proposed new road will impact on local roads and traffic flows along the A1, just a set of statements which at best can be described as positive spin. There is no commitment to future monitoring of induced demand or to the effects on local communities.

Please note that our above response is also relevant to **Q1.15.1 Need for the development**

Finally, please note that our submission is in respect of the proposed consultation. While we have taken every effort to present accurate information for your consideration, as we are not a decision maker or statutory consultee, we cannot accept any responsibility for unintentional errors or omissions, and you should satisfy yourselves on any facts before reaching your decision.

Other Questions about which CPRE Cambridgeshire and Peterborough wishes to comment.

Q1.15.3.1 Applicant Effect on air quality and Q1.4. Climate Change and Carbon Emissions

There is a complete lack of effective modelling in the applicant's documents of the impact of carbon dioxide, (CO₂) and exhaust pollutant emissions such as oxides of nitrogen (NO_x) and small particulates (PM₁, PM_{2.5} and PM₁₀) on Air Pollution and Climate Change in the local area or their contribution to national and international levels of Climate Change and Ill-Health.

Prime Minister, Theresa May, leading a session on Climate Change at the G20 Summit in Osaka on 29 June 2019 stated: *"For example, when building roads or developing energy infrastructure, we will consider the greenest way to do this and use the best materials and design to manage the impacts of climate change that people are already feeling."* and *"The facts, which are clear, should guide us: we are running out of time to act. We need a fivefold increase on existing 2030 commitments to remain below 1.5 degrees of warming. In addition to stronger national commitments, we need determined implementation, and a change in how we invest."*

The Annual Progress Report to Government of the Climate Change Committee, published on 10 July 2019, indicated that UK action to curb greenhouse gas emissions is lagging behind what is needed to meet legally binding targets. The report stated that surface transport is now the largest single source of greenhouse gas emissions in the UK (115 Million tonnes of CO₂ equivalent per annum).

Road transport is a major source of small particulate emissions which are highly dangerous to health, especially that of children and older people. These arise from vehicle exhausts and also from brake dusts and tyre residues.

The following recent reports have highlighted that danger and demonstrated the need for urgent action:

"Air pollution: outdoor air quality and health", National Institute for Health and Care Excellence (NICE), Guideline, June 2017

"Improving air quality", Joint Committees of Parliament, March 2018

"Annual Report of the Chief Medical Officer 2017, Health Impacts of All Pollution - what do we know?", CMOH, March 2018

"Clean Air Strategy 2018", DEFRA consultation, May 2018

"A Breath of Toxic Air – UK Children in Danger", UNICEF, June 2018.

"Assessing health effects of air quality actions: what's next?", Lancet Public Health, November 2018

"Clean Air Strategy 2019", DEFRA, January 2019

"Air Pollution and Non-communicable Diseases, A Review by the Forum of International Respiratory Societies' Environmental Committee, Part 1: The Damaging Effects of Air Pollution", CHEST Journal, January 2019

"Air Pollution and Non-communicable Diseases, A Review by the Forum of International Respiratory Societies' Environmental Committee, Part 2: Air Pollution and Organ Systems", CHEST Journal, January 2019

"Healthy Air for Every Child – A Call for National Action", UNICEF, February 2019

“Cardiovascular disease burden from ambient air pollution in Europe reassessed using novel hazard ratio functions”, Lelieveld et al, European Heart Journal, March 2019

“Air Quality: National Air Pollution Control Programme”; DEFRA, March 2019

“Global, national, and urban burdens of paediatric asthma incidence attributable to ambient NO₂ pollution: estimates from global datasets”, Pattanun Achakulwisut, Michael Brauer, Perry Hystad,

“Ambient black carbon particles reach the fetal side of human placenta”, Hannelore Bové, Eva Bongaerts, Eli Slenders, Esmée M. Bijmens, Nelly D. Saenen, Wilfried Gyselaers, Peter Van Eyken, Michelle Plusquin, Maarten B.J. Roeffaers, Marcel Ameloot & Tim S. Nawrot, Nature Communications (August 2019) 10:3866.

