

# A428 Black Cat to Caxton Gibbet improvements

TR010044

Volume 8

**8.5 Draft Statement of Common Ground with Bedford Borough  
Council**

Planning Act 2008

Rule 8(1)(e)

Infrastructure Planning (Examination Procedure) Rules  
2010

August 2021

Infrastructure Planning

Planning Act 2008

**The Infrastructure Planning  
(Examination Procedure) Rules 2010**

**A428 Black Cat to Caxton Gibbet  
improvements**  
Development Consent Order 202[ ]

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**STATEMENT OF COMMON GROUND**

**This Statement of Common Ground has been prepared and agreed by (1) Highways England Company Limited and (2) Bedford Borough Council.**

Signed.....  
Anne-Marie Rogers  
Senior Project Manager  
on behalf of Highways England  
Date: 31 August 2021

This statement has been approved by the Officers of Bedford Borough Council.

Signed.....  
[NAME]  
[POSITION]  
on behalf of [STAKEHOLDER]  
Date: [DATE]

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# 1 Introduction

## 1.1 Purpose of this document

- 1.1.1 This Statement of Common Ground (SoCG) has been prepared in respect of the A428 Black Cat to Caxton Gibbet improvements (the Scheme) made by Highways England Company Limited (Highways England) to the Secretary of State for Transport (Secretary of State) for a Development Consent Order (the Order) under section 37 of the Planning Act 2008 (PA 2008).
- 1.1.2 The order, if granted, would authorise Highways England to construct a new 10 mile (16km) dual 2-lane carriageway from the Black Cat roundabout to Caxton Gibbet roundabout and in addition approximately 1.8 miles (3km) of tie-in works. The Scheme includes the following components:
- a. A new three-level grade separated junction at Black Cat roundabout, with the A1 at the lower level, the new dual carriageway on the upper level and a roundabout between the two at approximately existing ground level. In addition to slip roads, a new free flowing link between the A421 eastbound carriageway and the A1 northbound carriageway will also be provided.
  - b. A new grade separated all movements junction will be constructed to the east of the existing Cambridge Road roundabout to provide access to the new dual carriageway and maintain access to the existing A428.
  - c. At the Caxton Gibbet roundabout, a new grade separated all movements junction will be constructed, incorporating the existing roundabout on the south side of the new dual carriageway and a new roundabout on the north side. The new dual carriageway will then tie-in to the existing A428 dual carriageway to the east of the new Caxton Gibbet junction.
  - d. In the vicinity of the new Black Cat junction, direct access onto the A1 from some local side roads and private premises will be closed for safety reasons. A new local road will provide an alternative route. The existing Roxton Road bridge will be demolished and replaced with a new structure to the west to accommodate the realigned A421.
  - e. New crossings will be constructed to enable the new dual carriageway to cross the River Great Ouse, East Coast Main Line railway, Barford Road, the B1046/Potton Road, Toseland Road and the existing A428 at Eltisley.
  - f. The existing A428 between St Neots and Caxton Gibbet will be de-trunked and retained for local traffic and public transport with maintenance responsibility transferred to the local highway authorities.
  - g. An alternative access will be provided to side roads at Chawston, Wyboston and Eltisley.

h. There will be safer routes for walkers, cyclists, and horse riders.

1.1.3 This SoCG has been produced to confirm to the Examining Authority (ExA) where agreement has been reached between the parties to it, and where agreement has not (yet) been reached. SoCGs are an established means in the planning process of allowing all parties to identify and so focus on specific issues that may need to be addressed during the Examination.

## 1.2 Parties to this Statement of Common Ground

1.2.1 This SoCG has been prepared by (1) Highways England as the Applicant and (2) the Bedford Borough Council (BBC).

1.2.2 Highways England became the Government-owned Strategic Highways Company on 1 April 2015. It is the highway authority in England for the strategic road network and has the necessary powers and duties to operate, manage, maintain and enhance the network. Regulatory powers remain with the Secretary of State. The legislation establishing Highways England made provision for all legal rights and obligations of Highways England, including in respect of the Application, to be conferred upon or assumed by Highways England.

1.2.3 BBC is a prescribed consultee for this application under Sections 42(1)(a) and 56(2)(a) of the PA 2008.

1.2.4 Collectively Highways England and BBC are referred to as 'the parties'.

## 1.3 Terminology

1.3.1 In Section 3 of this SoCG:

- a. "Agreed" indicates where the issue has been resolved.
- b. "Not Agreed" indicates a final position.
- c. "Under discussion" where these points will be the subject of on-going discussion wherever possible to resolve, or refine, the extent of disagreement between the parties.

1.3.2 It can be taken that any matters not specifically referred to in the Issues chapter of this SoCG are not of material interest or relevance to BBC's representation and therefore have not been considered in this document. It is recognised however that engagement between both parties will need to continue due to their joint vested interest in the area of the Scheme.

## 2 Record of Engagement

2.1.1 The parties have been engaged in consultation since the beginning of the proposed development. A summary of the meetings and correspondence that has taken place between Highways England and BBC in relation to the Application is outlined in **Table 2-1**.

**Table 2-1 - Record of Engagement**

### Record of Engagement Under Development

Date	Form of correspondence	Key topics discussed and key outcomes
09/06/2017	Email	Ecology survey dates relating to the A428 road improvement scheme at ponds / ditches located east of the Black Cat roundabout in proximity to the Motor Sports circuit shared with BBC.
08/08/2017	Meeting	Meeting with the lead local flood authorities and internal drainage board for a discussion on flood risk.
28/09/2017	Email	Confirmation from BBC regarding land ownership for access required to undertake ecology surveys.
24/01/2018	Meeting	Meeting with BBC to introduce the Scheme, discuss the highways design and how the Scheme will impact roads within the local authority's jurisdiction. The affected side roads, public rights of way and de-trunking were also covered.
06/02/2018	Meeting	Meeting with BBC to discuss the plans for public rights of way that are affected by the Scheme.
10/05/2018	Email	Three draft drawings depicting Representative Viewpoints for LVIA shared with BBC.
24/05/2018	Email	Clarification regarding BBC pavement specification.
03/07/2018	Meeting	Meeting with BBC, Cambridgeshire County Council (CCC), Huntingdonshire District Council (HCDC) and South Cambridgeshire District Council (SCDC), A presentation was given on the Landscape visual impact assessment (LVIA) viewpoints to landscape officers. The ongoing nature of consultation was discussed, and Highways England invited further thoughts on the initial viewpoint selections for LVIA photomontages, so that they could brief surveyors in August 2018.

Date	Form of correspondence	Key topics discussed and key outcomes
TBC	Email	Cultural Heritage: Email to BBC and CCC introducing the scheme and requesting a meeting.
13/08/2018	Email	Request to BBC for collision records and location plans for Barford Road, Bedford Road and Roxton Road.
TBC	Email	Confirmation from BBC that consultation materials can be deposited at BBC offices.
18/09/2018	Meeting	Cultural Heritage meeting with BBC and CCC introducing the Scheme and an initial discussion on the assessment of significance of heritage assets and the need for a geophysical survey and aerial photographic analysis. Discussed the need for a mitigation strategy within the ES.
18/09/2018	Meeting	Meeting with BBC and CCC to give an introduction to the Scheme and programme and approach to assessment of significance of heritage assets.
24/09/2018	Email	Request for information from BBC Manager for Traffic Operations on any existing assets that have or have a potential for Asbestos.
16/10/2018	Email	Cultural heritage: Email to BBC and CCC requesting a quote to produce the required WSI for the geophysical survey,
07/11/2018	Email	Cultural heritage: Email from BBC on charging and quote for initial work.
15/11/2018	Meeting	Meeting with BBC to discuss the Roxton Road link and how it had been designed with the local authority. The local authority made requests for what they would like to be changed and HE amended the design accordingly. Stakeholder communications for the area affected were also discussed.
13/12/2018	Email	Cultural heritage: Follow-up for geophysics brief from the councils.
17/12/2018	Meeting	Meeting with BBC to discuss the relocation of two bus lay-bys that are located on the A1 northbound and southbound carriageways between Wyboston and Black Cat junction, the safety of both bus lay-bys was also discussed.
03/01/2019	Email	Cultural heritage: Follow up for geophysics brief from BBC and CCC. Request for the Written Scheme of Investigation (WSI) for the geophysical survey from BBC.



Date	Form of correspondence	Key topics discussed and key outcomes
TBC	Email	Advance copy of the project update (including consultation findings) shared with BBC.
12/03/2019	Email	Draft Statement of Community Consultation shared with BBC.
14/03/2019	Email	Cultural heritage: Information sent to BBC, CBC, and CCC on preferred route announcement. Update on progress to geophysical survey.
14/03/2019	Email	Request to BBC for information regarding a farm/quarry site adjacent to the existing Black Cat Island, and a request for access for non-intrusive geophysical survey.
15/03/2019	Email	Cultural heritage: Link to plans etc sent to BBC, CBC, and CCC.
25/03/2019	Email	Cultural heritage: WSI prepared by MHI for geophysical survey sent to BBC, CBC, and CCC.
25/03/2019	Email	WSI prepared by MoLA Headland Infrastructure shared for review by BBC.
26/03/2019	Email	Joint response by BBC, CBC and CCC on the WSI prepared by MoLA Headland Infrastructure.
05/04/2019	Email	Relocation of bus stops on the A1 northbound and southbound carriageways between Wyboston and Black Cat junction.
10/04/2019	Email	Cultural heritage: Request for additional data for small outlier compounds etc made to BBC, CBC, and CCC.
11/04/2019	Email	Cultural heritage: Confirmation from BBC that proposed study area for compounds is acceptable.
12/04/2019	Email	Cultural Heritage: Request for additional data (BBC, CBC, CCC)
30/04/2019	Meeting	Cultural Heritage meeting with BBC, CBC, and CCC providing an update following geophysical and aerial photography surveys. Discussion on trenching strategy.
20/05/2019	Email	Email from BBC advising that its freehold land at Roxton Quarry is intended to be developed following the end of quarry operations, and a request for the design of the A428 Scheme to support this development proposal.
31/05/2019	Letter	Statutory Consultation Launch Communications.

Date	Form of correspondence	Key topics discussed and key outcomes
06/06/2019	Email	Cultural heritage: First draft archaeological trenching layout shared with BBC, CBC, and CCC.
10/06/2019	Meeting	Cultural heritage: Meeting with BBC and CCC to discuss the trenching strategy and the principles of it.
14/06/2019	Email	Cultural heritage: Meeting minutes from meeting on 10/06/2019 sent out to BBC, CBC, and CCC.
24/06/2019	Email	Cultural heritage: Second draft of Phase 1 trench layout emailed to BBC, CBC, and CCC.
25/06/2019	Email	Cultural heritage: Comments on the phase 1 trench layout received from BBC.
25/06/2019	Email	Cultural heritage: Copy of NMP data received from BBC.
10/07/2019	Email	Request to BBC for information regarding main/minor/awarded watercourses that may be impacted by the A428 Scheme.
22/07/2019	Email	Cultural heritage: Email to BBC, CBC, and CCC asking for final comments on the phase 1 trenching.
26/07/2019	Response to Statutory Consultation	BBC Public Consultation response.
30/07/2019	Email	Correspondence to BBC regarding access to council land for Ground Investigation surveys.
20/08/2019	Email	Structural information from BBC regarding Roxton Culvert.
21/08/2019	Email	Cultural heritage: Email to BBC, CBC, and CCC requesting updated brief. Confirmed that Phase 2 GS results will be targeted in Phase 2 of trenching.
21/08/2019	Email	Cultural heritage: Updated brief received from CCC on behalf of BBC and CBC.
TBC	Email	Figures for the Desk-Based Assessment shared with BBC.
19/03/2020	Email	Geophysical Survey Report for Phases 1 and 2 shared with BBC.
17/02/2020	Email	Draft Desk-Based Assessment shared by HE.

