

A417 Missing Link
TR010056

8.21 Comments on Responses
received by Deadline 2

Planning Act 2008

APFP Regulation
Infrastructure Planning (Applications: Prescribed Forms and
Procedure) Regulations 2009

Volume 8

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Infrastructure Planning

Planning Act 2008

**The Infrastructure Planning
(Applications: Prescribed Forms
and Procedure) Regulations 2009**

A417 Missing Link

Development Consent Order 202[x]

Comments on Responses received by Deadline 2

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1 Introduction

1.1 Purpose of this document

- 1.1.1 This document has been prepared by National Highways (the Applicant) for submission to the Examining Authority (ExA) under Deadline 3 of the Examination of the A417 Missing Link Development Consent Order (DCO) application.
- 1.1.2 This document provides the Applicant's comments on the submissions made to the ExA by Interested Parties at Deadline 2. The submissions made by Interested Parties at Deadline 2 were made in response to the Applicant or other Interested Parties' previous submissions at Deadline 1, including responses to the ExA's Written Questions (ExQ1).
- 1.1.3 In total, 12 Interested Parties made submissions at Deadline 2, including those that were accepted at the discretion of the ExA after that deadline had passed. Several Interested Parties submitted more than one document at Deadline 2. The Applicant has reviewed and considered these submissions.

1.2 Structure of this document

- 1.2.1 In reviewing the submissions made by Interested Parties at Deadline 2, National Highways has determined that in some instances, the matters raised are similar to those already raised in previous submissions by Interested Parties and to which National Highways has provided comment at Deadline 1 and Deadline 2. In particular, the ExA is directed to the following documents which have responded to key themes raised by Interested Parties at the previous deadlines:
- Responses to Relevant Representations (Document Reference 8.3, REP1-008)
 - Response to Written Representations made at Deadline 1 (Document Reference 8.11, REP2-012)
 - Comments on Responses to the Examining Authority's Written Questions (ExQ1) (Document Reference 8.13, REP2-014)
- 1.2.2 In light of the above and to avoid unnecessary duplication, in this document National Highways has sought to respond only where it has identified matters that may benefit from new or further points of clarification or correction, where it may assist a stakeholder and/or the ExA. Therefore, this document generally does not seek to provide a detailed response to each individual submission made at Deadline 2 where National Highways considers that its existing submissions to the Examination address the matter in question. Failure to respond to a particular point should not therefore be inferred as National Highways accepting a matter on which its position is already clearly identified. National Highways would, however, be very willing to respond to any additional questions from the ExA arising from the submissions made at Deadline 2, where they consider it would be helpful for National Highways to further comment.

2 Comments on Deadline 2 submissions

2.1 Introduction

2.1.1 This chapter provides National Highways' comments on the submissions made by Interested Parties at Deadline 2, where it is considered the ExA may benefit from further clarification or where it is considered that a point needs correction. On review of the submissions at Deadline 2, National Highways considers there are two matters that require comment for the benefit of the ExA:

- a. Access to Cowley village
- b. Matters raised by Climate Emergency Policy and Planning (CEPP)

2.2 Access to Cowley village

Summary of matters raised in Deadline 2 submissions

- 2.2.1 To date, a number of Relevant Representations and Written Representations have expressed concern over the potential effects of the scheme on Cowley village, including in relation to, noise, air quality and traffic and 'rat running'. Concerns have also been raised in relation to consultation undertaken with local residents. National Highways has previously provided a response to such matters in its submissions at Deadline 1 and Deadline 2, primarily in sections 2.9 and 2.15 of Responses to Relevant Representations (Document Reference 8.3, REP1-008) and section 2.2 of the Response to Written Representations made at Deadline 1 (Document Reference 8.11, REP2-012)
- 2.2.2 At Deadline 2, a number of Interested Parties have submitted comments which continue to raise concern that the scheme would result in unsuitable levels of traffic on the local road network providing access to Cowley. Some of these directly comment on the information National Highways provided regarding traffic modelling results on Cowley Lane, in paragraphs 2.9.4 and 2.9.5 of the Responses to Relevant Representations (Document Reference 8.3, REP1-008).
- 2.2.3 National Highways has identified that there is some uncertainty amongst Interested Parties over the design of the scheme in relation to the local roads around Cowley, with some submissions seeking further clarification on the proposals, including any restrictions in access that are proposed. The decision-making process for restricting access to Cowley Wood Lane has also been queried, with a suggestion that this aspect of the design was not communicated to local residents.