“Our Planet, Our Health”, House of Commons Environmental Audit Committee, September 2019

“Personalising Health Impacts of Air Pollution”, Kings College London, 18 October 2019

“Large changes in Great Britain’s vegetation and agricultural land-use predicted under unmitigated climate change”, Paul D L Ritchie, Anna B Harper, Greg S Smith, Ron Kahana, Elizabeth J Kendon, Huw Lewis, Carlo Fezzi, Solmaria Halleck-Vega, Chris A Boulton, Ian J Bateman and Timothy M Lenton, Environmental Research Letters, 14 (2019) 114012, 29 October 2019.

“Evaluating the Sensitivity of PM_{2.5}-Mortality Associations to the Spatial and Temporal Scale of Exposure Assessment”, Dan L Crouse, Anders C Erickson, Tanya Christidis, Lauren Pinault, Aaron van Donkelaar, Chi Li, Jun Meng, Randall V. Martin, Michael Tjepkema, Perry Hystad, Rick Burnett, Amanda Pappin, Michael Brauer, Scott Weichenthal, Epidemiology, Post Acceptance: November 04, 2019

“Within-City Spatial Variations in Ambient Ultrafine Particle Concentrations and Incident Brain Tumors in Adults”, Weichenthal, Scott; Olaniyan, Toyib; Christidis, Tanya; More, Epidemiology, Post Acceptance: November 06, 2019

“The Relationship Between Ambient Atmospheric Fine Particulate Matter (PM_{2.5}) and Glaucoma in a Large Community Cohort”, Chua et al, Investigative Ophthalmology and Visual Science, November 18, 2019.

“Short term exposure to fine particulate matter and hospital admission risks and costs in the Medicare population: time stratified, case crossover study”, Wei et al, British Medical Journal, 27 November 2019.

“Air Pollution (Particulate Matter) Exposure and Associations with Depression, Anxiety, Bipolar, Psychosis and Suicide Risk: A Systematic Review and Meta-Analysis”, Braithwaite et al, Environmental Health Perspectives, 18 December 2019.

“Association Between Cardiovascular Disease and Long-term, Exposure to Air Pollution With the Risk of Dementia”, Giulia Grande et al, JAMA Neurology. doi:10.1001/jamaneurol.2019.4914, Published online March 30, 2020.

“SARS-Cov-2 RNA Found on Particulate Matter of Bergamo in Northern Italy: First Preliminary Evidence”, Leonardo Setti et al, published as Medrxiv online pre-print, April 15 2020.

“Alzheimer disease starts in childhood in polluted Metropolitan Mexico City. A major health crisis in progress”, Environmental Research, Lilian Calderón-Garcidueñas et al, October 10 2020.

“Health costs of air pollution in European cities and the linkage with transport”, C E Delft – European Public Health Alliance, October 20 2020.

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“Mental health consequences of urban air pollution prospective population-based longitudinal survey” Social Psychiatry and Psychiatric Epidemiology, Bakolis et al, October 23 2020.

“Association of ambient air pollution with age-related macular degeneration and retinal thickness in UK Biobank” Br J Ophthalmol, Sharon Y L Chua et al, December 7 2020.

“Air Quality and coronavirus: a glimpse of a different future or business as usual” House of Commons - Environment, Food and Rural Affairs Committee, Feb 10 2021.

“Spatio-temporal associations of air pollutant concentrations, GP respiratory consultations and respiratory inhaler prescriptions: a 5-year study of primary care in the borough of Lambeth, South London” Environmental Health, Mark Ashworth et al, May 7 2021.