Date	Form of correspondence	Key topics discussed and key outcomes
TBC	Email	WCH proposals within BBC shared with Public Rights of Way Officer.
TBC	Email	First departure application for approval relating to BBC highways that are affected by the scheme.
TBC	Email	Request to BBC for fluvial, pluvial, groundwater, sewer, snowmelt, reservoir and other artificial flood sources.
02/10/2019	Meeting	Highways and Planning Technical Working Group.
08/10/2019	Meeting	Strategic Road Users Technical Working Group.
08/10/2019	Meeting	Walkers, Cyclists and Horse Riders Technical Working Group.
14/10/2019	Email	Sheets from General Arrangement plans showing the proposed layout of the new Black Cat junction shared with BBC.
14/10/2019	Meeting	Economic and Benefits Technical Working Group.
17/10/2019	Meeting	An inaugural meeting was held with BBC, CCC, CBC, and SCDC to as part of the formation of the Flood Risk/ Water Management group and covered the terms of reference for the working group, the lessons that could be learnt from the A14 and each authorities' areas watercourses and responsibilities. HE gave an overview of the different types of hydraulic modelling of water course crossings and overland runoff for the three main technical notes to be generated (River Ouse Crossing, Bedfordshire Area and Cambridgeshire Area). The Environment Agency and the Bedford Group of Drainage Boards were also in attendance.
22/10/2019	Email	Cultural heritage: Email from CCC (BBC and CBC copied) asking about aerial photographic report and whether contractor on board for trenching.
22/10/2019	Email	Cultural heritage: Information on status of aerial photography report sent to BBC, CBC, and CCC. Responded to query about trenching contractor – TBC.
23/10/2019	Email	Cultural heritage: Email from BBC asking about payment for their time
23/10/2019	Email	Cultural heritage: Email from CCC (BBC copied) asking about payment for their time

Date	Form of correspondence	Key topics discussed and key outcomes
23/10/2019	Email	Second and third departure applications for approval relating to BBC highways that are affected by the scheme.
28/10/2019	Email	Cultural heritage: Update on charging for consultation time sent to BBC, CBC, and CCC.
30/10/2019	Email	Correspondence regarding potential collaborations with BBC All Age Skills Plan
07/11/2019	Meeting	Meeting held to present the General Arrangement plans used at statutory consultation and explained which PROWs were affected by the Scheme and how each was to be dealt with. The temporary closures were also discussed, and the local authority advised they would like the temporary closures to be temporarily checked.
11/11/2019	Email	Discussions regarding proposed improvements to Public Rights of Way network as part of the A428 Scheme.
05/12/2019	Email	Cultural heritage: Copy of MOLA's WSI for the Phase 1 trenching sent to BBC, CBC, and CCC.
09/12/2019	Meeting	Economic and Benefits Technical Working Group.
10/12/2019	Meeting	Strategic Road Users Technical Working Group.
11/12/2019	Meeting	Highways and Planning Technical Working Group.
13/12/2019	Email and file transfer	Cultural heritage: Phase 2 trenching plan sent to BBC, CBC, and CCC.
16/12/2019	Meeting	Walkers, Cyclists and Horse Riders Technical Working Group.
18/12/2019	Email	Cultural heritage: Response confirming AP report was not ready to be sent. Scope of Works sent to BBC and CBC.
18/12/2019	Email	Cultural heritage: Screen shot of slight amendment to Phase 2 trenches.
TBC	Email	Drawings shared with BBC showing proposals for the creation of a service road from the BP filling station at Wyboston to the new Black Cat junction.
06/06/2019	Email	Draft archaeological trenching layout shared with BBC Archaeological Officer.

Date	Form of correspondence	Key topics discussed and key outcomes
08/01/2020	Email	Discussions with BBC regarding parking enforcements on the proposed new service road from the BP filling station at Wyboston to the new Black Cat junction.
10/01/2020	Email	Cultural Heritage: Comments received from BBC and CCC on A428 MOLA Evaluation WSI (Phase 1).
14/01/2020	Email	A428 Bedfordshire Watercourse Technical Note shared with BBC.
		Cultural Heritage: Phase 1 WSI from MOLA shared with BBC.
24/01/2020	Email	Cultural Heritage: Further comments on Phase 1 WSI received from CCC and BBC.
24/01/2020	Email	Cultural Heritage: Confirmation that comments on WSI will be addressed and asked for any other comments from CCC and BBC. Work will start on site on 28/01/20.
28/01/2020	Email	Cultural Heritage: Email regarding CSCS cards and inductions.
28/01/2020	Email	Cultural Heritage: Email to BBC, CBC, and CCC confirming work had started, and that contingency can be accommodated as required. Informed curators of need for minor changes to Phase 1 trenches for safety reasons – info will be sent. Reminder that comments on Phase 2 trench layout were needed.
28/01/2020	Email	Cultural Heritage: Email from CCC (BBC and CBC copied) asking if the aerial photograph layer was available to inform comments.
28/01/2020	Email	Cultural Heritage: Email from CBC (CCC and CBC copied) trying to determine what AP info they have.
29/01/2020	Email	Cultural Heritage: AECOM confirmed AP layer not yet available. Requested info from CBC (BBC and CCC copied).
TBC	Email	Updated Phase 1 WSI prepared by MOLA shared following comments by BBC, CBC, CCC..
05/02/2020 (TBC)	Email	Cultural heritage: Information from BBC regarding excavation works that have been carried out at the Black Cat Quarry.
06/02/2020	Email	Cultural heritage: Discussions with BBC regarding designating the A1 garage service road as a red route clearway.

Date	Form of correspondence	Key topics discussed and key outcomes
06/02/2020	Email	Cultural heritage: Comments from BBC on phase 2 trenching layout received.
TBC	Email	MOLA Report from week 2 of Phase 1 trial trenching shared with BBC.
TBC	Email	MOLA Report from week 3 of Phase 1 trial trenching shared with BBC.
TBC	Email	Confirmation BBC would like to enter into a Planning Performance Agreement (PPA).
10/02/2020	Email	Draft PPA shared with BBC.
12/02/2020	Email	Planning data provided by BBC to complete uncertainty log.
17/02/2020	Email	Cultural heritage: Draft version of the Archaeological Desk Based Assessment shared BBC, CBC. And CCC for information.
24/02/2020	Email	MOLA Report from week 4 of Phase 1 trial trenching shared with BBC.
TBC	Email	MOLA Report from week 5 of Phase 1 trial trenching shared with BBC.
TBC	Email	MOLA Report from week 6 of Phase 1 trial trenching shared with BBC.
25/02/2020	Meeting	Economic and Benefits Technical Working Group.
02/03/2020	Email	Cultural heritage: Geophysical survey reports sent to BBC, CBC, and CCC for comment.
03/03/2020	Meeting	Walkers, Cyclists and Horse Riders Technical Working Group.
03/03/2020	Email	EWP7 Archaeology WSI work package issued to BBC.
05/03/2020	Meeting	Local Authorities Traffic Meeting with BBC, CCC, and CBC. The project team presented information on the Stage 3 Model, including the model network and area of detailed modelling. The traffic forecasting process was explained and presented to the local authorities as well as the Model Cordon Data.

Date	Form of correspondence	Key topics discussed and key outcomes
10/03/2020	Email	List of developments provided by BBC for inclusion in the Environmental Impact Assessment (EIA) cumulative effects assessment.
11/03/2020	Email	MOLA Report from week 7 of Phase 1 trial trenching shared with BBC.
12/03/2020	Meeting	Further to the meeting on 17 October 2019 a second meeting was held for the Flood Risk/ Water Management Technical Working Group. In this meeting each local authorities' watercourse was reviewed and discussed and the terms of reference for the group were finalised and agreed. The Environment Agency and Bedford Group of Drainage Boards were also in attendance.
18/03/2020	Email	Remote sign off for two trenches in F14.
TBC	Email	MOLA Report from week 8 of Phase 1 trial trenching shared with BBC.
25/03/2020	Meeting	Meeting with BBC to discuss the restoration of the gravel pits near the Black Cat with the local authority. It was agreed that Highways England should assume that this site has been restored in all assessments.
30/03/2020	Email	MOLA Report from week 9 of Phase 1 trial trenching shared with BBC.
02/04/2020	Email	MOLA Report from week 10 of Phase 1 trial trenching shared with BBC.
03/04/2020	Email	Cultural heritage: Info from BBC regarding Covid related site visit requirements.
08/04/2020	Email	Request for further information from BBC regarding Bedford Business Park.
TBC	Email	MOLA Report from week 11 of Phase 1 trial trenching shared with BBC.
14/04/2020	Meeting	Archaeological Consultation Meeting with Historic England, BBC, CBC, and CCC which included discussion on Statements of Common Ground and how COVID-19 might impact archaeological investigation. An update was also provided on Phase 1 fieldwork and the archaeological potential and land



Date	Form of correspondence	Key topics discussed and key outcomes
		access of various fields were discussed. Historic England were also in attendance.
17/04/2020	Email	Remote sign off for trenches in F2, F5 and F29.
20/04/2020	Email	MOLA Report from week 12 of Phase 1 trial trenching shared with BBC.
23/04/2020	Email	Cultural heritage: WSI for Phase 2 trenching sent to BBC, CBC, and CCC.
27/04/2020	Email	Cultural heritage: WSI for Phase 2 prepared by MOLA shared with BBC and CBC.
29/04/2020	Email	Confirmation of no additional comments from BBC on WSI for Phase 2 prepared by MOLA.
30/04/2020	Email	Planner for May archaeological information shared.
01/05/2020	Email	MOLA Report from week 1 of Phase 2 trial trenching shared with BBC.
06/05/2020	Email	MOLA Report from week 2 of Phase 2 trial trenching shared with BBC.
07/05/2020	Email	Cultural heritage: Phase 3 geophysics and Phase 3 trench plan sent to BBC, CBC, and CCC.
11/05/2020	Email	Proposed environmental work packages for BBC shared.
11/05/2020	Email	EWP1 Major Developments work package issued to BBC.
11/05/2020	Email	First batch of work packages to BBC comprising: <ul style="list-style-type: none"> <li>• BBEWP1 Major Developments – Future Baseline;</li> <li>• BBEWP4 Public Health Information;</li> <li>• BBEWP7 Archaeology WSI and ATT sign off; and,</li> <li>• BBEWP12 Brook Cottages.</li> </ul>
13/05/2020	Email	Information from BBC regarding lease expiry date of the Black Cat quarry and updates regarding potential redevelopment of the site.
13/05/2020	Email	MOLA Report from week 3 of Phase 2 trial trenching shared with BBC



Date	Form of correspondence	Key topics discussed and key outcomes
13/05/2020	Email	Cultural heritage: Comments from BBC on phase 3 trench layout received.
14/05/2020	Email	Cultural heritage: AECOM response to comments on Phase 3 trench layout.
18/05/2020	Email	MOLA Phase 1 Trenching Report shared with BBC.
19/05/2020	Email	Cultural heritage: Copy of phase 1 trenching report sent to BBC, CBC, and CCC.
19/05/2020	Email	Local Model Validation Report shared with BBC.
19/05/2020	Meeting	Traffic and Transport Meeting: LMVR and Modelling.
21/05/2020	Meeting	Cultural heritage: Archaeological Consultation Meeting with Historic England, BBC, CBC, CCC, and MOLA. MOLA gave a presentation on the results of the Phase 1 trenching. Attendees were informed that it was possible that not all trenching results would be available with the submission of the DCO and could be submitted as an addendum.
21/05/2020	Email	Cultural heritage: Slides from presentation earlier in the day sent to Historic England, BBC, CBC, and CCC.
22/05/2020	Email	MOLA Report from week 4 of Phase 2 trial trenching shared with BBC.
01/06/2020	Email	MOLA Report from week 5 of Phase 2 trial trenching shared with BBC.
05/06/2020	Email	Cultural Heritage: Comments from BBC on Phase 1 trenching report received.
08/06/2020	Email	<p>The following work packages were issued to BBC:</p> <ol style="list-style-type: none"> <li>1) Roxton Road and Bedford Road.</li> <li>2) Roxton Road Link.</li> <li>3) Kelpie Marine Access Road.</li> <li>4) BP Service Road 2-way section.</li> <li>5) Public Rights of Way.</li> </ol>

Date	Form of correspondence	Key topics discussed and key outcomes
10/06/2020	Meeting	Cultural Heritage: Meeting with BBC Archaeology & Conservation Officers to update project and discuss Brook Cottages investigation into potential for relocation. Historic England were also in attendance.
10/06/2020	Email	MOLA Report from week 7 of Phase 2 trial trenching shared with BBC.
18/06/2020	Email	MOLA Report from week 8 of Phase 2 trial trenching shared with BBC.
23/06/2020	Email	Cultural heritage: Phase 3 WSI sent to BBC, CBC, and CCC.
23/06/2020	Email	Updated uncertainty log assumptions shared with BBC.
23/06/2020	Meeting	Traffic and Transport meeting with BBC– LMVR and Modelling Workshop during which the project team ran through an overview of the Stage 3 Model including an overview of the base year model calibration and validation performance.
24/06/2020	Email	MOLA Report from week 9 of Phase 2 trial trenching shared with BBC.
24/06/2020	Letter	Supplementary Consultation Launch Communications.
24/06/2020	Email	Cultural heritage: Link for online consultation sent to BBC, CBC, and CCC.
25/06/2020	Meeting	Cultural Heritage Meeting with Historic England, BBC, CBC, and CCC regarding five sites (F9, F34, F44, F59 and F97) that would be targeted early for advanced construction activity including compounds, statutory diversions and borrow pits.
25/06/2020	Section 42 representation email from BBC Corporate Property Management Team Leader	Land matters: No objection to purchase of land for balancing Pond 16. Objection to purchase of land south of Black Cat Junction due to development potential. Purchase terms and access from new island.
01/07/2020	Email	Updated list of developments provided by BBC for inclusion in the EIA cumulative effects assessment.
07/05/20	Email	WSI for Phase 3 prepared by MOLA shared.

