

# A428 Black Cat to Caxton Gibbet improvements

TR010044

Volume 9

9.116 National Highways Position Statement on Operational Phase  
Monitoring

Planning Act 2008

Rule 8(1)(k)

Infrastructure Planning (Examination Procedure) Rules  
2010

January 2022

Infrastructure Planning

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

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

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**9.116 National Highways Position Statement on Operational Phase  
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<b>Author</b>	A428 Black Cat to Caxton Gibbet improvements Project Team, National Highways

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# 1 Introduction

- 1.1.1 This Statement (the “Statement”) has been produced by National Highways (the Applicant) in response to Q4.8.1.7 in the Examining Authority’s proposed schedule of changes to the dDCO **[PD-015]**. Q4.8.1.7 reads as follows:
- “Throughout the Examination, LHAs have consistently raised concern regarding potential unanticipated traffic effects on the local road network during operational phases of the Proposed Development and the likelihood of either the Applicant or the LHA being able to mitigate such effects in a timely manner **[REP6-060]** **[EV-069]**. Whilst the ExA accepts that such potential effects are largely unknown at this stage, it remains concerned that there is a possibility that the Proposed Development could affect the local network and indeed the LHAs’ ability to deliver their statutory Network Management Duty, as defined in S16 of the Traffic Management Act, 2004. In that regard, the ExA finds that the current traffic monitoring methodology being proposed by the Applicant is neither robust, nor secured through the dDCO **[REP6-041]**. Therefore, subject to responses to WQ3, the ExA is minded to propose a Requirement relating to quantitative Traffic Monitoring and Mitigation for the Proposed Development’s operational phase, should consent be granted. Applicant to provide suggested wording, including definitions if relevant. LHAs have provided wording for such a Requirement **[REP6-074]**, which the Applicant may consider.”*
- 1.1.2 The Applicant’s response to the LHA’s proposed Requirement submitted at Deadline 8 **[REP08-010]** (response to submission REP6-074a) reads:
- ‘For the reasons outlined within the Monitor and Manage Technical Note, submitted at Deadline 6 **[REP6-041]**, the Applicant does not consider the inclusion of this proposed Requirement justified or at all appropriate. Please see the Applicant’s response to Written Question 3.11.2.1(g) in the Applicant’s Responses to the Examining Authority’s Third Round of Written Questions **[REP8-014]** for a more detailed response on this proposed requirement.’
- 1.1.3 At para 1.5.4 of **[REP6-041]**, the Applicant acknowledges that qualifying locations on local roads may be included within the Post-Opening Project Evaluation (POPE) of the Scheme.
- 1.1.4 However, noting the LHA’s concern for potential increases in HGV and overall traffic volumes during the operational phase and in light of the ExA’s indication that it may propose a Requirement on operational monitoring, the Applicant has reviewed the proposed monitoring locations presented within **[REP06-074]** and the results of this analysis are presented at Appendix A.

