A428 Black Cat to Caxton Gibbet improvements

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9.103 Applicant's comments on the submissions made at Deadline 6 Camcycle [REP6-077]

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Development Consent Order 202[ ]

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1 Introduction

1.1.1 The Development Consent Order (DCO) application for the A428 Black Cat to Caxton Gibbet improvements scheme (the Scheme) was submitted by National Highways (the Applicant) to the Secretary of State for Transport via the Planning Inspectorate on 26 February 2021 and accepted for Examination on 23 March 2021.

1.1.2 The purpose of this document is to set out the Applicant's comments on submissions made by Camcycle at Deadline 6 of the Examination, set out in document reference **[REP6-077]**.

2 Applicant's comments on submission made at Deadline 6 by Camcycle

REP6-077 – Camcycle

Post-Hearing Submission

Reference Number	Interested Parties Submission/Applicant's Comments
REP6-077a	Camcycle is a volunteer-led charity with over 1,600 members working for more, better and safer cycling for all ages and abilities in the Cambridge region. We focus on cycling as a mode of sustainable general transportation for everyday purposes. Many of our members transport themselves and their families using a wide variety of cycles, such as cargo cycles, tandem cycles, tricycles, recumbent cycles, disability-adapted cycles and cycles with trailers. ISH5 Action 8: points to be made in addition to previous submission We have very little confidence that the applicants will comply with Gear Change and other policies regarding active travel unless they are compelled to do so. Our experience with the A14 project informs us. The applicants have at all stages failed to consult with active travel users in critical ways, and have refused for specious reasons to use modern design guidance, even from their own manual, the Design Manual for Roads and Bridges (DMRB). For example: • The county has documented, in their representation, a case in Histon and Impington where the A14 project team widened a roundabout for motorists and left behind a very poor situation for the numerous people who were walking and cycling at the crossings. This had to be remedied after the fact with a crude fix, costing time and money for the local highway authority. • Another example is at the so-called landmark active travel bridges built at Bar Hill and Swavesey/Boxworth. A year ago, then-Highways England suddenly installed exclusionary barriers on both ends of both bridges, defying Gear Change, LTN 1/20, the Equality Act, and their own DMRB CD 195 guidance. Highways England did not perform an Equality Impact Assessment, nor did they ever respond to our enquiries asking what standards or guidance documents they had followed in creating these barriers. Instead, they made up some post hoc rationalisations that had no connection to the actual situation on the ground, implying that (in brief) cyclists would somehow exceed the laws of physics in ways that would cause problems for motorists. A longer rebuttal of their arguments can be viewed at REF 17. In any case, Highways England then promptly gave up responsibility for the site and handed the problem to the county. See REF 6 for the FOI request and outcome. Eventually, the situation required a significant investment in time and money by both

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	the local highway authority and volunteers such as ourselves in order to rectify the matter after the bridges were adopted by the county. • When building the expanded A14 overpass of the Cambridgeshire Guided Busway, they needed to close the busy and popular active travel route that runs alongside the Busway. The officers at then Highways England provided no more notice than a small sign posted on a pole about five days before the closure (see REF 16). The diversion route was not ready in time for the closure and was poorly coordinated when it finally did arrive. Thousands of people use this active travel route every day, including many schoolchildren from outlying villages; they were all left stranded to find their own way on much more dangerous alternative roads during the closure of the Busway route. To have such a crucial route shut down in such amateur fashion with hardly any notice and no diversion ready to go in time shows how little respect that the applicant has for active travel. • We have previously raised the issue of dangerous roundabouts, crossings and junctions on the A14 project. We are especially concerned about junctions and roundabouts where the curvature of the roadway is designed for very high speeds, but active travel users are somehow expected to cross the live carriageway at-grade. The response we received from Mr David Bray (via email) included this statement: 'Using tighter radii risks vehicle overrun and damage to the crossing facility, which would become a maintenance concern' and similar statements have been found in other correspondence (see REFs 3, 4 & 11). From this response we gathered that Highways England was more worried about damage to the crossing facility and maintenance concerns than they were worried about injuries to human beings trying to cross the road. • Prior to LTN 1/20, Highways England / National Highways had a section of the Design Manual for Roads and Bridges (DMRB) known as CD 195 (REF 14) that specified the design of infrastructure for cycle traffic. CD 195 is fairly well written and it would have saved a lot of trouble if it had been followed. It would seem logical that they should use CD 195 for any cycling infrastructure, in addition to any other relevant guidance for other non-motorised modes. Instead, the officers at then-Highways England took a very pedantic stance, claiming that their schemes 'incorporate shared use facilities [not cycleways], and therefore the design parameters in CD 195 are not directly applicable' (similar statements are found in REFs 2, 3 & 11). The officers threw out the modern guidance and used some very old and dated documents. • We believe this above described pedantic stance was taken in bad faith. After all, those very same officers are more than happy to use motor-traffic-specific guidance to design ordinary public highways that are by law shared between motorised users and non-motorised users. They showed no inclination to throw out any other part of DMRB on the grounds that such highways are shared between many different types of road