Date	Form of correspondence	Key topics discussed and key outcomes
02/07/2020	Email	Comments from BBC on WSI for Phase 3 prepared by MOLA.
13/07/2020	Email	Remote sign-off for trenches in F47 and F49.
17/07/2020	Email	MOLA Report from week 12 of Phase 2 trial trenching shared with BBC.
21/07/2020	Meeting	A meeting was held with BBC, CCC, and CBC to present the methodology adopted for the traffic forecasting and the results of the future forecasts to the local authorities.
24/07/2020	Email	Photos of trenches in F45 shared with BBC.
24/07/2020	Email	MOLA Report from week 13 of Phase 2 trial trenching shared with BBC.
27/07/2020	Meeting	A meeting was held with BBC to present a summary of the assessment of the wider traffic impacts and junction capacity modelling to be contained in the Transport Assessment (TA).
28/07/2020	Meeting	Cultural heritage: Joint meeting with Historic England and BBC heritage and archaeology officers to discuss scheme and programme updates.
29/07/2020	Email	MOLA Report from week 14 of Phase 3 trial trenching shared with BBC.
30/07/2020	Meeting	Local Economy Legacy Working Group.
30/07/2020	Email	Work package "CCCHWP15 LTN 1/20" issued to BBC for review and comment.
30/07/2020	Email	Work package "EWP8 ATT sign off" issued to BBC County Archaeologist for review.
03/08/2020	Email	Cultural heritage: Draft WSI for Brook Cottages issued to Historic England for comment with BBC copied in.
03/08/2020	Email	Work Package on Order Plans and Schedules issued to BBC
12/08/2020	Email	MOLA Report from week 16 of Phase 3 trial trenching shared with BBC.
12/08/2020	Email	Work package sent out to BBC for De-trunking plans.

Date	Form of correspondence	Key topics discussed and key outcomes
14/08/2020	Email	EWP3 Noise work package issued to BBC EHO/Biodiversity teams
17/08/2020	Email	Cultural heritage: Meeting notes for 25 <sup>th</sup> June meeting sent to Historic England, BBC, CBC, and CCC.
19/08/2020	Email	MOLA Report from week 17 of Phase 3 trial trenching shared with BBC.
27/08/2020	Email	MOLA Report from week 18 of Phase 3 trial trenching shared with BBC.
02/09/2020	Email	MOLA Report from week 19 of Phase 3 trial trenching shared with BBC.
10/09/2020	Email	MOLA Report from week 20 of Phase 3 trial trenching shared with BBC.
10/09/2020	Meeting	Meeting with BBC to discuss de-trunking & re-classification of what will be the old A428; A428 between Wyboston and Cambridge Road, St Neots and A428 between Cambridge Road, St Neots and Caxton Gibbet.
16/09/2020	Email	MOLA Report from week 21 of Phase 3 trial trenching shared with BBC.
18/09/2020	Meeting	Cultural heritage: Meeting with Historic England, BBC, CBC, CCC, and MoLA regarding results of Phase 2 trenching – presentation by MoLA. A wider discussion on the evaluations was held, along with an update on the advance works.
22/09/2020	Email	Cultural heritage: Email to Historic England, BBC, CBC, and CCC with slides of phase 2 trenching presentation.
23/09/2020	Email	Cultural heritage: Email to Historic England, BBC, CBC, and CCC sending current draft of the archaeological strategy document prepared by Christopher Evans in advance of the meeting on 24-09-2020.
24/09/2020	Meeting	Cultural heritage - Archaeological Consultation Meeting with Historic England, BBC, CBC, CCC, and MoLA covering: <ul style="list-style-type: none"> <li>• Presentation by Chris Evans on the Rationale and Strategy.</li> <li>• Information on the form of the mitigation strategy.</li> <li>• A wider discussion regarding the mitigation strategy.</li> </ul>

Date	Form of correspondence	Key topics discussed and key outcomes
30/09/2020	Email	Water courses work package issued to BBC Biodiversity/Drainage teams.
30/09/2020	Email	Cultural heritage: Email to Historic England, BBC, CBC, and CCC to share minutes of the Phase 2 trenching presentation.
30/09/2020	Email	Cultural heritage: Minutes of the meeting on the rational, strategy and mitigation shared with Historic England, BBC, CBC, and CCC.
02/10/2020	File transfer	Cultural heritage: Updated Phase 1 and 2 trenching reports, plus draft mitigation area figures, sent to Historic England, BBC, CBC, and CCC by file transfer.
16/10/2020	Meeting	Cultural Heritage meeting with Historic England, BBC, CBC, CCC, and MoLA discussing the results of Phase 3 trenching – presentation by MoLA.
21/10/2020	Email	Project Management work package “MWP1” issued to BBC for review.
27/10/2020	File transfer	Cultural heritage: Draft Phase 3 report sent to BBC, CBC, and CCC by file transfer.
29/10/2020	Meeting	Cultural heritage: Teams meeting with BBC, CBC, and CCC on archaeological review covering comments on the rational and strategy by BBC and CBC and discussion of mitigation areas proposed.
30/10/2020	Email	EWP3 Noise work package re-issued to BBC EHO/Biodiversity teams.
03/11/2020	Email	Carbon work package “BBCEWP14” issued to BBC for review.
10/11/2020	Meeting	Work Package meeting discussing biodiversity and landscape and visual aspects of the Scheme.
12/11/2020	Email	Work package “EWP2b” (landscaping) issued to BBC.

Date	Form of correspondence	Key topics discussed and key outcomes
12/11/2020	Briefing	A meeting was held with BBC, CCC, CBC, SCDC, and HDC to provide a briefing on the draft Development Consent Order to highlight the key articles and provide an overview of the requirements. An overview of the structure of the Environmental Management Plan and explanation of the role of local authorities in the post submission process (covering Adequacy of Consultation responses and Local Impact Reports) was also provided.
20/11/2020	File transfer	Cultural heritage: Revised Phase 3 report sent to Historic England, BBC, CBC, and CCC by We Transfer and CCC file share.
25/11/2020	Meeting	Cultural heritage: meeting with BBC, CBC, and CCC.
25/11/2020	Meeting	Cultural Heritage meeting discussing the A428 evaluation reporting process for the A428 evaluation reporting process.
19/01/2021	Workshop	Meeting held with BBC to discuss the details of the de-trunking, including, signage, white lining, lighting. Highways England operations update was also provided. It was agreed that a draft legal agreement on the terms of the de-trunking would be shared with the local authority in due course
29/01/2021	Meeting	Meeting with BBC, CCC, and CBC to discuss the construction impacts of the Scheme. This included an outline of the construction management plan, local modelling (including details of junction assessments) and strategic modelling
03/02/2021	Briefing	Meeting with BBC, CCC, and CBC. Officers were briefed on a Scheme walk through which included mainline alignment design and reason for changes, junction locations and designs, key structures, public rights of way proposals, borrow pits and key constraints and design considerations. The structure of the DCO application and the key documents within it were also covered. A recap was provided on the role of local authorities in the post submission period, as well as an update on the draft legal agreements.
05/02/2021	Meeting	Meeting with BBC, CCC, and CBC in which the results of the Sensitivity Test were presented using the updated Uncertainty Log to demonstrate that the current forecasts continue to provide a robust basis for the Scheme assessment.
09/02/2021	Meeting	The project team held a meeting with BBC archaeological officer to discuss site F3, an area south west of Black Cat roundabout, between Bedford Road and the A421 (north of Roxton).

Date	Form of correspondence	Key topics discussed and key outcomes
20/05/2021	Meeting	Biodiversity update meeting covering roles in Examination, navigating the ES, the SoCG and biodiversity impacts, effects and mitigation.
08/06/2021	Meeting	Air quality and noise and vibration update meeting covering roles in Examination, navigating the ES, the SOCG and air quality and noise and vibration impacts, effects and mitigation.
15/06/2021	Meeting	Cultural heritage update meeting covering roles in Examination, navigating the ES, the SOCG and cultural heritage impacts, effects and mitigation.
23/06/2021	Meeting	Meeting to discuss the biodiversity elements of the SOCG and update the team on the landscape and visual effects assessment.
23/06/2021	Email	Email to Highways England asking why borrow pits are not being discussed as part of the Material Assets and Waste Update presentation.
25/06/2021	Email	Email from Highways England to BBC, CBC and CCC detailing a borrow pit technical note is being prepared and once issued Highways England will set up a specific meeting to discuss borrow pits.
June 2021	Letter from BBC to Highways England (via the Planning Inspectorate)	Letter from BBC detailing their Relevant Representation.
01/07/2021	Meeting	Material assets and waste update meeting with BBC, CBC and CCC covering roles in Examination, navigating the ES, the SOCG and material assets and waste impacts, effects and mitigation.
01/07/2021	Meeting	Initial Local Technical Review Group meeting.
01/07/2021	Joint meeting with BBC and CBC	Members Meeting - Construction Impacts on Traffic.
05/07/2021, 08/07/2021 and 27/07/2021	Email	Email to BBC requesting the names of specialist team members from BBC landscape, geology and soils, road drainage and water environment, climate and population and human health with a view to organising future SOCG meetings. No response received.
26/07/2021	Meeting	Meeting to discuss the cultural heritage elements of the SOCG.

<b>Date</b>	<b>Form of correspondence</b>	<b>Key topics discussed and key outcomes</b>
27/07/2021	Meeting	Meeting to discuss the air quality and noise and vibration elements of the SOCG.

- 2.1.2 It is agreed that this is an accurate record of the key meetings and consultation undertaken between (1) Highways England and (2) BBC in relation to the issues addressed in this SoCG.
- 2.1.3 The issues and matters highlighted in Section 3 of this SoCG summarise the key issues that have been identified in relation to a number of key areas of the DCO application.



### 3 Issues Raised

Table 3-1 – DCO and Legal Matters

Issue	Document Reference	Highways England Position	Bedford Borough Council Position	Status	Date
Draft DCO Definitions	Draft Development Consent Order [APP-025]	The draft DCO (dDCO) definitions are appropriate for the Scheme.		The discussions on the definitions are ongoing.	
Draft DCO Articles/powers sought	Draft Development Consent Order [APP-025]	The articles and schedules in the dDCO contain those powers required by Highways England to deliver the Scheme. The powers sought are appropriate for the Scheme.	<p>The undertaker is only required to maintain a register for a period of three years following the completion of the authorised development. Local authorities are required to maintain a register of planning applications and decisions with no end date.</p> <p>The aftercare period for maintaining the landscaping may still apply after the requirement to keep a record of the approved details has expired.</p>	The discussions on the articles/powers are ongoing.	
Draft DCO Requirements	Draft Development Consent Order [APP-025]	The requirements set out in Part 1 of Schedule 2 of the dDCO are appropriate and provide a suitable framework for securing the necessary and relevant environmental mitigation measures	The procedure for the discharge of requirements (Requirement 22) places the authority for approval on the Secretary of State. It is questioned why it is considered that the Secretary of State should be the decision maker in matters of such	The discussions on the requirements are ongoing.	