National Highways response

- 2.2.4 National Highways acknowledges that there is some confusion amongst Interested Parties from Cowley regarding the proposals for the local road network in their area, which has in part arisen through differences in local naming conventions for some of the roads. To aid understanding of the proposals in this area, National Highways has prepared an annotated drawing (Appendix A) which summarises the design and proposed forms of access for the local roads between Cowley and the A417.

Cowley Lane and Cowley overbridge

- 2.2.5 National Highways can clarify that Cowley Lane refers to the local road which would provide the primary vehicular access between Cowley village and A417, via Cowley overbridge. This is depicted in point A of the annotated drawing provided at Appendix A and the Unique Street Reference Number (USRN) for the road is 9401354. It is this road to which the traffic modelling reported in section in paragraphs 2.9.4 and 2.9.5 of the Responses to Relevant Representations (Document Reference 8.3, REP1-008) related.

Cowley Wood Lane

- 2.2.6 National Highways can clarify that Cowley Wood Lane refers to the road identified as USRN 9400716, which is also known as Daisy Bank Road. Under the scheme, it is proposed that this road would be stopped up as a public road and would provide a new section of restricted byway, joining the new section of bridleway between Cowley Footpath 40 and Cowley Footpath 39.
- 2.2.7 Cowley Wood Lane therefore would not be open for general motor traffic access to Cowley village, however it would provide a private means of access to limited properties. This is depicted in point B of the annotated drawing provided at Appendix A and it is set out in the DCO Application in the Rights of Way and Access Plans (Document Reference 2.5 Rev 1, AS-039).
- 2.2.8 National Highways made the decision to stop up Cowley Wood Lane following the 2019 statutory consultation. National Highways notes from the submissions made at Deadline 2 that some Interested Parties consider that this decision was made without input from or communication with the local community.
- 2.2.9 National Highways can clarify that it made the decision to amend the design of the scheme to stop up Cowley Wood Lane in response to feedback received at the 2019 statutory public consultation, in which members of the local community raised concern over the potential for rat-running on the road, which at that point was proposed to connect Cowley junction with Cowley village. This design change was then specifically consulted upon through a supplementary statutory consultation in 2020, along with several other amendments to the scheme design. National Highways has previously responded to this point in further detail at Deadline 1 in paragraphs 2.15.16 to 2.15.20 of Responses to Relevant Representations (Document Reference 8.3, REP1-008).

Stockwell overbridge

- 2.2.10 The Stockwell overbridge carries a proposed bridleway and would provide a private means of vehicular access only. This is depicted in point C of the annotated drawing provided at Appendix A however details of the public rights of way (PRoW) proposals are set out in the DCO Application in the Rights of Way and Access Plans (Document Reference 2.5 Rev 1, AS-039).

Traffic modelling

- 2.2.11 National Highways would like to provide a correction to paragraph 2.9.4 of the Responses to Relevant Representations (Document Reference 8.3, REP1-008) in relation to the reported traffic modelling figures.
- 2.2.12 For convenience, these paragraphs stated:

“In Cowley, there is a forecast increase in traffic on Cowley Lane due to the proposed closure of Cowley Wood Lane. Whilst the forecast increase is a significant, the two-way Annual Average Daily Traffic flows in 2041 increase from 18 to 188 vehicles with the scheme, it equates to a relatively low number of actual vehicles (e.g., a forecast of 23 vehicles in the 2041 PM peak). Access to Cowley village via the proposed Cowley junction and Cowley Wood Lane was removed from the scheme following statutory consultation in 2019, in which local residents raised concern over the safety and suitability of the road for general traffic. It is now proposed that Cowley Wood Lane would provide access for residents and walkers, cyclists and horse riders only.

Whilst the modelling shows there would be increases in traffic to some local roads, the assessment reports that overall, there would be an increase in traffic on the A417 and decreases on local roads. This demonstrates how the scheme would achieve its objective of discouraging rat-running by having a high-capacity free flowing road with improved journey times and reliability that encourages vehicles to use this strategic route rather than local routes.”

