

# A428 Black Cat to Caxton Gibbet improvements

TR010044

Volume 9

**9.32 Applicant response to actions arising from Issue Specific  
Hearing 2**

Planning Act 2008

Rule 8(1)(k)

Infrastructure Planning (Examination Procedure) Rules  
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Infrastructure Planning

Planning Act 2008

**The Infrastructure Planning (Examination  
Procedure) Rules 2010**

**A428 Black Cat to Caxton Gibbet  
improvements**  
Development Consent Order 202[ ]

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# 1 Applicant’s Response to actions arising from Issue Specific Hearing 2

- 1.1.1 Following Issue Specific Hearing 2 (ISH2) which was held on Thursday 23 September 2021 the Examining Authority (ExA) published a list of actions arising from ISH2 on 27 September 2021 which required a response or update at Deadline 3.
- 1.1.2 Of the actions identified a number were identified for the Applicant whilst others were directed to other interested parties.
- 1.1.3 The following table sets out only those actions directed to the Applicant and the Applicant’s corresponding response. In some instances, as noted within the table, further discussions will take place with relevant parties after Deadline 3 and the Applicant will update the ExA at subsequent deadlines as appropriate.

**Table 1-1 Applicant’s responses to actions arising from Issue Specific Hearing 2**

Action No.	Action	Party	Response at Deadline 3
1	Report on the possibility, process and outcomes of greater sensitivity testing of the strategic traffic model with regard to stated concerns from Local Highway Authorities (LHAs), in locations highlighted in Local Impact Reports, at minimum: <ul style="list-style-type: none"> <li>a. Great north road (and side roads) leading to Wyboston Roundabout, St Neots</li> <li>b. Caxton Gibbet Roundabout</li> <li>c. A1/A603 Roundabout, Sandy</li> </ul>	Applicant	Please see the Scope of Junction Model Sensitivity Test [TR010044/EXAM/9.44] submitted at Deadline 3.
2	Joint Position Statement on the possibility, process and outcomes of common modelling methodology	Applicant and Local Highway Authorities	Please see the Joint Position Statement with Local Highway Authorities [TR010044/EXAM/9.38] submitted at Deadline 3.
3	Confirmation of intended ‘early and ongoing engagement’ with LHAs in the Outline Construction	Applicant	The Applicant confirms that engagement with the LHAs has already commenced on the Outline Construction Traffic Management Plan (OCTMP). The Applicant is committed to continuing engagement with the affected LHAs on the OCTMP through the examination and

Action No.	Action	Party	Response at Deadline 3
	Traffic Management Plan (CTMP)		<p>update the document in line with any agreed changes. The Applicant will submit an updated version of the OCTMP to the Examining Authority during the examination period.</p> <p>As outlined in the OCTMP, the Applicant also wishes to confirm that the LHAs will be consulted as the detailed traffic management plans and provisions are developed in subsequent stages including both prior to and during construction of the Scheme.</p>
4	<p>Update on the construction traffic impacts at the following locations, including likely Heavy Goods Vehicles (HGVs) numbers, routes and frequency:</p> <ol style="list-style-type: none"> <li>Station Road, Tempsford</li> <li>Sandy</li> <li>Potton Road Junction</li> <li>Cambridge Road Junction</li> </ol>	Applicant	Please refer to Appendix A of this document for the Applicant's response to Action Point 4.
5	Provide the number of construction workers and other site/compound, based employees expected to be involved in the scheme during all construction phases, and the expected effects on local traffic. Consider the provision of Workers and Employee Travel Plan.	Applicant	<p>The maximum monthly workforce to be employed across the Scheme will be 900. This includes National Highways staff, Technical Assurance staff, contractor's staff, management, plant operators, and operatives. The numbers, however, will vary throughout the duration of the construction period.</p> <p>This workforce will be employed at multiple locations across the project including the two main compounds proposed at Black Cat and Wintringham. As on other similar highway schemes the largely rural location of these works and the diverse locations from which staff and labour will be drawn, together with a lack of local public transport options, means that the workforce will travel to the site in cars, vans and minibuses.</p> <p>The site compounds make an allowance for a suitable number of parking bays to accommodate these vehicles.</p> <p>The main site compounds at Wintringham and Black Cat will be accessed directly from the</p>

