

LONDON LUTON AIRPORT EXPANSION

BUCKINGHAMSHIRE COUNCIL (“BC”)

DEADLINE 6: POST-HEARING SUBMISSIONS INCLUDING WRITTEN SUBMISSIONS OF ORAL CASES

IHS7 – Traffic and Transport

Tuesday 28 November 2023 at 14:00

1. BC’s position remains as set out in **[REP3-083, §§35-55]**. The issues have not materially moved on since the last hearings. This note does not repeat but adopts those paragraphs. In particular, the main concerns remain as expressed in **[REP3-083, §35]** as do BC’s identified means of addressing those concerns **[REP3-083, §36]**.

Transport Modelling and Transport Assessments

Validation for Buckinghamshire

2. BC’s Transport and Highway officers are not satisfied that the transport model has been properly validated for use in relation to the Council’s area and, as a result, BC is not content that the model is suitable for application to the Buckinghamshire (“Bucks”) network. This is not just a traffic and transport issue but has consequences for the downstream analysis of impacts derived from traffic modelling such as noise, air quality and health.
3. BC requests that the Applicant validates the traffic modelling for the Bucks network, in accordance with the requirements of the Council’s Transport and Highways officers. BC has taken active steps to assist the Applicant in this regard. It has conducted its own survey to allow the Applicant to validate the model for Bucks. The survey comprises an automated traffic count (“ATC”) on the B489 in two locations and was carried out between 7 October 2023 and 13 October 2023 (this period is not in the school holidays and represents normal network conditions).
4. The relevant data and ATC location are attached to this document. These data have been offered to the Applicant, most recently on 15 November 2023 during a Statement of Common Ground meeting. The Applicant’s consultants agreed to seek approval to accept the BC observed survey data to undertake a localised validation exercise at B488/B489. The completion of this validation by the Applicant remains an objective of BC, it will provide a means of benchmarking flows and enabling traffic data to be validated. BC awaits confirmation as to whether or not the Applicant will undertake this work. Given the steps BC has taken to facilitate it, it is very much hoped that the Applicant will do so.
5. At the hearing, the Applicant suggested that there had been a validation exercise in relation to a screen line south from Leighton Buzzard and that this was a good proxy for Bucks. BC is not satisfied that this suitably addresses its concerns.

6. Bucks falls outside of the area that has been informed through survey data (but within the area informed by mobile phone data). As a result, the modelling is not as detailed in Bucks as it is in relation to the Luton and Central Bedfordshire areas. Strategic models become less accurate as one moves away from the central area which is fully modelled. The Dunstable - Leighton Buzzard screenline sits significantly to the east of the area of concern to BC. BC is not content that it can be confident of the accuracy of the model in relation to the B489 corridor and the Dunstable - Leighton Buzzard screenline does not provide validation in relation to this area of concern.
7. BC is not requesting significant work from the Applicant in this area: the validation being requested is a comparison exercise between the modelled flows on the B489 in the base year against the actual flows obtained through the BC's ATC surveys which have been made available to the Applicant.

Trip distribution plans

8. BC's concerns in relation to the Applicant's trip distribution plans remain despite the update to the documents **[REP5-037]**. The short point is that the updated plans do not provide the necessary underlying data. The trip distribution plans do not present the information required in a suitable format. There are no numbers attributed to the plans, and they only show average daily flows. Peak hour and early morning flows (reflecting travel along the Bucks network from up to two and a half hours prior for passengers to meet the development peak flights) are also required.
9. During a meeting between the Applicant and BC on 15 November 2023, it was stated that the early morning flows had not been modelled despite being the airports peak hours of traffic generation and limited information would be available. However, that appeared to be contradicted in the hearing when it was said that the data was being produced. BC hopes it was modelled and the data will be produced.
10. BC is also concerned that during the hearing the Applicant indicated that the trip distribution plans were not representing assignment of traffic on the network and therefore the traffic shown to be routing on the B489 was only a demonstration of desire lines. This is an incorrect characterisation of the Strategic modelling outputs, strategic modelling provides assignment information, and so it is clear that the B489 is being shown to be the route to which development traffic will be assigned without mitigation.

Ivinghoe junction

11. The Trip Distribution Plans **[REP5-037]** show that the west east corridor is an important route from the west to the airport. The routes through the villages are not well suited for such usage, which vehicles passing through locations that will be sensitive to relatively small changes in traffic flow, with small increases in vehicle throughout leading to material safety concerns where elements of the route are inherently unsafe.
12. The Trip Distribution Plans **[REP5-037]** demonstrate that with the expansion of the airport, greater numbers of air passengers shall use this route. This is evidenced by the

thickening of the difference plot line but, as stated above, the numerical data has not been supplied to quantify this impact.

13. As noted by the ExA during the hearing, the model routes the traffic through the Bucks villages (Pitstone, Marsworth and Ivinghoe). That modelled prediction, despite the lack of suitability of that route in highways safety and environmental terms, justifies the relatively minor works BC proposes to the Ivinghoe junction in order to re-route traffic down the more suitable B488. Such changes to the priority junction at the B489 and B488 Ivinghoe would reduce traffic using unsuitable routes, protecting pedestrian and driver safety within the villages and making the main route away from the villages improves air quality within the villages. BC maintains until demonstrated otherwise that the junction priority works at the B488/ B489 junction should be included within the required works for the scheme and not left to the Council to fund at a later date, either through the TRIMMA process or independently.
14. The above matters result in the BC concerns regarding the lack of confidence in the application of strategic traffic modelling to the Bucks highway network and its consequential implications for the robustness of conclusions drawn from downstream analysis that informs, for example, the health and community assessment.

Sustainable transport

15. BC's position remains as set out at **[REP3-083, §§39-44]**. As previously pointed out, Goal 3 of the Employment and Training Strategy **[APP-215]** sets out to reduce barriers to commuting to the airport and seeks to ensure access as large a pool of potential workers as possible.
16. Local bus services provide connectivity for employees and local residents to the airport and route 61 is important in the context of Bucks, in particular, due to the areas of deprivation within the Aylesbury area. In order for the Applicant to achieve the stated goal of accessing as large a pool of people as possible, within Bucks a public transport connection is essential.
17. The Applicant has now proposed that Route 61 be restored but only as a three hourly service. This is insufficient to (a) provide a realistic means of transport to the airport for staff and (b) to become commercially viable over time (and thereby risk its withdrawal after initial support). BC considers a minimum service of once an hour to be required as stated in BC's Written Representation **[REP1-042]**. This would return the connection to the previous level prior to the introduction of the Luton to Dunstable bus way.
18. BC also seeks a high speed adapted bus or coach service from Aylesbury to the airport that would help to remove longer distance journeys and provide an alternative to the private car from Aylesbury. Without such connections then residents of Aylesbury (c.120,000) will have little choice but to travel by car which will, at the very least, not further the objectives of the Framework Travel Plan and undermine the claimed benefit of the modal shift/ sustainable surface access pleaded by the Applicant.

19. BC notes that this has not been assessed in the Bus and Coach Study [REP5-058, Figure 3.2] at all. This is a material omission where the Trip Distribution Plans [REP5-037] demonstrate the use of the west – east corridor to and from the airport, which BC understood from ISH4 that the Applicant accepts the importance of.

The sustainable transport fund (“STF”)

20. The Applicant referred to the necessity of “pump priming” bus and coach services during the hearing. BC accept this need and this is precisely the point that BC has made regarding the STF: critically, the STF does not allow for pump priming (see [REP3-083, §52] in relation to the identified funding lag). BC remains concerned that the Sustainable Transport Fund lacks the ability to forward fund mitigation, as the funding lag has not been addressed through [REP5-056].
21. BC is also concerned that the Applicant has put forward two scenarios which lead to significantly different maximum fund values, and it is not certain that either of these will provide sufficient value to deliver the schemes that are required. It appears that the value has been set based on a series of income projections rather than identification of the needs and then seeking to match the funding to the needs.
22. It was suggested that the Green Controlled Growth Framework was the mitigation and anything funded by the STF was additional and not required to mitigate. That does not reflect the Applicant’s approach on the papers. The STF is expressly to deliver the Framework Travel Plan (“FTP”). The FTP is a part of the Surface Access Strategy [APP-228, Figure 1.1]. The Surface Access Strategy is a fundamental part of the Green Controlled Growth Framework. As such BC does not accept, the Applicant’s response. There is a genuine lack of clarity as to what comprises mitigation and what is funding the mitigation.
23. The funding model needs to be tested against anticipated costs of potential interventions to demonstrate that it is able to achieve any of its objectives in a given year.

TRIMMA

24. BC’s concerns in relation to the TRIMMA were summarised in the last post-hearing submissions [REP3-083, §§45-47]. Additionally, BC is concerned that the TRIMMA places the burden of responsibility and cost on local highway authorities to identify and show impacts are caused by the airport in order to bring them before the ATF in order to be considered (see [REP5-042, §2.1.4(b)]). This imposes the burden on the local highway authorities whereas it should properly fall on the operator causing the impacts.
25. Further, any such mitigation will be funded by the “Residential Impacts Fund”. The size of this fund is not known. The mitigation to which it will be directed is not known. The cost of that mitigation is not known. The adequacy of the pot, therefore, cannot be assessed.

26. Furthermore, [REP5-051] sets out a number of example principles for the governance of the TRIMMA, these include a maximum allocation per year and a maximum allocation per authority. It has not been demonstrated how this would be compatible with the STF objectives.
27. During a meeting between the Council and the Applicant on 6th December 2023 to discuss the SoCG and the TRIMMA. It was stated that the residual impact fund (RIF) set out within the TRIMMA is only intended to be used for the implementation of highway schemes, and shall not cover other schemes that do not relate to physical works. It was suggested that these should be covered by the STF only. This only increases the concerns BC has in relation to STF funding as set out above.
28. BC officers also raised again the concerns regarding the requirement currently presented for the Local Authorities to fund the evidence gathering to present to the ATF, and set out that it is recognised that applicant would rightly want to be protected from funding studies that do not relate to airport impacts. It was suggested by BC that the concern could be addressed by amending the TRIMMA so that expenses incurred in evidencing schemes to be funded by the RIF would be reimbursed, if found to meet the requirements of the TRIMMA mitigation type 2. If this is accepted BC would be satisfied that this would provide a suitable balance between protecting the applicant and ensuring that the taxpayer is not funding a developer's mitigation.

Conclusion on traffic and transport

29. BC remains of the view that: the model needs to be validated in regards to Bucks; improvements should be made to the B488/B489 junction at Ivinghoe to avoid traffic using the unsuitable route through the Ivinghoe villages; it is imperative that significant public transport improvements and provisions are secured prior to the commencement of the Authorised Development; and a full funding assessment is carried out to demonstrate that the funding arrangements proposed are capable of providing the necessary services set to meet the objectives of the Transport Assessment, the ETS and the Travel Plan.

IHS8 – Environmental Matters

Wednesday 29 November 2023 at 09:30

30. BC principally contributed to Agenda Items 3 Health and community and Agenda Item 8 Climate change and greenhouse gas emissions.

Health and community

31. BC made following points:

- (i) Dependency of health assessment on traffic data: BC reiterated that the assessment of health impacts is reliant upon properly validated transport data, including properly articulated traffic numbers on the trip distribution plans **[REP5-037]** (which was discussed at ISH7). This should include consideration of the very early morning traffic flows through the Bucks villages that are considered likely to be directly affected (Pitstone, Marsworth and Ivinghoe). Movements through these villages are anticipated to start at c.04.30 hours to meet the morning development peak of 07:00-09:00 hours.
- (ii) Limitations of the assessment: Chapter 13 of the ES – Health and Community provides the principal source of health assessment information **[AS-078]**. Paragraph 13.1.2 states the purpose of the assessment to include “*the assessment of effect on people living close to, or affected by, the Proposed Development*”. BC considers its population to be in the ‘affected by’ category. Paragraph 13.1.3 sets out the health determinants, of which four are of key interest to BC (a. iv housing, a. vi Neighbourhood quality, a. viii Perception and uncertainty and b. i Residential properties). Paragraph 13.3.17 sets out health aspects, of which five are of key interest to BC (e. effects on health and wellbeing associated with employment, income and training including the impacts of: f. displacement of businesses; g. opportunities for construction employment, training and apprenticeships; h. changes to the local economy arising from the construction supply chain and expenditure by the temporary workforce; i. increased opportunities for employment within the expanded airport; n. changes to the character and quality of neighbourhood, due to combined environmental impacts (noise, air quality, traffic, light and visual effects); and o. public concern, perceptions and uncertainty about the effects of the Proposed Development). Paragraph 13.3.5(c) states that ‘*effects will occur across the wider study area*’. The wider study area includes BC (defined at 13.3.4/5). There is, therefore, an expectation that the assessment will report on all of these ‘scoped in’ items within the assessment. However, this is not the case and no justification is given for why aspects are not reported on. In this regard, the analysis does not do what it states it is required to do and these omissions affect the assessment of health impacts in Bucks.
- (iii) Integration of Institute of Environmental Management and Assessment (IEMA) 2022 guidance on health assessment in EIA: Table 13.4 of Chapter 13 of the ES **[AS-078]** states that the 2022 IEMA guidance (reference docs 13.27 and 13.28 of

[AS-078]) has “*informed the methodology.*” BC appreciates that this guidance post-dated the Scoping Opinion (2019). However, many projects have been put in the position of responding to this new guidance part way through an application/assessment. The 2022 IEMA guidance represents a shift in the way health assessment in EIA is to be conducted. It is not clear to BC how the IEMA guidance has been accommodated within the assessment undertaken by the Applicant. Parts of Chapter 13 do not accord with the statement in Table 13.4 that the IEMA guidance has informed the methodology. At paragraph 13.5.3, it is said that the health methodology is based on Health Urban Development Unit (HUDU), Wales Health Impact Assessment Support Unit (WHIASU) and International Association for Impact Assessment (IAIA). There is no mention of IEMA. Paragraph 13.5.6 indicates that in order for any assessment of neighbourhood quality to be undertaken, two or more significant residual effects must be experienced by a receptor. Paragraph 13.6.3 (d) goes further to state that the assessment is based on the findings of the other topic assessment. BC suggests that as currently drafted, the threshold for consideration of in-combination effects is therefore set too high and misses important effects. The health assessment should look at the nature of impacts and assess on a qualitative basis, rather than rely on screening through combinations of significant effects. As an example, the point raised by Mr Cutforth in ISH8 regarding the health effects derived from impacts on open spaces and woodland (and indeed the reference by another attendee at ISH8 to community anxiety/opposition) would be scoped in under the IEMA approach, but is not captured by the Applicant’s methodology. The approach followed by the Applicant does not accord with the multi-layered approach relying on professional judgement to answer a series of questions for each set of impacts that is advocated in the IEMA guidance. Nor does it reflect UK HSA’s position as set out in its relevant representation, that adverse health effects occur below the thresholds within topic specific assessments (e.g. noise and air quality) and need to be assessed accordingly.