- 2.2.13 National Highways has identified that the figure of 188 vehicles has been included as a typographical error. For clarification, this paragraph should have stated:

*“In Cowley, there is a forecast increase in traffic on Cowley Lane due to the proposed closure of Cowley Wood Lane. Whilst the forecast increase is a significant, the two-way Annual Average Daily Traffic flows in 2041 increase from 18 to **118** vehicles with the scheme, it equates to a relatively low number of actual vehicles (e.g., a forecast of 23 vehicles in the 2041 PM peak). Access to Cowley village via the proposed Cowley junction and Cowley Wood Lane was removed from the scheme following statutory consultation in 2019, in which local residents raised concern over the safety and suitability of the road for general traffic. It is now proposed that Cowley Wood Lane would provide access for residents and walkers, cyclists and horse riders only.”*

- 2.2.14 Some of the submissions made at Deadline 2 queried the traffic flows on Cowley Lane as stated paragraph 2.9.4 of the Responses to Relevant Representations (Document Reference 8.3, REP1-008). This matter was discussed in the Issue Specific Hearing 2 (ISH2) on 27 January 2022. As requested through Hearing Action Point ISH2-AP18, the Applicant provides traffic data for Cowley at Appendix B of this document.

2.3 Matters raised by Climate Emergency Policy and Planning (CEPP)

Summary of matters raised in Deadline 2 submissions

- 2.3.1 CEPP made a number of submissions at Deadline 2, which relate to the assessment of the effects of the scheme on climate. These matters were discussed at the Issue Specific Hearing 2 (ISH2) on Environmental Matters (Thursday 27 January 2022) which both CEPP and the Applicant attended. Arising from ISH2 was Hearing Action Point ISH2-AP8 which requested that the Applicant consider and respond to submissions made to date by CEPP regarding the carbon assessment.

National Highways response

2.3.2 An initial response to CEPP was provided at Deadline 1 in section 2.2 Carbon emissions and climate change of Responses to Relevant Representations (Document Reference 8.3, REP1-008). To assist the ExA further, National Highways has set out its response for each of the matters raised in turn:

- Assessment of cumulative effects of greenhouse gas emissions from the scheme with other existing and/or approved projects
- The appropriate geographical scale of assessment of greenhouse gas emissions
- How the assessment presented for the scheme complies with the Environmental Impact Assessment Regulations

Assessment of cumulative effects of greenhouse gas emissions from the scheme with other existing and/or approved projects

2.3.3 National Highways follows the advice set out in the Design Manual for Roads and Bridges (DMRB) for the design and evaluation of the impact of any of its road schemes. This ensures consistency in how any scheme is progressed and how the outcomes are evaluated.

2.3.4 In respect of the assessment of cumulative effects, DMRB Chapter LA 104 Environmental assessment and monitoring provides the following overarching advice on the assessment and evaluation of cumulative impacts on pages 17-18:

2.3.5 *“Paragraph 3.21 Environmental assessments shall assess cumulative effects which include those from:*

- *a single project (e.g. numerous different effects impacting a single receptor); and*
- *different projects (together with the project being assessed).*

2.3.6 *Paragraph 3.21.2 The assessment of cumulative effects should report on:*

- *roads projects which have been confirmed for delivery over a similar timeframe;*
- *other development projects with valid planning permissions or consent orders, and for which EIA is a requirement; and*
- *proposals in adopted development plans with a clear identified programme for delivery.*

2.3.7 *Paragraph 3.22 The assessment of cumulative effects shall:*

- *establish the zone of influence of the project together with other projects;*
- *establish a list of projects which have the potential to result in cumulative impacts; and*
- *obtain further information and detail on the list of identified projects to support further assessment.”*

2.3.8 The DMRB LA 114 Climate describes the approach to be undertaken to assess and evaluate the climate impacts and adaptation for schemes. This is set out in ES Chapter 14 (Document Reference 6.2, APP-045) for the scheme.

2.3.9 The assessment of carbon dioxide (CO₂) undertaken has assessed the construction and operational effects of the scheme as follows:

- Construction – the materials and energy required to construct the scheme.
- Operational – emissions produced by vehicles using the completed scheme and associated journeys from the wider road network that incorporate or have a change in their journey following opening of the scheme; emissions produced by maintenance activities over its design life (i.e. 60 years).