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	users. It is only CD 195 that receives this strange and illogical treatment. We believe that officers at Highways England deliberately had particular wording inserted into the introduction of CD 195 knowing that they could make this highly tendentious argument. Since cycle routes built by Highways England are always shared by other non-motorised users, they have effectively nullified the entire existence of CD 195 by inserting a single sentence into the introduction, and rendered the document completely useless despite all the care and effort that went into producing it. • Later, Highways England added a section to DMRB called CD 143 'Designing for walking, cycling and horse-riding' (REF 15). CD 143 has a relatively small number of useful specifications in it, but it is a largely inadequate document with many, many important details missing, such as how to design safe junctions and crossings. It is not possible to design a sensible active travel route on the basis of CD 143 alone. It seemed obvious from the way it was written that CD 143 made sense when combined with other manuals such as CD 195 to fill in the details, but the officers at Highways England refused to use CD 195 (e.g. REFs 2, 3 & 11), and thus did not avail themselves of the latest design guidance of the time. • In any case, Local Transport Note (LTN) 1/20 and the Gear Change Policy have been published in the interim and are explicitly applicable to all highway projects in England. Will the applicant, National Highways, apply these policies and specifications diligently and honestly? We shall see, but we do not have much reason to believe they will respect active travel policies and specifications unless they are compelled to do so.
Applicant's comments	The A14 Cambridge to Huntingdon scheme was designed in compliance with the 2014 version of DMRB and followed the standards as stated at the time; it is not possible to update significantly developed design to meet constantly developing documentation. Independent Road Safety Audits (RSA) were carried out on the two non-motorised user bridges at Swavesey & Bar Hill prior to the handover of the structures to Cambridgeshire County Council. The Audit identified safety concerns for cyclists who may re-join the carriageway at speed when exiting the bridges. Metal barriers (that create a narrowing in the cycle route, allowing cyclists to pass through but at a reduced speed) were specifically installed at the request of Cambridgeshire County Council; such barriers exist elsewhere on the local authority network, for example alongside the Guided Busway. Of the four sets installed, three have subsequently been removed by Cambridgeshire County Council, but one set remains on the south side of the Bar Hill NMU bridge. The Scheme proposals include provision for shared use facilities and the level of provision is considered reasonable and proportionate. The Applicant has designed these facilities to DMRB standard CD 143 Designing for walking,

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	cycling and horse-riding. This standard covers the design of all NMU facilities whether it be for walkers, cyclists or horseriders. CD195 Designing for cycle traffic is a specific document that is for the design of cycle-only facilities and does not cater for any other types of user. As no cycle-only facilities are being provided as part of the Scheme CD195 Designing for cycle traffic, does not apply (CD195 Section 1.1 states "This document does not cover the design of shared use facilities for pedestrians, equestrians and cyclists"). The existence of a design standard does not mean that it needs to be used if the elements covered by that standard are not required as part of a National Highways scheme. The Scheme proposals do however incorporate some aspects of CD195, where it was appropriate to do so without affecting other users, such as the provision of "jug handle" style crossings where these are achievable within physical constraints. The Applicant maintains that LTN1/20 does not apply to the Scheme, or any National Highways scheme. The Applicant is not required to adopt the principles of Local Transport Notes. The requirements and standards in the Design Manual for Roads and Bridges are the appropriate standards to be complied with for the development of the Strategic Road Network, whereas LTN1/20 is a guidance document produced by the Department for Transport and is recommended to local highway authorities when seeking funding for construction or improvements of local highways, with particular emphasis on urban areas. It should be noted that LTN/120 is advisory and as such compliance with LTN 1/20 is not compulsory for local highway authorities either. In addition, the Scheme was designed prior to the publication of LTN1/20 and could not in any case be applied retrospectively. The Department for Transport's document 'Gear Change, A bold vision for cycling and walking' was published on 27 July 2020 and sets out Government's strategy for a step-change in cycling and walking in terms of promoting active travel and a significant increase in dedicated funding in cycling and walking. The strategy is predominantly focused at local authorities and the delivery of improvements to cycling and walking infrastructure within the urban environment (i.e. within towns and cities). The strategy states that Highways England will deliver even more cycling infrastructure as part of RIS2 published in March 2020 through the new Users and Communities Fund (i.e. Designated Funds). The Applicant considers that its proposals align with the 'Gear Change' strategy and as has already been noted maintains the position that the proposed NMU routes of the Scheme are both proportionate and reasonable.

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REP6-077b	History of correspondence between Camcycle, Daniel Zeichner MP and parties at Highways England/National Highways • (July 2019) Letter from Camcycle to Mr Daniel Zeichner MP: an outline of the problems and asking for assistance. (REF 1) • (Oct 2019) Mr Daniel Zeichner MP attends the Parliamentary Transport Committee (see transcript: 23 Oct, 11:40am) and asks Mr Jim O'Sullivan why Highways England was not following its own standards. • (Nov 2019) Letter from Camcycle to Mr Jim O'Sullivan: a follow-up on the remarks made at the Parliamentary Transport Committee. (REF 2) • (Dec 2019) Letter from Mr Jim O'Sullivan to Mr Daniel Zeichner MP: makes the claim that CD 195 is not applicable because they are only designing 'shared facilities'. Furthermore states that the existing A428 will become a local road 'safer and more attractive for cyclists'. (REF 3) • (Dec 2019) Letter from Mr Chris Taylor to Camcycle: makes the claim that the A14 project was designed in compliance with CD 143, which was published the previous month. Also repeats the claim that 'Using tighter radii risks vehicle overrun and damage to the crossing facility', without considering the safety risk from vehicles travelling at higher speeds facilitated by wider radii. (REF 4) • (Jan 2020) Letter from Camcycle to Mr Jim O'Sullivan: we rebut the claims made by the two officers from Highways England and reiterate our questions. (REF 5)
Applicant's comments	The Applicant notes the list of correspondence submitted by Camcycle into the Examination at Deadline 6.
REP6-077c	ISH5 Action 14: how and why LTN 1/20 should be embedded in the design principles document Sections 3 and 5 of the design principles document Had the applicant applied LTN 1/20 then it would have been included in the list of documents specified in paragraph 3.2.2. The applicant should from this point be required to apply LTN 1/20 and therefore include the document in the paragraph 3.2.2 list. This is because LTN 1/20 is the government's design manual for all cycling infrastructure and this scheme includes active travel provision that will be used for cycling. All subsequent design steps including detailed design must comply with LTN 1/20.