Action No.	Action	Party	Response at Deadline 3
			<p>Strategic Road Network (SRN). These compounds will be meeting points for the majority of the site-based workforce and include canteen and drying room facilities. The workforce will be consolidated into teams in these compounds before travelling to their planned worksites together in site minibuses or vans. This will allow vehicle access onto the site to be controlled by the Principal Contractor with the works teams travelling to their specific work sites via the site haul routes either directly from the compounds or from the local road network.</p> <p>All staff and operatives will be required to complete a site induction prior to starting works on the project. This induction will include a briefing on travelling to work including details of potential public transport options, electric vehicle charging points, secure parking for bicycles and options for car sharing. A Travel Plan provides a benefit on a scheme where there are opportunities for the workforce to use various modes of transport to travel to work. In this case a Travel Plan has not been developed as those working on the Scheme are expected to be drawn from a wide area and will vary in makeup throughout the duration of the programme as activities and thus the skills required change. There will also be a variation in the shift patterns by operatives for different activities and trades. The options for using alternative transport modes would be limited to a relatively small number of staff. <b>The Applicant notes that, as far as it is aware, it is not usual practice for National Highways DCO schemes to include Travel Plans for its workforce.</b></p> <p>The Scheme will actively seek to recruit from the local community. It is envisaged that shorter local trips may be more attractive to undertake by public transport over longer trips assuming shift patterns are aligned to provision. For example, the Wintringham compound is in close proximity to St Neots train station and should demand become evident, a minibus could be provided for transport from the train station to site.</p> <p>The traffic modelling completed for the Scheme includes the additional traffic that will be associated with the workforce travelling to the</p>

Action No.	Action	Party	Response at Deadline 3
			project in the morning and evening peak hours during the period of the works and this has therefore been assessed.
6	Consider how physical measures such as temporary traffic calming (to reduce need for enforcement), or temporary traffic regulation HGV restrictions could be introduced to assist in mitigating effects of construction traffic and inappropriate re-routing on the local highway network.	Applicant	<p>Construction vehicles employed on the Scheme will be controlled through instructions to drivers and suppliers as to which roads may be used and which may not be used. If there are infringements these will be dealt with through informal warnings and/or disciplinary action.</p> <p>In respect of other network users, traffic management for the Scheme is specifically designed to minimise delay on the Strategic Road Network (SRN) so that re-routeing onto inappropriate routes is not advantageous. This ensures that traffic is retained on the SRN as far as possible. In addition to the obvious benefits of retaining traffic on the SRN, it is more effective to monitor and manage traffic on the strategic network than on the wider local network. For example, if strategic network monitoring indicates that journey times are increasing on the SRN, the Applicant can alter signage to warn drivers of the delays and to direct them to use alternative routes at an appropriate point on the strategic network, and this is done in real time.</p> <p>Where the Local Highway Authority (LHA) advises of a significant increase in self diverting traffic on the local network, the Applicant will review this information against performance on the SRN. Should a relationship be established the Applicant will work with the LHA to determine suitable temporary traffic management measures.</p> <p>Deploying temporary traffic management measures in this way obviously takes time, unlike the real time approach proposed by the Applicant. If it is agreed that temporary traffic management measures should be deployed in a particular location, this may reduce traffic self-diverting to the particular route in question, however, if the cause for the self-diversion is not addressed at its core (i.e. on the SRN as the Applicant proposes), this may lead to further self-diversion to an alternative route rather than encourage the self-diverting traffic to re-join the SRN.</p>

Action No.	Action	Party	Response at Deadline 3
			<p>In summary, an approach which focuses on traffic monitoring and mitigation on the local network rather than the strategic network will not address the reason for the self-diversion and is likely to be a longer-term solution given the time it will take to implement. It also has the potential to result in traffic continuing to self-divert (albeit to other routes), which then perpetuates the need for other traffic calming measures to be undertaken at multiple locations. For these reasons, the Applicant considers that the most effective approach is to manage traffic on the strategic network as the Applicant has proposed in the Outline Construction Traffic Management Plan [APP-244].</p>
7	<p>Explain how local and landowner consultation will occur for temporary traffic management proposals associated with construction, including but not limited to road closures and lane closures.</p>	Applicant	<p>Through consultation with local residents, landowners, occupiers and other stakeholders prior to the start of construction, the Principal Contractor's stakeholder and community engagement team will establish lines and routine means of communication to suit the individuals involved. National Highways use the full range of media available from press notices through social media platforms to letter drops to individual households. Individual requirements and preferences vary and the team will be as flexible and accommodating as possible.</p> <ul style="list-style-type: none"> <li>• National Highways standard communication plans require the Principal Contractor to notify all stakeholders of temporary traffic management changes at least 10 working days in advance. Depending on the circumstances, advance notification of traffic management arrangements and/or changes may be longer than 10 working days. Emergency events will be notified as widely as possible through local contact points and via the Scheme's social media channels.</li> <li>• Local Authorities and parish councils will be invited to the regular (usually monthly) traffic management meetings where plans are assessed and discussed between a number of parties including the emergency services.</li> </ul>