Issue	Document Reference	Highways England Position	Bedford Borough Council Position	Status	Date
		<p>and other environmental control measures.</p> <p>The procedures for discharge requirements as set out in Part 2 of Schedule 2 of the dDCO are appropriate and satisfactorily involve Bedford Borough Council (BBC).</p>	<p>detail rather than the relevant local authority.</p>		
<p>Draft DCO Requirements 3 and 4</p>	<p>Draft Development Consent Order [APP-025]</p>	<p>The provisions in Requirements 3 and 4 are sufficient to ensure the appropriate controls are in place in relation to the construction and maintenance of the Scheme.</p>	<p>The Council is concerned that the only control over the borrow pits appears to be through the Environmental Management Plan (EMP). The EMP sets out a list of standard practices that could be applied to any similar development and is not site specific. The EMP contains no assessment of any potential impacts. The DCO contains two requirements for iterations of the EMP. Whilst the second iteration EMP may be expected to contain more detail on the borrow pits proposals, it is not clear what further impact assessments will be provided at this stage. This brings into question whether the DCO currently contains a sufficient description of the proposal or a proper environmental assessment.</p>	<p>Discussions regarding Requirements 3 and 4 are ongoing.</p>	

Issue	Document Reference	Highways England Position	Bedford Borough Council Position	Status	Date
Draft DCO Requirement 16 – Brook Cottages	Draft Development Consent Order [APP-025]	The provisions in Requirement 16 are sufficient to ensure the appropriate steps are taken with regards to Brook Cottages, the intrusive surveys and its potential relocation.	<p>There remains concern that this should not be a matter reserved for a Requirement, given the great weight afforded to its conservation and the need for clear and convincing justification for harm. Only in exceptional circumstances should a scheme proposing substantial harm to the significance of a designated heritage asset be supported, however in the absence of a detailed survey the actual scale of loss/harm is not known – it is possible that a lower degree of harm may arise. This has potential ramifications for how the application is determined (para 200 or 201 of the NPPF).</p> <p>2(a) potentially suggests a bias towards relocating to a museum (note ‘receptor’). The Requirement should require the applicant to also consider potential sites within the vicinity of its existing location, to allow for its continued use as a dwelling within a context similar to the existing, as this may be more appropriate in terms of the building’s conservation.</p>	Discussion s regarding Requireme nt 16 is ongoing	

Issue	Document Reference	Highways England Position	Bedford Borough Council Position	Status	Date
Draft DCO Protective Provisions	Draft Development Consent Order [APP-025]	The protective provisions, as set out in Part 3 of Schedule 9 of the dDCO, that are relevant to BBC relate to its role as the Lead Local Flood Authority (LLFA). The protective provisions are appropriate for the protection of ordinary watercourses.		The discussions on the protective provisions are ongoing.	
Draft DCO Associated consents / licenses / permits	Draft Development Consent Order [APP-025]  Consents and Agreements Position Statement [APP-029]	The Consents and Agreements Position Statement identifies the consents, licences or permits that Highways England will need to obtain outside of the dDCO in order to deliver the Scheme. This document contemplates the disapplication of specific legislation on the basis that those powers are contained within the dDCO. This approach is appropriate for the Scheme.		The disapplication is subject to the consent of BBC as LLFA and those discussions are ongoing.	
Legal agreement with BBC – Detrunking		The legal agreement between BBC and Highways England provides a framework for the process of detrunking the existing A428, part of which will become a local road to be maintained by BBC.  The legal agreement also provides a mechanism for handing over the local roads constructed as part of the Scheme that are to be maintained by BBC as local highway authority. The		The discussions on the legal agreement are ongoing.	

A428 Black Cat to Caxton Gibbet improvements  
Draft Statement of Common Ground with Bedford Borough Council

Issue	Document Reference	Highways England Position	Bedford Borough Council Position	Status	Date
		measures contained in this agreement are appropriate for the Scheme.			

**Table 3-2 – Compulsory Acquisition and Property Matters**

Issue	Document Reference	Highways England Position	Bedford Borough Council Position	Status	Date
Compulsory Acquisition and Temporary Possession	The Statement of Reasons (SoR) <b>[APP-030]</b> and Book of Reference <b>[APP-032]</b> .	In order to deliver the Scheme, should the Development Consent Order be made, it would be necessary to temporarily possess and/or acquire land and/or rights owned by Bedford Borough Council. Land Plots in which BBC has an interest, that would be subject to the compulsory acquisition (CA) of land and/or rights are identified in the Book of Reference [APP-032] and Schedule 2 of the Statement of Reasons (SoR) [APP-030]. The extent of the land take identified is required for the Scheme or is required to facilitate or is incidental to the Scheme. The Applicant is happy to continue discussions to acquire the land and rights affected through negotiation, outside the CA process.		Under discussion	
Flood Compensation	BBC Relevant Representation <b>[RR-008]</b>	The Environmental Statement, Appendix 13.4 (Flood Risk Assessment (FRA)) <b>[APP-220]</b> , in paragraph 4.7.8 (and Section 5.3) explains that the floodplain storage compensation assessment is based upon the Environment Agency's	Approximately 12 hectares identified for permanent acquisition. The Council objects to the detail of the Scheme proposals because the permanent acquisition of the Land for flood compensation is not reasonably necessary in the	Under discussion.	

Issue	Document Reference	Highways England Position	Bedford Borough Council Position	Status	Date
		<p>climate change guidance. Paragraph 7.2.4 of the FRA explains that the River Great Ouse floodplain compensation area is designed to compensate for the displacement of the floodplain as a result of the raised embankment. The compensatory flood storage areas are shown on Figures 8.1 and 8.2 of the FRA.</p> <p>All land required for floodplain compensation has been included in the Order limits and is set out in the Book of Reference (BoR) [APP-032], over which compulsory acquisition powers are sought. The area being proposed for flood storage has been derived from modelling results.</p> <p>The Applicant does not agree with Bedford Borough Council's (BBC's) assertion that the area identified for flood mitigation appears excessive. It is stated in paragraph 5.3.3 of the Statement of Reason (SoR) [APP-030] that the land included in the draft Development Consent Order (DCO) is the minimum land-take necessary to achieve the objectives of the Scheme. The Applicant has sought to achieve a balance between minimising land-take</p>	<p>circumstances. The case of 'R(oao FCC Environment (UK) Ltd) v Secretary of State for Energy &amp; Climate Change [2015] EWCA Civ 55' considered, among other things, the statutory requirement in S.122(3) of the 2008 Act. In the decision in that case the example was provided that a compelling case in the public interest may not be demonstrated where acquisition of a right over the land, rather than its acquisition, would suffice. The temporary acquisition of this part of the Land by agreement would be sufficient and the Council is ready to negotiate with the Applicant to enter into covenants or management agreements necessary to satisfy the Applicant's requirements here in the long term.</p> <p>At a meeting between the Council's agent and the Applicant (11 August 2020) the possibility of the flood compensation requirement being satisfied by temporary possession and rights was discussed. It was agreed that the Applicant would provide details of requirements for</p>		

Issue	Document Reference	Highways England Position	Bedford Borough Council Position	Status	Date
		<p>and securing sufficient land to deliver the Scheme, noting that the detailed design of the Scheme has yet to be undertaken. The limits of the Land subject to compulsory acquisition have been drawn as tightly as possible in order to avoid unnecessary land take. The Applicant has ensured that only land that is essential to construct and deliver the Scheme has been included in the Book of Reference (BoR). The BoR explains in paragraph 2.5.6 that all of the land in the Order limits is required in order to deliver the Scheme. However, should it transpire that any part of the Land within the Order limits is not required for the Scheme, for example during the detailed design stage, the Applicant would only seek to acquire that part of the land required, and in all events, will seek to minimise the effects on land interests.</p> <p>As the land required for flood compensation would be required in perpetuity, the rights that would be available through temporary possession would not be sufficient to guarantee that the land remains as</p>	<p>flood compensation management as required in order to progress negotiations for the provision of land and rights needed for the Scheme by agreement. To date these details are still awaited.</p> <p>Generally, the area identified for Flood compensation appears excessive and the Council seeks this be reduced or to see evidence that this is fully justified.</p>		



Issue	Document Reference	Highways England Position	Bedford Borough Council Position	Status	Date
		<p>flood compensation land in the long term. In addition, the Applicant needs clean title of the land that is to be incorporated into the Scheme. Temporary Possession would not provide certainty to the Applicant that the land is not encumbered by any historic rights on or over the land.</p>			
<p>Access from Black Cat Junction</p>	<p>BBC Relevant Representation [RR-008]</p>	<p>This issue was discussed on a Teams meeting on 25 June 2021 with Carter Jonas where it was confirmed the extent of the public highway runs from the junction at 1/9c through the blue area at 1/8p to plot 1/8q, all shown on Sheet 1 of the Land Plans [APP-008], owned by Bedford Borough Council. Once the works are finished the Applicant will ensure that the Council owned access abuts public highway, thus providing the continued ownership as requested.</p> <p>The Scheme proposals do not preclude development of the land in question. However, with no development proposal in place or included within the approved Local Plan, the Scheme is not able to take into account the Council's aspirations</p>	<p>The Council seeks commitments from the Applicant to safeguard delivery of the full potential of the Land (in particular in respect of plot 1/8q) for a sustainable strategic employment development. To date there has been engagement between the parties, but no tangible commitments from the Applicant to safeguard suitable access to the Land from the new junction. The Council, in its capacity as a directly affected landowner, therefore objects to the detail of the Scheme including any recourse to the use compulsory purchase powers until such safeguards are agreed.</p>	<p>Under discussion</p>	

Issue	Document Reference	Highways England Position	Bedford Borough Council Position	Status	Date
		<p>until further definition is available. Highways England routinely manages new development in proximity to the Strategic Road network and the Council has been advised of the statutory process to be observed which will enable development to be considered.</p>			

**Table 3-3 – Transport Matters**

Issue	Document Reference	Highways England Position	Bedford Borough Council Position	Status	Date
Base Year Traffic Model – Data	Transport Assessment Report – Part 1 [APP-241] Transport Assessment – Part 2 [APP-242]	The Base Year model is underpinned by good quality data that provides a sound basis for model calibration and validation.	BBC has been kept informed of the development of the traffic model for the scheme and is in agreement with how it reflects the situation in Bedford Borough in current and future years.	Agreed	Confirmed in BBC Relevant Representation – 23 June 2021
Base Year Traffic Model – Fit for Purpose	Transport Assessment Report – Part 1 [APP-241] Transport Assessment – Part 2 [APP-242]	The Base Year has been developed in accordance with DfT TAG procedures and meets the required TAG standards for validation. It gives a reliable representation of base year conditions within the study area. It therefore provides a sound foundation for the development of future traffic flows for assessment of the Scheme.	BBC has been kept informed of the development of the traffic model for the scheme and is in agreement with how it reflects the situation in Bedford Borough in current and future years.	Agreed	Confirmed in BBC Relevant Representation – 23 June 2021
Future Year Traffic Models – Fit for purpose	Transport Assessment Report – Part 1 [APP-241] Transport Assessment – Part 2 [APP-242]	The future year models fully comply with DfT TAG methods. They provide a reliable forecast of future traffic flows and the impact of the Scheme as reported in the Transport Assessment and Transport Assessment Annex.	BBC has been kept informed of the development of the traffic model for the scheme and is in agreement with how it reflects the situation in Bedford Borough in current and future years.	Agreed	Confirmed in BBC Relevant Representation – 23 June 2021

Issue	Document Reference	Highways England Position	Bedford Borough Council Position	Status	Date
Future Year Traffic Model – Sensitivity Test	Transport Assessment Report – Part 1 [APP-241] Transport Assessment – Part 2 [APP-242]	The sensitivity test carried out using the updated 2020 Uncertainty Log does not result in any significant differences in forecasts flows when compared to the results using the 2018 Uncertainty Log data. This demonstrates that the assessments for the Scheme using the 2018 Uncertainty Log data as submitted are robust and it is appropriate for the Scheme to continue to rely on the 2018 UL Data forecasts.	BBC has been kept informed of the development of the traffic model for the scheme and is in agreement with how it reflects the situation in Bedford Borough in current and future years.	Agreed	Confirmed in BBC Relevant Representation – 23 June 2021
Transport Assessment Methodology	Transport Assessment Report – Part 1 [APP-241] Transport Assessment – Part 2 [APP-242]	The Transport Assessment methodology adopted follows best practice and provides a reasonable indication of the outcomes arising from the Scheme.	BBC is satisfied that the Transport Assessment methodology as set out in APP-241 and APP-242 follows best practice and provides a reasonable indication of the outcomes arising from the scheme	Under discussion	
Transport Assessment Data collection methods	Transport Assessment Report – Part 1 [APP-241] Transport Assessment – Part 2 [APP-242]	Sufficient data has been collected in order to inform the Transport Assessment and the Transport Assessment Annex in relation to the Scheme.	BBC is satisfied that sufficient data has been collected to inform the Transport Assessment and the Transport Assessment Annex in relation to the scheme.	Under discussion	