2.3.10 The traffic modelling for the scheme has been undertaken in line with Transport Appraisal Guidance¹ published by the Department for Transport (DfT). Details of the traffic modelling are provided in the Combined Modelling and Appraisal Report (Document Reference 7.6, APP-422) for the scheme. The traffic model used for the scheme has been developed in line with DfT requirements and is **inherently cumulative**. This is because, in brief, traffic models used to support scheme assessment contain data about the following:

- The proposed scheme and adjoining Strategic Road Network and local road network.
- Other schemes promoted by National Highways in the near vicinity of the proposed scheme with high certainty that they are to be progressed i.e. progressed beyond preferred route announcement stage.
- They are based on discussions with the relevant planning authority, of foreseeable developments promoted by third parties as likely to be developed in a similar timeline to the proposed National Highways' scheme. Knowing where the proposed third party development is to be sited, the extents and types of development, and the timescales of when it is to be completed are requirements to ensure that the third party developments can be reasonably described in the traffic model.
- National government regional growth rates which include a representation of likely growth rates excluding known planning developments already included in the traffic model. This is represented by DfT's NTEM/TEMPO² growth factors for car usage, and growth in freight is derived from DfT's National Transport Model³.

2.3.11 In terms of operational carbon, when National Highways evaluates the changes in CO₂e emissions of their proposed schemes they do so by comparing changes in the road traffic on the Strategic Road Network and local road network between the 'without scheme scenario' and the 'with scheme scenario'. This takes into account the assessment of the proposed scheme and all other developments likely to have an influence on the proposed road scheme and on the area the proposed road scheme is likely to influence.

2.3.12 In essence, as both with and without scheme scenarios already include all likely developments and traffic growth factors, the assessment is inherently cumulative as regards operational carbon emissions. This is a state of affairs recognised in general terms in paragraph 3.4.4 of the Planning Inspectorate's Advice Note 17 ("Cumulative effects assessment relevant to nationally significant infrastructure projects"), the first two sentences of which state that:

¹ <https://www.gov.uk/guidance/transport-analysis-guidance-tag>

² <https://www.gov.uk/government/publications/tempo-downloads>

³ <https://www.gov.uk/government/publications/national-transport-model-ntmv2r-overview-of-model-structure-and-update>

“Certain assessments, such as transport and associated operational assessments of vehicular emissions (including air and noise) may inherently be cumulative assessments. This is because they may incorporate modelled traffic data growth for future traffic flows. Where these assessments are comprehensive and include a worst case within the defined assessment parameters, no additional cumulative assessment of these aspects is required (separate consideration may be required of the accumulation or inter-relationship of these effects on an individual set of receptors e.g. as part of a socio economic assessment).”

The appropriate geographical scale of assessment of greenhouse gas emissions

2.3.13 In line with the requirements set out in Climate Change Act 2008, Part 1, Section 4 (see below) Parliament has set carbon budgets at the national scale.

Carbon budgets

1) *It is the duty of the Secretary of State—*

(a) to set for each succeeding period of five years beginning with the period 2008-2012 (“budgetary periods”) an amount for the net UK carbon account (the “carbon budget”), and

(b) to ensure that the net UK carbon account for a budgetary period does not exceed the carbon budget” [our emphasis].

2.3.14 Carbon budgets cover the following 11 sectors:

- Surface Transport
- Buildings
- Manufacture and Construction
- Electricity Generation
- Fuel Supply
- Agriculture and land use, land use change and forestry
- Aviation
- Shipping
- Waste
- Fluorinated gases (F-gases)
- Greenhouse gas removals

2.3.15 The national carbon budgets are themselves cumulative i.e. the sum of carbon emissions from a range of sectors between now and the end of the 6th carbon budget (2037).

2.3.16 The Climate Change Act 2008 does not impose a legal duty to set carbon budgets at a smaller scale than those set out nationally i.e. regional or local budgets are not required. Specifically:

a) In setting carbon budgets parliament has not imposed any legal duty upon local authorities to attain any particular targets whether carbon budgets or for net zero 2050. i.e. there are no legal duties which require particular geographical areas within the UK to achieve particular reductions in carbon emissions by particular dates.

b) Neither Parliament nor Government has identified any sectoral targets for carbon reductions related to transport, or any other sector. There is no requirement in the Climate Change Act 2008, or in Government policy, for carbon

emissions for all road transport to become net zero. This was explained in the *R(Transport Action Network) v Secretary of State for Transport* [2021] EWHC 2095 (Admin) (“the TAN case”) in which Holgate J held that:

“...there is no sectoral target for transport, or any other sector, and that emissions in one sector, or in part of one sector, may be balanced against better performance in others. A net increase in emissions from a particular policy or project is managed within the government's overall strategy for meeting carbon budgets and the net zero target as part of "an economy-wide transition."

c) A net increase in emissions from a particular policy or project is thus managed within the Government's overall strategy for meeting carbon budgets and the net zero target as part of an economy-wide transition.