## 2 Position Statement

### Applicant's Position

- 2.1.1 The locations listed within **[REP06-074]** were not precisely identified and consisted largely of named villages. In most cases, these did not include specific junctions or locations for monitoring. There were also a number of specific highway links identified on the wider network, some of which are quite remote from the Scheme. The list was not supported by any evidence or sensitivity information and includes a number of locations where, based upon the forecasts from the strategic model, traffic flows are either anticipated to reduce as part of the Scheme, or are predicted to remain broadly the same.
- 2.1.2 However, and without prejudice to the Applicant's position that the LHAs have not provided any compelling evidence which demonstrates that a requirement for operational monitoring is necessary, the Applicant has used selected links available within the Strategic model to consider the most notable predicted increases in traffic flows in the "With Scheme" scenario, within each of these village locations. The Applicant has then extracted traffic volumes without the Scheme (the Do Minimum (DM) and with the Scheme (the Do Something (DS) and presented the all-vehicle and HGV results separately to allow further consideration of LHA concerns.
- 2.1.3 As explained in **[REP8-019]**, some of the forecast year sustainable transport schemes are not included in the Applicant's model forecasts as they are still not confirmed or committed schemes. However, if they come forward (without which some of the permitted developments within the corridor will not be able to develop above a certain level), then these future schemes such as C2C (the Cambourne to Cambridge public transport scheme) and East-West Rail, might provide some relief at locations predicted to experience traffic flow increases.
- 2.1.4 From the analysis of flow changes, the Applicant has identified the locations at which there is a risk of a notable increase in traffic flows. For this purpose, and in recognition of the greater damage caused by HGVs a criterion was used of either an increase of more than 30% in heavy goods vehicle (HGV) traffic (subject to a minimum 12 vehicle increase), or an increase of 1,000 or more in all-vehicle traffic per day (average 1.4 vehicles per minute over a 12-hour weekday, daytime period).
- 2.1.5 The first and primary of these criteria is a common threshold for the assessment of the impact of motor vehicle traffic on rural communities: it is set out in the document 'Guidelines for the Environmental Assessment of Road Traffic'. The second criteria was introduced by the Applicant to further address LHA concerns and represents an increase in flow likely to be notable in terms of the overall performance of a highway link. In the context of a Scheme which makes minimal physical alterations to the LRN and has an overall beneficial effect on the local and wider network, these criteria are considered to offer a reasonable and proportionate approach to identifying operational monitoring locations. There are no special features of the Scheme which would lead to a particular re-assignment

of traffic or therefore which would warrant operational monitoring beyond that now proposed.

- 2.1.6 The Applicant has identified 5 locations on the LRN to monitor once the Scheme opens to traffic. In the event that the ExA is minded to impose a Requirement on operational monitoring, these sites would be founded on an evidence base and therefore more reasonable, appropriate and proportionate than the extensive list of general locations proposed by the LHAs. In the circumstances of this specific Scheme, the Applicant would therefore be prepared to fund baseline and post-opening monitoring at the following locations only:
- a. Great North Road, between A428 and Nelson Rd.
  - b. Cambridge Road, between Station Road and A428
  - c. Dry Drayton (Park Street East)
  - d. Coton (Brook Lane)
  - e. Sandy (St Neots Road).
- 2.1.7 A plan showing these locations is contained at Appendix B of this Statement. The Applicant considers the proposed locations not only address those points where the evidence may suggest that notable differences in traffic flows as a result of the Scheme may occur, but allows conclusions to be drawn from the count locations to identify potential impacts at locations between monitoring points.
- 2.1.8 The Applicant would make the baseline and post-opening data available to the LHAs for the purpose of informing their ability to deliver their statutory Network Management Duty.
- 2.1.9 In addition, the Applicant still intends to carry out the Post-Opening Project Evaluation (POPE) monitoring that will be undertaken as part of the work necessary to confirm that the Scheme has achieved its objectives. Since the scope/extent of the POPE cannot be finalised at this stage, the Applicant is prepared to commit to monitoring at the locations identified above, and to secure this as a Requirement of the DCO.
- 2.1.10 Baseline data will be collected for a minimum 2 week period in the autumn prior to construction start and will distinguish between HGV and light vehicles.
- 2.1.11 Post-opening data will be collected 1 year and 5 years following the opening of the Scheme. This aligns with the standard timescales over which POPE data is collected and allows the impact of the Scheme to be assessed as soon as traffic patterns have settled down following the opening of the Scheme and at a point in the future where further growth may have occurred.
- 2.1.12 The Applicant does not consider it appropriate to specify what, if any, further measures may be required following the completion of the monitoring. This can only be considered after the results of post-opening traffic monitoring are available, and any measures identified would be specific to the particular locational circumstances and funding available at that point in time.