Issue	Document Reference	Highways England Position	Bedford Borough Council Position	Status	Date
Transport Assessment Baseline Data	Transport Assessment Report – Part 1 [APP-241] Transport Assessment – Part 2 [APP-242]	Where applicable, the Base Year junctions models are underpinned by good quality data that provides a sound basis for model calibration and validation.  (Where Baseline Data is not utilised the assessment is based on outputs from the strategic model)	BBC is satisfied that the Base Year junction models within Bedford Borough are underpinned by good quality data and provide a sound basis for model calibration and validation.	Under discussion	
Transport Assessment Approach to modelling	Transport Assessment Report – Part 1 [APP-241] Transport Assessment – Part 2 [APP-242]	The Transport Assessment approach to modelling follows best practice and provides a reasonable indication of the outcomes arising from the Scheme.	BBC has been kept informed of the development of the traffic model for the scheme and is in agreement with how it reflects the situation in Bedford Borough in current and future years.	Under discussion	
Transport Assessment Assumptions	Transport Assessment Report – Part 1 [APP-241] Transport Assessment – Part 2 [APP-242]	The assumptions adopted within the Transport Assessment follows best practice and provides a reasonable indication of the impacts arising from the Scheme.	BBC has been kept informed of the development of the traffic model for the scheme and the adopted assumptions, and is in agreement with how it reflects the situation in Bedford Borough in current and future years.	Under discussion	

Issue	Document Reference	Highways England Position	Bedford Borough Council Position	Status	Date
Transport Assessment Presentation of results	Transport Assessment Report – Part 1 [APP-241] Transport Assessment – Part 2 [APP-242]	The Transport Assessment results presented are a fair reflection of the results obtained from the modelling undertaken.	BBC is satisfied that the Transport Assessment results presented for Bedford Borough are a fair reflection of the results obtained from the modelling undertaken.	Under discussion	
Transport Assessment Quantification of impacts	Transport Assessment Report – Part 1 [APP-241] Transport Assessment – Part 2 [APP-242]	The quantification of impacts presented within the Transport Assessment is a reliable indication of the impacts arising from the Scheme.	BBC is satisfied that the quantification of impacts presented within the Transport Assessment is a reliable indication of the impacts arising from the Scheme within Bedford Borough.	Under discussion	
Transport Assessment Construction impacts general	Transport Assessment Report – Part 1 [APP-241] Transport Assessment – Part 2 [APP-242]	The Transport Assessment methodology adopted with regard to impacts predicted to arise during the construction phases provides a reasonable indication of the impacts arising from the Scheme.	BBC is satisfied that the Transport Assessment methodology adopted with regard to impacts predicted to arise during the construction phases provides a reasonable indication of the impacts arising from the Scheme.	Under discussion	

Issue	Document Reference	Highways England Position	Bedford Borough Council Position	Status	Date
Transport Assessment Construction impacts approach to modelling	Transport Assessment Report – Part 1 [APP-241] Transport Assessment – Part 2 [APP-242]	The modelling presented in the Transport Assessment with regard to impacts during the construction phases provides a reasonable indication of the impacts predicted to arise from the Scheme.	BBC is satisfied that the modelling presented in the Transport Assessment with regard to impacts during the construction phases provides a reasonable indication of the impacts predicted to arise from the Scheme within Bedford Borough.	Under discussion	
Transport Assessment Junction Operational Assessments at: Black Cat Cambridge Road Caxton Gibbet	Transport Assessment Report – Part 1 [APP-241] Transport Assessment – Part 2 [APP-242]	The operational assessment modelling presented within Transport Assessment with regard to new or modified junctions provides a reasonable indication of the predicted operation of individual junctions.	BBC is satisfied that the operational assessment modelling presented within Transport Assessment with regard to new or modified junctions provides a reasonable indication of the predicted operation of the Black Cat junction.	Under discussion	
Transport Assessment Wider impacts Quantification of impacts: A428 Wyboston Roundabout A428 Barford Road Roundabout	Transport Assessment Annex [APP-243]	The quantification of impacts presented within the Transport Assessment Annex is a reliable indication of the impacts arising from the Scheme.	BBC is satisfied that the quantification of impacts presented within the Transport Assessment Annex is a reliable indication of the impacts arising from the Scheme.	Under discussion	

Issue	Document Reference	Highways England Position	Bedford Borough Council Position	Status	Date
Transport Assessment Wider impacts: A428 Wyboston Roundabout A428 Barford Road Roundabout	Transport Assessment Annex <b>[APP-243]</b>	The operational assessment modelling presented within the Transport Assessment Annex with regard to existing junctions provides a reasonable comparison of the predicted operation of individual junctions without and with the Scheme.	BBC is satisfied that the operational assessment modelling presented within the Transport Assessment Annex with regard to existing junctions provides a reasonable comparison of the predicted operation of individual junctions without and with the Scheme.	Under discussion	



**Table 3-4 – Environment Matters**

Issue	Document Reference	Highways England Position	Bedford Borough Council Position	Status	Date
<p><b>General</b> Description of the Scheme</p>	<p>Chapter 2, The Scheme <b>[APP-071]</b></p>	<p>An Environmental Impact Assessment (EIA) has been undertaken to identify the likely significant effects of the Scheme on the environment.</p> <p>The western part of the Scheme is located within BBC. A description of the Scheme and its location is reported in Chapter 2, The Scheme <b>[APP-071]</b>.</p> <p>This is considered an appropriate description of the Scheme.</p>	<p>BBC is content that the Scheme is adequately described in the ES.</p>	<p>Under discussion</p>	
<p><b>General</b> Legislation and policy</p>	<p>Chapter 5, Air quality <b>[APP-074]</b> Chapter 6, Cultural heritage <b>[APP-075]</b> Chapter 7, Landscape and visual effects <b>[APP-076]</b> Chapter 8, Biodiversity <b>[APP-077]</b> Chapter 9, Geology and soils <b>[APP-078]</b></p>	<p>Highways England considers that the ES has identified and appropriately considered all applicable legislation and policy pertaining to the following assessments undertaken as part of the EIA of the Scheme:</p> <ul style="list-style-type: none"> <li>• Air quality.</li> <li>• Cultural heritage.</li> <li>• Landscape and visual effects.</li> <li>• Biodiversity.</li> <li>• Geology and soils.</li> <li>• Material Assets and Waste.</li> <li>• Noise and Vibration.</li> </ul>	<p>BBC is content that these assessments have considered all relevant legislation and policy that was in place at the time of undertaking and reporting the assessments.</p>	<p>Under discussion</p>	

Issue	Document Reference	Highways England Position	Bedford Borough Council Position	Status	Date
	<p>Chapter 10, Material assets and waste [APP-079]</p> <p>Chapter 11, Noise and vibration [APP-080]</p> <p>Chapter 12, Population and human health [APP-081]</p> <p>Chapter 13, Road drainage and the water environment [APP-082]</p> <p>Chapter 14, Climate [APP-083]</p> <p>Chapter 15, Assessment of cumulative effects [APP-084]</p>	<ul style="list-style-type: none"> <li>• Population and human health.</li> <li>• Road drainage and the water.</li> <li>• Climate.</li> <li>• Assessment of cumulative effects.</li> </ul>			
<p><b>General</b></p> <p>Study area definition and extents</p>	<p>Chapter 5, Air quality [APP-074]</p> <p>Chapter 6, Cultural heritage [APP-075]</p> <p>Chapter 7, Landscape and</p>	<p>The study areas adopted by Highways England within the following assessments are considered to reflect current best practice and standards:</p> <ul style="list-style-type: none"> <li>• Air Quality.</li> </ul>	<p>BBC is content that the geographical extents of the adopted study areas cover the area over which direct and indirect effects of the Scheme are likely to occur.</p>	<p>Under discussion</p>	

Issue	Document Reference	Highways England Position	Bedford Borough Council Position	Status	Date
	<p>visual effects [APP-076]</p> <p>Chapter 8, Biodiversity [APP-077]</p> <p>Chapter 9, Geology and soils [APP-078]</p> <p>Chapter 10, Material assets and waste [APP-079]</p> <p>Chapter 11, Noise and vibration [APP-080]</p> <p>Chapter 12, Population and human health [APP-081]</p> <p>Chapter 13, Road drainage and the water environment [APP-082]</p> <p>Chapter 14, Climate [APP-083]</p> <p>Chapter 15, Assessment</p>	<ul style="list-style-type: none"> <li>• Cultural Heritage.</li> <li>• Landscape and Visual Effects.</li> <li>• Biodiversity.</li> <li>• Geology and Soils.</li> <li>• Material Assets and Waste.</li> <li>• Noise and Vibration.</li> <li>• Population and Human Health.</li> <li>• Road Drainage and the Water Environment.</li> <li>• Climate.</li> <li>• Assessment of Cumulative Effects.</li> </ul> <p>Highways England considers that the geographical extents of the adopted study areas are appropriate to identify the likely direct and indirect effects of the Scheme on sensitive features and receptors.</p>			

Issue	Document Reference	Highways England Position	Bedford Borough Council Position	Status	Date
	of cumulative effects [APP-084]				
<p><b>General</b></p> <p>Application of expert / professional judgements</p>	<p>Chapter 5, Air quality [APP-074]</p> <p>Chapter 6, Cultural heritage [APP-075]</p> <p>Chapter 7, Landscape and visual effects [APP-076]</p> <p>Chapter 8, Biodiversity [APP-077]</p> <p>Chapter 9, Geology and soils [APP-078]</p> <p>Chapter 10, Material assets and waste [APP-079]</p> <p>Chapter 11, Noise and vibration [APP-080]</p> <p>Chapter 12, Population and human health [APP-081]</p>	<p>The identification of likely significant effects on sensitive features and receptors has been informed by professional judgement and the views of relevant technical specialists, where necessary.</p> <p>Highways England considers the application of professional judgement by its specialists within the following assessments to be appropriate and robust:</p> <ul style="list-style-type: none"> <li>• Air Quality.</li> <li>• Cultural Heritage.</li> <li>• Landscape and Visual Effects.</li> <li>• Biodiversity.</li> <li>• Geology and Soils.</li> <li>• Material Assets and Waste.</li> <li>• Noise and Vibration.</li> <li>• Population and Human Health.</li> <li>• Road Drainage and the Water Environment.</li> <li>• Climate.</li> </ul>	<p>BBC is content with how Highways England has applied professional judgement in the assessments of effects on sensitive features and receptors undertaken and reported. Without information on dust and noise impacts on residents with regard to the borrow pits can we be satisfied that the application of judgement is robust</p>	<p>Under discussion</p>	

Issue	Document Reference	Highways England Position	Bedford Borough Council Position	Status	Date
	<p>Chapter 13, Road drainage and the water environment [APP-082]</p> <p>Chapter 14, Climate [APP-083]</p> <p>Chapter 15, Assessment of cumulative effects [APP-084]</p>	<ul style="list-style-type: none"> <li>Assessment of Cumulative Effects.</li> </ul>			
<p><b>General</b> Assessment assumptions and limitations</p>	<p>Chapter 5, Air quality [APP-074]</p> <p>Chapter 6, Cultural heritage [APP-075]</p> <p>Chapter 7, Landscape and visual effects [APP-076]</p> <p>Chapter 8, Biodiversity [APP-077]</p> <p>Chapter 9, Geology and soils [APP-078]</p>	<p>The following assessments record the assumptions applied and the approaches taken by Highways England to reduce any uncertainty resulting from any limitations encountered:</p> <ul style="list-style-type: none"> <li>Air Quality.</li> <li>Cultural Heritage.</li> <li>Landscape and Visual Effects.</li> <li>Biodiversity.</li> <li>Geology and Soils.</li> <li>Material Assets and Waste.</li> <li>Noise and Vibration.</li> <li>Population and Human Health.</li> </ul>	<p>BBC is content that the assumptions recorded within these assessments are reasonable and accepts that the limitations encountered do not impact upon the validity of the reported findings.</p>	<p>Under discussion</p>	