- (iv) Errata report [REPS-036]: This document proposes a change to Table 13.6 that is, in BC’s view, not suitable to be presented as an errata. It proposes the deletion of the first row beneath the ‘wider area’ category, indicating that neither the health nor community assessment would consider areas within which there are likely to be environmental impacts (e.g. noise and visual impacts of the airport, construction and surface access traffic routes). This effectively scopes out any consideration of these matters. BC is concerned that there is insufficient justification for the Applicant to make such a blanket assumption that surface access traffic and noise impacts from the airport will “*not be relevant for the wider study area.*” This is not an errata, it is a change in the scope of the assessment presented as something else.
- (v) Mitigation: Because the Applicant has not fully assessed health impacts for the reasons set out above, the mitigation proposed is inadequate. [AS-078] sets out key measures at paragraph 13.8.3 – four are of key interest to BC – f (noise envelope), m (CoCP), k (ETS) and l (sustainable travel). Focusing particularly on k as an example, there is a question about its status. The inclusion in the key

measures in [AS-078] suggests it is essential mitigation; while [REP5-052] at SE.1.4 includes comments to suggest that the ETS is elective and presents an enhancement rather than a necessary intervention. This needs to be clarified and the inconsistent presentation should be removed. In BC's view the ETS is a necessary intervention.

32. The Applicant, in response at the hearing, said that the assessment was done at the Population level over a very wide area and it would not be proportionate to cover all of the items for the wider study area.
33. If this is the case, then the introductory parts of the chapter need to be updated to manage this expectation; a robust rationale for excluding all of these matters is required; a check that this will then not place the assessment out of conformity with the Scoping Opinion needs to be completed; and the change to Table 13.6 also needs to be robustly evidenced.
34. Another comment was made that the different characteristics of the communities across the wider study area are expressed in the baseline but this does not appear to be the case at least in any detail. The characterisation of the summary demographics statistics is done at a whole authority level (nothing lower). There does not appear to have been any attempt to analyse details about health priorities within various parts of either the core or wider study area.
35. The Applicant says that the health assessment does not duplicate assessment undertaken by others – it relies, for example, on the noise chapter to address noise effects. This is the reason cited for further assessment not being appropriate below the level of 'significant'. This is considered by BC to be a failure to properly apply the 2022 IEMA guidance.
36. The 2022 IEMA guidance provides a method that promotes a standalone interrogation of data through a health lens, rather than reliance on the conclusions of other assessments undertaken using other guidance. At paragraph 3.11 of the IEMA guidance relating to the scoping of health, it is stated that *'the practice of solely relying on other EIA technical chapters to provide the coverage of human health (i.e. disparate discussion of health issues across the EIA Report) is not recommended and should not be the justification to scope out health in EIA'*. BC is of the opinion that the health assessment may use the same datasets as other assessments, but it should analyse the findings through the lens of health, acknowledging that the thresholds set in topic assessments for noise, air quality etc are linked to requirements of legislation, rather than capturing all instances of impacts becoming adverse effects for people, for example of nuisance, sleep disturbance, general irritants that lead to stress and mental health deterioration. BC advocates an approach of analysing the totality of discernible impacts in terms of noise changes, air quality changes, visual intrusion, traffic disruption etc. and then using the IEMA framework of questions to explore using qualitative professional judgement, whether a) there is the potential for significant effects and b) whether the combination of impacts could disproportionately affect groups with protected characteristics (e.g. neurodiverse members of the community who may experience greater difficulties

adapting to changes, plus sensory overload). The exclusion of this element of the approach does not, in BC's view, result in a robust mental health and well-being assessment being reported.

37. In terms of the key concerns for BC, principally this is around the way in which the characteristic qualities of the villages of Pitstone, Marsworth and Ivinghoe may be detrimentally affected by increases in traffic; as well as the implications of extension of trip generation into the early hours of the morning, leading to sleep deprivation/disturbance on a permanent basis. BC is seeking both quantitative and qualitative assessment of this, and fuller consideration of what mitigations could be effective (e.g. it may be junction re-prioritisation to reduce residential exposure; there may be some opportunities for noise attenuation through other means; effective public transport options could also reduce private vehicle throughput, particularly for staff). BC is also keen that the measures of the ETS relating to securing accessibility for all manifest as firm commitments to the delivery of an at least hourly bus service to the airport for Bucks residents – this is a key aspect of supporting access to employment opportunities, which is an important factor in well-being.
38. In response to the ExA suggesting that there could be potential for degradation of amenity from just one type of effect as part of neighbourhood character assessment, the Applicant said that this was not in scope and that controls covered this, citing GCG. BC does not consider this response to reflect a full consideration of the issue. GCG does not cover all health determinants (in this regard it is only really aircraft noise that is controlled by GCG). In reality, the reliance on the noise assessment results re: significance means that many of the traffic flow changes are disguised within the data. The fact that the outline TRIMMA has been set up is, to BC, indicative of the Applicant's underlying awareness that this is a weakness and that unforeseen and unintended consequences are actually very likely (and arguably, therefore, foreseeable and in some locations, mitigatable. For example, the homes adjacent to the car parks proposed at the airport, which were discussed at ISH8, which are also falling out of scope due to the health methodology followed).

Climate change and greenhouse gas emissions

Sensitivity of the assessment to future operational requirements and pace of technological improvements

39. Inset 12.4 of Chapter 12 of the Environmental Statement ("the ES"), Greenhouse Gases ("GHG"), which is entitled "*The incremental effect of Jet Zero Strategy mitigation policies on Aviation Emissions*" [REP3-007, p.68] has been referred to at times as a sensitivity study. However, it merely shows the different contributions of measures to the total aviation GHG emissions reductions through to 2050. It is not and should not be understood as a sensitivity study, (see [REP5-064, §2.40]).
40. The Applicant stated during the hearing that the outlined blue section of Inset 12.4, referring to efficiency improvements is "already happening". David Johnson for BC clarified that current system efficiency improvements are 1% per annum, whereas the High Ambition scenario assumes a 2% per annum rate, which would be a doubling of

improvement against the current trend. Accordingly, the required improvements are not happening now.

41. In Table 12.23 of Chapter 12 of the ES [REP3-007, p.68], the Applicant indicates their position is that UK ETS and CORSIA provide backstops should the technological developments from Jet Zero Strategy (“JZS”) not come forward. BC requested within [REP3-083, §§22-32] that the Applicant show the effect of a higher or lower carbon price upon cumulative GHG emissions. This is the mechanism that the UK ETS & CORSIA would use, should JZS developments not come forward as assumed. CORSIA relies upon significant international cooperation, which may not be forthcoming.
42. In [REP4-104, pp.8-9] the Applicant states that although variation in carbon prices has been assessed with respect to demand variation, they also state that it is not possible to model the effect of higher or lower carbon prices upon GHG emissions due to the volume of data. The question remains though, what is the specific impact upon carbon price and demand if, for example, efficiency improvements do not come forward at 2% per annum? What is the price impact if SAF comes forward at a different rate from that foreseen within JZS? This specific causal assessment of the sensitivity of GHG emissions to varied rates of technological development has not been made by the Applicant.

Application of the Luton Net Zero: Climate Policy and Action Plan [REP3-100]

43. The ExA has asked about the implications of “Luton Net Zero: Climate Policy and Action Plan”. The Action Plan is essentially a policy paper that is of relevance chiefly for Luton Borough Council and is not something that BC has a material position upon.
44. However, BC makes a single observation: Chapter 4 “Luton Airport” states “*Innovation - Aviation: support the airlines in uptake of sustainable aviation fuels and electric aircraft*” [REP3-100, p.11] with Luton Airport (the Applicant) identified as the Action “owner”. The timeframe given is 2040. BC asks that the Applicant outline what concrete action has or will be committed to by the Applicant within the DCO to address this action point.

ISH9 – Green Controlled Growth

Agenda Item 4: Greenhouse Gas Emissions

Basis for the limits and thresholds

45. The Applicant has provided details of the Green Controlled Growth limits and thresholds for GHG in Table 3.7 of **[REP5-021]**, however it is not clear what the source of the figures within the table are or how they are calculated. In paragraph 3.4.3 the Applicant refers to the calculation of GHG emissions for the Proposed Development in Chapter 12 of the Environmental Statement **[REP3-007]**. However, there is no reference to how the limits and thresholds were determined, i.e. a methodology. The Applicant provides detail regarding the monitoring processes and actions required if thresholds were exceeded, but not the basis for the limits and thresholds. BC requests that the Applicant provides an explanation of the methodology utilised to allow for a review to be able to comment on this area. The ExA asked essentially the same questions at the Hearing and David Johnson for BC explained that BC has the same questions and would welcome sight of the answers provided to the questions asked by the ExA at the Hearing.

Achievability of limits and thresholds, including options for mitigation and offsetting

46. Without the inclusion of details or a methodology on how the limits and thresholds were determined, BC is unable to comment on their achievability.
47. It is noted by the Applicant in paragraph 3.4.23 that scope 3 aviation emission are excluded from the GCG limit, as there are separate national and international offsetting schemes (UK Emission Trading Scheme/CORSIA), which will be used to reduce GHG emissions in this area. BC reiterated the need for robust sensitivity analysis in this area. This position has already been extensively stated by BC within Deadline 3 (**[REP3-081, p.5]**, **[REP3-082, §20]** and **[REP3-083, §6]**).

Ability of the Framework to incorporate updated policy and legislation

48. In paragraph 3.4.40, the Applicant commits “...to undertake a review of both the definition of ‘airport operation’ and the associated Limit for 2040 onwards within three months of government clarifying the scope and pathway to achieving this policy ambition”. BC suggests that the Applicant include within this a process to take into consideration other future policy changes regarding decarbonisation measures beyond current government policy and ambition.