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Applicant's comments	The Applicant maintains that LTN1/20 does not apply to this scheme and disputes the position above in describing it as the Government's design manual for all cycling infrastructure. It provides guidance to local authorities and is not a design standard, but a Local Transport Note. Please refer also to response REP6-077a
REP6-077d	In paragraph 3.3.23, a key design principle for the scheme should be: Following the core and summary principles of LTN 1/20 in all aspects of design that touch upon infrastructure used by cyclists. Especially at junctions, structures and places where people must cross carriageways at-grade. The reason is that LTN 1/20 must be used to guide the design of all infrastructure that is used for cycling, and the active travel provision in this application will be used for cycling. Especially because LTN 1/20 specifies how to design junctions, structures and crossings in a way that is fully inclusive, safe and accessible for people of all ages and abilities.
Applicant's comments	Please see the response to REP6-077a
REP6-077e	In paragraph 3.3.23, a key design principle should be: Providing a coherent, safe, direct, comfortable and fully accessible route for active travel between St Neots and Cambourne, in accordance with LTN 1/20 and other relevant guidance for active travel. The reason is that the applicant must be serving the needs of all road users not merely those of motorised road users. Cyclists are road users who fall into the category of 'active travel' road users, and are among those road users who need coherent, safe, direct, comfortable and fully accessible routes between settlements. The government's design manual LTN 1/20 specifies how infrastructure should be designed in order to create and maintain active travel provision that is also suitable for cyclists of all ages and abilities, in addition to other active travel road users
Applicant's comments	Please see the response to REP6-077a
REP6-077f	In paragraph 3.3.33 subsection (f), the design principle should also state that permanent structures are designed in a way that meets all the necessary guidance for accessibility, safety, coherence and comfort as specified by guidance documents such as LTN 1/20. This is to ensure that the needs of active travel road users are not sacrificed for the sake of visual appearance.
Applicant's comments	Please see the response to REP6-077a

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REP6-077g	In paragraph 3.3.46 it specifies that the scheme has been designed in a way to minimise the frequency of future maintenance events using features that would reduce the number of repairs required. In our experience with prior schemes from the applicant (evidence submitted separately), these maintenance reducing features often compromise the safety of active travel road users by making carriageways, junctions and crossings much wider and larger than they need be. Wide and large carriageways encourage motorists to travel at much higher speeds and therefore put active travel road users in danger. We ask that this paragraph explicitly state that the principles of LTN 1/20 and the safety of active travel road users will not be compromised by any maintenance-reducing or similar features. Appendix A should also be updated accordingly.
Applicant's comments	Please see the response to REP6-077a
REP6-077h	In section 5, development of the detailed design, a step should be included in which the scheme will be audited from the standpoint of LTN 1/20 and other relevant guidance in order to identify and rectify all shortcomings for active travel users. The auditor must be an engineer with a specific qualification and training in the design of active travel infrastructure.
Applicant's comments	Please see the response to REP6-077a
REP6-077i	Appendix A of the design principles document In the table row pertaining to paragraph 4.31, the applicant mentions that there is poor non-motorised user provision along the corridor. However, the applicant does not propose to create coherent nonmotorised user provision along the corridor. Therefore the applicant should be required to create nonmotorised or active travel user provision along the corridor in a coherent fashion meeting the principles of LTN 1/20 and other relevant guidance for active travel. In the table row pertaining to paragraph 4.33, the applicant does not specify compliance with LTN 1/20. The government's cycling design manual, LTN 1/20, applies to all highway schemes. Therefore, the applicant should be applying LTN 1/20 to ensure that the scheme is fit for purpose.
Applicant's comments	Please see the response to REP6-077a

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REP6-077j	Appendix B of the design principles document In row 1 ('good road design makes roads safe and useful'), the applicants have failed to apply LTN 1/20 and therefore they have failed to design roads that are safe and useful for road users such as cyclists. The core principles of LTN 1/20 are safety, coherency, directness, comfort and attractiveness. LTN 1/20 applies to all highway schemes. In order to ensure that this scheme is safe and useful for cyclists the applicant should be applying LTN 1/20.
Applicant's comments	Please see the response to REP6-077a
REP6-077k	In row 2 ('good road design is inclusive'), the applicants have failed to apply LTN 1/20 and therefore they have failed to design roads that are inclusive. The overarching principle of LTN 1/20 is inclusivity. Infrastructure used for cycling must be fully accessible to people of all ages and abilities who may be riding a diverse variety of cycles of various sizes and dimensions. Failure to apply LTN 1/20 means that the applicants have failed to comply with their public sector equality duty as required under the Equality Act 2010. See in particular paragraphs 1.5.4, 2.4.1, 4.5.11 and 6.5.5 of LTN 1/20.
Applicant's comments	Please see the response to REP6-077a
REP6-077l	In row 6 ('good road design is environmentally sustainable'), the applicants try to make the case that their scheme will be environmentally sustainable. There are no grounds under which they can make this claim. Evidence from the SACTRA report (1994; REF 8) on trunk roads and the generation of traffic, and its recent update by WSP (2018; REF 9), show that increased road space leads to further induced motor traffic. This comes as more people switch away from sustainable transport modes to private motor cars, and new developments are planned in car-dependent locations that force people to make more motorised journeys. Therefore the opening of a new dual carriageway represents a massive increase in road space which will shortly thereafter be filled with a huge increase in the amount of motor traffic using it. For the next couple of decades, at least, that will imply an increase in the number of carbon-emitting internal combustion engines. As a result, this scheme will clearly exacerbate the climate emergency (see REF 7 for more details). Furthermore, the air pollution from the emissions of said vehicles will diminish air quality in the region. To make matters worse, the active travel provision of this scheme is piecemeal and does not comply with the latest design guidance such as LTN 1/20. If the applicant is being honest then they must include words to the following effect: 'The construction of this new dual carriageway will lead to an increase in motorised traffic and the production of more greenhouse gas and other emissions that will cause irreversible harm to the