- 2.1.13 In addition, and as previously noted by the Applicant, it would be for LHAs to bring forward measures, should any be required, at locations on the LRN affected by traffic flow increases identified by operation monitoring.
- 2.1.14 It must be remembered that unlike a conventional development which generates traffic, the Scheme does not generate new traffic: it provides significant relief to traffic flows across a wide area of the LRN. In the few places where increases in traffic flows are predicted to occur, the strategic model indicates that this would arise from local road users choosing different routes to access the wider road network once the Scheme is open to traffic.
- 2.1.15 For example, in St Neots, the model predicts that the Scheme will result in traffic flow increases along Great North Road and Cambridge Road due to drivers diverting away from less suitable routes within the town, residential areas and the surrounding rural area, to access the Scheme. These increases must be set against the larger number of locations on the LRN at which the Scheme is forecast to bring benefits in terms of traffic flow reductions.
- 2.1.16 The LRN is forecast to experience greater traffic increases without the Scheme than with. The situation that would arise in the Do Minimum scenario if the Scheme did not proceed is set out in section 6.2 of the Transport Assessment **[APP-241]**. In addition to the reasons set out in the Monitor and Manage Technical Note **[REP6-041]** the Applicant also asserts that mitigation on the LRN is not justifiable, as the LHA will experience a reduced burden in a with Scheme scenario.
- 2.1.17 Percentage increases between the 2015 Do Minimum and 2040 Do Minimum are generally forecast to be much larger on the minor roads in the area compared to the major roads. This reflects the use of the LRN to avoid congestion on the SRN. Without the Scheme, there is forecast to be an increase of 80-100% in traffic along minor east-west routes from 2015 to 2040, that results from an increase in the use of alternative routes to the SRN (**[APP-241]** para 6.2.5). The Scheme will be effective in mitigating this increase. However, this may result in localised increases in traffic on the routes for which monitoring is now proposed.
- 2.1.18 The Applicant does not consider that the remit of the Scheme includes provision of measures on local roads indirectly affected by traffic flow increases that result from local road users having a greater choice of routes available to them.
- 2.1.19 Finally, and separately to the issue of operational monitoring on the LRN, the Applicant proposes that the following SRN location is monitored during operation of the Scheme as a result of the assessment reported in document 'Results of Additional VISSIM Modelling at M11 Junction 13' **[REP8-019]**:
- a. A428/Madingley Mulch junction.
- 2.1.20 For completeness, the following seven locations are listed in the Transport Assessment Annex **[APP-243]** at which operational monitoring has been proposed on the SRN in response to traffic capacity issues identified in the TAA **[APP-243]**:
- a. M11 Junction 13.

- b. M11 J14 (Girton Interchange, eastbound merge from M11 onto A428).
- c. A421 main carriageway, between A6 and A600 Shortstown junction.
- d. A421/ A6 junction.
- e. A1/ A603 Sandy junction.
- f. Biggleswade North junction.
- g. Biggleswade South junction.

2.1.21 However, as the Applicant will bring forward measures on the SRN as and when required in accordance with its Licence duties and using the delivery and funding mechanisms set out in paragraphs 6.4.5 to 6.4.7 of the TAA **[APP-243]**, it is not considered necessary or appropriate to include this in any DCO Requirement on operational monitoring.

2.1.22 The Applicant will endeavour to agree a joint position statement with the LHAs on Operational Traffic Monitoring, to be submitted at Deadline 10, which contains the final position of the parties.