Issue	Document Reference	Highways England Position	Bedford Borough Council Position	Status	Date
	<p>Chapter 10, Material assets and waste <b>[APP-079]</b></p> <p>Chapter 11, Noise and vibration <b>[APP-080]</b></p> <p>Chapter 12, Population and human health <b>[APP-081]</b></p> <p>Chapter 13, Road drainage and the water environment <b>[APP-082]</b></p> <p>Chapter 14, Climate <b>[APP-083]</b></p> <p>Chapter 15, Assessment of cumulative effects <b>[APP-084]</b></p>	<ul style="list-style-type: none"> <li>Road Drainage and the Water Environment.</li> <li>Climate.</li> <li>Assessment of Cumulative Effects.</li> </ul> <p>Highways England considers the assumptions adopted in these assessments to be reasonable and appropriate.</p>			
<p><b>General</b></p> <p>Worst-case scenario: limits of deviation</p>	<p>Works Plans <b>[APP-009]</b> <b>[APP-010]</b></p> <p>Engineering Sections <b>[APP-017 to APP 022]</b></p> <p>Chapter 5, Air quality <b>[APP-074]</b></p>	<p>The following assessments have taken into account the lateral limits of deviation forming part of the Scheme design, as defined on the Works Plans <b>[APP-009]</b> <b>[APP-010]</b>, and the vertical limits of deviation defined on the Engineering Sections <b>[APP-017 to APP 022]</b>:</p> <ul style="list-style-type: none"> <li>Air Quality.</li> </ul>	<p>BBC is content that these assessments have appropriately considered the worst-case scenario in relation to the potential for the Scheme design and/or its construction to deviate within the lateral and vertical extents defined on the</p>	<p>Under discussion</p>	

Issue	Document Reference	Highways England Position	Bedford Borough Council Position	Status	Date
	<p>Chapter 6, Cultural heritage <b>[APP-075]</b></p> <p>Chapter 7, Landscape and visual effects <b>[APP-076]</b></p> <p>Chapter 8, Biodiversity <b>[APP-077]</b></p> <p>Chapter 9, Geology and soils <b>[APP-078]</b></p> <p>Chapter 10, Material assets and waste <b>[APP-079]</b></p> <p>Chapter 11, Noise and vibration <b>[APP-080]</b></p> <p>Chapter 12, Population and human health <b>[APP-081]</b></p> <p>Chapter 13, Road drainage and the water environment <b>[APP-082]</b></p>	<ul style="list-style-type: none"> <li>• Cultural Heritage.</li> <li>• Landscape and Visual Effects.</li> <li>• Biodiversity.</li> <li>• Geology and Soils.</li> <li>• Material Assets and Waste.</li> <li>• Noise and Vibration.</li> <li>• Population and Human Health.</li> <li>• Road Drainage and the Water Environment.</li> <li>• Climate.</li> <li>• Assessment of Cumulative Effects.</li> </ul> <p>Highways England considers that the maximum extents of possible deviation accounted for in these assessments represent the realistic worst-case assessment scenario.</p>	<p>Works Plans and Engineering Sections.</p>		

Issue	Document Reference	Highways England Position	Bedford Borough Council Position	Status	Date
	Chapter 14, Climate [APP-083] Chapter 15, Assessment of cumulative effects [APP-084]				
<b>General</b> Presentation of results	Chapter 5, Air quality [APP-074] Chapter 6, Cultural heritage [APP-075] Chapter 7, Landscape and visual effects [APP-076] Chapter 8, Biodiversity [APP-077] Chapter 9, Geology and soils [APP-078] Chapter 10, Material assets and waste [APP-079] Chapter 11, Noise and vibration [APP-080]	The following application documents present the approaches to, and outcomes of, assessments undertaken to identify the likely significant effects of the construction, operational and (where relevant) the maintenance phases of the Scheme: <ul style="list-style-type: none"> <li>• Air Quality.</li> <li>• Cultural Heritage.</li> <li>• Landscape and Visual Effects.</li> <li>• Biodiversity.</li> <li>• Geology and Soils.</li> <li>• Material Assets and Waste.</li> <li>• Noise and Vibration.</li> <li>• Population and Human Health.</li> <li>• Road Drainage and the Water Environment.</li> <li>• Climate.</li> </ul>	BBC is content with the formats and styles adopted by Highways England in presenting the details of the assessments undertaken.	Under discussion	



Issue	Document Reference	Highways England Position	Bedford Borough Council Position	Status	Date
	<p>Chapter 12, Population and human health [APP-081]</p> <p>Chapter 13, Road drainage and the water environment [APP-082]</p> <p>Chapter 14, Climate [APP-083]</p> <p>Chapter 15, Assessment of cumulative effects [APP-084]</p>	<ul style="list-style-type: none"> <li>Assessment of Cumulative Effects.</li> </ul> <p>Highways England considers that the format and methods used to present the assessments undertaken are clear and unambiguous.</p>			
<p><b>General</b></p> <p>Route / junction design selection</p>	<p>Chapter 2, The Scheme [APP-071]</p> <p>Chapter 3, Assessment of Alternatives [APP-072]</p>	<p>Highways England has undertaken thorough and comprehensive route studies, junction appraisals and optioneering studies during the design-development of the Scheme, in pursuit of establishing its preferred design solution, as described in Chapter 2, The Scheme [APP-071] and Chapter 3, Assessment of Alternatives [APP-072] of the Environmental Statement.</p> <p>In considering, evaluating and balancing constraints and opportunities, Highways England considers that the preliminary design of the new dual carriageway</p>	<p>BBC is content that the studies, optioneering exercises and appraisals undertaken by Highways England are appropriate from a design perspective.</p>	<p>Under discussion</p>	

Issue	Document Reference	Highways England Position	Bedford Borough Council Position	Status	Date
		represents the optimum solution to meet the Scheme objectives.			
<b>General</b> Approach to modelling	Chapter 5, Air quality <b>[APP-074]</b> Chapter 11, Noise and vibration <b>[APP-080]</b> Chapter 13, Road drainage and the water environment <b>[APP-082]</b>	Modelling of existing and future conditions and changes, and the effects and risks of the Scheme, has been undertaken as part of the Air quality, Noise and vibration and Road drainage and the water environment assessments.  Highways England considers that the approaches to modelling are appropriate.	BBC is content with the approaches applied to modelling existing and future conditions and changes, and the effects and risks of the Scheme, and that the parameters included / considered in the modelling are appropriate.	Under discussion	
<b>Air Quality</b> Data collection methods, baseline data and the identification and sensitivity of relevant features and receptors	Chapter 5, Air quality <b>[APP-074]</b>	The baseline conditions have been collated using desk-based and field-based techniques, and through consultation with stakeholders.  Highways England considers the scope, coverage and timing of surveys undertaken to establish the baseline conditions and sensitive features and receptors are in line with best practice and appropriate to inform the assessment of direct and indirect effects reported in the Chapter 5, Air Quality assessment <b>[APP-074]</b> .	BBC is content that the scope and coverage of surveys undertaken to inform the assessment of air quality effects are sufficiently comprehensive.	Under discussion	

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<p><b>Air Quality</b> Construction and operational effects</p>	<p>Chapter 5, Air quality <b>[APP-074]</b></p>	<p>The assessment has concluded that no significant effects associated with air pollution would occur through construction activities or as a consequence of traffic movements (emissions) on the road network.</p>	<p>The Council is concerned that the only control over the borrow pits appears to be through the Environmental Management Plan (EMP). The EMP sets out a list of standard practices that could be applied to any similar development and is not site specific. The EMP contains no assessment of any potential impacts. The DCO contains two requirements for iterations of the EMP. Whilst the second iteration EMP may be expected to contain more detail on the borrow pits proposals, it is not clear what further impact assessments will be provided at this stage. This brings into question whether the DCO currently contains a sufficient description of the proposal or a proper environmental assessment.</p>	<p>Under discussion</p>	
<p><b>Air Quality</b> Embedded and essential mitigation</p>	<p>Chapter 2, The Scheme <b>[APP-071]</b> Chapter 5, Air quality <b>[APP-074]</b></p>	<p>Highways England considers that:</p> <ul style="list-style-type: none"> <li>The embedded mitigation measures mentioned in Chapter 2, The Scheme <b>[APP-071]</b>.</li> </ul>	<p>The Council is concerned that the only control over the borrow pits appears to be through the Environmental Management</p>	<p>Under discussion</p>	

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	Environmental Masterplan [APP-091]  First Iteration EMP [APP-234]  Schedule of mitigation [APP-235]	<ul style="list-style-type: none"> <li>The essential mitigation measures set out in the First Iteration EMP [APP-234] are appropriate to avoid, prevent, reduce, manage, control and (where necessary) monitor the adverse effects of the Scheme.</li> </ul>	Plan (EMP). The EMP sets out a list of standard practices that could be applied to any similar development and is not site specific. The EMP contains no assessment of any potential impacts. The DCO contains two requirements for iterations of the EMP. Whilst the second iteration EMP may be expected to contain more detail on the borrow pits proposals, it is not clear what further impact assessments will be provided at this stage. This brings into question whether the DCO currently contains a sufficient description of the proposal or a proper environmental assessment.		
<b>Cultural Heritage</b>  Data collection methods, baseline data and the identification and sensitivity of relevant features and receptors	Chapter 6, Cultural heritage [APP-075]	The baseline conditions have been collated using desk-based and field-based techniques, and through consultation with stakeholders.  Highways England considers the scope, coverage and timing of surveys undertaken to establish the baseline conditions and sensitive features and receptors are in line with best practice	<u>Matters raised within BBC's Relevant Representation</u>  The BBC Heritage Team are satisfied that the pre-submission archaeological evaluation work comprising desk-based assessment, aerial photographic analysis,	Agreed	June 2021

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		<p>and appropriate to inform the assessment of direct and indirect effects reported in the Cultural heritage assessment [APP-075].</p>	<p>geophysical survey, and trial trenching provide an adequate baseline assessment of the archaeological potential within the proposed route.</p> <p>The assessment allows likely impacts on the archaeological remains to be predicted and a programme of archaeological mitigation work to be formulated.</p>		
<p><b>Cultural Heritage</b> Construction and operational effects</p>	<p>Chapter 6, Cultural heritage [APP-075]</p>	<p>The cultural heritage assessment has concluded that construction of the Scheme would result in significant adverse effects of either moderate or large significance on the assets listed in Table 6-6 of Chapter 6, Cultural heritage [APP-075].</p> <p>All other assets identified and assessed would experience either:</p> <ul style="list-style-type: none"> <li>• Slight adverse effects (not significant).</li> <li>• Neutral effects (not significant).</li> <li>• Slight beneficial effects (not significant).</li> </ul> <p>The construction assessment has predicted substantial harm on Brook Cottages.</p>	<p><u>Matters raised within BBC's Relevant Representation</u></p> <p>The BBC Heritage Team are not in agreement with the terminology used in assessing the impacts on below ground archaeological remains, i.e. it seems somewhat misleading to describe the effect on remains which will be permanently destroyed as being of 'slight adverse effect (not significant).' The issue comes from assessing the level of the effect of the scheme on the basis of the significance of the individual asset. Regardless of the significance of the</p>	<p>Under discussion</p>	

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		<p>The operation assessment would not result in any significant adverse effects on the assets identified within Chapter 6, Cultural heritage [APP-075].</p>	<p>individual asset our view is that in most cases the effect caused by the scheme will be the loss of any remains which survive.</p> <p>The specific impact of the scheme on Brook Cottages cannot be accurately gauged in the absence of a detailed survey and method statement.</p>		
<p><b>Cultural Heritage</b> Setting impact assessment</p>	<p>Chapter 6, Cultural heritage [APP-075]</p>	<p>Chapter 6, Cultural heritage [APP-075] records that the setting of the listed buildings within Roxton village would not individually be impacted by the Scheme, but that construction of the Scheme would result in a slight adverse effect (not significant) on Roxton Conservation Area.</p> <p>The assessment has taken into consideration the temporary impacts from the construction and operation of the Scheme, including noise and lighting, and those associated with the borrow pits.</p> <p>The effects on the setting of the Grade II* listed Parish Church of St Mary Magdalen (1114927) in Roxton have been considered within the cultural heritage assessment.</p>	<p><u>Matters raised within BBC's Relevant Representation</u></p> <p>The BBC Heritage Team note that the setting impact assessment on designated heritage assets would benefit from illustration of the impacts through viewpoints from and across (i.e. with the Scheme in the background of an overall view of the asset) the affected assets towards the Scheme and from the Scheme towards the assets. These views could also use modelling to illustrate the Scheme as proposed on these viewpoints. When conducting the assessment the focus seems to have been on changes to the visible setting of</p>	<p>Under discussion</p>	