Locally, the **Cambridgeshire Transport and Health Joint Strategic Needs Assessment (JSNA) report on Air Pollution** published in May 2016, stated that: *“There are levels of air pollution in Cambridgeshire that impact health, even though most annual averages may not be over Air Quality Thresholds. The East and South East of England have higher background levels of particulates as these regions receive a larger contribution of particulate pollution from mainland Europe. However, there are also hot spots in Cambridgeshire caused by traffic-related pollution, especially in busy urban areas and around arterial and trunk roads such as the A14.”* *“It has been estimated that there were 257 deaths attributable to air pollution in Cambridgeshire in 2010 and that over 5% of Cambridgeshire’s population mortality is attributed to air pollution. Air pollution also impacts respiratory and cardiovascular hospital admissions and incidence of respiratory disease. There are higher levels of nitrogen dioxide in the winter months and peaks of larger particulate matter in the spring, which may lead to seasonal health impact.”* We see no evidence that this comprehensive study has even been considered during the preparation of the A428 proposals. We cannot find it in the list of references of the **“Preliminary Environmental Information Report”**.

How exactly does the A428 proposal relate to the local, national and international calls for less polluting and low carbon transport infrastructure?

There is inadequate explanation as to where the predicted extra 30,000 vehicle movements per day, (vpd), at Caxton Gibbet, (page 56 of Consultation Booklet), are coming from or why the scheme will reduce the proportion of Heavy Goods Vehicles (HGV) from 9% to 7%. Is this resulting from and does it include induced demand? Does this reflect increased commuter traffic? With the ‘improved’ route, will there not be a tendency for HGV journeys from the East Coast ports to increase disproportionately?

With what evidence can the Highways England study argue that an extra 30,000 vpd have a *‘beneficial impact on air quality’*, (page 15 of the Consultation Booklet). In reality this will lead to an increase in emissions of oxides of nitrogen, small particulates and greenhouse gases.

Page 47 of the Consultation Booklet claims the scheme will improve air quality for cyclists along the existing A428 but at the same time showing high levels of local traffic will continue to use this route. The argument put forward on Page 47 that fewer vehicles waiting in traffic queues will reduce vehicle emissions along the route is at best misleading and scientifically an untrue urban myth. When traffic moves faster, vehicle engine rotation speeds increase, fuel burn increases and this in turn increases vehicle exhaust emissions as well as the distribution of road dusts from increased wheel rotation energy. Highways England should not be perpetuating such inaccurate information when their expert knowledge and scientific studies indicate otherwise.

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CPRE would like to see an independent study by a reputable institution, such as Kings College, London, of the likely pollution and health effects of this proposal. Even the inaccurate argument made by the proposal does not apply when the traffic is proposed to increase by at least 30,000 vpd at Caxton Gibbet and it does not take into account traffic queueing at the new roundabouts at Cambridge Road and Caxton Gibbet where traffic is predicted to substantially increase on the A1198! This is in addition to the potential queuing of traffic trying to get into Cambridge because the scheme does not integrate into the "last mile".

CPRE are very concerned that at a time when a coroner has for the first time ruled that air pollution should be registered as cause of death, this applicant is not taking this subject more seriously.

<https://www.bbc.co.uk/news/uk-england-london-56801794>

It should also be noted that recent research has shown that oxides of nitrogen, previously used as an indicator for ozone potential, is as damaging to health as small particulates, PM2.5, and that road transport is their largest source.

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/411756/COMEAP_The_evidence_for_the_effects_of_nitrogen_dioxide.pdf

<https://www.gov.uk/government/statistics/emissions-of-air-pollutants/emissions-of-air-pollutants-in-the-uk-nitrogen-oxides-nox>

How does the A428 scheme fit in with the UK Government agenda of "Zero Carbon" and target of net zero greenhouse gas emissions by 2050? It is clear when comparing the objectives of this project with the report "**Reducing UK emissions, 2019 Progress Report to Parliament**" by the Climate Change Committee, published in July 2019, that little or no consideration has been given to these national objectives when planning this project, whose outcome is designed to make it easier to increase vehicle movements and add to the volume of polluting road transport.

How is the proposed route contributing to the target of net zero greenhouse gas emissions by 2050?