Surface access

The relationship between GCG, Framework Travel Plan (FTP) and the TRIMMA

49. The Applicant provided an organogram/flow diagram at the hearing that laid down the relationship between GCG and other mitigation measures.
50. The GCG is shown to set mode share limits for the surface access to the airport that are disaggregated from both the FTP and the TRIMMA, contrary to the position presented during ISH7. The only direct connection between the three documents and their

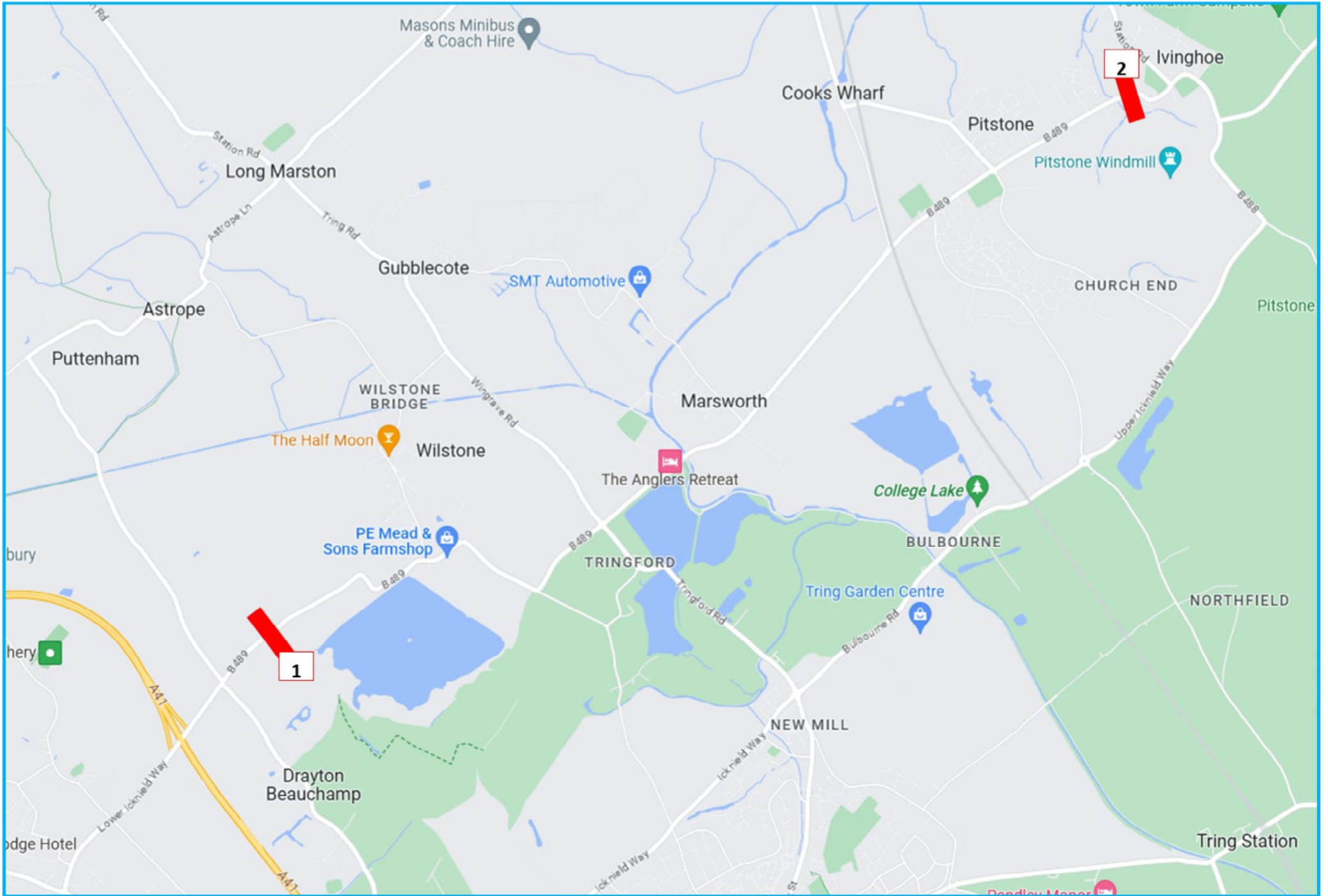
respective outworkings comes from the identification of them within the Transport Assessment.

51. It has been presented by the Applicant that if the GCG surface access targets are not being met (presumably threshold 2 or above) then GCG will require the Applicant to commit funds from the airports revenue account in order to implement changes to the sustainable transport provision in order to bring the surface access back within the acceptable limits. (It would also be possible for the airport to simply block people arriving by private car or taxi and potentially displace the non-sustainable modes further out and have potential to mask the unsustainable modes.)
52. The FTP is a required mitigation as shown in the mitigation route map, however there is no requirement for the Travel Plan (TP) Coordinator to report to the GCG via the ESG or the other way round and so it functions independently of the GCG, albeit with its stated aims of needing to have greater targets than the GCG. It is therefore possible for the FTP (and later TP) to support the reaching of the GCG targets but they are not intrinsically linked. The case remains that it is uncertain if the funding profile for the FTP is sufficient to deliver meaningful interventions in any given year. It should also be noted that the FTP is written in such a way as to make all the Public Transport interventions subject to private commercial entities being willing to provide the service, and therefore be out of the Applicant's control. This means that for the TP, engagement could take place and nothing be delivered and the requirements of the TP be met.
53. It is however perfectly possible for the Applicant to provide private services in the public transport sector should they be unable to engage an existing provider. This has been secured within other planning applications (e.g. Pinewood studios Screen Hub UK application was to provide a private shuttle bus to Slough Station, and the Luton DART is an equivalent.) Please search application reference: PL/20/3280/OA for details, [Simple Search \(buckinghamshire.gov.uk\)](https://www.buckinghamshire.gov.uk/simple-search).
54. The TRIMMA falls under the same conditions as the FTP, in that there is no link between that and the GCG post consent, and the only link between the TRIMMA and the FTP is that they are administered through the ATF, however these two documents are shown to operate independently of each other. It would make sense that if the FTP identified a limiting factor in the physical network that it could inform the TRIMMA Type 2 mitigation to undertake works to facilitate the greater effectiveness of a FTP intervention and a suitable feedback loop in the opposite direction.


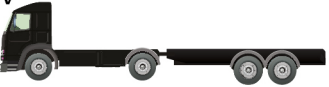






















ISH 10 – draft DCO

Friday 1 December 2023 at 09:30

55. BC noted that, in responses to its previous submissions, the draft DCO had been amended to include the concept of discretionary consultation in the discharge of requirements (Requirements 34 and 35) and that BC is included as a discretionary consultee. BC is grateful for that change.
56. BC made the following points, principally relating to Agenda Item 6 – Green Controlled Growth:
- (i) The key change BC wishes to see is the inclusion of BC as a member of the ESG, which would require the insertion of BC into Requirement 19(2).
 - (ii) In BC’s view the consultation process in relation to Level 2 Plans and Mitigation Plans under Requirements 22 and 23 needs to be clarified. Whilst there is reference to “consultation period”, there is no express obligation to consult. Such an express obligation should be included and it should make clear when the consultation should take place and with whom.
 - (iii) BC confirmed that it no longer challenges the frequency of reviews under Requirement 24.
 - (iv) In relation to the discharge of requirement process under Requirement 35 to the draft DCO, BC suggests that a minimum consultation period, be it 21 or even 14 days, is specified within the 8-week specified period for determining the application to discharge. This would ensure that consultees have sufficient time to consider any application and are not consulted too late in the day.



Road Data Services Ltd

Class No	Vehicle Description	Class No	Vehicle Description
1	Car, Light Van, Taxi 	5	Rigid 2 Axle HGV + 2 Axle (Close coupled) Trailer 
1	Light Goods Vehicle 	6	Rigid 3 Axle HGV + 2 Axle Drawbar Trailer 
1	Car or Light Goods Vehicle + 1 Axle Caravan or Trailer 	6	Rigid 3 Axle HGV + 3 Axle Drawbar Trailer 
1	Car or Light Goods Vehicle + 2 Axle Caravan or Trailer 	7	Artic, 2 Axle Tractor + 1 Axle Semi-Trailer 
2	Medium / Large Goods Vehicle 	8	Artic, 2 Axle Tractor + 2 Axle Semi-Trailer 
3	Rigid 3 Axle Heavy Goods Vehicle 	9	Artic, 2 Axle Tractor + 3 Axle Semi-Trailer 
3	Rigid 3 Axle Heavy Goods Vehicle 	10	Artic, 3 Axle Tractor + 1 Axle Semi-Trailer 
4	Rigid 4 Axle Heavy Goods Vehicle 	10	Artic, 3 Axle Tractor + 2 Axle Semi-Trailer 
4	Rigid 4 Axle Heavy Goods Vehicle 	11	Artic, 3 Axle Tractor + 3 Axle Semi-Trailer 
5	Rigid 2 Axle HGV + 2 Axle Drawbar Trailer 	12	Bus or Coach, 2 Axle 
5	Rigid 2 Axle HGV + 3 Axle Drawbar Trailer 	12	Bus or cCoach, 3 Axle 
5	Rigid 2 Axle HGV + 1 Axle Caravan or Trailer 	13	Vehicle with 7 or more Axles 

Classification Classes: Car/Van: 1 OGV1/Bus: 2,3,5,6,7,12 OGV2: 4,8,9,10,11,13

Marsworth ATC 1, B489 (Western Site)

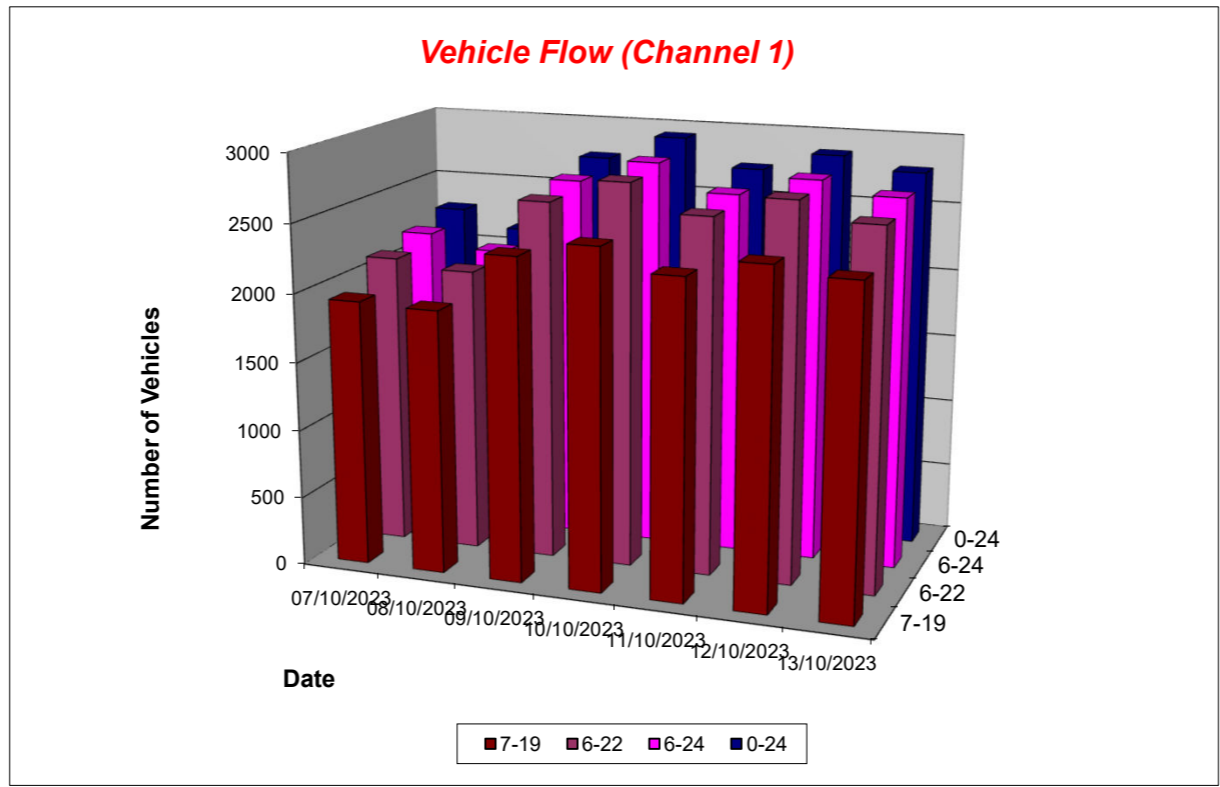
Produced by Road Data Services Ltd.

Channel 1 - Northeastbound

Vehicle Flow

Week 1

Hr Ending	07/10/2023 Saturday	08/10/2023 Sunday	09/10/2023 Monday	10/10/2023 Tuesday	11/10/2023 Wednesday	12/10/2023 Thursday	13/10/2023 Friday	Weekday Average	Average
1	12	21	7	8	9	3	9	7	10
2	4	10	1	3	2	4	4	3	4
3	17	6	1	3	2	5	4	3	5
4	6	8	5	7	6	4	4	5	6
5	26	1	31	29	30	28	20	28	24
6	16	6	33	44	37	37	38	38	30
7	17	13	62	66	57	45	47	55	44
8	42	35	187	193	200	197	157	187	144
9	116	55	190	203	170	211	124	180	153
10	155	146	155	163	171	162	132	157	155
11	195	226	144	156	135	164	175	155	171
12	210	224	155	162	128	163	160	154	172
13	213	190	149	155	154	161	188	161	173
14	219	215	168	187	159	187	205	181	191
15	197	182	174	178	174	178	216	184	186
16	192	205	223	222	233	209	237	225	217
17	152	180	293	288	287	265	304	287	253
18	148	165	289	336	288	328	284	305	263
19	99	99	222	217	201	200	183	205	174
20	79	70	99	144	110	150	88	118	106
21	55	41	66	62	68	55	55	61	57
22	39	27	43	61	59	71	59	59	51
23	50	24	41	32	40	28	47	38	37
24	24	10	11	12	10	9	33	15	16
7-19	1938	1922	2349	2460	2300	2425	2365	2380	2251
6-22	2128	2073	2619	2793	2594	2746	2614	2673	2510
6-24	2202	2107	2671	2837	2644	2783	2694	2726	2563
0-24	2283	2159	2749	2931	2730	2864	2773	2809	2641



Marsworth ATC 1, B489 (Western Site)

Produced by Road Data Services Ltd.