- 2.3.17 There is, therefore, no legal requirement to assess the impact of an individual project against the total carbon emissions from RIS 1 and RIS 2.
- 2.3.18 To conduct an impact assessment at a local or regional scale some form of baseline would need to be identified, and that baseline would need to comprise:
- A forecast of carbon emissions from all cumulative sources relevant to the geographic / sectoral scale being adopted.
 - A forecast which addresses the time frame relevant to the proposed road scheme.
 - A forecast which reflects existing government policy to attain the 6th carbon budget and net zero 2050.
 - A forecast which does not include carbon emissions from the proposed road scheme (to avoid double counting).
- 2.3.19 The Government sets carbon budgets at a national level in accordance with the Climate Change Act 2008. Carbon budgets are not produced at a local or regional level.
- 2.3.20 National Highways is therefore unable to produce a baseline at a local or regional scale itself. Such a baseline would have to be consistent with the Government's understanding of the likely implications of its policies over time in a particular geographic area. In relation to carbon reductions, those policies are myriad and extend to matters beyond the planning system and into issues relating to the use of fiscal incentives / disincentives to manage carbon emissions across the country as a whole.
- 2.3.21 An environmental statement is required to include such information as is reasonably required to assess the environmental effects of the development and which the applicant can reasonably be required to compile having regard to current knowledge (see *R. (Khan) v London Borough of Sutton* [2014] EWHC 3663 (Admin) and *Preston New Road Action Group v Secretary of State for Communities and Local Government* [2018] Env. L.R. 18).
- 2.3.22 There is no reasonable basis upon which National Highways can assess the carbon emissions impact of the scheme at a local or regional level and it is not required to do so by law or by the National Policy Statement for National Networks (NPSNN).
- 2.3.23 Accordingly, National Highways is not in a position to provide an assessment of the cumulative effects of the greenhouse gas emissions for the scheme for anything other than at the national level carbon budgets.

How the assessment presented for the scheme complies with the Environmental Impact Assessment Regulations

- 2.3.24 An environmental statement is required to describe the likely significant effects of a proposed development on the environment, as per Regulation 14 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017⁴. This includes a description of the likely significant effects on the environment from, inter alia, the impact of the project on climate (for example the nature and magnitude of greenhouse gas emissions) and the vulnerability of the project to climate change. An environmental statement is also required to describe the likely significant cumulative impacts of the development proposed together with those from other “existing and/or approved projects” (see paragraph 5 (e) of Schedule 4 to the 2017 Regulations).
- 2.3.25 To undertake this work and come to an informed judgement an environmental statement is required to include such information as is reasonably required to describe the environmental effects of the development and which the applicant can **reasonably be required to compile having regard to current knowledge**⁵. In the context of assessing cumulative carbon impacts, the only assessment National Highways can be reasonably required to undertake is one having regard to current knowledge.
- 2.3.26 Accordingly, the environmental statement produced for the Scheme complies with the 2017 Regulations.
- 2.3.27 National Highways can only assess the change in CO2e emissions from the Scheme in absolute terms and against the national carbon budgets.
- 2.3.28 The procedures and evaluation criteria set out in DMRB LA 114 Climate, are appropriate and sufficient to ensure that the cumulative effects of proposed road schemes upon climate change are assessed in accordance with the 2017 Regulations and to provide sufficient evidence for the decision-making requirements set out in paragraph 5.18 of the NPSNN.

