

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

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Infrastructure Planning

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Development Consent Order 202[]**

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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 LHAs’ 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.
- 1.1.5 Originally submitted at Deadline 9 **[REP9-034]** this Statement has been updated to reflect comments received and further engagement with the LHAs.
- 1.1.6 Initially, it was intended to issue a Joint Position Statement. However, following discussions, it has been agreed that each party will submit their own Position Statement. The list of sites for baseline monitoring set out below was shared with the Local Highway Authorities on 14 February 2022.

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 forecasts from the Strategic Model indicate 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, is likely to provide some relief at locations predicted to experience traffic flow increases.
- 2.1.4 The original version of this Statement was submitted by the Applicant at Deadline 9, setting out the Applicant's proposed approach to monitoring traffic impacts during the Operational Phase of the Scheme. This document is referenced as follows:
- a. 9.116 National Highways Position Statement on Operational Phase Monitoring **[REP9-034]**.
- 2.1.5 The original version of this Statement was based on the principle that National Highways would offer to collect traffic flow data to facilitate the monitoring of operational traffic impacts of the Scheme where the model indicated an increase in forecast traffic flows above a certain level. This included some, but not all, of the locations identified by the Local Highway Authorities in document **[REP6-074]** (Deadline 6 Submission – Monitor and Manage Draft Requirement). The sites to be selected were identified on the basis that the Strategic Model forecast an increase in traffic flows of either:
- a. An increase in 12-hour weekday two-way all-vehicle flows of more than 1,000.

- b. An increase in 12-hour weekday Heavy Goods Vehicle (HGV) flows of more than 30%, subject to a minimum increase of 12 HGVs per day.
- 2.1.6 Following further discussions with the Local Highway Authorities on this matter, National Highways agreed to re-assess the site selection on the following basis:
 - a. An increase in 12-hour weekday two-way all-vehicle flows of more than 30%.
 - b. An increase in 12-hour weekday Heavy Goods Vehicle (HGV) flows of more than 30%, subject to a minimum increase of 12 HGVs per day.
- 2.1.7 In addition, sites identified by the Local Highway Authorities which were forecast to receive increases of more than 10% were also identified for the purposes of ascertaining whether they would qualify under rule 2 set out below.
- 2.1.8 The analysis based on the above methodology is set out in Appendix A to this Statement.
- 2.1.9 These thresholds are based on Rules 1 and 2 in the document 'Guidelines for the Environmental Assessment of Road Traffic'. These are:
 - a. Rule 1: 'include highway links where traffic flows will increase by more than 30% (or the number of heavy goods vehicles will increase by more than 30%)'.
 - b. Rule 2: 'include any other specifically sensitive areas where traffic flows have increased by 10% or more'.
- 2.1.10 It is of note that, in **[REP9-041]**, in their response to the original proposals, Central Bedfordshire Council stated that: "*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 Examining Authority consider that a threshold-based criteria for baseline monitoring is appropriate, CBC consider that links within the identified parishes within CBC experiencing increases of 10% or more should be included (on the basis that an ES assessment would be required for this level of increase)*".
- 2.1.11 Sites identified in the original version of this Statement have been retained in this analysis, even if they do not meet the revised criteria adopted.
- 2.1.12 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 are therefore more reasonable, appropriate and proportionate than the extensive list of general locations proposed by the LHAs. In the circumstances of this specific Scheme, in addition to sites that may be selected for Post Opening Project Evaluation (POPE), and sites already identified (see paras 2.1.25 and 2.1.26 below), the Applicant would therefore be prepared to undertake baseline and post-opening monitoring at the following locations only:
 - a. St Neots: Great North Road, between A428 and Nelson Rd.
 - b. St Neots: Cambridge Road, between Station Road and A428.
 - c. Dry Drayton (Park Street East).

- d. Coton (Brook Lane).
 - e. Sandy (St Neots Road).
- 2.1.13 In all other locations, beneficial impacts are predicted and therefore it is not necessary to require monitoring of these locations as part of the DCO process.
- 2.1.14 A plan showing the proposed monitoring 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.
- 2.1.15 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.
- 2.1.16 In addition, the Applicant intends to carry out the 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 monitoring of these locations as a Requirement of the DCO.
- 2.1.17 Baseline data will be collected for a minimum two week period in the autumn prior to construction start and will distinguish between HGV and light vehicles.
- 2.1.18 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.
- 2.1.19 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.
- 2.1.20 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.
- 2.1.21 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.

- 2.1.22 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.
- 2.1.23 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.
- 2.1.24 The LRN is forecast to experience greater traffic increases without the Scheme than with the Scheme. 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 considers that mitigation on the LRN is not justifiable, given that the LHA will experience a reduced burden in a with Scheme scenario.
- 2.1.25 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.
- 2.1.26 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.
- 2.1.27 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.

2.1.28 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.

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

Area	Village	Link Selected	2025 DM All Traffic	2025 DM HGVs	2025 DS Traffic (all vehicles)	2025 DS Traffic (HGVs)	Flow Difference (absolute) (all vehicles)	Flow Difference (%) (all vehicles)	All Vehicle Criterion (>30% = red, >10% = amber)	Flow Difference (absolute) (HGVs)	Flow Difference (%) (HGVs)	HGV Rating (>30% = red, >10% = amber)
Bedford Borough	Roxton	High Street	569	11	575	11	6	1%		0	0%	
	Great Barford	Roxton Road	2349	53	2091	61	-258	-11%		8	15%	
	Willington	Bedford Road	15715	833	14112	670	-1603	-10%		-163	-20%	
	Little Barford	Barford Road N	7476	61	4015	62	-3461	-46%		1	2%	
Cambridgeshire	St. Neots	Great North Road (between Nelson Road and A428)	7720	414	9374	440	1654	21%	Yes.	26	6%	
	St. Neots	Cambridge Road (between Station Road and A428)	6425	174	8809	199	2384	37%	Yes.	25	14%	
	St. Neots	High Street (between Town Bridge and B1043 Huntington Street)	12739	122	12074	114	-665	-5%		-8	-7%	
	Dry Dayton	Park Street E	7026	178	7980	265	954	14%		87	49%	Yes
	Cambourne	Broad Street	10537	200	10711	217	174	2%		17	9%	
	Coton	Brook Lane	5003	109	5801	198	798	16%		89	82%	Yes
	Eltisley	Potton End S	265	0	270	0	5	2%		0	0%	
	Madingley	High Street	3911	60	3904	59	-7	0%		-1	-2%	
	Toseland	High Street E	4062	63	1784	51	-2278	-56%		-12	-19%	
	Yelling	High Street E	4459	70	2149	56	-2310	-52%		-14	-20%	
Central Bedfordshire	Tempsford	Barford Road (N of Station Road)	7224	64	4190	71	-3034	-42%		7	11%	
	Moggerhanger	Bedford Road E	12244	770	10751	607	-1493	-12%		-163	-21%	
	Blunham	Station Road	2823	52	2853	52	30	1%		0	0%	
	Sandy	St Neots Road	7165	152	8687	177	1522	21%	Yes.	25	16%	
	Junction 13 M1	Salford Road (WE arm of northern dumbbell)	12315	1501	13085	1589	770	6%		88	6%	
	Marston Moretaine	Beancroft Road	1191	41	1185	41	-6	-1%		0	0%	
	Biggleswade	Hill Lane West	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

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