Channel 1 - Northeastbound

Average Speed

Week 1

Hr Ending	07/10/2023 Saturday	08/10/2023 Sunday	09/10/2023 Monday	10/10/2023 Tuesday	11/10/2023 Wednesday	12/10/2023 Thursday	13/10/2023 Friday
1	53.1	50.9	49.1	48.6	43.6	44.1	44.8
2	51.0	53.9	50.4	49.5	61.1	54.3	50.0
3	47.7	50.9	51.3	56.4	49.5	42.9	46.8
4	45.9	52.3	45.2	49.4	53.6	46.2	43.8
5	50.8	52.1	50.9	51.5	49.9	48.5	46.0
6	50.9	50.3	54.5	52.5	53.3	49.1	47.3
7	47.9	45.0	49.4	48.2	50.8	48.3	48.2
8	49.3	49.4	48.5	48.8	48.5	48.6	47.6
9	48.5	47.6	48.4	47.7	49.4	48.0	46.8
10	50.6	47.7	46.3	46.8	47.4	46.4	44.6
11	48.8	44.8	47.6	46.6	46.7	47.4	47.1
12	47.1	46.0	46.8	46.1	48.3	46.8	47.6
13	48.5	46.1	48.1	46.7	46.3	45.8	47.3
14	48.2	47.1	46.1	46.5	47.9	46.1	47.9
15	47.7	46.0	47.5	48.6	47.0	49.0	48.4
16	47.7	47.4	48.9	49.6	47.1	49.5	48.8
17	49.6	49.0	48.9	49.6	49.2	48.9	49.0
18	50.3	50.2	48.5	49.2	49.8	49.4	49.5
19	50.0	49.7	49.3	48.5	47.9	48.9	49.9
20	48.3	47.7	48.8	47.3	47.0	46.0	49.0
21	50.6	51.4	48.8	50.0	48.2	49.5	50.4
22	51.4	53.5	52.8	50.9	48.0	50.8	50.5
23	50.2	51.2	51.7	50.2	49.4	48.1	50.0
24	49.2	50.1	48.2	47.4	47.1	48.3	50.3

10-12	47.9	45.4	47.2	46.3	47.5	47.1	47.3
14-16	47.7	46.8	48.3	49.1	47.0	49.3	48.6
0-24	48.8	47.5	48.4	48.3	48.2	48.1	48.3

Average (ALL)	48.2
Weekday Inter-Peak	47.9

Channel 1 - Northeastbound

85th Percentile

Hr Ending	07/10/2023 Saturday	08/10/2023 Sunday	09/10/2023 Monday	10/10/2023 Tuesday	11/10/2023 Wednesday	12/10/2023 Thursday	13/10/2023 Friday
1	61.1	59.3	58.0	55.6	50.6	46.9	55.5
2	52.9	60.3	-	54.7	67.1	68.7	56.6
3	58.7	58.4	-	64.3	51.3	53.8	55.8
4	49.7	58.7	49.9	56.4	66.6	54.7	46.4
5	60.4	-	59.2	60.1	58.7	55.8	53.3
6	62.3	58.5	63.4	60.5	61.3	55.3	56.2
7	56.2	52.8	57.4	56.8	57.5	55.7	55.1
8	60.3	57.6	56.7	57.0	56.4	57.0	55.1
9	57.2	58.2	57.1	56.8	57.7	56.9	54.5
10	58.7	57.5	55.0	55.6	56.4	55.9	52.1
11	56.7	54.8	54.7	54.8	54.1	55.3	54.3
12	56.5	56.3	54.2	54.8	55.6	54.8	55.4
13	57.6	55.1	56.1	55.1	55.0	53.7	54.8
14	56.8	55.2	54.3	54.2	55.8	53.8	55.8
15	56.8	55.4	56.3	57.6	55.0	57.7	57.6
16	57.3	54.4	57.6	57.9	55.4	58.0	56.1
17	58.2	57.4	56.0	57.1	55.8	55.8	56.6
18	59.7	59.2	56.3	55.9	57.0	56.0	57.4
19	59.1	58.6	57.0	56.7	55.2	57.1	58.6
20	56.4	54.5	57.6	56.6	56.1	54.2	60.0
21	59.9	63.3	56.2	59.0	55.3	57.7	60.1
22	59.5	60.8	62.6	60.2	57.3	60.1	57.9
23	59.4	59.8	59.8	57.4	58.7	55.0	56.8
24	58.3	54.2	54.0	54.8	52.6	54.9	59.1

10-12	56.7	55.6	54.4	54.8	54.9	55.0	54.8
14-16	57.1	55.1	57.1	57.7	55.2	57.9	56.9
0-24	57.8	56.7	56.6	56.7	56.2	56.2	56.4

85th %ile (ALL)	56.6
Weekday Inter-Peak	56.1

Marsworth ATC 1, B489 (Western Site)

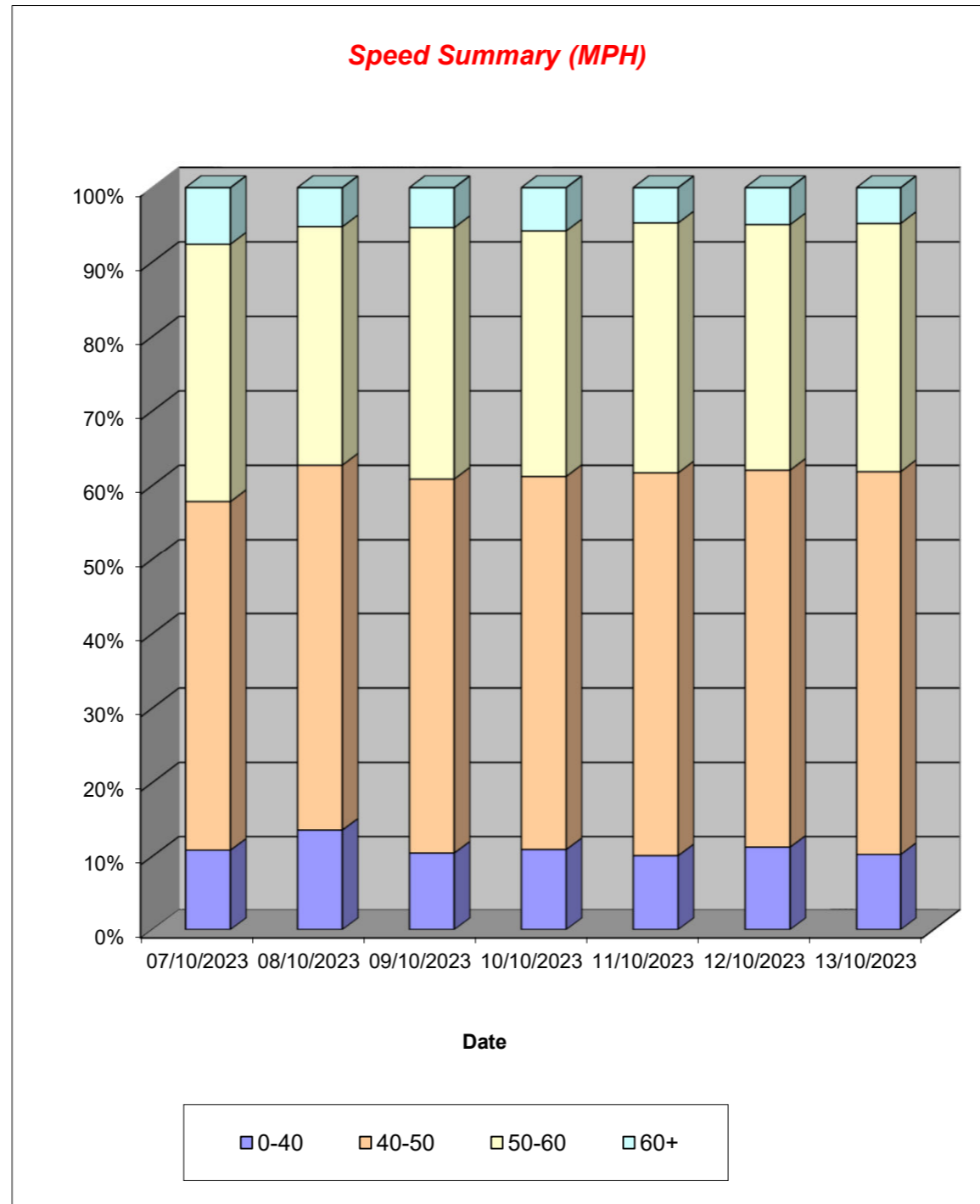
Produced by Road Data Services Ltd.

Channel 1 - Northeastbound

Speed Summary

Week 1

Speed (MPH)	07/10/2023 Saturday	08/10/2023 Sunday	09/10/2023 Monday	10/10/2023 Tuesday	11/10/2023 Wednesday	12/10/2023 Thursday	13/10/2023 Friday
0-40	248	294	288	321	276	323	285
40-50	1073	1061	1386	1474	1409	1455	1431
50-60	789	691	928	966	916	944	924
60+	173	113	147	170	129	142	133
TOTAL	2283	2159	2749	2931	2730	2864	2773



Marsworth ATC 1, B489 (Western Site)

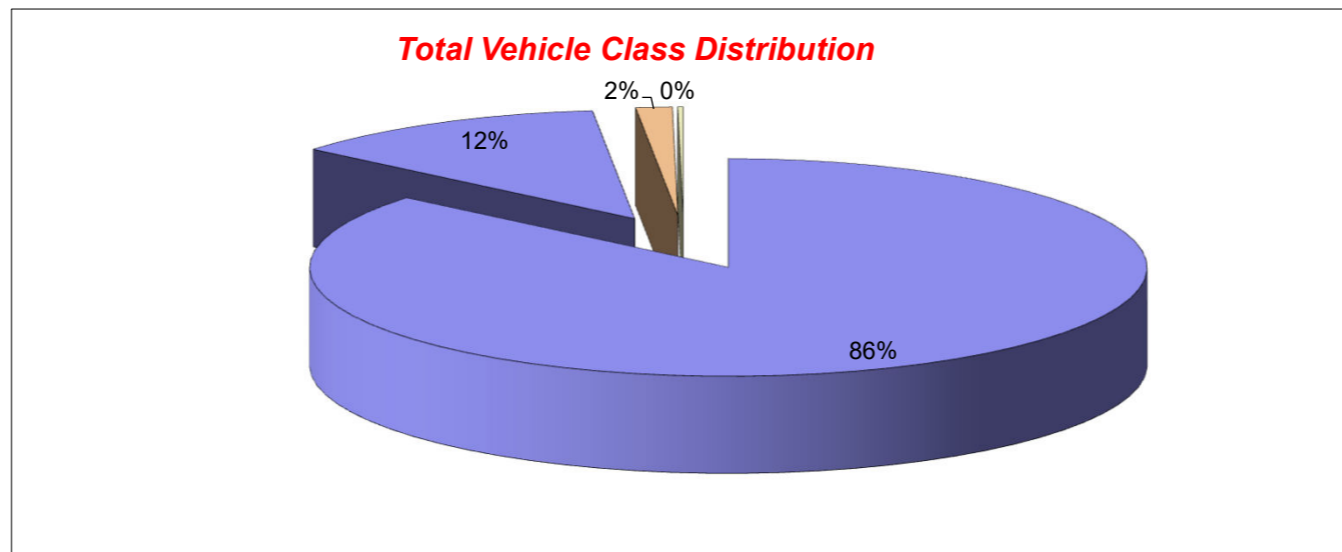
Produced by Road Data Services Ltd.