## Appendix A - Analysis of traffic flow changes between 2025 DM and 2025 DS

Area	Location	Link Selected	2025 DM All Traffic	2025 DM HGVs	2025 DS (all vehicles)	2025 DS Traffic (HGVs)	Flow Difference (absolute) (all vehicles)	Flow Difference (%) (all vehicles)	All Vehicle Criterion (>1,000 veh/day)	Flow Difference (absolute) (HGVs)	Flow Difference (%) (HGVs)	HGV Criterion (>30% and >12 HGV/day increase)
Bedford Borough	Roxton	Park Road	569	11	575	11	6	1%		0	0%	
		School Lane	0	0	-	-	-	-		-	-	
		High Street	569	11	575	11	6	1%		0	0%	
	Great Barford	Great Barford Bridge	2587	6	2220	6	-367	-14%		0	0%	
		Bedford Road	7469	71	6726	78	-743	-10%		7	10%	
		Green End Road	2759	32	2725	31	-34	-1%		-1	-3%	
		Roxton Road	2349	53	2091	61	-258	-11%		8	15%	
	Willington	Bedford Road	15715	833	14112	670	-1603	-10%		-163	-20%	
		Station Road	2280	29	2295	29	15	1%		0	0%	
		Barford Road	2957	29	2893	30	-64	-2%		1	3%	
		Sandy Road	11932	811	10436	646	-1496	-13%		-165	-20%	
	Little Barford	Barford Road N	7476	61	4015	62	-3461	-46%		1	2%	
		Barford Road S	6614	0	3102	0	-3512	-53%		0	0%	
	St Neots	Great North Road (between Nelson Road and A428)		7720	414	9374	440	1654	21%	Yes	26	6%
			15287	714	17540	745	2253	15%		31	4%	
			15736	721	18015	752	2279	14%		31	4%	
Cambridge Road (between Station Road and A428)			8506	175	10322	199	1816	21%		24	14%	
			5782	174	7880	199	2098	36%		25	14%	
			6425	174	8809	199	2384	37%	Yes	25	14%	
			10690	177	14255	202	3565	33%		25	14%	
High Street (between Town Bridge and B1043 Huntingdon Street)			10946	147	10042	140	-904	-8%		-7	-5%	
			12739	122	12074	114	-665	-5%		-8	-7%	