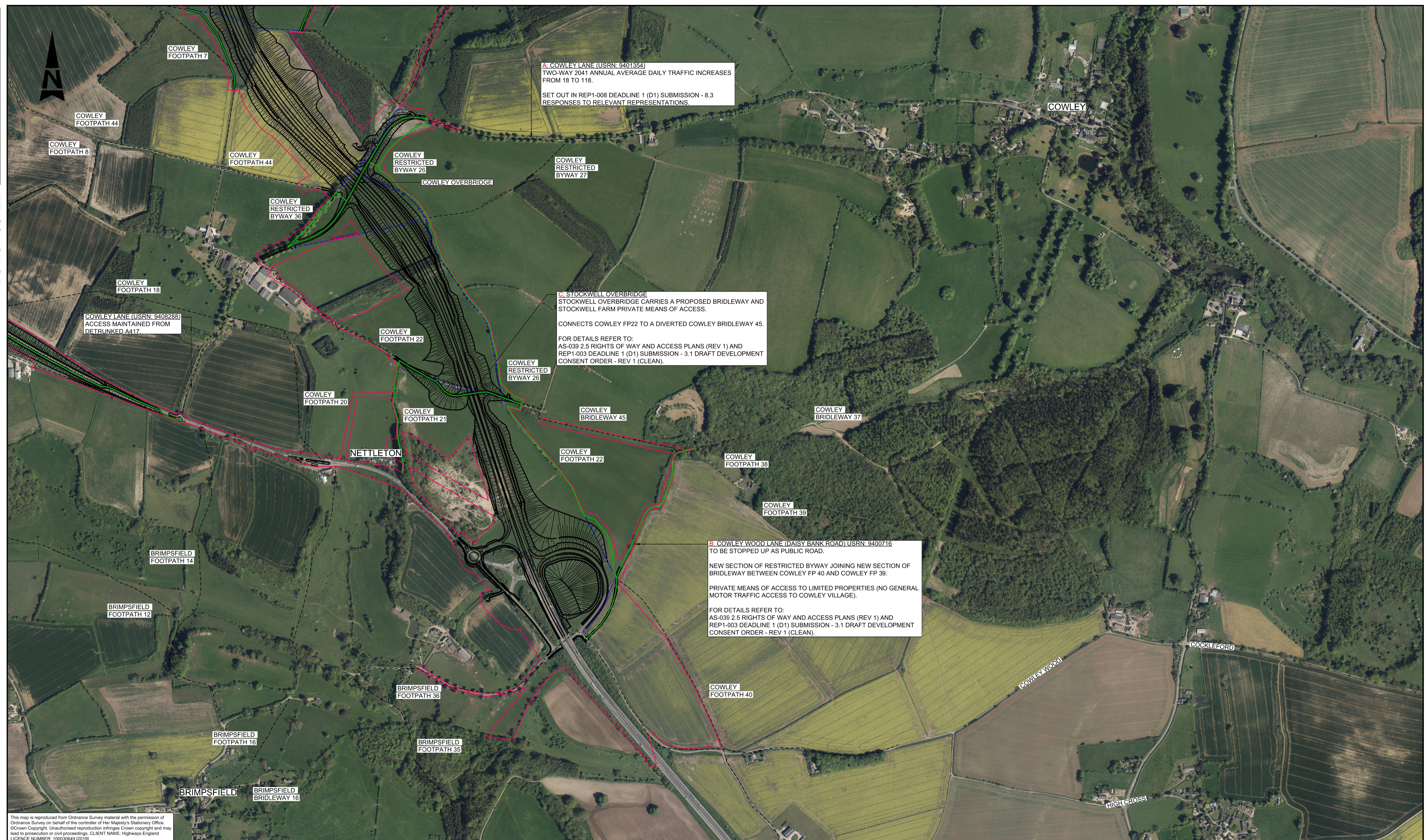
⁴ <https://www.legislation.gov.uk/uksi/2017/572/contents/made>

⁵ see R. (Khan) v London Borough of Sutton [2014] EWHC 3663 (Admin) and Preston New Road Action Group v Secretary of State for Communities and Local Government [2018] Env. L.R. 18)

Appendix A Cowley Village Access Arrangements Plan

DO NOT SCALE

100
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Millimetres



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LEGEND	NOTES
PROPOSED SCHEME BOUNDARY	1. ALL DIMENSIONS ARE IN METRES UNLESS NOTED OTHERWISE.
PROPOSED PUBLIC RIGHT OF WAY (BRIDLEWAY, FOOTPATH, RESTRICTED BYWAY, BYWAY OPEN TO ALL TRAFFIC)	2. ONLY WRITTEN DIMENSIONS SHALL BE USED. DO NOT SCALE.
EXISTING PUBLIC RIGHT OF WAY (BRIDLEWAY, FOOTPATH, RESTRICTED BYWAY)	
STOPPED UP PUBLIC RIGHT OF WAY (BRIDLEWAY, FOOTPATH, RESTRICTED BYWAY)	