How does it support a move away from diesel and petrol to electric cars, other forms of transport or reduced transport?

There appear to be no proposals to future-proof the design and delivery of the road to support future digital road infrastructure. Will full fibre ducts / 5G be laid alongside to allow the digital infrastructure required to support the next generation of road transport?

There is no mention of electric charging and other emerging technologies and how they are being designed into the scheme.

In short, this scheme as proposed will increase greenhouse gas emissions, making national reduction targets harder to achieve, while simultaneously increasing the risk of ill-health to current and future generations arising from increased polluting emissions.

Q1.11. Highways – network and structures

CPRE refers the Inspectorate to our submission of 22/04/2017 and our comments on the Highways England public consultation on the proposed A428 Black Cat to Caxton Gibbet improvements.

We do not believe those comments were adequately addressed by the applicant and they raise fundamental concerns as to how the final scheme was chosen.

In particular we refer to the following extracts:

Portfolio of Schemes – Integrated Planning

The present consultation process is focused on the A428 from Black Cat to Caxton Gibbet but it is part of the RIS2 Oxford-Cambridge Expressway study area and intersects with the A1 study area. We are concerned that this consultation seems to be taken in isolation of those two wider schemes. In particular the A1 scheme where one of the options (Package A - A1 EofE Strategic Study Stage 3) contains proposals for a new section of road which would pass to the west of the Black Cat roundabout and indeed bypass the proposed A428 Black Cat study solutions A, B & C altogether. There is no mention as to how the design of this scheme will integrate into any proposals emerging for the A1 scheme. This scheme should not be considered in isolation and to do so would be premature and potentially could prejudice the other RIS2 schemes highlighted. In your consultation brochure p11 in relation to the A1 East of England Study it notes:

'Further analysis to examine the case to improve the A1 in the East of England is being carried out. This is needed to assess the full impact of improvements before a conclusion can be reached.'

CPRE questions how a decision can be reached on the Black Cat roundabout and A428 route alignment before the A1 study has concluded and we believe the two studies should be run in parallel.

The National Audit Office in the March 2017 initial evaluation of the Department for Transport and Highways England's investment in England's strategic road network (Progress with the Road Investment Strategy) criticised DfT and Highways England for not assessing how selected projects would work together. 2.13 states:

'The Department and Highways England did not assess the interdependencies between projects to confirm they would be delivered in an efficient way that would minimise disruption to road users. Nor did they plan how the enhancements would integrate with other road renewal projects and maintenance work to produce an integrated portfolio of work'

Public Transport Options and the last mile

Public Transport was looked at in the JACOBS A428 Traffic Data Collection report (Appx H. Initial Sift Tool) including Reinstating E-W Rail link, Park and Ride at St Neots, Tram Services, Bus Improvements and Guided Busway extension but none was carried forward. This is disappointing and the focus is purely on road infrastructure based solutions.

CPRE believes that all infrastructure investment must include public transport solutions within the corridor otherwise we fail to see how the benefits that the consultation listed (*enabling economic growth, an improved environment, a more accessible and integrated network*) can be achieved without encouraging modal shift in transport.

The scheme also fails to address the issue of the 'last mile'. There is a lack of a joined-up strategic vision. There is no portfolio of solutions, including demand management, to ensure a sustainable end-end transport corridor involving multi-modal options. Indeed, there is a danger the focus on a purely road based solution could prejudice investment in alternatives. In the Rees Jeffreys Road Fund Study, **A Major Road Network for England** Oct16 Executive Summary, it highlights that:

'...clear spatial planning policies are essential to head off any adverse development pressures generated by otherwise beneficial transport improvements. Roads are crucial, but can only perform well if managed as the core infrastructure in an overall transport strategy, to support economic growth and improve the quality of life and mobility. This must recognise the wide range of transport modes which use roads, as well as the role of rail, and embrace a willingness to consider options for demand management to contain road traffic congestion over the longer term.'