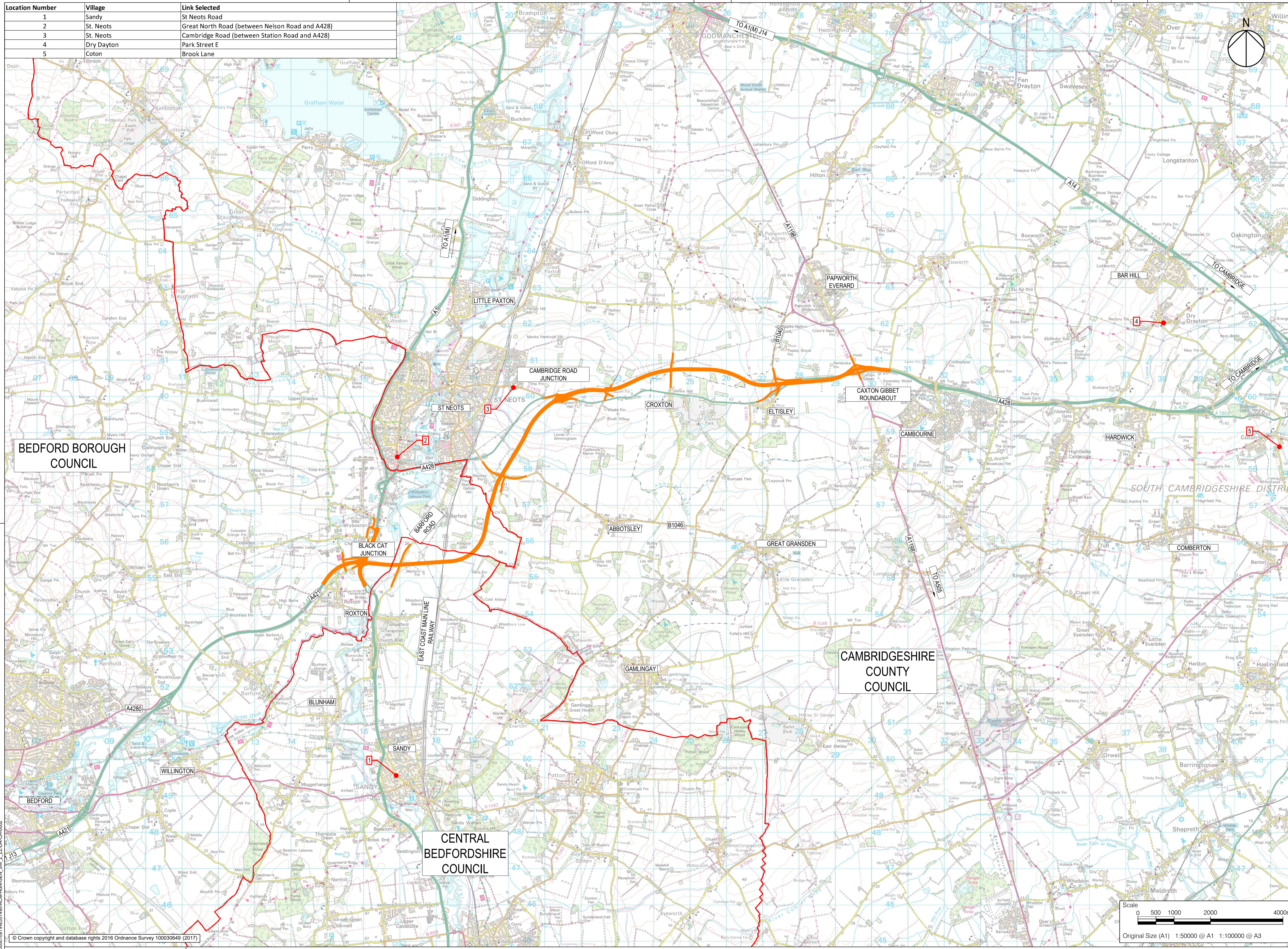
Area	Location	Link Selected	2025 DM All Traffic	2025 DM HGVs	2025 DS (all vehicles)	2025 DS Traffic (HGVs)	Flow Difference (absolute) (all vehicles)	Flow Difference (%) (all vehicles)	All Vehicle Criterion (>1,000 veh/day)	Flow Difference (absolute) (HGVs)	Flow Difference (%) (HGVs)	HGV Criterion (>30% and >12 HGV/day increase)
Cambridgeshire	Dry Drayton	Park Street E	7026	178	7980	265	954	14%		87	49%	Yes
		Park Street W	7377	189	8327	276	950	13%		87	46%	
		Madingley Road	351	11	347	11	-4	-1%		0	0%	
	Cambourne	Cambourne Road	13969	207	14140	224	171	1%		17	8%	
		Back Lane	4212	9	4216	9	4	0%		0	0%	
		Broad Street	10537	200	10711	217	174	2%		17	9%	
		School Lane	6008	106	5968	115	-40	-1%		9	8%	
		School Lane	7455	169	7540	179	85	1%		10	6%	
	Coton	Brook Lane	5003	109	5801	198	798	16%		89	82%	Yes
		Cambridge Road	5612	110	6399	199	787	14%		89	81%	
	Eltisley	The Green N	2329	4	-	-	-	-		-	-	
		The Green W	1397	3	0	0	-1397	-100%		-3	-100%	
		The Green S	931	1	932	1	1	0%		0	0%	
		Potton End N	931	1	932	1	1	0%		0	0%	
		Potton End S	265	0	270	0	5	2%		0	0%	
	Madingley	Dry Dayton Road	351	11	347	11	-4	-1%		0	0%	
		The Avenue	3560	49	3558	48	-2	0%		-1	-2%	
		High Street	3911	60	3904	59	-7	0%		-1	-2%	
		Cambridge Road	2719	29	2628	31	-91	-3%		2	7%	
		Church Lane	1700	34	1791	32	91	5%		-2	-6%	
	Toseland	High Street E	4062	63	1784	51	-2278	-56%		-12	-19%	
		Toseland Road N	2688	41	3086	48	398	15%		7	17%	
		Toseland Road S	1820	28	-	-	-	0%		-	-	
		High Street W	4052	39	1565	27	-2487	-61%		-12	-31%	

