

CWWTPR DCO Examination**SHH 64****Submission by Save Honey Hill Group****Response to Applicant's Revised Traffic and Transport Submissions Made on 26 March 2024****2 April 2024****1. Introduction**

SHH has undertaken an initial review of the Applicant's Revised Traffic and Transport submissions, Rev 06) made on 26 March 2024 [AS-189 to AS-199]. This response records that review and notes questions which SHH wishes to see raised at the Further Hearing on 9 April. There may be other questions once the agenda for that hearing is published.

These submission documents cross refer to the Construction Traffic Management Plan and Operational Logistics Transport Plan, which are both being updated by the Applicant at D6, so have not yet been checked against the ES Chapter or the statements made in the Independent Review.

2. Overall Review Conclusion

The Independent Review Report [AS-199] undertaken by Mike Axon of SLR Consulting is authoritative and helpful, both in detailing the extent of the checking and updating that has been done by the Applicant, but also in validating the conclusions, including taking account of recently available post pandemic traffic data and the release of TEMPro 8.1, which sets out lower background traffic growth assumptions for future years than those used in the original assessment. The summary tables and graphs provided in the Independent Review are helpful in setting the impacts in context.

We are satisfied with the overall conclusions drawn in paras 1.8 to 1.16 of the Independent Review and with the reported significant residual traffic effects, with mitigation, now set out in Chapter 19.

3. Errors and Omissions

We have not carried out a detailed review of the documents, but have noticed minor inconsistencies and typographic errors still remain in the text of 5.2.19 Chapter 19 Traffic and Transport [AS-191]. However, these are not, in our view, material to the substance of the assessment nor to the conclusions now being drawn.

4. Points to be Raised at Further Hearing

References to page numbers are to those as printed in AS-191.

Page 19. Assessment Years should refer to 2027 as Year 4 Construction.

Page 21. Construction deliveries. We believe this is still slightly incorrect and could be more clearly worded. Our understanding at ISH4 was that the 0930 to 1500 Monday to Friday restriction on construction vehicles on Station Road and Clayhithe Road is to apply both within and outside school terms, to reflect the narrow footways and volumes of pedestrian activity, related principally to the railway station. This text is then used at various points in Chapter 19 eg para 2.8.21 and will need amending throughout the document.

Page 32. Para 1.1.3 notes the use of the traffic assessment data in other chapters of the ES. Have those assessments been checked against Chapter 19 Rev 06 and the TA and amended where necessary?

Page 62. Para 2.4.5 and Table 2-6. In line with the Independent Review, it should be made clear which version of TEMPro has been used and could state the comparison with the TEMPro 8.1 assumptions.

Page 64. Paras 2.4.10 to Table 2-8. This does not appear to have been fully updated to reflect the decision to only assess Operation in Year 1+10.

Page 185. Table 4-37 et seq. References to Low Fen Drove Way in the tables and succeeding text, eg Table 4-47 and para 4.2.188, contain data which appears wrong. Although not material to the findings of the overall assessment, it is surprising that there are any changes to vehicle movements on LFDW recorded for Construction Year 3 and there certainly are not 17 HGV movements in both peak hours as noted in Table 4-37.

Page 218. Para 4.2.252. Reference to Junction 33 incorrect.

Page 242. Para 4.3.20. This appears to be the first reference in the Chapter to the intended secondary mitigation for operation. This notes that Section 5 of the OLTP will include 'Application of a peak delivery period restrictions on operational vehicles, if required, to manage impacts on the local junction. Peak hour restrictions would be 08:00-09:00, 15:00-16:00, and 17:00-18:00, unless it is determined to be essential that the delivery is to be completed during peak hours or specific alternative restrictions are agreed with the local highway authority.'

We note that this steps back from the previous position that HGV movements during operation will be restricted to outside peak hours, based on the revised traffic assessments. Our concern about this statement is, however, that it is unclear in several respects:

- (i) Are 'operational vehicles' meant to include all LGVs and HGVs entering and leaving the works? The terms 'operational' and 'delivery' both appear in the quoted text.
- (ii) What monitoring will be undertaken and what triggers will determine if a restriction is 'required'? Who will agree that restriction? We recognise the difficulty in addressing this, given that future background traffic flows will not necessarily conform to the TEMPro based projections in the ES and that other restrictions or changes to the road network, for example, further traffic management measures in Fen Ditton independent of this scheme, may both affect the future operation of J34.
- (iii) The text refers to 'the local junction'. Is this meant to be J34 or to be both J33 and J34.

These are points which may be addressed in the updated OLTP to be submitted at D6, but we suspect they are not.

We note, also, as set out in the second bullet, that geofencing and routeing restrictions through Horningsea and Fen Ditton will now only apply to 'Anglian Water HGVs'. This is a point that SHH has previously questioned and if restrictions only apply to AW vehicles, 3rd party contractors hauling septic tank waste who are not contracted to AW and possibly some sludge deliveries will be excluded. Given that around half of all HGVs visiting the works are septic tank waste vehicles, this is a substantial weakening of the restrictions previously offered by the Applicant. Can the Applicant please clarify that this is the intended position?

These statements about restrictions are also repeated in para 4.3.37, although the Horningsea and Fen Ditton restriction is worded differently.

Page 251 Para 4.3.41. Final bullet. We note that there is already an 'uninterrupted' connection on the west side of Horningsea Road, albeit that the Applicant proposes to slightly widen it. The reference to 'Biggins Lane' is incorrect and should say Biggin Abbey drive or Low Fen Drove Way.