

A428 Black Cat to Caxton Gibbet Road Improvement Scheme

Written Representations Summary

1 Introduction

- 1.1 The Cambridgeshire Authorities would like to take this opportunity to restate their strong support for the improvements to the A428 between the Black Cat roundabout, and Caxton Gibbet. The Councils are generally supportive of this project coming forwards as part of the wider Ox-Cam Arc strategic development corridor, and to relieve congestion and improve network reliability in the area. This submission provides a summary of our full Written Representation to the Examination, which should be read in conjunction with our previous submissions to the Statutory Consultations, Adequacy of Consultation Response, and Relevant Representations.
- 1.2 Now that detailed information has been shared as part of the Application the Councils are able to respond to much of the information therein. There are several issues which at this point remain of concern and they are summarised here for convenience.
- 1.3 The Councils have always been clear in their aspiration to work with the Applicant and agree as much information as possible in advance of the Application being submitted, including Statement of Common Ground matters, technical information, legal issues, and the Order itself. Our understanding is that through the Development Consent Order process, applications should be 'front loaded' with much agreed before the Application is submitted. Unfortunately, much of the information requested was shared with the Councils in the Application (Environmental Statement, responses to our Statutory Consultation submissions), or after acceptance (legal agreement received 11th June, Statement of Common Ground received 30th July). This means that our representations to the Examination are longer than we would have preferred.

2 The Draft Development Consent Order

- 2.1 The Councils discussed this at a presentation by the Applicant in November 2020 and made a number of points including an offer to engage and discuss the draft. The Council's position is that they are seeking a number of changes to the drafting of the Order, with regard to:
 - Protective Provisions for Highway design, acceptance, and adoption
 - Protection and articulation of the County Council's role as Lead Local Flood Authority, Highway Authority, and Traffic Manager
 - Detailed matters about Rights of Way
 - Clarifications to the drafting
 - Additional Requirements

- 2.2 The Councils would like to explore with the Applicant whether some of the Requirements may be best discharged locally, principally those relating to design and environmental matters, instead of by the Secretary of State, and will inform the Examination of our position when we have had this discussion.
- 2.3 The changes to the draft Development Consent Order (dDCO) are sought to reasonably secure control over the design, and acceptance of new Highway assets by the County Council, and address matters with regard to borrow pits and environmental mitigation.

3 Traffic and Transportation

- 3.1 The Councils are broadly content with the Applicant's methodology and conclusions on the dual carriageway, and the traffic numbers used within the economic assessment of the scheme. It has become apparent however that the modelling of the local roads and junctions to be adopted by the County Council has used a non-standard method, and remains not agreed at this point. As a consequence, the local road design cannot be approved as the Council hasn't been able to agree the relevant traffic flows, and therefore confirm whether the local roads have been designed with the right size and capacity. The Councils have received information from the Applicant during August 2021 which is still under review. The County Council considers that it is reasonably seeking to understand the detailed operation of its future asset, and be confident that the design is appropriate.

4 Highway Design

- 4.1 The design of the local roads and junctions has been discussed with the Applicant but there have been no detailed discussions this year between February and July. The Council's position can be summarised very briefly. The Council requires the normal standards for highways, the Design Manual for Roads and Bridges to be used for the design of any asset it is to adopt, and the Council requires a robust approval process for the design to be secured through the Development Consent Order and a legal agreement.

5 Biodiversity

- 5.1 The Councils have expressed concerns about the range and quality of the ecological surveys undertaken for the Application and are not confident that the impact of the scheme can be fully assessed, with particular reference to habitats and areas of local significance. Clarity would be welcomed on whether the Applicant intends to undertake further ecological surveys. The Applicant's assessment of Biodiversity Net Gain has been questioned by the Councils and there are concerns that using the standard metrics for this does not give an accurate picture of the impact of the project. The Councils are keen to explore this with the Applicant to ensure that the scheme delivers the maximum possible benefits for biodiversity.

6 Non-Motorised Users

- 6.1 The Councils are keen that all development in the area provides safe and extensive opportunities for cycling, walking, and other active travel uses. The Councils are not convinced that the local roads within the scheme provide good connectivity to all surrounding villages, or that the level of provision is in accordance with the latest policy guidance. The Councils are keen that all opportunities are taken to deliver high standard facilities for active travel users.

7 Construction Traffic and Impacts

- 7.1 Given the extensive period of construction the Councils are concerned about the volume, duration, and control of construction traffic, routing and diversions, and the impacts on our communities. Additional information and commitment to mitigate impacts secured through the draft Development Consent Order would be welcomed, given the nature and location of the routes that have been identified for use.

8 Minerals and Waste

- 8.1 The Councils are concerned that there is limited information on borrow pits and their management and remediation within the Application.

9 Conclusion

- 9.1 The Councils will continue to work with the Applicant through the Examination period to resolve issues and understand the information in the Application.