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			<p>the monument with little account taken of other aspects of the setting such as changes to tranquillity etc. through increased noise.</p> <p>There appears to be little assessment of setting impacts from the proposed borrow pits or in relation to 'Parish Church of Saint Mary Magdalen' (Roxton, grade II*).</p> <p>An additional assessment of assets with new photographic viewpoints has been submitted to BBC following a meeting with Highways England. This is currently being reviewed.</p>		
<p><b>Cultural Heritage</b> Embedded and essential mitigation</p>	<p>Chapter 2, The Scheme [APP-071] Archaeological Mitigation Strategy [APP-238] First Iteration EMP [APP-234] Schedule of mitigation [APP-235]</p>	<p>Highways England considers that:</p> <ul style="list-style-type: none"> <li>The embedded mitigation measures within Chapter 2, The Scheme [APP-075].</li> <li>the essential mitigation measures set out in the First Iteration EMP [APP-234] and the Archaeological Mitigation Strategy [APP-238]</li> </ul> <p>are appropriate to avoid, prevent, reduce, manage, control and (where necessary) monitor the adverse effects of the</p>	<p><u>Matters raised within BBC's Relevant Representation</u></p> <p>The BBC Heritage Team are not in agreement with the proposed Archaeological Mitigation Strategy as submitted and believe further discussion over required amendments is necessary in order to provide further detail and clarification on the work proposed and how it will</p>	<p>Under discussion</p>	

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		<p>Scheme during its construction and operation.</p> <p>Highways England’s Archaeological Mitigation Strategy <b>[APP-238]</b> sets out the mitigation measures that would be implemented to reduce the adverse effects of the Scheme on archaeological and built heritage resources.</p> <p>An Archaeological Mitigation Strategy <b>[APP-238]</b> was requested, to form an appendix to the ES, at the first consultation meeting held with CCC and BBC on 18th September 2018. Section 2.2 of the Brief from the councils also requires the DCO to identify a ‘robust mitigation strategy’.</p> <p>The Archaeological Mitigation Strategy <b>[APP-238]</b>, and in particular the mitigation areas, have been discussed with BBC and the mitigation areas have been agreed at a meeting held on 10 December 2020.</p> <p>This approach is considered acceptable in order to provide the appropriate mitigation for the archaeological and built heritage resources.</p>	<p>comply with the Archaeological Design Brief prepared jointly with our counterparts at Cambridgeshire County Council and Central Bedfordshire Council. The Archaeological Mitigation Strategy appears to be trying to set the scope of the required works: however within development led archaeology in the planning system it is the LPA and not the applicant that sets the scope of the required archaeological works within a Design Brief, and the Archaeological Mitigation Strategy should then set out the methodology for meeting the requirements of the Design Brief.</p> <p>BBC met with Highways England, CCC, and CBC on 12/08/2021. A revised Design Brief has been drafted and sent to Highways England for agreement. It is understood that the Archaeological Mitigation Strategy is also being revised.</p>		



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<p><b>Cultural Heritage</b> Mitigation – Milestones</p>	<p>Chapter 6, Cultural heritage <b>[APP-075]</b> Archaeological Mitigation Strategy <b>[APP-238]</b> First Iteration EMP <b>[APP-234]</b> Draft DCO <b>[APP-025]</b> Schedule of mitigation <b>[APP-235]</b></p>	<p>The non-designated milestone impacted by the Scheme would be stored and reinstated as close as possible to its original location, with all works undertaken in accordance with a Method Statement to be prepared by the Archaeological Contractor and agreed with the relevant local authorities.</p> <p>This is secured through the Archaeological Mitigation Strategy <b>[APP-238]</b> and Requirement 15 (Safeguarding of milestones) of the draft DCO <b>[APP-025]</b>.</p> <p>These measures are appropriate for this Scheme.</p>	<p>BBC's Heritage Team is content with the mitigation approach with regard to non-designated_milestones.</p>	<p>Under discussion</p>	
<p><b>Cultural Heritage</b> Brook Cottages – Assessment of harm</p>	<p>Chapter 6, Cultural heritage <b>[APP-075]</b> Case for the Scheme <b>[APP-240]</b></p>	<p>As Brook Cottages are located within the Order Limits of the Scheme and would require demolition, Chapter 6, Cultural Heritage assessment <b>[APP-075]</b> has identified that there would be a total loss of the significance of this asset.</p> <p>Accordingly, Highways England has concluded that the loss of Brook Cottages would amount to substantial harm to the asset.</p> <p>Highways England acknowledges that a detailed survey has not been undertaken for Brook Cottages. It has not been possible to enter the premises to</p>	<p><u>Matters raised within BBC's Relevant Representation</u></p> <p>BBC Heritage Team agree with that demolishing without rebuilding Brook Cottages would constitute 'substantial harm' to its significance for the purposes of the National Planning Policy Framework (NPPF).</p> <p>BBC Heritage Team remain seriously concerned that Brook Cottages has not been subject</p>	<p>Under discussion</p>	

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		<p>undertake the survey as access has not been granted to the property. Highways England has continued to request access for the purposes of undertaking the survey.</p> <p>The information provided within Appendix E of the Case for the Scheme [APP-240] is based on a reasonable assumption given the evidence collected to date. Highways England has stated that the dismantling and relocation of Brook Cottages, either for continued residential use or reconstruction at a museum would result in substantial harm to its significance.</p> <p>It is acknowledged that the ultimate decision regarding the listed status of the building should it be relocated is a matter for the Secretary of State for Digital Media, Culture and Sport through their advisors Historic England. However, Highways England has applied the tests for designation as set out by Historic England.</p> <p>As set out in Paragraph A5.1.5 in Appendix E of the Case for the Scheme [APP-240], Highways England has considered whether the substantial harm to Brook Cottages as a result of its demolition can be reduced to less than substantial harm by either relocating</p>	<p>to a detailed survey, and also that such a significant element of the scheme remains unresolved. Document 6.3 is limited in scope (accepted in the body of the text) and does not provide a strong enough evidence basis to justify the assertion that dismantling and relocating the timber framed building would not result in 'substantial harm' to its significance. The potential harm to the building following its dismantling, indeed if it could even be dismantled and relocated, has not been clarified by the applicant. The Council are concerned with the arguments set out in A5.6.4 and A.5.6.5, which 'jump the gun' in terms of the outcome of any detailed survey. The listed status (A.5.7) would be for Historic England and the Secretary of State to consider.</p> <p>Dismantling and reconstructing Brook Cottages could potentially result in a more preferable level of 'less than substantial harm' to its significance particularly given</p>		

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		<p>Brook Cottages for its continued residential use, or by relocating Brook Cottages to a museum. Highways England considers that neither option will reduce the substantial harm to Brook Cottages to less than substantial harm.</p> <p>Paragraph A5.7.2 in Appendix E of the Case for the Scheme [APP-240], sets out that relocating Brook Cottages and retaining its existing residential use would retain elements of the historic fabric, however, the extent of works required to make it habitable and viable for residential use on the open market would erode its historic interest to such an extent that it would not meet the criteria for listing. It is considered that the loss of heritage significance described above would result in substantial harm to Brook Cottages even if it was possible to relocate it and bring it back into use as a residential dwelling. Paragraph A5.7.2 further sets out that whilst there are benefits to reconstruction of the cottages in a museum, it is not considered sufficient to reduce the level of harm to less than substantial.</p> <p>Notwithstanding this, Highways England has continued to engage with the Museum of East Anglia Life with a view to</p>	<p>the contribution currently made by setting and the method of the building's construction. It certainly avoids 'total loss', and so the question would be whether its reconstruction would see its significance vitiated altogether or very much reduced. This depends on details and evidence which have not yet been provided as part of the application (see below). The applicant should be able to demonstrate that every effort to avoid the total loss of the statutorily listed building has been pursued, and there is no evidence within the application to show this.</p> <p>The Council have not received evidence regarding the potential interest from the Museum of East Anglia Life, or the nature and detail of its potential reuse.</p>		

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		offering the elements of the cottages that are capable of reconstruction.			
<b>Cultural Heritage</b> Brook Cottages – Retention in its existing location	Black Cat Junction Design Options [APP-247]	Based on the thorough evaluation of potential junction design options [APP-247], Highways England has concluded that Brook Cottages would have to be demolished to facilitate progression of the proposed improvements to Black Cat roundabout. This is because no acceptable design solution exists that would enable the building to be retained in its current location.	<u>Matters raised within BBC's Relevant Representation</u>  BBC Heritage Team accept that there is no safe or viable way of retaining Brook Cottages (a grade II listed building proposed for demolition) in its current position whilst delivering the objectives of the Scheme.  (Option C).	Agreed	June 2021
<b>Cultural Heritage</b> Brook Cottages – Relocation options	Chapter 6, Cultural heritage [APP-075] Case for the Scheme [APP-240] Draft DCO [APP-025]	Based on the conclusion that the loss of Brook Cottages would result in substantial harm to the asset [APP-075], Highways England has identified and evaluated options for relocating the building to an alternative location, comprising either: <ul style="list-style-type: none"> <li>• Relocation of the building to a location that would enable its continued use as a private dwelling.</li> <li>• Relocation of the building to a museum.</li> </ul>	<u>Matters raised within BBC's Relevant Representation</u>  The BBC Heritage Team remain seriously concerned regarding the applicant's approach of seeking to offer the building to the Museum of East Anglian Life (A.5.6.1), which is put forward as the only alternative to its total loss (A.5.5.1). No contract has been produced, and therefore such	Under discussion	

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		<p>Following evaluation of these options within the Case for the Scheme [APP-240], Highways England has concluded that the relocation of Brook Cottages and future use as a private dwelling would remain as substantial harm to the asset due to the loss of building's historic fabric (when moving the property) and the extent of change that would be necessary to ensure the building conforms to the prevailing building regulations.</p> <p>Highways England considers although that reconstructing the structural elements of Brook Cottages in a museum would not be sufficient to reduce the substantial harm of demolition to less than substantial harm, this outcome affords greater opportunity to retain more of the building's heritage significance than relocating it for continued residential use. This option also presents a greater opportunity to secure the building's future and provides additional public benefits,</p> <p>Accordingly, Highways England is investigating relocating the structural elements of the building that are capable of being reconstructed to a museum. We are in discussions with possible receptors which may be willing to accept Brook Cottages, subject to:</p>	<p>plans can be afforded no weight at this stage. However, if as the Case for the Scheme asserts its reconstruction will result in substantial harm it is unlikely to prove an attractive proposition for any museum. The application does not demonstrate that an alternative approach has been sought, such as relocating the building within the vicinity of its current position within the Borough (an approach recommended by Officers).</p>		

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		<ul style="list-style-type: none"> <li>A structural survey concluding that this is feasible.</li> <li>Further discussions and terms to be agreed.</li> </ul> <p>Highways England acknowledges that relocation of the building to a museum would mean that its Grade II listed status would be lost, as the rebuilt cottages would not have the same heritage interests as the current building.</p> <p>The Case for the Scheme [APP-240] also explains that in accordance with the NPSNN, Highways England would properly record the asset prior to its removal, as secured through Requirement 16 on the draft DCO [APP-025].</p>			
<p><b>Landscape and Visual Effects</b></p> <p>Data collection methods, baseline data and the identification and sensitivity of relevant features and receptors</p>	<p>Chapter 7, Landscape and visual effects [APP-076]</p>	<p>The baseline conditions have been collated using desk-based and field-based techniques, and through consultation with stakeholders.</p> <p>Highways England considers the scope, coverage and timing of surveys undertaken to establish the baseline conditions and sensitive features and receptors are in line with best practice and appropriate to inform the assessment of direct and indirect effects reported in</p>	<p>BBC is content that the scope and coverage of surveys undertaken as part of the assessment are sufficiently comprehensive to identify the likely effects of the Scheme on landscape character and visual amenity.</p>	<p>Under discussion</p>	

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		the Chapter 7, Landscape and visual effects assessment <b>[APP-076]</b> .			
<b>Landscape and Visual Effects</b> Construction and operational effects	Chapter 7, Landscape and visual effects <b>[APP-076]</b>	<p>The assessment has concluded that the Scheme would result in significant adverse effects on areas of local landscape character, and on visual receptors afforded views of the landscape from locations including residential properties, local roads and PRoW.</p> <p>The assessment has concluded that the Scheme would not result in significant adverse effects on sites designated for the landscape value or importance.</p>	BBC is content with the conclusions of the assessment and the significance of the reported effects.	Under discussion	
<b>Landscape and Visual Effects</b> Embedded and essential mitigation	Chapter 2, The Scheme <b>[APP-071]</b> Chapter 7, Landscape and visual effects <b>[APP-076]</b>  Environmental Masterplan <b>[APP-091]</b> First Iteration EMP <b>[APP-234]</b>	<p>Highways England considers that:</p> <ul style="list-style-type: none"> <li>The embedded mitigation measures illustrated on the Environmental Masterplan <b>[APP-091]</b>.</li> <li>The essential mitigation measures set out in the First Iteration EMP <b>[APP-234]</b></li> </ul> <p>are appropriate to avoid, prevent, reduce, manage, control and (where necessary) monitor the adverse effects of the Scheme during its construction and operation.</p>	BBC is content with the form, nature and extent of the embedded mitigation measures incorporated into the design of the Scheme, and the essential mitigation measures that would be implemented during construction of the Scheme, including associated monitoring.	Under discussion	