Local Issues – Local Solutions

The consultation document argues one of the reasons for the requirement to improve the A428 is to reduce congestion related delay and improve journey time reliability. In the JACOBS A428 Traffic Data Collection report p36 it highlights the key delay factors along the route are the Black Cat and Caxton Gibbet roundabouts. 7.4 Summary of Journey Time Data:

*'The A1 SB, A1198 SB and A14 EB routes all show significantly higher journey times in the AM peak than either the inter-peak or PM periods. For the A1 SB and A1198 SB route this **can be explained by the need to queue at the Black Cat and Caxton Gibbet roundabouts...** Journey time route 4 (A421/A1/A428) in the eastbound direction sees significant delay from the IP in both the AM and PM periods; while in the westbound direction there is only a significant difference from IP (Inter1Peak) journey times in the AM with a smaller difference in the PM period. This route goes through two junctions known to have significant delay, Black Cat and Caxton Gibbet roundabouts.'*

If road improvements are to be considered as a last resort to improve the delays highlighted, then examination of the JACOBS report A428 Black Cat to Caxton Gibbet Option Assessment report reveals Option 'C10 Local junction widening with channelisation at existing A428 junctions, grade separation at Caxton Gibbet roundabout, grade separation at Black Cat and upgrade to existing A1 junctions', as being identified as a solution costing £100 to £250 million. This would represent best value. The JACOBS report on p63 lists it as the 'Low Cost Solution':

'...are the lowest cost options considered to perform well against the problems and issues on the route.'

This scheme was not taken forward to public consultation despite the appraisal stating in Appendix K Summary Tables the following benefits:

'The scheme is likely to improve journey times along the route and remove queuing for key movements at major junctions, therefore providing significant benefits... Journey time reliability has been highlighted as a key problem on the route and this scheme would likely significantly improve the consistency of journey times... The scheme is likely to improve journey times along the route and remove queuing for key movements at major junctions, therefore providing significant benefits... The scheme is likely to reduce congestion and improve journey times leading to reduced traveller stress.'

If the aim of the consultation (Consultation Doc p4 *We are consulting on the route options to improve the A428 between the Black Cat roundabout and Caxton Gibbet'*) was to find a localised road only based solution to the current A428 congestion/journey time issues highlighted, then CPRE would support Option C10 as the preferred choice.

Conclusions

CPRE has responded to Q1.11.1.3 as requested and has made additional comments with respect to Q1.15.3.1, Q1.4. and Q1.11.

We have raised serious concerns that the road traffic data used to support this proposal can no longer be relied upon following the COVID pandemic and consider that this project should at least be deferred until proper and current evaluation has occurred.

CPRE has also raised serious concerns about the lack of any proper attempt to take an integrated approach to Transport Planning in the county. We believe that this should be done as a matter of urgency in co-operation with the Cambridgeshire and Peterborough Combined Authority who are the body responsible for transport planning in the county.

Cont'd...

We have highlighted our serious concerns about the greenhouse gas emissions and additional pollutants which will arise if this project proceeds. Our concerns are echoed by the Climate Change Committee to Parliament, by the Chief Medical Officer and by the many health studies which we have listed above. These issues must be taken seriously and responsibly.

We consider that this project, if pursued, should probably revert to a localised road solution to the current A428 congestion/journey time issues and not be constructed to 'expressway' standards as proposed. This would be consistent with the need to minimise the use of scarce public funds and minimise borrowing post-COVID.

Finally, please note that our submission is in respect of the proposed project. While we have taken every effort to present accurate information for your consideration, as we are not a decision maker or statutory consultee, we cannot accept any responsibility for unintentional errors or omissions, and you should satisfy yourselves on any facts before reaching your decision.

Yours faithfully

Gareth Ridewood
For and on behalf of CPRE Cambridgeshire and Peterborough

Cc: Jonathan Djanogly MP
Daniel Zeichner MP
Anthony Browne MP
Dr Nik Johnson