Channel 1 - Northeastbound

Vehicle Class

Week 1

Classes Day / Time	Car / LGV / Caravan - 1	MGV - 2	OGV1 / Bus - 3,5,6,7,12	OGV2 - 4,8,9,10,11,13	TOTAL - 1-13
07/10/2023					
7-19	1744	176	16	2	1938
6-22	1912	195	19	2	2128
6-24	1981	199	20	2	2202
0-24	2054	207	20	2	2283
08/10/2023					
7-19	1762	150	8	2	1922
6-22	1897	166	8	2	2073
6-24	1929	168	8	2	2107
0-24	1978	171	8	2	2159
09/10/2023					
7-19	1972	332	40	5	2349
6-22	2211	362	41	5	2619
6-24	2254	370	42	5	2671
0-24	2326	376	42	5	2749
10/10/2023					
7-19	2074	341	39	6	2460
6-22	2371	377	39	6	2793
6-24	2412	379	40	6	2837
0-24	2496	388	41	6	2931
11/10/2023					
7-19	1907	333	54	6	2300
6-22	2160	367	61	6	2594
6-24	2201	375	62	6	2644
0-24	2278	382	62	8	2730
12/10/2023					
7-19	2053	329	37	6	2425
6-22	2335	366	38	7	2746
6-24	2369	368	39	7	2783
0-24	2440	376	41	7	2864
13/10/2023					
7-19	1963	348	45	9	2365
6-22	2187	372	46	9	2614
6-24	2261	378	46	9	2694
0-24	2335	383	46	9	2773
Average					
7-19	1925	287	34	5	2251
6-22	2153	315	36	5	2510
6-24	2201	320	37	5	2563
0-24	2272	326	37	6	2641



Marsworth ATC 1, B489 (Western Site)

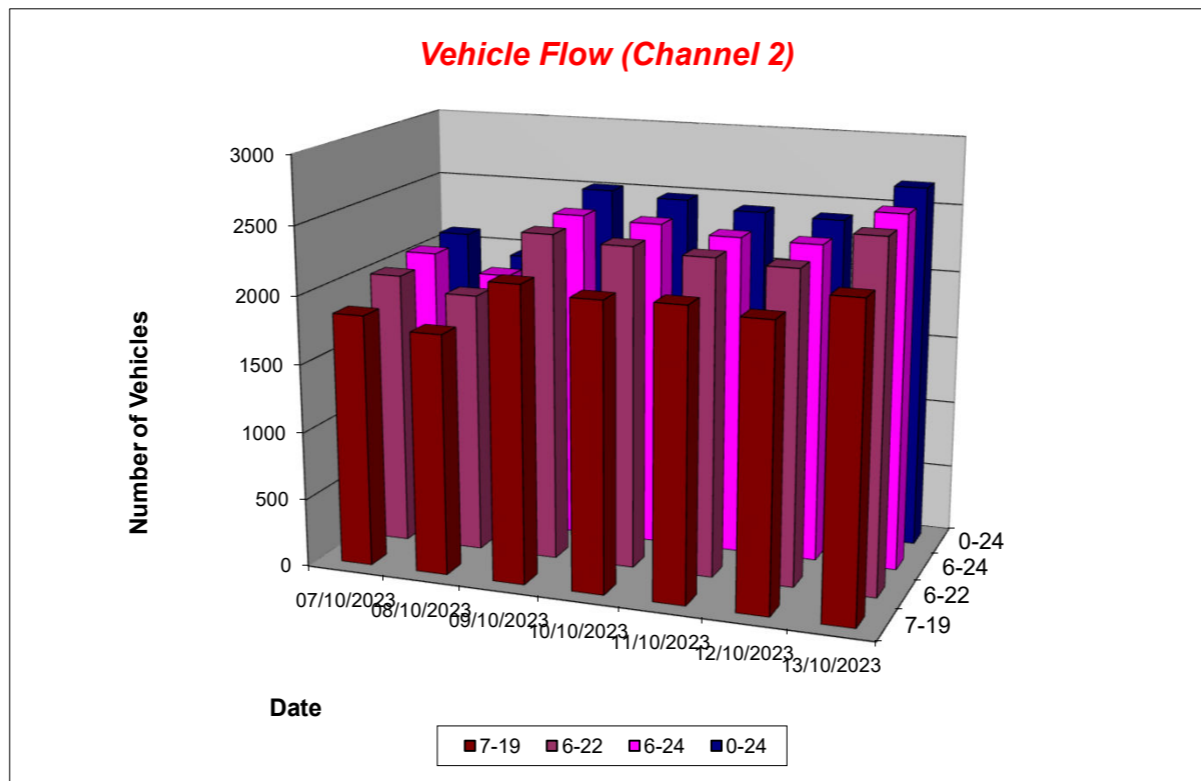
Produced by Road Data Services Ltd.

Channel 2 - Southwestbound

Vehicle Flow

Week 1

Hr Ending	07/10/2023 Saturday	08/10/2023 Sunday	09/10/2023 Monday	10/10/2023 Tuesday	11/10/2023 Wednesday	12/10/2023 Thursday	13/10/2023 Friday	Weekday Average	Average
1	14	9	6	6	1	2	7	4	6
2	5	4	3	3	4	6	2	4	4
3	3	0	13	11	11	9	10	11	8
4	3	3	13	13	12	11	14	13	10
5	3	3	11	6	6	7	14	9	7
6	10	4	39	36	41	31	35	36	28
7	19	6	105	87	94	59	123	94	70
8	71	28	272	237	242	222	279	250	193
9	133	72	265	196	242	186	263	230	194
10	172	131	162	158	158	161	163	160	158
11	178	178	144	147	145	145	144	145	154
12	199	193	141	163	151	158	162	155	167
13	162	213	157	137	166	145	160	153	163
14	157	194	155	154	153	161	159	156	162
15	187	195	164	166	177	174	190	174	179
16	187	173	187	221	231	206	230	215	205
17	171	163	212	180	176	181	190	188	182
18	139	132	190	222	177	212	191	198	180
19	96	95	121	126	102	119	132	120	113
20	76	79	72	76	49	72	81	70	72
21	36	40	35	46	35	41	47	41	40
22	32	21	21	42	24	49	38	35	32
23	30	20	21	42	22	43	28	31	29
24	19	6	8	7	7	6	17	9	10
7-19	1852	1767	2170	2107	2120	2070	2263	2146	2050
6-22	2015	1913	2403	2358	2322	2291	2552	2385	2265
6-24	2064	1939	2432	2407	2351	2340	2597	2425	2304
0-24	2102	1962	2517	2482	2426	2406	2679	2502	2368



Marsworth ATC 1, B489 (Western Site)

Produced by Road Data Services Ltd.

Channel 2 - Southwestbound

Average Speed

Week 1

Hr Ending	07/10/2023 Saturday	08/10/2023 Sunday	09/10/2023 Monday	10/10/2023 Tuesday	11/10/2023 Wednesday	12/10/2023 Thursday	13/10/2023 Friday
1	44.4	34.9	42.2	43.9	49.3	38.9	39.9
2	43.1	56.7	43.0	46.4	44.8	45.7	37.3
3	35.9	-	44.3	46.0	44.9	40.0	44.8
4	47.4	35.1	45.0	48.4	46.2	43.5	44.5
5	45.6	44.9	44.4	43.9	41.0	37.8	43.7
6	47.0	41.1	45.3	43.5	47.4	43.7	46.3
7	43.1	43.4	43.0	41.3	43.0	42.2	42.6
8	46.1	46.7	42.1	41.6	41.3	41.9	42.4
9	43.6	43.5	40.3	39.9	40.7	39.9	40.1
10	42.4	41.3	40.5	38.5	41.2	38.4	40.3
11	41.5	40.7	39.9	38.7	39.8	38.5	39.7
12	40.2	41.8	40.3	40.2	40.5	40.3	41.2
13	41.6	39.2	40.9	39.0	41.1	38.9	41.6
14	41.6	41.0	41.4	40.0	40.3	39.7	41.7
15	40.8	40.6	39.3	39.9	38.5	39.6	40.8
16	41.3	40.6	41.3	41.0	40.4	40.5	39.6
17	40.3	38.7	40.2	41.5	41.1	41.7	39.8
18	40.3	40.3	41.1	41.0	41.2	41.2	42.4
19	41.7	41.0	41.2	40.1	40.3	38.7	42.4
20	41.9	41.8	42.5	41.5	39.1	40.8	42.8
21	42.5	45.0	41.6	43.1	38.4	42.0	43.2
22	44.5	43.7	41.7	43.1	41.4	43.6	43.4
23	42.0	44.6	43.7	40.9	41.8	41.2	41.9
24	42.3	44.3	48.4	43.8	44.4	47.1	44.3

10-12	40.8	41.2	40.1	39.5	40.2	39.5	40.5
14-16	41.0	40.6	40.4	40.5	39.6	40.1	40.1
0-24	41.7	40.9	41.1	40.6	40.8	40.4	41.3

Average (ALL)	41.0
Weekday Inter-Peak	40.0

Channel 2 - Southwestbound

85th Percentile

Hr Ending	07/10/2023 Saturday	08/10/2023 Sunday	09/10/2023 Monday	10/10/2023 Tuesday	11/10/2023 Wednesday	12/10/2023 Thursday	13/10/2023 Friday
1	54.2	42.1	50.0	49.3	-	42.2	45.6
2	47.2	63.4	51.4	51.8	48.9	55.5	44.1
3	45.6	-	48.3	54.4	48.6	45.6	49.0
4	51.5	45.1	53.0	56.6	55.9	50.6	51.3
5	54.1	52.0	49.9	51.3	53.1	44.3	49.1
6	58.5	45.5	52.7	50.3	55.2	49.8	53.7
7	49.4	51.2	49.2	46.3	48.1	48.9	47.9
8	53.3	54.4	48.1	46.5	47.2	47.0	48.6
9	50.5	51.3	46.8	45.6	46.6	45.3	46.5
10	48.4	48.9	46.5	44.5	46.8	44.9	46.3
11	49.3	46.8	45.9	44.3	45.2	44.4	44.7
12	46.7	48.2	46.2	46.5	47.2	47.1	47.9
13	49.2	46.5	47.7	45.8	48.7	45.0	48.2
14	48.0	47.7	47.5	45.0	46.3	44.4	47.8
15	47.0	46.3	46.1	46.0	45.7	46.0	47.9
16	47.4	46.9	47.8	47.4	46.8	46.6	47.5
17	47.6	45.7	46.1	48.7	47.8	49.3	46.8
18	45.7	46.8	47.8	46.8	47.6	47.2	49.2
19	48.7	47.0	48.8	46.0	48.6	44.1	50.6
20	47.8	49.6	49.3	48.2	45.3	47.4	48.6
21	51.1	52.6	47.5	50.5	45.5	49.4	51.2
22	51.7	50.3	47.0	51.4	48.5	51.4	53.4
23	50.7	52.3	51.2	48.4	52.9	47.8	48.7
24	50.0	56.6	58.0	52.9	50.2	57.0	53.2

10-12	47.9	47.5	46.0	45.5	46.3	45.9	46.5
14-16	47.2	46.6	47.1	46.8	46.4	46.3	47.7
0-24	48.7	47.9	47.6	46.9	47.5	46.8	48.2

85th %ile (ALL)	47.7
Weekday Inter-Peak	46.5

Marsworth ATC 1, B489 (Western Site)

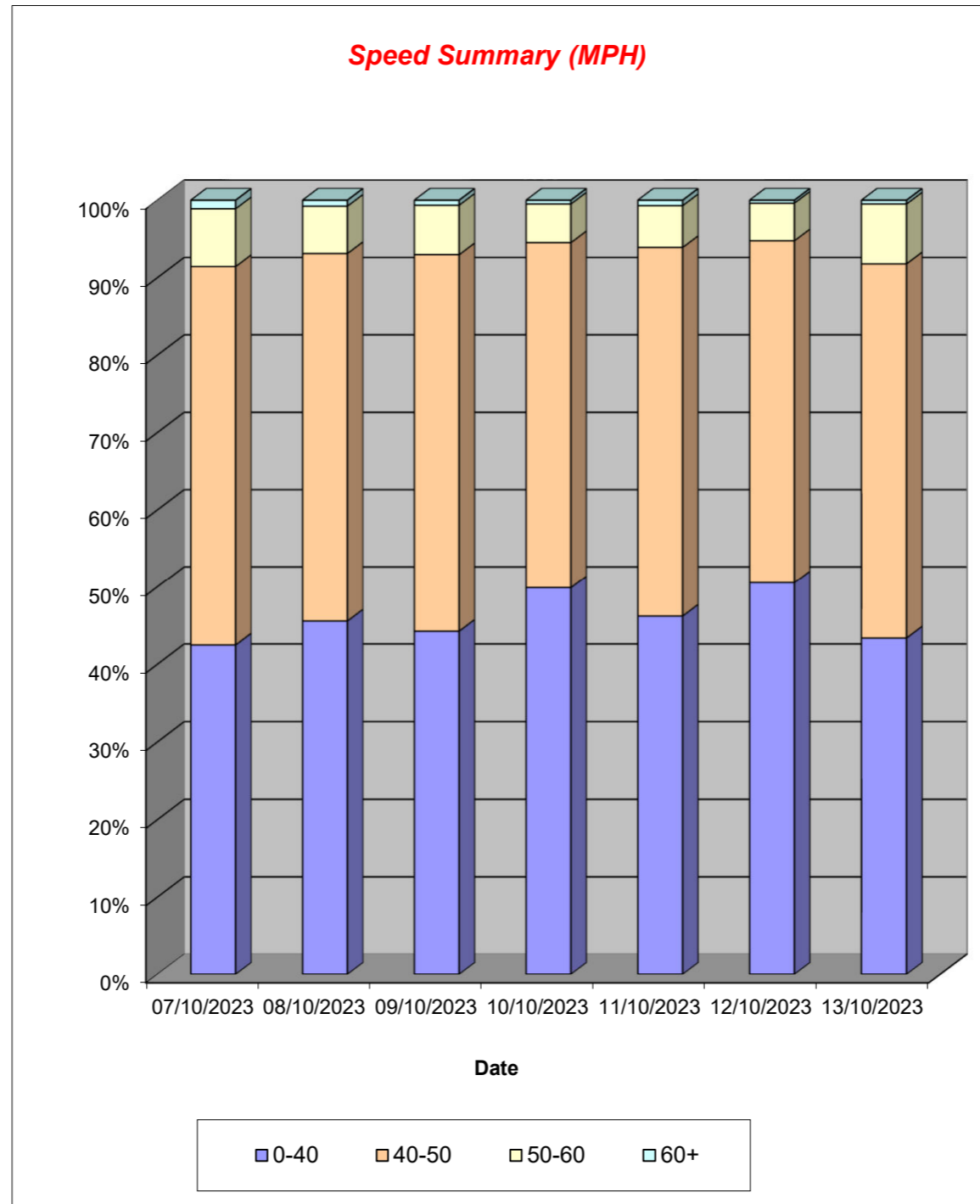
Produced by Road Data Services Ltd.