Action No.	Action	Party	Response at Deadline 3
			<ul style="list-style-type: none"> <li>Those people affected by more localised limitations to vehicle movements will be engaged directly in order to minimise disruption to them. An example might be making arrangements with a works team to enable farm vehicles to safely cross a haul route or working space during planting or harvest periods, or rescheduling that work package to enable farm work to take place unhampered during certain periods.</li> <li>The stakeholder and community engagement team will work with all parties to find reasonable resolutions wherever possible and minimise disruption to the public as a whole.</li> </ul>
8	Provide the next iteration of the Outline CTMP.	Applicant	The deadline for submission of the next iteration of the Outline CTMP is Deadline 4 (4 November 2021). The Applicant will submit the document at this deadline.
9	Provide the document on the proposed design and design development process, and highlight the most suitable way to secure it in the Draft Development Consent Order (dDCO).	Applicant	Please see document <b>[TR010044/EXAM/9.26]</b> , submitted at Deadline 3. It is the current intention of the Applicant to secure the Good Design document by including it within the First Iteration Environmental Management Plan <b>[APP-234]</b> .
10	Provide a technical note on the baseline noise data review that concluded that the 2017 data was sufficient for the ES.	Applicant	Refer to Appendix B of this document for response to Action Point 10.
11	Provide an update on outcomes of discussions with Central Bedfordshire Council regarding air quality in Sandy, specifically regarding potential mitigation measures during construction and operational phases.	Applicant	<p>In the Statement of Common Ground Central Bedfordshire Council (CBC) <b>[REP1-011]</b> indicated they were satisfied with the construction phase dust mitigation measures proposed in the First Iteration Environmental Management Plan <b>[APP-234]</b>.</p> <p>As set out in the Applicant's response to the Written Questions <b>[REP1-022]</b>, it is the Applicant's position that because there have been no significant effects predicted as a result of the Scheme (only imperceptible increases are predicted at receptors above the objective value) no mitigation measures are required in</p>

Action No.	Action	Party	Response at Deadline 3
			<p>regard to the Sandy Air Quality Management Area (AQMA) for the operational phase.</p> <p>As was expressed by CBC in ISH2, they have not suggested any specific mitigation proposals for National Highways consideration.</p> <p>Historically (outside of the A428 project) discussions have been held between National Highways and CBC regarding measures to improve air quality within the Sandy AQMA. Those meetings did not result in any specific measures being agreed for this location.</p> <p>For example, air quality barriers were considered however these were not considered practical due to space constraints between the A1 and the residential properties.</p>
12	Details on how each pre-commencement activity would be controlled, with particular reference to the related issues raised by Cambridgeshire County Council, Huntingdonshire District Council and South Cambridgeshire District Council Deadline 1 submission <b>[REP1-103]</b> .	Applicant	Please see document <b>[TR010044/EXAM/9.37]</b> , submitted at Deadline 3.
13	Statements of Common Ground to include detail of engagement with LHAs regarding the effects of intended limits of deviation and changes to Public Rights of Way, so as to be sure future records are correctly updated and links do not become severed.	Applicant	The deadline for submission of the next iteration of the Statements of Common Ground is Deadline 4 (4 November 2021). The Applicant will submit the documents at this deadline.
14	Provide details of the Handover Plan for roads to be passed to Local Highway Authorities (and if applicable land owners) and update on the related side legal agreements with the LHAs.	Applicant	The deadline for submission details of the Handover Plan is Deadline 4 (4 November 2021). The Applicant will submit the details at this deadline.
15	Consider and update on the need, rationale for	Applicant	The NFU Written Representation <b>[REP1-085]</b> requests a specific point of contact for

