

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

**CBC Statement on  
Construction Phase Traffic Monitoring**

**Prepared by  
Central Bedfordshire Council (CBC)**

**Deadline 9 (25.1.22)**

# 1 Introduction

- 1.1 CBC understands that National Highways is preparing a document to submit to the Examining Authority (ExA) for DCO Deadline 9, outlining National Highways approach to construction phase monitoring. An initial draft with regards to the expected content of this document has been shared with the local highway authorities (LHAs), which have given the LHAs a reasonable indication of the expected content of this document. Following discussion with National Highways the LHAs have been encouraged to submit a separate representation with regards to this matter.

## 2 Construction Phase Monitor and Manage

- 2.1 It is CBC's understanding that National Highways propose a numerical threshold approach to identifying locations for baseline traffic monitoring, and that the thresholds selected by National Highways for baseline monitoring are on links where there is either:
- (a) A predicted increase (within the Strategic Transport Model) in daily flow of 1,000 vehicles.
  - (b) A predicted increase (within the Strategic Transport Model) in HGV traffic of 30%.
- 2.2 It is understood that this threshold-based approach would exclude the majority of survey locations identified in the LHA REP6-074, including the exclusion of all locations within Central Bedfordshire. In addition, it is understood that National Highways does not propose any surveys following the initial baseline, and that no commitment to mitigation is being offered.
- 2.3 The proposals, as CBC understand them, do not address the areas of concern previously expressed, and the following document outlines the reasons for CBC continuing concern with regards to this matter, and commentary upon CBC's understanding of National Highways' position.
- 2.4 In the first instance, CBC consider it important that this matter is not conflated with the separate need for the baseline monitoring necessary to inform the operational phase Monitor and Manage process outlined in REP6-074 and referred to in the ExA's Question Q4.8.1.7 in its proposed changes to the draft DCO dated 14 January 2022. As such, the comments below are predicated on the assertion that baseline surveys for operational phase Monitor and Manage as detailed in REP6-074 are also fully required as part of a separate and necessary process.
- 2.5 For clarity the LHA proposals for construction phase monitoring, including the need for baseline monitoring to set a benchmark for assessing future impacts, were based upon addressing a range of expected construction phase impacts, including:
- (a) Increased total traffic flows through villages or on unsuitable roads.

- (b) Increased HGV movements through villages or on unsuitable roads, including contravention of weight restrictions.
  - (c) Increased potential for speeding through villages or on unsuitable roads, as self-diverting traffic seeks to make up lost time.
- 2.6 CBC's responses provided to the ExA with regards to Question 3.11.7.5 at WQ3 also referred to the experiences of CCC associated with the A14 DCO, where construction phase impacts caused considerable issues within the CCC network, a number of which were directly related to HGV movements or contraventions.
- 2.7 Based upon the above range of issues to be addressed, it is therefore not considered that the use of a numerical threshold would be a suitable means of identifying baseline monitoring sites, as:
  - (a) A numerical threshold has little relevance to the variation between locations where impacts are expected, treating increases through a minor rural back road as having the same weight and potential for harm as increases on more major roads.
  - (b) The use of a transport model to assess HGV impacts will not identify or predict issues of HGV contraventions (as it is assumed that HGV traffic within the model would adhere to the model coding, including restrictions on use of routes).
  - (c) The use of a numerical threshold would not identify issues of increased incidences of speeding, and the associated safety concerns.
- 2.8 CBC is also of the view that the threshold selected for total traffic increases appears to be arbitrary, with no rationale provided for the selection of the 1,000 vehicle cut-off for baseline monitoring suggested by National Highways within previous discussions. Conversely the 30% HGV increase appears to be based upon the guidance within the IMEA document 'Environmental Assessment of Road Traffic' in which **Rule 1** for the assessment of highway links states that an assessment should:  
*'include highway links where traffic flows will increase by more than 30% (or the number of heavy goods vehicles will increase by 30%)'*.
- 2.9 However, the guidance goes on to state, in **Rule 2**:  
*'include any other specifically sensitive areas where traffic flows have increased by 10% or more'*.

- 2.10 The areas identified within REP6-074 were on the basis that the locations were considered to be traffic sensitive by the authorities. As such, should the ExA consider that a threshold-based criteria for baseline monitoring is appropriate, CBC considers that links within the identified parishes within CBC experiencing increases of 10% or more should be included (on the basis that an Environmental Statement (ES) assessment would be required for this level of increase and which has not been done). This would require baseline monitoring of construction phase impacts in:
- (a) Blunham
  - (b) Potton
  - (c) Wrestlingworth
  - (d) Everton
- 2.11 Notwithstanding the above CBC remains of the view that the other locations referenced within REP6-074 also merit construction phase monitoring, in the cases of Sandy and Biggleswade (for example) these were already identified within the submitted Transport Assessment Annex as having key junctions operating over capacity, and therefore where self-diverting traffic during the construction phases could be reasonably expected to create further issues.
- 2.12 It is further understood that ongoing construction phase monitoring is intended to be made the responsibility of the LHAs and that no further monitoring is proposed by National Highways.
- 2.13 It is not considered reasonable or justified for ongoing monitoring of the scheme impacts to be made the responsibility of the LHAs because the impacts being monitored are reasonably related to the A428 project and the resulting mitigation necessary as a result, nor is it considered justified that no monitoring is proposed by National Highways throughout the construction period.
- 2.14 As CBC understands it, NH's proposed approach to construction phase traffic impacts of the local highway network is tantamount to the following (unless the LHAs fund and implement their own monitoring regime and agree this with NH):
- (a) NH will not be monitoring the local highway network during construction. In addition, limited pre-construction surveys are proposed and do not cover any part of the CBC's highways network. CBC understands, in any event, the surveys are to be very limited in scope and effect, not extending beyond a single pre-commencement survey period.
  - (b) Further construction phase traffic monitoring by NH will only be considered limitedly. In the absence of construction phase surveys, there will be no reasonable evidence base to call upon, as the lack of monitoring throughout the construction phases will mean that there is

no comparison data (between pre and post commencement of works) and, as such, no requirement for NH will carry out further monitoring.

- (c) CBC understands that NH intend to discuss findings and necessary intervention within the Traffic Management forums. Along with the lack of monitoring to inform discussions and provide an evidence base to justify interventions, no further commitment beyond the discussion is offered. Any resulting mitigation would be subject to agreement and CBC understands that no process for disputes is included. This provides no secured commitment to work with the LHAs on the delivery of appropriate mitigation where justified.

### 3 Conclusion

- 3.1 In conclusion, CBC respectfully submits that it is necessary for the ExA to review and consider the position in the light of the lack of commitment to monitoring, management, or mitigation of construction phase impacts to decide whether it is necessary to be contained in a DCO requirement. In addition, CBC contends that NH's limited proposals for construction phase traffic impacts on the local highway network can only be given very limited, almost nil, weight because something that is not secured in the DCO is of itself of very limited weight.
- 3.2 CBC therefore remains firmly of the view that the approach to construction phase monitoring and mitigation, as outlined in REP6-074 remains the appropriate mechanism by which construction phase impacts can be monitored, managed, and mitigated in a proportional and proactive manner, which was agreed jointly with the other joint local authorities in the form of a draft DCO requirement put forward to the ExA.
- 3.3 CBC continues to request that it is imposed as a DCO requirement by the Secretary of State and ExA.