Channel 2 - Southwestbound

Speed Summary

Week 1

Speed (MPH)	07/10/2023 Saturday	08/10/2023 Sunday	09/10/2023 Monday	10/10/2023 Tuesday	11/10/2023 Wednesday	12/10/2023 Thursday	13/10/2023 Friday
0-40	893	894	1114	1238	1121	1216	1162
40-50	1029	933	1226	1108	1157	1064	1297
50-60	157	120	161	124	131	117	207
60+	23	15	16	12	17	9	13
TOTAL	2102	1962	2517	2482	2426	2406	2679



Marsworth ATC 1, B489 (Western Site)

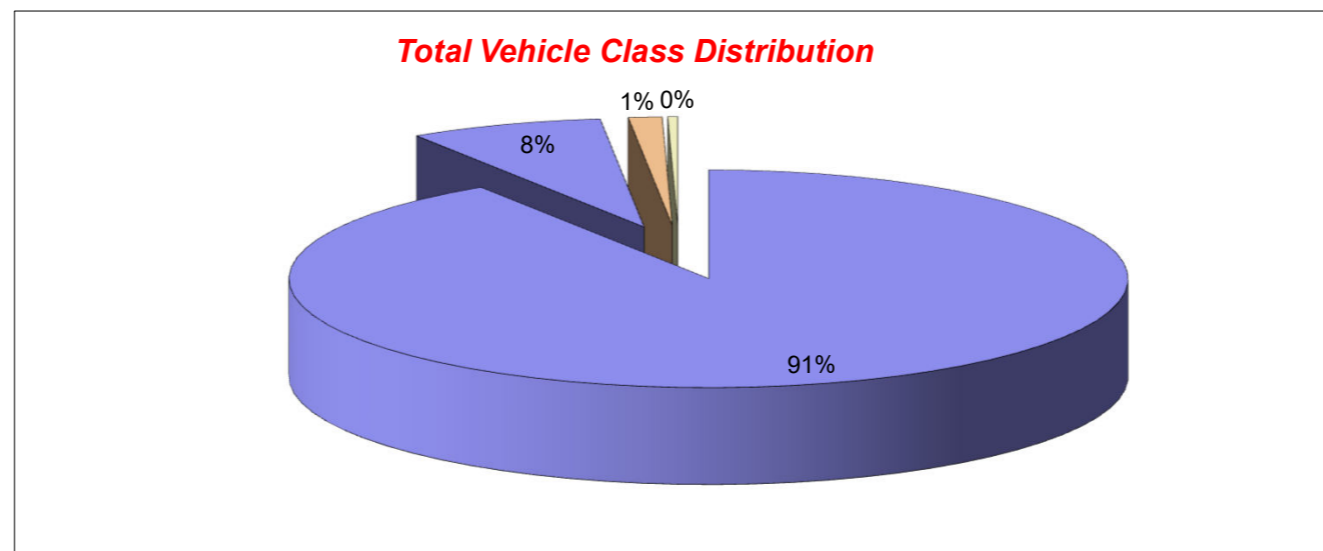
Produced by Road Data Services Ltd.

Channel 2 - Southwestbound

Vehicle Class

Week 1

Classes Day / Time	Car / LGV / Caravan - 1	MGV - 2	OGV1 / Bus - 3,5,6,7,12	OGV2 - 4,8,9,10,11,13	TOTAL - 1-13
07/10/2023					
7-19	1738	103	9	2	1852
6-22	1892	112	9	2	2015
6-24	1939	114	9	2	2064
0-24	1970	117	12	3	2102
08/10/2023					
7-19	1691	70	3	3	1767
6-22	1829	77	3	4	1913
6-24	1853	79	3	4	1939
0-24	1874	80	3	5	1962
09/10/2023					
7-19	1927	201	34	8	2170
6-22	2134	223	38	8	2403
6-24	2161	225	38	8	2432
0-24	2239	231	38	9	2517
10/10/2023					
7-19	1891	176	28	12	2107
6-22	2127	186	33	12	2358
6-24	2175	187	33	12	2407
0-24	2240	196	33	13	2482
11/10/2023					
7-19	1873	184	55	8	2120
6-22	2065	190	59	8	2322
6-24	2094	190	59	8	2351
0-24	2161	197	59	9	2426
12/10/2023					
7-19	1856	173	28	13	2070
6-22	2063	184	31	13	2291
6-24	2111	185	31	13	2340
0-24	2170	190	32	14	2406
13/10/2023					
7-19	2028	193	33	9	2263
6-22	2284	221	37	10	2552
6-24	2329	221	37	10	2597
0-24	2405	226	37	11	2679
Average					
7-19	1858	157	27	8	2050
6-22	2056	170	30	8	2265
6-24	2095	172	30	8	2304
0-24	2151	177	31	9	2368



Marsworth ATC 2, B489 (Eastern Site)

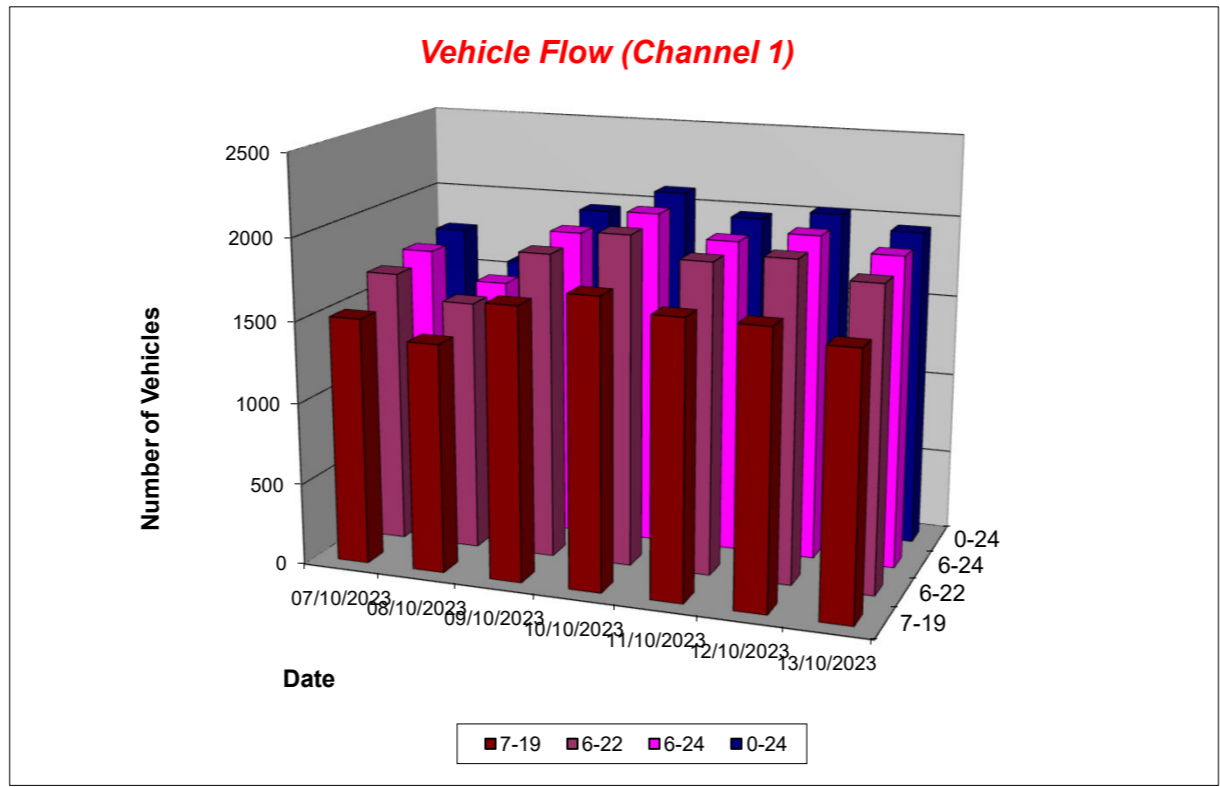
Produced by Road Data Services Ltd.

Channel 1 - Southwestbound

Vehicle Flow

Week 1

Hr Ending	07/10/2023 Saturday	08/10/2023 Sunday	09/10/2023 Monday	10/10/2023 Tuesday	11/10/2023 Wednesday	12/10/2023 Thursday	13/10/2023 Friday	Weekday Average	Average
1	12	11	5	5	7	2	2	4	6
2	8	2	1	3	5	4	5	4	4
3	2	2	4	0	1	1	2	2	2
4	4	2	2	2	3	7	2	3	3
5	3	4	5	3	8	4	4	5	4
6	13	6	29	29	24	20	28	26	21
7	21	10	55	67	72	67	51	62	49
8	35	18	183	186	162	183	156	174	132
9	71	60	182	181	194	215	137	182	149
10	116	99	113	143	126	136	140	132	125
11	132	145	130	122	126	114	128	124	128
12	148	135	104	128	125	106	117	116	123
13	159	137	130	118	117	117	118	120	128
14	141	160	118	132	110	117	118	119	128
15	175	161	125	134	133	118	116	125	137
16	180	155	125	128	144	147	156	140	148
17	117	150	179	182	176	135	154	165	156
18	145	97	172	184	158	168	147	166	153
19	93	84	111	129	115	120	112	117	109
20	74	57	72	98	73	101	99	89	82
21	47	39	51	53	47	49	66	53	50
22	24	27	23	37	21	58	34	35	32
23	27	13	18	27	16	25	34	24	23
24	18	9	15	8	7	15	23	14	14
7-19	1512	1401	1672	1767	1686	1676	1599	1680	1616
6-22	1678	1534	1873	2022	1899	1951	1849	1919	1829
6-24	1723	1556	1906	2057	1922	1991	1906	1956	1866
0-24	1765	1583	1952	2099	1970	2029	1949	2000	1907



Marsworth ATC 2, B489 (Eastern Site)

Produced by Road Data Services Ltd.

Channel 1 - Southwestbound

Average Speed

Week 1

Hr Ending	07/10/2023 Saturday	08/10/2023 Sunday	09/10/2023 Monday	10/10/2023 Tuesday	11/10/2023 Wednesday	12/10/2023 Thursday	13/10/2023 Friday
1	22.9	20.7	21.6	25.2	24.1	24.3	21.5
2	21.1	20.8	23.9	20.7	21.5	26.7	20.6
3	23.5	27.0	17.5	-	15.2	15.7	17.8
4	22.0	18.8	25.8	23.5	24.3	23.0	22.2
5	23.7	22.0	24.2	26.7	24.1	26.7	20.7
6	24.5	20.9	23.6	22.7	25.7	23.6	22.7
7	22.1	27.1	22.5	23.0	22.6	23.5	24.0
8	22.9	23.5	21.3	21.2	19.5	19.9	20.8
9	21.4	22.3	18.2	17.4	17.5	17.2	17.6
10	21.3	20.7	20.8	19.1	18.3	18.4	18.2
11	21.2	20.6	20.7	18.2	19.7	19.8	19.2
12	21.1	21.0	22.0	20.2	20.7	18.2	19.1
13	20.2	21.9	20.2	20.9	20.5	19.3	19.4
14	20.8	20.5	20.7	19.3	20.9	19.3	19.6
15	20.7	20.0	18.8	19.3	18.5	18.7	19.3
16	20.0	20.3	18.7	17.2	17.0	17.7	17.4
17	20.6	20.4	19.5	19.9	19.5	20.7	20.6
18	20.2	20.1	20.3	19.4	20.2	20.3	20.0
19	21.2	21.1	20.2	19.4	20.9	19.7	18.5
20	20.4	22.2	20.7	21.0	20.2	20.6	18.4
21	23.0	22.5	20.6	20.9	21.7	22.6	18.8
22	21.7	21.9	22.3	22.4	22.7	20.1	21.6
23	22.5	21.8	24.3	21.1	22.8	21.5	19.4
24	21.0	23.4	23.0	21.1	25.5	22.8	23.6

10-12	21.2	20.8	21.3	19.2	20.2	19.0	19.1
14-16	20.3	20.1	18.7	18.2	17.7	18.2	18.2
0-24	20.9	20.9	20.3	19.7	19.7	19.5	19.4