Action No.	Action	Party	Response at Deadline 3
	inclusion and role description of an Agricultural Liaison Officer or Team in the First Iteration Environmental Management Plan (EMP) in light of NFU representations.		agricultural landowners through inclusion of an Agricultural Liaison Officer (ALO), and this is largely acceptable to the Principal Contractor. The Principal Contractor will employ a number of individuals who will collectively liaise with all stakeholders and provide community engagement. The Principal Contractor will allocate a named individual within the stakeholder and community engagement team as the ALO. Should the named ALO require specialist agricultural advice to respond to landowner concerns, the Principal Contractor would expect to engage an agricultural and environmental consultancy to support the ALO. Previously, the Principal Contractor has engaged ADAS to support a named ALO. ADAS are the UK's largest independent provider of agricultural and environmental consultancy. A full description of the stakeholder and community engagement team, including the ALO role, will be included in the Second Iteration Environmental Management Plan and the First Iteration Environmental Management Plan will be updated accordingly.
16	Identify all specific locations where pedestrian signal crossings are intended to be introduced. Provide corresponding information including plans and highlight if the introduction of the pedestrian signal crossings affects the modelling of junctions. Provide clear justification in line with Advice Note 16, whether a corresponding change request is required.	Applicant	<p>The 2016 NMU surveys recorded no users using the footway at Cambridge Road whatsoever. The 2020 NMU surveys [APP-216] recorded two pedestrians and 11 cyclists using the footway. Nonetheless, signalised crossings have been proposed for Cambridge Road as referred to below.</p> <p>At Caxton Gibbet the 2016 NMU survey recorded 23 pedestrians and 52 cyclists using the footway. The 2020 NMU survey recorded 13 pedestrians and 53 cyclists using the footway. Similarly, signalised crossings have been proposed for the Caxton Gibbet junction as set out below.</p> <p>Signalised crossing will be provided at the following locations. Refer to Sheets 9 and 14 of the General Arrangement drawings [APP-011]:</p> <p><b>Cambridge Road junction (Sheet 9 of APP-011) – 1.</b> At the eastbound on slip-road approximately 20m east of the exit from the northern roundabout.</p> <p><b>2.</b> At the westbound off-slip road approximately 20m east of the entry to the southern roundabout.</p>

Action No.	Action	Party	Response at Deadline 3
			<p><b>Caxton Gibbet junction (Sheet 14 of APP-011)</b></p> <ol style="list-style-type: none"> <li>1. On the A1198 north of the junction, a crossing from the west side of the A1198 to the central refuge/splitter island.</li> <li>2. On the A1198 north of the junction from the central refuge/splitter island to the east side of the A1198.</li> <li>3. On the eastbound on-slip road approximately 20m south east of the exit from the northern roundabout.</li> <li>4. On the westbound off-slip road approximately 10m east of the entry to the southern roundabout.</li> <li>5. Consideration is being given to provision of a signalised crossing of the A1198 approximately 45m south of the southern roundabout.</li> </ol> <p>The full details of the proposed pedestrian signalised crossings will be dealt with as part of the detailed design and therefore no change request is proposed. It should be noted that any changes made to pedestrian signalised crossings at the detailed design stage would not be of an order that would alter the conclusions reported in the Environmental Statement.</p> <p>Whilst the junction modelling has not included the proposed signal-controlled crossings, the daily NMU survey results show that the expected level of usage during the peak hours is likely to be very low. The inclusion of these crossings in the model is not anticipated to materially impact the operation of the junctions because the signal crossings will be activated infrequently.</p>

## Appendix A: Response to Action Point 4

### ISH2 Hearing Action Point 4

- *Update on the construction traffic impacts at the following locations, including likely Heavy Goods Vehicles (HGVs) numbers, routes and frequency:*
  - a. *Station Road, Tempsford*
  - b. *Sandy*
  - c. *Potton Road Junction*
  - d. *Cambridge Road Junction*

### Response

#### a) Station Road, Tempsford

- Station Road, Tempsford is shown in the Outline Construction Traffic Management Plan [APP-244] as a route that will have restricted access during the construction works. The restrictions on this route only allow access for vehicles required for the works to construct the new Cadent Gas Main diversion and the East Abutment of the structure that will carry the new road across the East Coast Mainline.