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	global and local environment. This scheme is not in compliance with NPPF policies 11, 153 and 154 because it will exacerbate climate change by inducing more motorised journeys on the road network.' We note that the applicants have failed to consider alternative schemes that would be environmentally sustainable by reducing the number of motorised journeys in the region while increasing safety for all road users.
Applicant's comments	The traffic forecasts take into account the effects of changes in travel cost as a result of the Scheme upon demand for travel. This was carried out following the procedures set out in TAG unit M2.1 (Variable Demand Modelling) that follows the principles set out in the SATRA report. The Variable Demand Model (VDM) process is described in Chapter 5.4 of Appendix C of the Combined Modelling and Appraisal Report; Transport Forecasting Report **[APP-253]**. While the Scheme does not generate (induce) trips, the VDM forecasts a very small transfer of trips from rail to road. The main impact of the Scheme results from drivers changing their destination as the Scheme reduces travel times between the A1 and Caxton Gibbet and also due to drivers using different routes to make their journey. A comparison of the total vehicle distance travelled with and without the Scheme for each modelled time period is presented in Tables 6-4 and 6-5 of Appendix C Transport Forecasting Report of the Combined Modelling and Appraisal Report **[APP-253]** for 2025 and 2040 respectively. This shows that the increase in vehicle kilometres as a result of the Scheme is very small, ranging from 0.4% to 0.5%. The Scheme would produce significant benefits by reducing congestion along the existing A428 between Caxton Gibbet and the A1 at Black Cat along with significant savings in journey times. It would also provide significant traffic relief to other local routes as a result of traffic transferring to the Scheme, improving these routes for other non-vehicular users. Air quality effects, as set out in the Air Quality Chapter of the Environmental Statement **[APP-074]**, are not considered to be significant for air quality. Nitrogen dioxide (NO_2) pollution from roads disperses over short (200m) distances and therefore NO_2 concentrations at sensitive receptors are much more heavily influenced by the location of emissions, than the total emissions generated by the Scheme. The local air quality assessment for the operation of the Scheme has predicted imperceptible changes in NO_2 pollution (≤0.4µg/m^3) at the majority of modelled sensitive receptors. Whilst some increases in pollutant concentrations are predicted at individual receptors, where these are greater than imperceptible, air quality is good with concentrations under the air quality objective values. Similarly, some decreases in pollutant concentrations are predicted at receptors, particularly those located along the existing A428. As concentrations of pollutants are predicted to remain under the relevant air quality objective value at these receptors these changes are not considered significant. In response to the penultimate sentence, the National Planning Policy Framework (NPPF), Paragraph 5, explains that it does not contain specific policies for Nationally Significant Infrastructure Projects (NSIPs). They are

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	determined in accordance with the decision-making framework of the Planning Act 2008 (as amended) and relevant National Policy Statements (NPSs). The National Policy Statement for National Networks (NPS-NN) at paragraph 1.19 further explains that the National Networks NPS assumes the function of providing specific policies for NSIPs and provides transport policy which will guide individual development brought under it. The Applicant assumes that Camcycle's reference to "policies 11, 153 and 154" within the NPPF refer to the relevant paragraph numbers. NPPF Paragraph 11 relates to the presumption in favour of sustainable development in plan making and decision making; paragraphs 153 and 154 relate to planning for climate change. The Applicant's Case for the Scheme **[APP-240]**, Appendix A provides a NPSNN compliance table for the Scheme. Climate change matters contained within the NPSNN are addressed in response to NPSNN paragraphs 4.40-4.44 within Appendix A of the Case for the Scheme **[APP-240]**. Paragraph 2.2 of the NPSNN explains that "there is a critical need to improve the national networks to address road congestion...to provide safe, expeditious, and resilient networks that better support social and economic activity; and to provide a transport network that is capable of stimulating and supporting economic growth..."
REP6-077m	In row 7 ('good road design is thorough'), the applicants have omitted consideration of active travel provision. Such infrastructure that is used for cycling must be in compliance with the government's cycling design manual, LTN 1/20. Therefore, the applicant's road design is not thorough.
Applicant's comments	Please see the response to REP6-077a. The Applicant does not agree with Camcycle's comment regarding the road design not being thorough.
REP6-077n	In row 8 ('good road design is innovative'), the applicants have failed to mention any innovation with regard to active travel provision. They claim they chose their route because it 'provided additional connectivity to St Neots' and 'improved traffic and congestion'. However, the scheme does not provide those connectivity benefits to active travel users. Furthermore, the increase in road space will lead to an increase in traffic and congestion, as documented by the SACTRA report (1994) on trunk roads and the generation of traffic, as well as its recent update by WSP (2018). Far from being innovative, the applicants are repeating the well-worn mistakes of the 20th century by expanding road space instead of trying to manage road demand. A truly innovative approach to road design would instead seek to reduce motor traffic levels while increasing safety for all road users, enable mode shift to sustainable modes such as public transport and active transport, and thereby reduce both greenhouse gas and local particulate emissions in the region.

