

WORKING PAPER 1

Analysis of the Highway Authority Recommendation

Condition 10 – HMP Grendon / Springhill

Draft for Working Group Discussion

Purpose

This paper identifies issues arising from the Highway Authority's recommendation which may merit further consideration before Buckinghamshire Council determines the application to discharge Condition 10.

It is not intended to challenge the professional expertise of the Highway Authority or to provide an alternative highway assessment. Rather, it seeks to identify aspects of the recommendation where the reasoning appears incomplete, internally inconsistent or insufficiently explained.

This is a working draft only. It is intended to stimulate discussion within the Working Group and will be updated following receipt of:

- the independent highways expert's review;
- the Planning Officer's report (if available);
- any additional information received from Buckinghamshire Council or the Ministry of Justice.

Executive Summary

The Highway Authority has clearly undertaken considerable work in reviewing the submitted Construction Traffic Management Plan (CTMP).

However, the Working Group considers that a number of aspects of the recommendation would benefit from further explanation before the Local Planning Authority relies upon it when determining whether Condition 10 should be discharged.

The issues identified below do not necessarily suggest that the Highway Authority has reached the wrong conclusion.

Rather, they identify matters where the reasoning supporting that conclusion appears incomplete or where further clarification would assist the Planning Authority.

ISSUE H1

Assessment of the Complete Construction Traffic Proposal

Observation

The recommendation provides detailed analysis of HGV routing, swept paths, passing places and associated mitigation.

However, the CTMP proposes a construction traffic strategy comprising not only HGVs but also substantial movements of construction staff cars and light goods vehicles throughout the construction programme.

The recommendation contains comparatively little analysis of the cumulative operational effects arising from the interaction of these different traffic streams with existing traffic, agricultural vehicles, pedestrians and cyclists.

Why this matters

Residents and other highway users will experience the combined effect of all construction traffic rather than HGV movements in isolation.

The recommendation would therefore benefit from explaining how these cumulative operational impacts have been assessed.

Confidence: High

ISSUE H2

Relationship Between Earlier Highway Concerns and the Revised Recommendation

Observation

The Highway Authority previously expressed concerns regarding the adequacy of mitigation on the proposed route through Edgcott.

The recommendation now concludes that those concerns have been satisfactorily addressed.

However, many of the additional measures relied upon comprise:

- verge monitoring;
- verge repairs;
- warning signage;
- ongoing review.

These measures principally monitor performance or remedy consequences after implementation.

The recommendation does not clearly explain how they address the original operational concerns relating to the safe operation of the highway by large construction vehicles through constrained sections of the route.

Why this matters

The analytical link between the Highway Authority's previous concerns and its revised recommendation is not fully explained.

Confidence: High

ISSUE H3

Reliance Upon Future Mitigation

Observation

The recommendation relies upon future surveys, future junction assessment, monitoring, possible additional mitigation and continuing review of the CTMP.

Several of these measures remain to be developed following implementation.

Why this matters

The recommendation would benefit from distinguishing between:

- mitigation already incorporated within the proposal; and
- measures that may be developed in response to future monitoring.

It is not immediately apparent how future investigation and possible future mitigation support the present conclusion that the submitted proposals are acceptable.

Confidence: High

ISSUE H4

Grendon Road "Pinch Point"

Observation

The recommendation accepts the applicant's explanation that constraints associated with the Grendon Road haul road justify the revised access arrangements.

However:

- the CTMP continues to forecast substantial HGV movements using the Grendon Road access throughout both the Enabling Works and Main Works; and
- the MoJ has subsequently explained that the Lawn Hill access is also intended to provide a faster and safer construction programme through the provision of a second access together with additional compounds, welfare facilities and parking.

These appear to be related but different justifications.

Why this matters

The recommendation would benefit from explaining how the continuing substantial use of the Grendon Road access is reconciled with the reliance placed upon the "pinch point" as justification for the revised access strategy.

The Working Group is concerned that the recommendation may not fully distinguish between engineering constraints at the pinch point and the wider operational advantages of a revised construction methodology introduced after planning permission was granted.

Confidence: Medium / High

ISSUE H5

Construction Staff Traffic

Observation

The recommendation records uncertainty regarding the distribution of staff cars and vans.

However, the CTMP appears to identify Lawn Hill as the principal access for staff and operatives' vehicles throughout the principal construction phases.

Why this matters

If this interpretation is correct, the recommendation should explain how this informed its assessment of cumulative traffic impacts.

If the report has misunderstood or mischaracterised the CTMP on this point, the implications for the assessment should be clarified.

Confidence: High (subject to confirmation of CTMP wording)

ISSUE H6

Evidential Basis of the Recommendation

Observation

The recommendation concludes that the proposals are acceptable in a number of important respects.

Whilst professional judgement is central to the Highway Authority's role, the report would benefit from fuller explanation of the evidential reasoning supporting a number of its conclusions, including:

- adequacy of passing places;
- adequacy of junction mitigation;
- cumulative operation of construction traffic;
- resolution of earlier concerns.

Why this matters

A clearer explanation of the analytical reasoning would assist both the Planning Officer and interested parties in understanding the basis upon which the recommendation has been reached.

Confidence: High

Additional Issues for Consideration

The following issues require further investigation before inclusion in the final submission:

- Is the statement that Lawn Hill is an "approved HS2 construction route" factually correct?
- Has the recommendation accurately reflected the CTMP phasing, particularly the distinction between Early Enabling Works, Enabling Works and Main Works?
- Are the proposed passing place dimensions sufficient from a technical highways perspective?
- Should greater emphasis be placed upon the absence of any assessment of traffic conflict, vehicle interaction or queuing?

These issues will be reviewed following receipt of the independent highways assessment.