1.1.4 An average of 30no HGV will use the access through Station Road per week while these works are in progress. However, the nature of this construction work will mean that the number of HGV movements during some periods will be much less than would be expected from this average weekly figure and conversely, for specific activities where bulk materials including stone and concrete are required to facilitate the works, up to 25 HGV may use this restricted route during a day.

#### b) Sandy

1.1.5 Sandy is remote from the construction site and no specific roads have been identified in this area as logistic routes that will be used by HGVs supplying the construction works.

#### c) Potton Road Junction

1.1.6 The Applicant assumes this question relates to the impact of the construction site access that is shown in the Outline Construction Traffic Management Plan [APP-244] from Potton Road, and the associated construction traffic permitted routes that are shown through St Neots.

1.1.7 The Outline Construction Traffic Management Plan [APP-244] will be revised to show the access route to Potton Road from the south via Barford Road and the B1046 that passes the secondary school (St Ernulf Academy) as restricted to Light Goods Vehicles and thus Construction HGVs will not use this route.

1.1.8 The route via Cambridge Road and Cromwell Road will remain as a Green Route with construction traffic permitted and will be used by HGVs accessing the Potton

Road site access. An average of 200 HGVs per week will use this route during the construction works.

#### **d) Cambridge Road Junction**

- 1.1.9 A construction access is shown at Cambridge Road Junction which will allow construction traffic to access directly from the A428 Trunk Road to the construction site. The A428 is shown in the Outline Construction Traffic Management Plan [APP-244] as a Green Route with construction traffic permitted. An average of 275 HGVs will use this site access per week during the construction works.

#### **Noise**

- 1.1.10 No significant traffic noise effects due to the addition of construction traffic onto existing roads are anticipated in the four identified locations.
- 1.1.11 The criteria for identifying significant traffic noise effects due to the addition of construction traffic is described in paragraph 11.3.43 of Chapter 11 of the Environmental Statement [APP-080]. In summary, there is the potential for significant traffic noise effects on routes which have been identified as 'affected routes' and on which a traffic noise level change of greater than or equal to 3dB is predicted to occur for either:
- a. Ten or more working days (or evenings/weekends or nights) in any 15 consecutive days.
  - b. More than 40 days (or evenings/weekends or nights) in any six consecutive months.
- 1.1.12 Affected routes have been identified as those where there is the potential for the traffic noise levels to change by 1 dB or more due to the addition of construction traffic. Figure 11.2 [APP-144] illustrates the 'affected routes' identified due to construction traffic noise. Some sections of Potton Road meet the criteria of a change of 1 dB(A) or more to be identified as an affected route, though as detailed in Appendix 11.5 [APP-214] the anticipated increase on sections of Potton Road (link Ref: 4206>4434 and 3111>3654) across the various construction phases is a maximum of +1.5 dB(A), which does not meet the 3dB threshold to be identified as a potential significant effect.
- 1.1.13 There are no affected routes for construction traffic noise identified in the vicinity of the other three areas listed and therefore the impact of construction traffic in these locations is predicted to be negligible.

#### **Air Quality**

- 1.1.14 No significant air quality effects due to construction traffic on existing roads were predicted as set out in the Air Quality chapter of the ES [APP-074].
- 1.1.15 As set out in that chapter, based on guidance set out in DMRB LA 105, the assessment of construction impacts should be 'proportionate and limited to the areas of key risk of exceeding air quality thresholds'. To identify areas of key risk, the ARNs were cross referenced with the base year modelling outputs.

## **Sandy**

- 1.1.16 One key risk area for residential properties was identified, which was a property located on Bedford Road, to the east of the A1 junction at Sandy. Annual mean pollutant concentrations at this receptor were predicted to be below the objective value in the construction phase, both with and without construction traffic, and an imperceptible increase was predicted, therefore there were no significant effects predicted for air quality.