Reference Number	Interested Parties Submission/Applicant's Comments
Applicant's comments	Please see the response to REP6-077l.
REP6-077o	In row 9 ('good road design is collaborative') the applicants claim to have reviewed existing walking, cycling and horse-riding (WCH) movements to establish journey patterns on existing roads and public rights-of-way. However, given the poor existing non-motorised user provision they cite earlier in the document, it is unlikely that any kind of review of existing movements could provide a realistic view of what people would use if there was safe and LTN 1/20-compliant active travel infrastructure in place.
Applicant's comments	The comments are noted. The Scheme mitigates the impact it has on NMU movements as stated previously throughout the submission and examination process, and where reasonable opportunities exist to enhance the NMU provision, these have been included as part of the Scheme. Therefore, it is not reasonable or necessary to require any further NMU provision as part of the Scheme.
REP6-077p	Appendix C of the design principles document S2 Roxton Road Bridge: according to drawing ending in DC-3501 the bridge is proposed to have an active travel route within an off-carriageway space measuring 5.0m in width from kerb to parapet. According to Table 5-3 of LTN 1/20, there must be at least 0.5m of buffer space between the cycle route and any vertical obstruction over 0.6m tall. According to Table 6-1 of LTN 1/20, there should be 2.5m of separation between 60mph motor traffic and a cycle route, or an absolute minimum of 2.0m separation. This means that the effective width of the active travel route is only 2.0m (or 2.5m if following absolute minimum standards for protection). This effective width falls below the minimum standard of 3.0m for a lightly-used shared-use pathway as specified in Table 6-3 of LTN 1/20. To bring the Roxton Road Bridge into compliance with LTN 1/20 there should be: (a) a 0.5m horizontal separation between the parapet and the active travel route, (b) a 3.0m or wider active travel route, and (c) a 2.5m protective buffer between the 60mph motor traffic and the active travel route (or 2.0m at an absolute minimum). The protective buffer should be designed to prevent motor vehicles from mounting it and parking on it.

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Applicant's comments	CamCycle has taken the speed limit of Roxton Road as 60mph. This is not correct and a 40mph speed limit is proposed on Roxton Road as shown on Sheet 1 of the Permanent Speed Limit Plans **[APP-015]**. Using LTN 1/20, which the Applicant does not accept applies to the Scheme in any case, the separation between the carriageway and NMU route would be 0.5m as an absolute minimum, which taking the 0.5m separation from the parapet into account leaves a usable width of 4m. Even if a 60mph speed limit were to be in place it is extremely unlikely that vehicles would be able to achieve 60mph on the section in between the junction with Bedford Road and the new roundabout on the north side of the A421.
REP6-077q	S3-S8 Black Cat Junction and associated structures: we agree that active travel routes should be grade-separated from the Black Cat Junction. However, the scheme caters only for active travel movements between the northwest and the southwest of the junction, and does so via an indirect and circuitous route. The scheme simply does not offer a safe active travel crossing of the A1 and there are no other reasonably safe options within the vicinity of this area on the west side of the River Great Ouse. The combination of the A1, river and East Coast Main Line form a barrier to active travel between the Roxton and Gamlingay areas. An active travel bridge of the A1 near the New Black Cat Junction could form part of the missing link.
Applicant's comments	The route chosen for the footway/cycleway between the existing footway/cycleway on the A1 northbound carriageway and Wyboston takes users away from the A1 and leads to Wyboston via the Kelpie Marina access road, Bedford Road, Roxton Road (which forms part of Sustrans Route 12) and the Roxton Road Link. Although less direct, it is a substantial improvement over the existing route and is a more pleasant route than being adjacent to a busy dual carriageway. This strategy was presented to CamCycle during a meeting between National Highways designers and CamCycle in January 2020, where the overall NMU strategy, Scheme constraints and design issues were explained. During that meeting CamCycle made several suggestions for improvements to the original design and these were accommodated where it was possible to do so. There is no east-west NMU route from Black Cat junction and it is not reasonable or necessary for this to be provided as enhancement through the Scheme given the lack of evidence of need for such a provision and the increased land take which would be required to provide a new route in this location.

Reference Number	Interested Parties Submission/Applicant's Comments
REP6-077r	S9 River Great Ouse Viaduct: this structure lacks active travel provision, and no alternative is provided, therefore the scheme provides no way for active travel users to cross the River Great Ouse. That leaves a large gap in the active travel network. There is no reasonable way to cross the river between Blunham and St Neots. One possible improvement for active travel users would be the inclusion of an active travel sidepath on the viaduct; this would also have the benefit of providing a safe egress route for motorists on the viaduct. Alternatively an entirely separate active travel only bridge over the river could be provided.
Applicant's comments	Please refer to the response to REP6-077q. The verges on the River Great Ouse viaduct are sufficiently wide (2.5m with 1m separation from the carriageway) to allow their use in case of emergency or breakdown.
REP6-077s	S13 East Coast Main Line Railway Bridge: this structure lacks active travel provision and no alternative is provided. Currently, active travel users must use the level crossing at Station Road. If an active travel sidepath were to be provided then it would be possible to create an active travel route that is grade-separated from the East Coast Main Line in order to provide connectivity across the railway in lieu of the level crossing. This is a significant safety upgrade that is currently not being considered and it would also have the benefit of providing a safe egress route for motorists on the viaduct.
Applicant's comments	Please refer to the response to REP6-077q.
REP6-077t	S19 New Hen Brook Culvert and Underpass: this structure is proposed to be a narrow, dark and damp hole that combines a brook and a small shared-use pathway. The approach paths have sharp and blind bends. This will be a highly unattractive and uncomfortable place for people to be. LTN 1/20 paragraph 10.8.18 states that: 'Underbridges should be designed to maximise natural light and user perceptions of safety, for example by using increased headroom, keeping the approaches to the structure straight and at the same level as the natural ground and providing splayed wingwalls and openings in the structure above (see Figures 10.51 and 10.52)'. Table 5-3 states that there should be 0.5m of clearance between vertical walls or obstructions taller than 0.6m and the cycle route. Therefore, to make this underpass more attractive and comfortable the shared path should be 4.0m wide and it should maximise natural light by having straight approaches and splayed wingwalls
Applicant's comments	Hen Brook underpass is a footpath only. It is not a bridleway or cycleway.