Area	Location	Link Selected	2025 DM All Traffic	2025 DM HGVs	2025 DS (all vehicles)	2025 DS Traffic (HGVs)	Flow Difference (absolute) (all vehicles)	Flow Difference (%) (all vehicles)	All Vehicle Criterion (>1,000 veh/day)	Flow Difference (absolute) (HGVs)	Flow Difference (%) (HGVs)	HGV Criterion (>30% and >12 HGV/day increase)
	Yelling	High Street W	4062	63	1784	51	-2278	-56%		-12	-19%	
		High Street E	4459	70	2149	56	-2310	-52%		-14	-20%	
Central Bedford shire	Tempsford	Barford Road (N of Station Road)	7224	64	4190	71	-3034	-42%		7	11%	
		Barford Road (S of Station Road)	8810	113	5744	113	-3066	-35%		0	0%	
	Moggerhanger	Blunham Road	1246	121	1231	121	-15	-1%		0	0%	
		St Johns Road	393	10	396	9	3	1%		-1	-10%	
		Bedford Road W	11932	811	10436	646	-1496	-13%		-165	-20%	
		Bedford Road E	12244	770	10751	607	-1493	-12%		-163	-21%	
	Blunham	The Hill	2231	53	1720	53	-511	-23%		0	0%	
		Station Road	2823	52	2853	52	30	1%		0	0%	
		Barford Road	3989	0	3390	0	-599	-15%		0	0%	
	Sandy	Bedford Road	10675	596	9989	435	-686	-6%		-161	-27%	
		St Neots Road	7165	152	8687	177	1522	21%	Yes.	25	16%	
		High Street	13092	640	12689	499	-403	-3%		-141	-22%	
	M1 Junction 13	Salford Road (WE arm of northern dumbell)	12315	1501	13085	1589	770	6%		88	6%	
		Bedford Road (N of northern dumbell)	21800	1621	21690	1637	-110	-1%		16	1%	
		Bedford Road (S of northern dumbell)	16061	1009	16145	1004	84	1%		-5	0%	
	Marston Moretaine	Beancroft Road	1191	41	1185	41	-6	-1%		0	0%	
	Biggleswade	i. Hill Lane E	7147	388	6912	310	-235	-3%		-78	-20%	
		ii. Hill Lane W	8809	397	7488	379	-1321	-15%		-18	-5%	

## Appendix B - Plan showing proposed monitoring locations



Location Number	Village	Link Selected
1	Sandy	St Neots Road
2	St. Neots	Great North Road (between Nelson Road and A428)
3	St. Neots	Cambridge Road (between Station Road and A428)
4	Dry Dayton	Park Street E
5	Coton	Brook Lane



- NOTES
- DO NOT SCALE FROM THIS DRAWING. USE ONLY PRINTED DIMENSIONS.
  - ALL DIMENSIONS, CHAINAGES, LEVELS, AND COORDINATES ARE IN METRES UNLESS DEFINED OTHERWISE

- KEY
- TRAFFIC MONITORING LOCATION
  - COUNTY BOUNDARY
  - PROPOSED DEVELOPMENT

**BEDFORD BOROUGH COUNCIL**

**CAMBRIDGESHIRE COUNTY COUNCIL**

**CENTRAL BEDFORDSHIRE COUNCIL**

Purpose of Issue  
**DCO EXAMINATION**

Client  
National Highways  
Working on behalf of  
**national highways**

Development Consent Order Number  
**TR010044**

Project Title  
**A428 BLACK CAT TO CAXTON GIBBET IMPROVEMENTS**

Drawing Title  
**OPERATIONAL PHASE TRAFFIC MONITORING LOCATIONS**

Scale  
0 500 1000 2000 4000m  
Original Size (A1) 1:50000 @ A1 1:100000 @ A3

Designed	Drawn	Checked	Approved	Date
KBP	KBP	JW	PS	25/01/22
Internal Project No. 60541541				Subsidiary D9
Scale @ A1				Zone General
Drawing Number National Highways PIN HE551495 -ACM -HGN- GEN_SW_Z_ZZ				Rev P02
Location I Originator I Volume I Type I Role I Number				

First Issue	By	Date	Suffix
	KBP	25/01/22	P02
Revision Details	By	Date	Suffix
	PS		
	Check		

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