## Appendix B: Response to Action Point 10

### ISH2 Hearing Action Point 10

- a. *Provide a technical note on the baseline noise data review that concluded that the 2017 data was sufficient for the ES.*

#### Response

- 1.1.17 The discussion of the baseline noise survey carried out in 2017 is reported in paragraphs 11.6.16 to 11.6.23 of Chapter 11 Noise and Vibration of the ES **[APP-080]**.
- 1.1.18 In summary, the purpose of the baseline noise survey was two- fold:
- to assist with developing an understanding of the general noise climate along the Scheme. For example, to identify if any local noise sources other than road traffic were present, and if these contributed significantly to the local noise climate; and
  - to validate the traffic noise prediction modelling by comparing predicted traffic noise levels with the measured noise levels.
- 1.1.19 The validation exercise compared the baseline ambient noise levels measured during 2017 and the predicted traffic noise levels using 2015 Base Year traffic data, i.e. the measurement and traffic data were comparable. An exact match between the measured and predicted levels would not be expected for a variety of reasons, for example:
- 1.1.20 The noise predictions are based on typical weekday traffic conditions over a year, not the exact traffic conditions during the few weeks or hours of noise monitoring.
- 1.1.21 The prediction method is designed to be conservative in terms of the effect of wind direction whereas the wind direction is likely to vary throughout the monitoring period.
- 1.1.22 The noise predictions only consider road traffic noise, whereas the measurements include all ambient noise sources.
- 1.1.23 The monitoring carried out at ten locations along the length of the proposed Scheme provided sufficient information on the existing noise climate, concluding that a majority of the locations were dominated by existing road traffic noise sources. The exception was the rural location of Rectory Farm in Little Barford (M6). This location, located away from existing roads in a rural area, was observed to experience a number of other noise sources including agricultural sources, rail noise from the East Coast Mainline and noise from nearby overhead power lines.
- 1.1.24 In addition, no material changes in baseline conditions in the study area have been identified between 2017 and 2021. Chapter 11 Noise and Vibration **[APP-080]** of the Environmental Statement noted the ongoing development at Wintringham and the former site of St Neots Footgolf and Golf Centre on Potton Road which has been redeveloped with nine residential properties. However, the



scale and location of both these developments will not make a material difference to the current traffic levels on the surrounding network. The 2025 traffic data used in the traffic noise impact assessment reported in the ES, includes traffic associated with developments which have occurred since the baseline traffic year.

- 1.1.25 The validation exercise concluded that at a majority of the locations where road traffic noise was dominant, there was a reasonable match between measured and predicted traffic noise levels. Further discussion of the comparison of the measured and modelled noise levels is provided in paragraphs 11.6.18-11.6.23 within Chapter 11 Noise and Vibration **[APP-080]** of the Environmental Statement. Overall, the comparisons provide confidence that the noise model developed to estimate the noise impacts of the Scheme is a reasonable approximation.
- 1.1.26 A small piece of additional work to that reported in Chapter 11 Noise and Vibration **[APP-080]** has been undertaken to further validate the Applicant's conclusion that the 2017 measured data is sufficient for understanding the existing noise climate. This involved predicting traffic noise levels using Do Minimum 2025 traffic data at the 2017 noise monitoring locations and comparing these with the 2015 predictions. The results indicate that the magnitude of the change in predicted traffic noise levels between 2015 and 2025 is negligible (less than 1 dB).
- 1.1.27 Furthermore, as set out in paragraph 6.1.4 of Assessing the Potential Impacts of COVID 19 – The implications for traffic forecasts for the Scheme - Rev 1 **[REP1-029]**, highway traffic on the Strategic Road Network in the vicinity of the Scheme has recovered strongly following the relaxations of traffic restrictions in summer 2020 and early 2021, with road traffic levels currently approaching pre-COVID levels.
- 1.1.28 In conclusion, the Applicant considers that this additional analysis further validates its original conclusion that the 2017 measured data is sufficient for both understanding the existing noise climate and the validation of the noise model. In the absence of the pandemic the monitoring at a small number of additional sites discussed with the Local Authorities in 2020/21 would have simply provided supplementary data for the validation of the baseline traffic noise model, it was never essential for this process, and the impact of the pandemic on traffic conditions meant any data collected during that time would be unlikely to be useful for that purpose. It is noted that during ISH2 Central Bedfordshire Council confirmed that they agreed that the 2017 baseline data was robust and adequate for the ES. Finally, it should be understood that collecting additional baseline data would not change the outcome of the ES as baseline data are not used directly in the identification of significant effects, nor would it change any of the proposed noise mitigation measures.