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REP6-077u	S25 Cambridge Road Bridge: the structure provides a 3.5m wide space between parapet and kerb for an active travel route. This is an extremely narrow path on a very wide dual-carriageway bridge. Each carriageway measures 9.3m and the central reservation is 3.0m wide. We assume that motor traffic speeds could reach up to 70mph on such a structure. In that case, according to Table 6-1 of LTN 1/20, there should be 3.5m of separation between 70mph motor traffic and a cycle route, or an absolute minimum of 3.0m separation. According to Table 5-3 of LTN 1/20, there must be at least 0.5m of buffer space between the cycle route and any vertical obstruction over 0.6m tall (such as a bridge parapet). Therefore the effective width of the proposed active travel route on this bridge is nil, as opposed to the 3.0m width specified by Table 6-3 of LTN 1/20 for a lightly-used shared-use pathway. In order to bring this Cambridge Road Bridge structure into compliance with LTN 1/20 there should be: (a) 0.5m buffer between the parapet and the active travel route, (b) at least a 3.0m wide shared-use pathway, and (c) at least a 3.0m (preferably 3.5m) wide protective buffer between high speed motor traffic and the active travel route with measures to prevent motor vehicles from mounting or parking on it.
Applicant's comments	The Applicant asserts that LTN1/20 does not apply to this Scheme. Please see the response to REP6-077c. The eastbound verge over the Cambridge Road bridge will be 4.5m wide, comprising a 3m wide footway/cycleway and 1.5m wide strip adjacent to the kerb, providing an overall 1.5m separation from the carriageway which is in accordance with DMRB CD143 Designing for walking, cycling and horseriding. The Applicant does not accept that vehicles will be travelling at 70mph on this section of road. It is bounded by the Cambridge Road junction north and south roundabouts and the length of road in between the two roundabouts is approximately 140m. Vehicles from St Neots will be travelling at an estimated 20mph as they exit the northern roundabout. They will then accelerate briefly, perhaps reaching 40mph before then needing to immediately decelerate as they approach the southern roundabout.
REP6-077v	S31 Toseland Road Bridge: the structure provides a 4.0m wide space between parapet and kerb for an active travel route. According to Table 5-3 of LTN 1/20, there must be at least 0.5m of buffer space between the cycle route and any vertical obstruction over 0.6m tall (such as a bridge parapet). According to Table 6-1 of LTN 1/20, there should be 2.5m of separation between 60mph motor traffic and a cycle route, or an absolute minimum of 2.0m separation. This means that the effective width of the active travel route is only 1.0m (or 1.5m if following absolute minimum standards for protection). This effective width falls below the minimum standard of 3.0m for a lightly-used shared-use pathway as specified in Table 6-3 of LTN 1/20. To bring the Toseland Road Bridge into compliance with LTN 1/20 there should be: (a) a 0.5m horizontal separation between the parapet and the active travel route, (b) a 3.0m or wider active travel route, and (c) a 2.5m protective buffer between the 60mph motor traffic and the active travel

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	route (or 2.0m at an absolute minimum). The protective buffer should be designed to prevent motor vehicles from mounting it and parking on it. In addition, at either end of the bridge there is a very wide junction. Although these junctions are only intended to be used for emergency purposes, they interrupt the active travel route and leave people adrift in the middle of a wide and dangerous carriageway where motor vehicles may be travelling at 60mph. This issue can be resolved by gently bending the active travel route away from the carriageway such that it crosses the emergency access roads at places where they are much narrower. See figure 10.18 of LTN 1/20 for more details about designing such crossings of priority junctions.
Applicant's comments	The Applicant does not accept that LTN1/20 applies to this Scheme. Please see the response to REP6-077a. The route over the new bridge is a footway only. This is provided as part of the diversion of Footpath 278/7. There is no existing off road cycling route along Toseland Road and there is no justification for providing such facilities over the length of the new bridge.
REP6-077w	S38 St Ives Road Bridge: the structure provides a 4.0m wide space between parapet and kerb for an active travel route. According to Table 5-3 of LTN 1/20, there must be at least 0.5m of buffer space between the cycle route and any vertical obstruction over 0.6m tall (such as a bridge parapet). According to Table 6-1 of LTN 1/20, there should be 2.5m of separation between 60mph motor traffic and a cycle route, or an absolute minimum of 2.0m separation. This means that the effective width of the active travel route is only 1.0m (or 1.5m if following absolute minimum standards for protection). This effective width falls below the minimum standard of 3.0m for a lightly-used shared-use pathway as specified in Table 6-3 of LTN 1/20. To bring the St Ives Road Bridge into compliance with LTN 1/20 there should be: (a) a 0.5m horizontal separation between the parapet and the active travel route, (b) a 3.0m or wider active travel route, and (c) a 2.5m protective buffer between the 60mph motor traffic and the active travel route (or 2.0m at an absolute minimum). The protective buffer should be designed to prevent motor vehicles from mounting it and parking on it.
Applicant's comments	The Applicant does not accept that LTN1/20 applies to this Scheme. Please see the response to REP6-077a. The westbound NMU facility over the bridge will be 4.5m wide, comprising a 3m wide footway/cycleway and 1.5m wide strip adjacent to the kerb, forming the overall 1.5m separation from the carriageway which is in accordance with DMRB CD143 Designing for walking, cycling and horseriding. The Applicant does not accept that vehicles will be travelling at 60mph on this section of road. It is bounded by the two new roundabouts either side of the new road and the length of road in between the two roundabouts is approximately 140m. Vehicles from St Neots will be