SAFETY, HEALTH AND ENVIRONMENTAL INFORMATION	Rev	Date	Description	By	Chk'd	App'd	Auth'd
IN ADDITION TO THE HAZARDS/RISKS NORMALLY ASSOCIATED WITH THE TYPES OF WORK DETAILED ON THIS DRAWING, NOTE THE FOLLOWING SIGNIFICANT RESIDUAL RISKS (REFERENCE SHALL ALSO BE MADE TO THE DESIGN HAZARD LOG).							
CONSTRUCTION							
NONE							
MAINTENANCE / CLEANING							
NONE							
USE							
NONE							
DECOMMISSIONING / DEMOLITION	P01	20/01/22	FOR INFORMATION	ES	CT	JP	---
NONE	P02	20/01/22	FOR INFORMATION	ES	CT	JP	PD

Subsidiary	Drawing Status	Project Title
S4	SUITABLE FOR STAGE APPROVAL	A417 MISSING LINK
		Drawing Title
		COWLEY VILLAGE ACCESS ARRANGEMENTS
		Scale
		N/A
Client		By
		ES
Date		Checked
		CT
Date		Approved
		JP
Date		Authorised
		PD
Drawing Number		HE PIN
		HE551505 - ARP
Location		Volume
		LSI
Type		Number
		-DR - ZL - 000002
Role		Revision
		P02

Rev	Date	Description	By	Chk'd	App'd	Auth'd

Appendix B Cowley Traffic Data

- B.1.1.1 As noted in the Action Points from the Open Floor, Issue Specific and Compulsory Acquisition Hearings held between 24 and 27 January 2022 (Document Reference EV-036) Action Point ISH2-AP18 was for the Applicant to provide traffic count data for Cowley Lane.
- B.1.1.2 This data is provided in this appendix along with descriptions as to the contents of the tables and what the information shows.
- B.1.1.3 To be consistent with the data provided in the Combined Modelling and Appraisal Report (ComMA) (Document Reference 7.6, APP-422) and the Response to Relevant Representations (Document Reference 8.3, REP1-008), the requested information has been provided as Annual Average Daily Traffic (AADT) flows; in addition, traffic flows for the average peak hour have been provided.
- B.1.1.4 The observed data for Cowley Lane and Cowley Wood Lane (Daisy Bank Road) has been extracted from traffic count surveys and is provided as follows
- in Table B-1 for AAADT flows
 - in Table B-2 to Table B-5 for the AM, Inter peak, PM and Off peak average hours
- B.1.1.5 The observed data is based on Automatic Traffic Counts (ATCs) undertaken on Cowley Lane (H05) and Cowley Wood Lane (Daisy Bank Road) (F08 H06) between 6 October 2015 and 19 October 2015 as outlined in Table 3-1 of the ComMA Report (Document Reference 7.6, APP-422). The location of these is provided in Figure 3-1 of the ComMA. The data from each site is used to calculate the average hour traffic flows for the AM, Inter Peak and PM peak periods.
- B.1.1.6 The traffic flows on each of these roads have been added together to form a screenline to assist in relation to the reassignment effect as a result of the scheme and closing Cowley Wood Lane (Daisy Bank Road) to traffic.
- B.1.1.7 A screenline is an imaginary line on a map that crosses one or more roads. In screenline analysis, the sum of observed road traffic counts that are crossed by the screenline are compared with the modelled traffic flows for the same roads.

Table B-1 AADT flows for Cowley

Road	Direction	2015 base		Do-minimum		Do-something	
		Observed	Modelled	2026	2041	2026	2041
Cowley Lane	Eastbound	56	19	17	16	1	1
	Westbound	69	12	2	2	104	117
	Two-way	125	31	19	18	105	118
Cowley Wood Lane (Daisy Bank Road)	Eastbound	49	78	81	110	0	0
	Westbound	23	97	146	194	0	0
	Two-way	72	175	226	304	0	0
Screenline	Eastbound	105	97	98	126	1	1
	Westbound	92	109	147	196	104	117
	Two-way	197	206	245	322	105	118