Average (ALL)	20.0
Weekday Inter-Peak	18.9

Channel 1 - Southwestbound

85th Percentile

Hr Ending	07/10/2023 Saturday	08/10/2023 Sunday	09/10/2023 Monday	10/10/2023 Tuesday	11/10/2023 Wednesday	12/10/2023 Thursday	13/10/2023 Friday
1	26.8	25.6	24.3	33.4	27.8	28.1	33.2
2	27.4	22.9	-	22.8	24.4	33.1	26.8
3	30.7	33.5	27.0	-	-	-	19.7
4	26.4	24.3	31.6	23.6	29.0	25.4	23.7
5	30.1	25.6	26.3	27.9	28.5	29.0	28.8
6	31.7	28.2	30.4	27.7	31.2	29.5	27.4
7	27.8	32.9	27.4	28.3	28.2	27.6	28.1
8	27.3	28.8	26.0	25.9	25.3	24.6	25.4
9	25.7	27.2	22.7	22.3	22.8	22.3	22.8
10	25.6	24.9	25.2	23.7	23.1	23.2	22.4
11	25.7	24.7	25.0	23.3	24.0	24.5	24.1
12	25.3	24.7	29.3	24.7	25.1	23.3	23.5
13	25.1	26.9	24.8	25.3	24.9	24.2	24.6
14	25.3	25.0	25.1	23.9	25.9	24.1	24.0
15	25.1	24.7	23.5	24.1	22.6	23.5	24.8
16	24.6	24.8	23.3	22.8	22.3	23.0	22.3
17	25.6	24.6	23.9	24.7	23.6	25.2	25.6
18	25.1	25.1	24.5	23.8	24.7	25.0	24.7
19	25.9	26.8	24.4	24.7	25.8	24.5	22.7
20	25.4	26.5	25.1	26.2	24.7	25.1	23.2
21	30.3	28.7	26.6	25.8	26.1	27.2	24.9
22	28.5	26.9	27.2	28.9	26.9	25.1	26.2
23	27.7	28.5	28.7	26.5	27.5	25.2	24.4
24	25.2	29.4	28.0	29.0	29.7	27.0	30.8

10-12	25.6	24.7	27.1	24.1	24.6	24.0	23.8
14-16	24.8	24.7	23.4	23.5	22.5	23.3	23.5
0-24	25.8	25.7	25.3	24.8	24.8	24.6	24.5

85th %ile (ALL)	25.1
Weekday Inter-Peak	24.0

Marsworth ATC 2, B489 (Eastern Site)

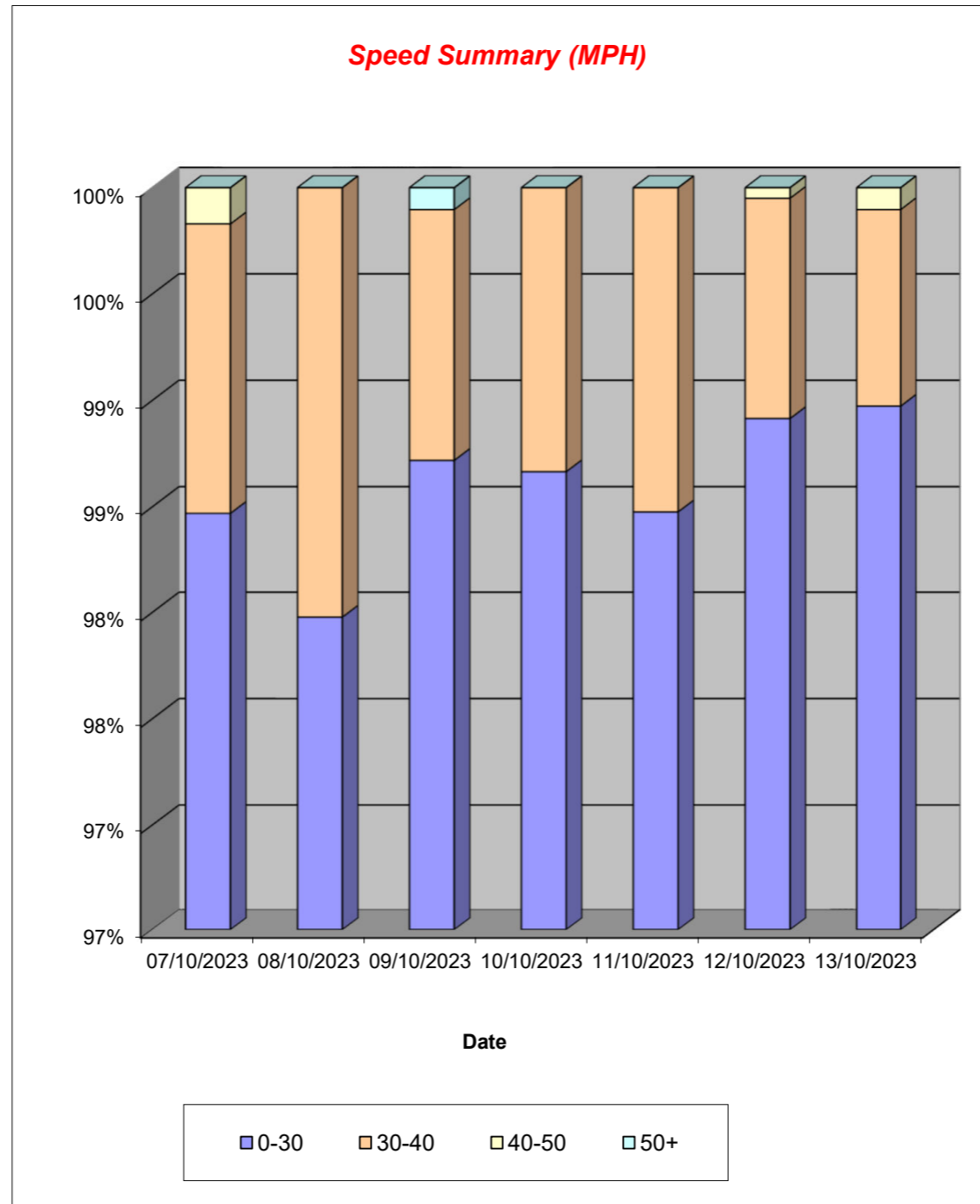
Produced by Road Data Services Ltd.

Channel 1 - Southwestbound

Speed Summary

Week 1

Speed (MPH)	07/10/2023 Saturday	08/10/2023 Sunday	09/10/2023 Monday	10/10/2023 Tuesday	11/10/2023 Wednesday	12/10/2023 Thursday	13/10/2023 Friday
0-30	1738	1551	1927	2071	1940	2007	1929
30-40	24	32	23	28	30	21	18
40-50	3	0	0	0	0	1	2
50+	0	0	2	0	0	0	0
TOTAL	1765	1583	1952	2099	1970	2029	1949



Marsworth ATC 2, B489 (Eastern Site)

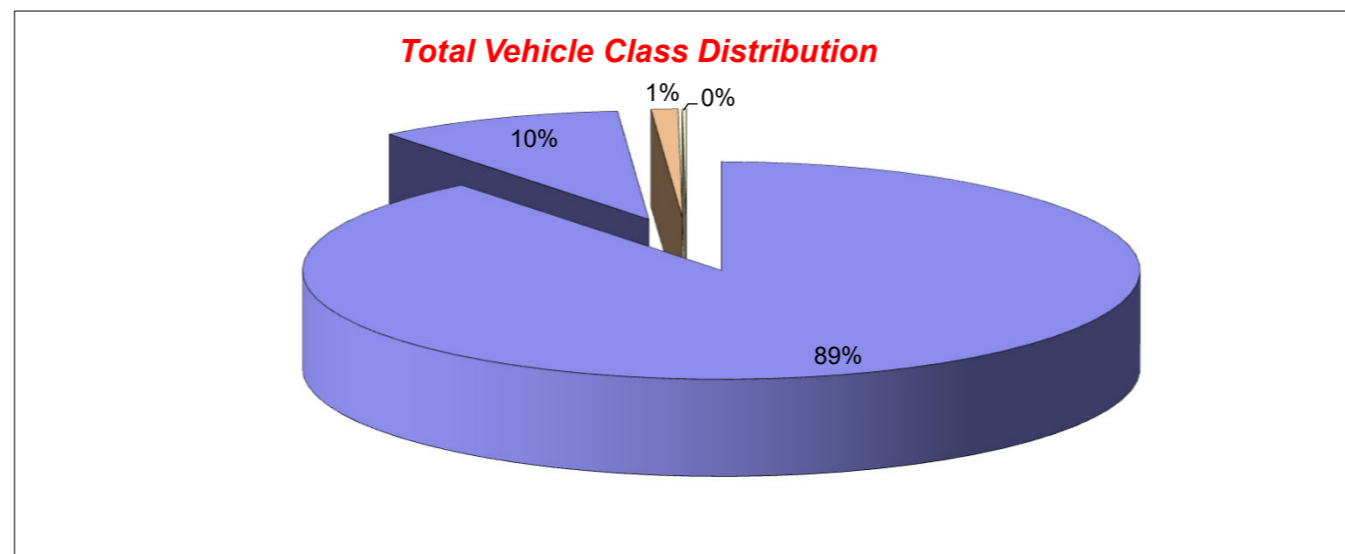
Produced by Road Data Services Ltd.

Channel 1 - Southwestbound

Vehicle Class

Week 1

Classes Day / Time	Car / LGV / Caravan - 1	MGV - 2	OGV1 / Bus - 3,5,6,7,12	OGV2 - 4,8,9,10,11,13	TOTAL - 1-13
07/10/2023					
7-19	1389	109	12	2	1512
6-22	1539	123	14	2	1678
6-24	1580	127	14	2	1723
0-24	1617	130	14	4	1765
08/10/2023					
7-19	1324	71	3	3	1401
6-22	1448	80	3	3	1534
6-24	1469	81	3	3	1556
0-24	1494	83	3	3	1583
09/10/2023					
7-19	1448	199	20	5	1672
6-22	1635	211	22	5	1873
6-24	1665	213	22	6	1906
0-24	1704	220	22	6	1952
10/10/2023					
7-19	1550	198	19	0	1767
6-22	1786	213	23	0	2022
6-24	1820	213	23	1	2057
0-24	1860	214	24	1	2099
11/10/2023					
7-19	1472	189	24	1	1686
6-22	1671	201	26	1	1899
6-24	1694	201	26	1	1922
0-24	1737	205	26	2	1970
12/10/2023					
7-19	1445	206	23	2	1676
6-22	1703	221	25	2	1951
6-24	1739	225	25	2	1991
0-24	1773	228	25	3	2029
13/10/2023					
7-19	1406	169	22	2	1599
6-22	1645	178	24	2	1849
6-24	1700	180	24	2	1906
0-24	1739	183	24	3	1949
Average					
7-19	1433	163	18	2	1616
6-22	1632	175	20	2	1829
6-24	1667	177	20	2	1866
0-24	1703	180	20	3	1907



Marsworth ATC 2, B489 (Eastern Site)

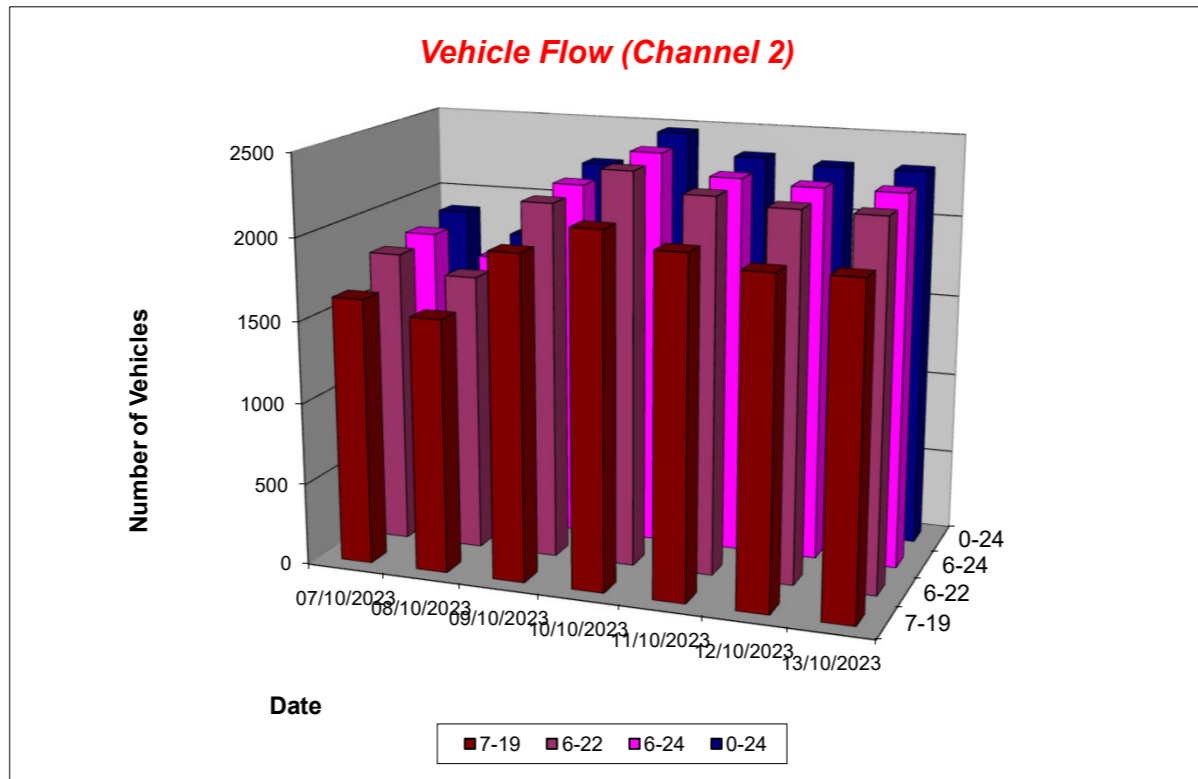
Produced by Road Data Services Ltd.