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	travelling at an estimated 20mph as they exit the northern roundabout. They will then accelerate briefly, perhaps reaching 40mph before then needing to immediately decelerate as they approach the southern roundabout.
REP6-077x	S40 Caxton Gibbet Bridge: the structure provides a 3.0m wide active travel route protected by a 2.5m buffer from the carriageway, a 0.5m buffer from support columns and 0.5m buffer from the edge of the structure. If we count the 2.5m buffer from the carriageway together with the 0.5m buffer from the support columns then that forms an effective 3.0m buffer from the carriageway. Therefore, this cross-section meets the absolute minimum requirement in LTN 1/20 for a lightly-used shared-use pathway alongside a 70 mph dual-carriageway. It shows that it is possible for the applicant to achieve LTN 1/20 compliance, when they consider it beneficial to do so at their full discretion.
Applicant's comments	The Applicant does not accept that LTN1/20 applies to this Scheme. Please see the response to REP6-077a. The approach to the design of NMU provision at Caxton Gibbet junction is consistent with the rest of the Scheme.
REP6-077y	Issues not mentioned in the design principle document While the document contains an evaluation of structures in Appendix C (critiqued above) there is no equivalent evaluation for ground-level infrastructure. However, there are numerous locations where the infrastructure falls short of the principles of LTN 1/20 and the needs of active travel users of all ages and abilities. Inadequate or no protection from high-speed motor traffic. The following is an incomplete list of locations on the plans where the active travel route appears to have insufficient or zero protection from highspeed motor traffic travelling on an adjacent carriageway; or the active travel route appears to be substandard in width. According to Table 5-3 of LTN 1/20, there must be at least 0.5m of buffer space between the cycle route and any vertical obstruction over 0.6m tall (such as a bridge parapet). According to Table 6-1 of LTN 1/20, there should be 2.5m of protective buffer between 60mph motor traffic and a cycle route, or an absolute minimum of 2.0m separation. With 70mph motor traffic, the protective buffer should be increased by another metre. Table 6-3 specifies that shared-use pathways should be at least 3.0m wide, in addition to the protective buffers mentioned above, and busier shared-use pathways should be at least 4.5m. However, in places where there are significant flows of pedestrians and/or equestrians, care should be taken to design a cycleway that is separate from the facilities for pedestrians and/or equestrians, as specified in sections 6.2 and 8.2 of LTN 1/20. Partial list of substandard locations:

Reference Number	Interested Parties Submission/Applicant's Comments
	• Sheet 1 Composite drawing ending with DR-DC-2671 (Black Cat Junction): none of the active travel routes north of the Kelpie Marina Access Road appear to have any separation from the carriageway, apart from locations in the vicinity of junctions where thankfully there is some separation. • Sheet 2 drawing ending with DR-DC-2672 (Roxton Road link north): none of the active travel routes appear to have any separation from the carriageway, apart from locations in the vicinity of junctions where thankfully there is some separation. • Sheet 9 drawing ending with DR-DC-2679 (New Cambridge Road Junction): none of the active travel routes appear to have any separation from the carriageway, apart from locations in the vicinity of slip road roundabout entries and exits, where thankfully there is some separation. • Sheet 11 drawing ending with DR-DC-2681 (Toseland Road Bridge): none of the active travel routes appear to have any separation from the carriageway. • Sheet 13 drawing ending with DR-DC-2683 (St Ives Road Junction): none of the active travel routes appear to have any separation from the carriageway, apart from locations in the vicinity of slip road roundabout entries and exits, where thankfully there is some separation. • Sheet 14 drawing ending with DR-DC-2684 (New Caxton Gibbet Junction): none of the active travel routes appear to have any separation from the carriageway, apart from locations underneath the proposed A428 and in the vicinity of slip road roundabout entries and exits, where thankfully there is some separation.
Applicant's comments	The Applicant does not accept that LTN1/20 applies to this Scheme. Please see the response to REP6-077a. Sheet 1: The NMU provision includes for 0.5m separation from the carriageway, which is appropriate for the speed limits of 40mph on the Kelpie Access road and 40mph on Bedford Road Sheet 2: The NMU provision includes for 0.5m separation from the carriageway, which is appropriate for the speed limits of 30mph on Roxton Road Link (north). Sheet 9: At Cambridge Road junction a separation of 1.5m is typically provided between the edge of carriageway line and the NMU provision. There is a section of footway/cycleway immediately adjacent to the northern roundabout where only 0.5m separation is provided, but vehicle speeds will be low. There is also 0.5m separation on the section of new road that ties-in with the existing A428 on the south side of the Cambridge Road junction. Vehicle speeds will be low along this section of road as traffic leaves the roundabout to join the old A428 heading towards Croxton and Eltisley.Sheet 11: The allowance between the kerb/edge of carriageway where the footway is

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	provided along Toseland Road is comprised of a 2m footway, then a 1.5m separation between the footway and the kerb. Sheet 13: The provision at Eltisley varies, but typically includes a 1.5m separation from the NMU facility, except on Cambridge Road as it enters the village of Eltisley and at some points on the roundabouts where a 0.5m separation is provided. Sheet 14: At Caxton Gibbet junction typically 1.5m separation is provided, except where physical constraints do not permit, and a minimum of 0.5m is provided
REP6-077z	Difficult or potentially dangerous places where active travel users must cross high-speed motor traffic carriageways at-grade. There are many places where active travel users are expected to cross carriageways at-grade and the design does not make clear how those crossings will be made safe, accessible and comfortable enough for people of all ages and abilities to reasonably use them. LTN 1/20 Chapter 10 deals with crossings, junctions and roundabouts. In particular, Table 10-2 specifies the criteria by which different types of crossings should be selected, whether that be 'uncontrolled', 'cycle priority', 'parallel zebra', 'signalised', or 'grade separated' entirely. Table 10-2 must guide the selection of type of crossing in order to ensure safety and inclusiveness. List of crossings of concern: • Sheet 1 Composite drawing ending with DR-DC-2671 (Black Cat Junction): Roxton Road roundabout has a crossing of one arm where drivers may be able to turn the corner at high speed and put active travel users in danger. • Sheet 9 drawing ending with DR-DC-2679 (New Cambridge Road Junction): there are crossings of two different slip roads, both of which will require signalisation due to heavy volume and high speed of motor traffic. • Sheet 11 drawing ending with DR-DC-2681 (Toseland Road Bridge): there are very wide junctions at either end of the bridge, and also for the private access. These wide junctions leave active travel users adrift in the middle of a wide expanse of carriageway while 60mph motor traffic zooms around them. Instead, the active travel route should bend gently away from the carriageway and the crossings should be designed in the uncontrolled style shown in Figure 10.18 and described in paragraphs 10.5.33 and 10.5.34.