Table B-2 AM average hour flows Cowley

Road	Direction	2015 base		Do-minimum		Do-something	
		Observed	Modelled	2026	2041	2026	2041
Cowley Lane	Eastbound	5	1	1	0	0	0
	Westbound	4	0	0	0	5	5
	Two-way	9	1	1	0	5	5
Cowley Wood Lane (Daisy Bank Road)	Eastbound	5	9	10	16	0	0
	Westbound	1	5	9	11	0	0
	Two-way	6	14	19	27	0	0
Screenline	Eastbound	10	10	11	16	0	0
	Westbound	5	5	9	11	5	5
	Two-way	15	15	20	27	5	5

Table B-3 Inter peak average hour traffic flows for Cowley

Road	Direction	2015 base		Do-minimum		Do-something	
		Observed	Modelled	2026	2041	2026	2041
Cowley Lane	Eastbound	3	2	2	2	0	0
	Westbound	3	1	0	0	6	6
	Two-way	6	3	2	2	6	6
Cowley Wood Lane (Daisy Bank Road)	Eastbound	3	4	4	6	0	0
	Westbound	1	4	5	9	0	0
	Two-way	4	8	9	15	0	0
Screenline	Eastbound	6	6	6	7	0	0
	Westbound	4	5	5	9	6	6
	Two-way	10	11	11	16	6	6

Table B-4 PM average hour traffic flows for Cowley

Road	Direction	2015 base		Do-minimum		Do-something	
		Observed	Modelled	2026	2041	2026	2041
Cowley Lane	Eastbound	5	1	1	2	0	0
	Westbound	11	1	0	0	20	23
	Two-way	16	2	1	2	20	23
Cowley Wood Lane (Daisy Bank Road)	Eastbound	5	9	8	10	0	0
	Westbound	4	18	30	39	0	0
	Two-way	9	27	38	49	0	0
Screenline	Eastbound	10	10	9	12	0	0
	Westbound	15	19	30	39	20	23
	Two-way	25	29	39	51	20	23

Table B-5 Off peak average hour traffic flows for Cowley

Road	Direction	2015 base		Do-minimum		Do-something	
		Observed	Modelled	2026	2041	2026	2041
Cowley Lane	Eastbound	1	0	0	0	0	0
	Westbound	1	0	0	0	0	0
	Two-way	2	0	0	0	0	0
Cowley Wood Lane (Daisy Bank Road)	Eastbound	1	1	1	1	0	0
	Westbound	0	1	1	1	0	0
	Two-way	1	1	1	1	0	0
Screenline	Eastbound	2	1	1	1	0	0
	Westbound	1	1	1	1	0	0
	Two-way	3	2	2	2	0	0

B.1.1.8 As can be seen from Table B-1 for the 2015 AADT base data, across both roads, the total observed traffic is 197 vehicles, and the modelled traffic is 206 vehicles. As such, the modelled traffic across both roads is within five percent of the observed data. This indicates that the modelled traffic travelling between the A417 and Cowley village on these roads is close to the observed traffic travelling between the A417 and Cowley village. This is replicated in the average peak hours, Table B-2 to Table B-5 where the difference between observed and modelled is low in absolute terms.

B.1.1.9 For the AADT forecast years, Table B-1, the model shows that the volume of traffic across both roads would decrease between the DM and DS scenarios for the forecast years of 2026 and 2041. In 2026 the traffic across the roads would decrease from 245 to 105 vehicles and in 2041 the traffic would decrease from 322 to 118 vehicles. This decrease in traffic between the DM and DS scenario indicates that with the scheme in place vehicles are no longer rat-running through Cowley Village as the congestion issues on the A417 are removed as those on the A417 no longer have to pass through Air Balloon roundabout. This decrease in traffic between the DM and DS is replicated across the peak periods, as presented in Table B-2 to Table B-5.

B.1.1.10 In relation to the written submissions submitted at Deadline 2 which queried the DM traffic flows on Cowley Lane, and the number of vehicles using Cowley Lane, the observed traffic data used in the development of the base model shows that for the average AM, inter peak and PM hour the traffic flows on Cowley Lane are low. As shown in Table B-2 to Table B-5 in the AM average hour the two way traffic flow is nine vehicles, the Inter peak average hour two way traffic flow is six vehicles and the PM average hour the two way traffic flow is 16 vehicles.