Channel 2 - Northeastbound

Vehicle Flow

Week 1

Hr Ending	07/10/2023 Saturday	08/10/2023 Sunday	09/10/2023 Monday	10/10/2023 Tuesday	11/10/2023 Wednesday	12/10/2023 Thursday	13/10/2023 Friday	Weekday Average	Average
1	14	14	6	7	7	4	6	6	8
2	4	5	3	4	3	2	4	3	4
3	10	7	4	2	6	2	2	3	5
4	5	5	1	3	2	5	6	3	4
5	7	4	12	13	7	8	6	9	8
6	13	9	22	18	21	23	21	21	18
7	23	13	60	67	65	62	53	61	49
8	59	35	165	187	187	165	146	170	135
9	111	59	169	203	196	187	166	184	156
10	136	115	131	131	166	140	138	141	137
11	169	162	139	134	123	147	129	134	143
12	181	164	125	143	123	132	175	140	149
13	161	164	133	147	133	127	174	143	148
14	148	154	129	144	113	126	149	132	138
15	145	165	152	141	142	120	151	141	145
16	156	165	166	165	180	181	159	170	167
17	172	160	242	273	229	229	230	241	219
18	105	128	261	304	290	257	209	264	222
19	86	78	163	173	168	163	158	165	141
20	75	56	71	88	79	89	100	85	80
21	43	50	41	61	50	58	53	53	51
22	29	26	28	33	34	51	39	37	34
23	18	18	15	22	14	27	32	22	21
24	14	5	12	8	8	12	12	10	10
7-19	1629	1549	1975	2145	2050	1974	1984	2026	1901
6-22	1799	1694	2175	2394	2278	2234	2229	2262	2115
6-24	1831	1717	2202	2424	2300	2273	2273	2294	2146
0-24	1884	1761	2250	2471	2346	2317	2318	2340	2192



Marsworth ATC 2, B489 (Eastern Site)

Produced by Road Data Services Ltd.

Channel 2 - Northeastbound

Average Speed

Week 1

Hr Ending	07/10/2023 Saturday	08/10/2023 Sunday	09/10/2023 Monday	10/10/2023 Tuesday	11/10/2023 Wednesday	12/10/2023 Thursday	13/10/2023 Friday
1	21.9	19.1	16.2	18.0	23.0	13.9	20.6
2	20.2	20.4	16.7	16.9	26.0	18.5	25.4
3	23.4	22.8	20.0	23.7	23.6	25.3	20.5
4	23.7	20.6	18.3	23.2	23.2	22.9	22.0
5	23.3	20.1	24.6	22.8	28.3	22.5	25.0
6	24.3	25.2	24.5	24.6	27.5	25.1	25.5
7	25.4	24.8	23.3	22.5	22.4	23.7	24.1
8	22.2	25.1	20.3	18.8	19.2	19.3	19.7
9	22.0	22.0	17.5	17.3	16.9	16.5	17.7
10	21.4	20.5	18.5	17.5	16.5	18.0	18.2
11	21.1	20.0	19.0	17.3	18.8	18.0	18.6
12	21.0	19.6	19.3	18.1	19.2	18.7	18.9
13	19.7	19.8	18.9	19.1	17.4	17.2	19.2
14	19.5	20.4	20.2	18.6	18.7	18.2	19.3
15	19.3	18.5	18.2	18.0	17.9	18.0	18.9
16	18.5	18.6	17.4	17.7	15.9	16.5	17.2
17	19.9	17.4	18.3	18.9	18.2	18.8	20.0
18	19.7	18.5	19.2	18.4	18.8	19.0	19.3
19	20.8	20.9	19.1	18.9	20.5	19.7	18.8
20	20.4	20.4	20.3	18.1	21.4	19.9	19.8
21	22.1	21.3	19.6	21.9	21.9	23.1	20.0
22	22.1	21.0	22.1	23.0	21.5	22.2	20.8
23	20.6	22.5	24.0	21.9	21.2	21.3	19.3
24	20.2	21.2	22.3	22.4	22.5	22.3	22.7

10-12	21.0	19.8	19.2	17.7	19.0	18.3	18.8
14-16	18.9	18.6	17.8	17.9	16.7	17.1	18.0
0-24	20.5	19.8	19.2	18.7	18.7	18.8	19.2

Average (ALL)	19.2
Weekday Inter-Peak	18.0

Channel 2 - Northeastbound

85th Percentile

Hr Ending	07/10/2023 Saturday	08/10/2023 Sunday	09/10/2023 Monday	10/10/2023 Tuesday	11/10/2023 Wednesday	12/10/2023 Thursday	13/10/2023 Friday
1	29.2	24.9	26.3	22.0	27.6	15.6	23.7
2	22.4	24.1	18.0	21.9	32.6	19.1	27.0
3	28.5	27.4	26.1	23.8	27.4	25.8	21.1
4	27.9	22.8	-	25.8	28.3	27.6	26.1
5	32.4	24.7	31.5	29.9	32.6	24.8	29.2
6	29.3	34.0	30.0	31.7	32.6	31.4	32.0
7	32.5	30.3	28.9	28.3	28.2	29.0	30.5
8	27.6	30.7	25.9	23.7	25.0	24.6	25.0
9	26.9	26.9	22.9	22.7	22.3	21.0	23.1
10	26.3	25.5	23.5	23.1	21.6	23.3	23.6
11	26.3	24.3	23.9	23.2	23.8	22.7	23.8
12	25.8	24.3	24.1	23.0	24.0	23.4	23.9
13	25.0	25.3	24.2	24.4	22.4	22.2	24.1
14	25.1	25.4	24.5	23.8	24.1	23.5	24.1
15	24.8	23.5	23.5	22.3	22.5	22.9	23.6
16	24.3	23.4	22.4	22.3	20.7	21.9	23.2
17	24.7	22.2	23.4	24.1	22.8	24.1	25.1
18	25.2	23.4	23.8	23.4	23.4	23.7	24.4
19	25.8	26.6	23.8	24.1	25.0	25.2	23.6
20	25.9	25.4	25.7	24.0	27.8	24.8	25.6
21	28.2	27.5	25.3	28.0	26.9	30.0	26.6
22	27.1	27.3	27.1	28.8	27.3	28.2	26.4
23	28.3	30.0	29.6	26.4	26.3	27.0	26.2
24	24.4	25.1	28.4	30.8	27.4	27.1	29.9

10-12	26.0	24.3	24.1	23.1	23.9	23.0	23.9
14-16	24.5	23.5	23.0	22.4	21.5	22.3	23.5
0-24	26.0	25.1	24.5	24.2	24.1	24.3	24.7

85th %ile (ALL)	24.7
Weekday Inter-Peak	23.1

Marsworth ATC 2, B489 (Eastern Site)

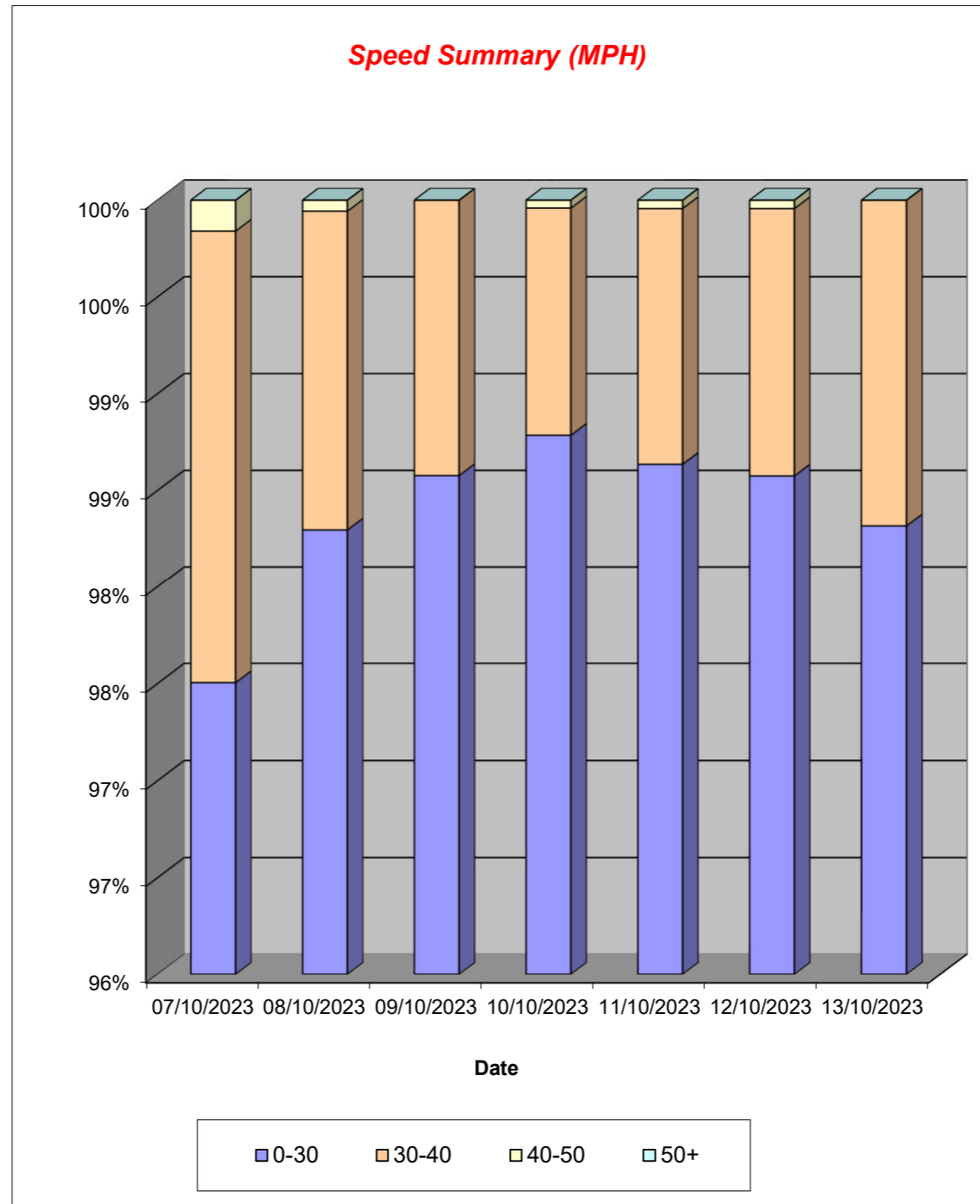
Produced by Road Data Services Ltd.

Channel 2 - Northeastbound

Speed Summary

Week 1

Speed (MPH)	07/10/2023 Saturday	08/10/2023 Sunday	09/10/2023 Monday	10/10/2023 Tuesday	11/10/2023 Wednesday	12/10/2023 Thursday	13/10/2023 Friday
0-30	1837	1731	2218	2441	2314	2284	2279
30-40	44	29	32	29	31	32	39
40-50	3	1	0	1	1	1	0
50+	0	0	0	0	0	0	0
TOTAL	1884	1761	2250	2471	2346	2317	2318



Marsworth ATC 2, B489 (Eastern Site)

Produced by Road Data Services Ltd.

Channel 2 - Northeastbound

Vehicle Class

Week 1

Classes Day / Time	Car / LGV / Caravan - 1	MGV - 2	OGV1 / Bus - 3,5,6,7,12	OGV2 - 4,8,9,10,11,13	TOTAL - 1-13
07/10/2023					
7-19	1473	138	16	2	1629
6-22	1627	150	20	2	1799
6-24	1654	155	20	2	1831
0-24	1700	162	20	2	1884
08/10/2023					
7-19	1426	111	5	7	1549
6-22	1560	121	6	7	1694
6-24	1579	125	6	7	1717
0-24	1618	130	6	7	1761
09/10/2023					
7-19	1681	276	16	2	1975
6-22	1862	292	19	2	2175
6-24	1885	296	19	2	2202
0-24	1926	303	19	2	2250
10/10/2023					
7-19	1886	226	26	7	2145
6-22	2101	255	29	9	2394
6-24	2130	256	29	9	2424
0-24	2170	263	29	9	2471
11/10/2023					
7-19	1779	240	27	4	2050
6-22	1970	275	29	4	2278
6-24	1990	277	29	4	2300
0-24	2032	281	29	4	2346
12/10/2023					
7-19	1714	233	23	4	1974
6-22	1944	261	24	5	2234
6-24	1977	267	24	5	2273
0-24	2009	278	25	5	2317
13/10/2023					
7-19	1723	240	20	1	1984
6-22	1934	272	22	1	2229
6-24	1977	273	22	1	2273
0-24	2015	280	22	1	2318
Average					
7-19	1669	209	19	4	1901
6-22	1857	232	21	4	2115
6-24	1885	236	21	4	2146
0-24	1924	242	21	4	2192