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	• Sheet 13 drawing ending with DR-DC-2683 (St Ives Road Junction): there is a crossing of a very wide private access on the southern roundabout. It is unclear why this private access is so wide or is permitted to make such a big gap in the active travel route. This private access should be narrowed down to the minimum width by taking into account the design principle that the road design should force drivers to take the turn slowly and carefully using tighter turn radii. • Sheet 14 drawing ending with DR-DC-2684 (New Caxton Gibbet Junction): every single carriageway crossing shown on this sheet is of major concern. In particular, the crossing of the A1198 at the northern roundabout forces active travel users to contend with a total of 5 lanes of busy and high-speed motor traffic. This crossing absolutely must be signalised, if it cannot be grade-separated entirely; the rest of the active travel infrastructure will be effectively inaccessible if this crossing is not safe to use. There are also crossings of two different slip roads, both of which must be signalised based on speed and likely heavy usage of these roads. Finally, there are the crossings at 14/8 and 14/12. Both of these lie on tangent sections of road where speeds will likely be at least 50mph. Therefore they should be signalised, according to Table 10-2, or alternative solutions considered. In particular, at 14/8, it does not make sense to force active travel users to cross the road to the west side, since most of them will be coming or going to the east. The active travel route should instead connect to Cambourne on the east side of the A1198.
Applicant's comments	Sheet 1: The roundabout has been designed to DMRB standards and has been reviewed by the Road Safety Auditor and by Bedford Borough Council highways officers and no such issue has been raised. Sheet 9: The provision of signalised crossings for the slip roads has already been confirmed in previous submissions for example in Deadline 1 Submission - 9.1 Applicant's Response to Relevant Representations **[REP1-021]** and Deadline 3 Submission - 9.21 Applicant's Comments on Written Representations **[REP3-008]** Sheet 11: It is not clear whether the comment relates to the use of the footway or the use of carriageway. If relating to the use of the footway, the accesses will be used infrequently by agricultural vehicles. They will also be used for regular but infrequent maintenance and inspection access. They also serve as emergency access points, which will be very infrequently used. In all cases it is unlikely that there will be conflict with footway users. If relating to the use of the carriageway by cyclists, the proposed situation is no different to the existing situation and there have been no reported incidents involving cyclists or any other vehicle on this section of Toseland Road in the last five years Sheet 13: The private access being referred to is a field access for agricultural use only and its use will be infrequent and unlikely to cause conflict with users.

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	Sheet 14: It has already been confirmed in, for example in Deadline 1 Submission - 9.1 Applicant's Response to Relevant Representations **[REP1-021]** and Deadline 3 Submission - 9.21 Applicant's Comments on Written Representations **[REP3-008]** that the crossings referred to will be signalised. The short section of footway/cycleway on the west side of the A1198 was included to allow those cycling north up the A1198 to leave the carriageway and cross safely to the facility on the east side of the road.
REP6-077aa	Missing segments that put together could provide active travel connectivity between St Neots and Cambourne. A further 3.5 miles of well-designed provision would make a significant contribution to enabling active travel all the way between St Neots to Cambourne. • Cambridge Road (St Neots) between the Stone Hill roundabout and the west side of the proposed New Cambridge Road Junction: needs improvements to less than half a mile of pathway to bring it up to current design requirements. • The existing A428 between the east side of New Cambridge Road Junction (across from Wintringham Farm access) and Eltisley: needs an active travel route alongside 3 miles of carriageway. A much cheaper alternative may be obtained by installing a modal filter on the existing A428 somewhere between New Cambridge Road Junction and Eltisley. This would turn the existing A428 into a local access road; all through-traffic would need to join the new A428 at either New Cambridge Road Junction or Caxton Gibbet Junction. Then part of the carriageway of the old A428 can be repurposed for active travel use, the speed limit lowered and the design of active travel provision greatly simplified due to the significantly lower speeds and volumes of motor traffic. Exemptions to the modal filter may be made for buses and farm vehicles. The remainder of the connecting infrastructure is already proposed, albeit in a form that is not yet compliant with LTN 1/20, as discussed in the sections above.
Applicant's comments	The Applicant does not accept that LTN1/20 applies to this Scheme. Please see the response to REP6-077a. As explained in Deadline 3 Submission - 9.21 Applicant's Comments on Written Representations **[REP3-008]**, the Applicant considers that it has made adequate provision to maintain connectivity as well as providing some new and improved routes for Non-Motorised Users, where they are relevant and proportionate to the Scheme. The opportunities mentioned would however be potential cases to be considered as Designated Funds projects. Designated Funds were established to assist with provision of facilities beyond the normal scope of major road schemes. The Applicant has suggested previously in Deadline 6 Submission - 9.74 Comments on submissions

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	made by the Cambridgeshire Authorities at Deadline 5 **[REP6-034]** that it will assist and support local authorities in obtaining Designated Funds for suitable projects.