Issue	Document Reference	Highways England Position	Bedford Borough Council Position	Status	Date
	Schedule of Mitigation [APP-235]				
<p><b>Biodiversity</b></p> <p>Data collection methods, baseline data and the identification and sensitivity of relevant features and receptors</p>	<p>Chapter 8, Biodiversity [APP-077]</p>	<p>The baseline conditions have been collated using desk-based and field-based techniques, and through consultation with stakeholders.</p> <p>Highways England considers the scope, coverage and timing of surveys undertaken to establish the baseline conditions and sensitive features and receptors are in line with best practice and appropriate to inform the assessment of direct and indirect effects reported in Chapter 8, Biodiversity assessment [APP-077].</p> <p>As certain surveys undertaken within the assessment were constrained or limited by factors including land access restrictions, Highways England has shared information with CBC regarding the scope, timing and coverage of surveys it plans to undertake during 2021, and prior to the commencement of construction of the Scheme.</p>	<p><u>Matters raised within BBC's Relevant Representation</u></p> <p>BBC is content that a suitable range of up-to-date ecological surveys which are based on evidence from the Bedfordshire &amp; Luton Biodiversity Recording and Monitoring Centre and pre-application discussions have been completed.</p>	<p>Agreed</p>	<p>June 2021</p>



Issue	Document Reference	Highways England Position	Bedford Borough Council Position	Status	Date
<p><b>Biodiversity</b> Construction and operational effects</p>	<p>Chapter 8, Biodiversity [APP-077]</p>	<p>The biodiversity assessment [APP-077] has identified that adverse and beneficial effects on habitats, species and designated sites would result from construction and operation of the Scheme; however, none of these effects would be significant.</p> <p>Highways England considers that the assessment findings accurately reflect the likely effects of the Scheme.</p>	<p><u>Matters raised in meetings with BBC's Biodiversity team on 23.06.2021</u></p> <p>BBC shared queries regarding assessment findings in terms of the timings of implementation of mitigation e.g. planting will take time to mature.</p>	<p>Under discussion</p>	
<p><b>Biodiversity</b> Embedded and essential mitigation</p>	<p>Chapter 2, The Scheme [APP-071] Chapter 8, Biodiversity [APP-077] First Iteration EMP [APP-234] Environmental Masterplan [APP-091] Biodiversity Pre-commencement Plan [APP-239] Schedule of Mitigation [APP-235]</p>	<p>Highways England considers that:</p> <ul style="list-style-type: none"> <li>The embedded mitigation measures illustrated on the Environmental Masterplan [APP-091].</li> <li>The essential mitigation measures set out in the First Iteration EMP [APP-234] and Biodiversity Pre-commencement Plan [APP-239]</li> </ul> <p>are appropriate to avoid, prevent, reduce, manage, control and (where necessary) monitor the adverse effects of the Scheme on habitats, species and designated sites during its construction and operation.</p> <p>A tunnel has been designed specifically for use by a range of mammals and other vertebrates including Badger.</p>	<p><u>Matters raised in meetings with BBC's Biodiversity team on 23.06.2021</u></p> <p>BBC note that some mitigation would be required ahead of the Scheme and in some cases a process of coming up with strategies of creating alternative roost site/nest sites/putting up nest boxes, in excess of a year, in the case of some species needing time to settle in.</p> <p>BBC notes that the entrances to the bat tunnel are fenced with a mammal entry point in the corner. It is recommended that this hole is slightly taller than the dimensions included</p>	<p>Under discussion</p>	

Issue	Document Reference	Highways England Position	Bedford Borough Council Position	Status	Date
		<p>Highways England and the Principal Contractor will explore opportunities to deliver early planting where construction sequencing and land acquisition allows.</p>	<p>on the current structure diagram.</p> <p>Monitoring the use of the bat tunnel during the operational phase will be vital for evaluating the success of this mitigation feature within the Scheme and for future bat mitigation elsewhere. The monitoring plans should be part of the Biodiversity Management Plan.</p> <p><u>Matters raised within BBC's Relevant Representation</u></p> <p>BBC note that the eastern agricultural area of Bedfordshire has previously been recognised for its farmland bird assemblages and for raptors. The surveys for this Scheme confirmed this and highlighted the presence of barn owls, red kite, hobby and other farmland birds. The Scheme includes woodland planting along the embankments in this section to try and reduce road casualties, particularly for barn owls. It is important to note that this</p>		

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			would only become effective once the planting has matured and we would encourage early planting where possible.		
<p><b>Biodiversity</b> Biodiversity net gain</p>	<p>Appendix 8.19 [APP-206]</p>	<p>Although the achievement of a net gain in biodiversity is not a requirement for nationally significant infrastructure projects, Highways England has sought to achieve an increase in biodiversity through the environmental measures incorporated into the design of the Scheme, as set out in Natural England’s advice appended to the Scoping Opinion [APP-231].</p> <p>Using Highways England’s Biodiversity Net Gain metric, a net gain of 20.5% across the Scheme has been calculated, when compared to the baseline conditions, as reported in Appendix 8.19 [APP-206].</p> <p>The calculation of biodiversity net gain also took account of Breedon Quarry being fully restored by the time of Scheme construction commencing.</p> <p>Highways England considers that the methods used to calculate biodiversity net gain are appropriate for the Scheme.</p>	<p><u>Matters raised in meetings with BBC’s Biodiversity team on 23.06.2021</u></p> <p>BBC agree with the conclusions of the biodiversity net gain assessment but suggest re-running the metric at subsequent iterations of the Scheme design.</p>	<p>Agreed</p>	<p>June 2021</p>

Issue	Document Reference	Highways England Position	Bedford Borough Council Position	Status	Date
<p><b>Geology and Soils</b></p> <p>Data collection methods, baseline data and the identification and sensitivity of relevant features and receptors</p>	<p>Chapter 9, Geology and soils <b>[APP-078]</b></p>	<p>The baseline conditions relating to geology and soils have been collated using desk-based information sources, and through consultation with stakeholders.</p> <p>Highways England considers the scope, coverage and timing of surveys undertaken to establish the baseline conditions and sensitive features and receptors are in line with best practice, and are appropriate to inform the assessment of direct and indirect effects reported in Chapter 9, Geology and Soils assessment <b>[APP-078]</b>.</p> <p>Due to Covid-19 restrictions in 2020/2021, it was not possible for Highways England to undertake sampling in the field to verify existing soil grades and profiles. Accordingly, the assessment has relied upon published information regarding soil grades and their distribution at a regional scale.</p> <p>Highways England is planning to carry out this sampling to confirm existing soil conditions in mid-2021 (subject to Covid-19 restrictions being relaxed), and will use the information gathered to verify the conclusions of its assessment of the likely effects on best and most versatile</p>	<p>BBC acknowledges the Covid-19 limitations placed on undertaking soil sampling, and is content that it was appropriate for Highways England to base its assessment of the effects of the Scheme on best and most versatile agricultural land on published data.</p>	<p>Under discussion</p>	

Issue	Document Reference	Highways England Position	Bedford Borough Council Position	Status	Date
		agricultural soils and its proposed mitigation measures.			
<b>Geology and Soils</b> Construction and operational effects	Chapter 9, Geology and soils <b>[APP-078]</b>	<p>The assessment has concluded that the Scheme would not result in any significant adverse effects on locally or regionally important geological sites.</p> <p>Construction of the Scheme would result in significant adverse effects on areas of land mapped as best and most versatile at a regional scale, these being associated with the permanent loss of agricultural land.</p>	BBC is content with the conclusions of the assessment and the significance of the effects reported.	Under discussion	
<b>Geology and Soils</b> Embedded and essential mitigation	Chapter 2, The Scheme <b>[APP-071]</b> Chapter 9, Geology and soils <b>[APP-078]</b> Environmental Masterplan <b>[APP-091]</b> First Iteration EMP <b>[APP-234]</b> Schedule of mitigation <b>[APP-235]</b>	<p>Highways England considers that:</p> <ul style="list-style-type: none"> <li>The embedded mitigation measures illustrated on the Environmental Masterplan <b>[APP-091]</b> and in Chapter 2, The Scheme <b>[APP-071]</b>.</li> <li>The essential mitigation measures set out in the First Iteration EMP <b>[APP-234]</b></li> </ul> <p>are appropriate to avoid, prevent, reduce, manage, control and (where necessary) monitor the adverse effects of the Scheme during its construction and operation.</p>	BBC is content with the form and nature of the essential mitigation measures relating to soil handling and management that would be implemented during construction of the Scheme.	Under discussion	

Issue	Document Reference	Highways England Position	Bedford Borough Council Position	Status	Date
<b>Material Assets and Waste</b> Data collection methods, baseline data and the identification and sensitivity of relevant features and receptors	Chapter 10, Material assets and waste [APP-079]	<p>The baseline conditions have been collated from a variety of sources including desk-based and input from consultees, and are reported in Chapter 10, Material Assets and Waste [APP-079].</p> <p>The baseline information collected is appropriate for this Scheme.</p>	Details of how the borrow pits will be worked for minerals and then backfilled with waste have not yet been provided and therefore the baseline information is deficient.	Under discussion	
<b>Material Assets and Waste</b> Construction and operational effects	Chapter 10, Material assets and waste [APP-079]	The material assets and waste assessment concluded no significant effects in the construction and operation of the Scheme.	The assessment is not accepted until the details of how the borrow pits will be worked and restored have been made clear.	Under discussion	
<b>Material Assets and Waste</b> Embedded and essential mitigation	Chapter 2, The Scheme [APP-071] Chapter 10, Material assets and waste [APP-079] Environmental Masterplan [APP-091] First Iteration EMP [APP-234]	<p>Highways England considers that:</p> <ul style="list-style-type: none"> <li>The embedded mitigation measures illustrated on the Environmental Masterplan [APP-091] and in Chapter 2, The Scheme [APP-071].</li> <li>The essential mitigation measures set out in the First Iteration EMP [APP-234]</li> </ul> <p>are appropriate to avoid, prevent, reduce, manage, control and (where necessary) monitor the adverse effects of the</p>	Mitigation cannot be considered until an adequate assessment has been made.	Under discussion	

Issue	Document Reference	Highways England Position	Bedford Borough Council Position	Status	Date
	Schedule of mitigation [APP-235]	Scheme during its construction and operation.			
<p><b>Noise and Vibration</b></p> <p>Data collection methods, baseline data and the identification and sensitivity of relevant features and receptors</p>	Chapter 11, Noise and vibration [APP-080]	<p>The baseline conditions have been collated using desk-based and field-based techniques, and through consultation with stakeholders.</p> <p>Highways England considers the scope, coverage and timing of surveys undertaken to establish the baseline conditions and sensitive features and receptors are in line with best practice and appropriate to inform the assessment of direct and indirect effects reported in Chapter 11, Noise and vibration assessment [APP-080].</p> <p>Highways England undertook a baseline noise monitoring survey during November and December 2017 to both provide information on the existing noise climate in the vicinity of the Scheme and provide data to validate the noise model from which the traffic noise impacts of the Scheme would be derived.</p> <p>This monitoring confirmed that road traffic noise was the dominant noise source at a majority of the locations, with other non-road traffic sources contributing to the acoustic environment in more rural locations. Overall, there was a reasonable correlation between the noise</p>	<p><u>Matters raised within BBC's Relevant Representation</u></p> <p>The Scoping assessment was undertaken in mid-2019 and no further baseline monitoring has been undertaken despite agreement with Local Authorities due to COVID.</p> <p>Areas are of concern with the information supplied at this time are that the noise monitoring was undertaken in 2017, more than three years ago which raises the concern that it is no longer reliable.</p>	Under discussion	

Issue	Document Reference	Highways England Position	Bedford Borough Council Position	Status	Date
		<p>levels measured in the 2017 survey and those predicted using 2016 traffic data at those locations close to roads. This provided confidence that the noise model developed to estimate the traffic noise impacts of the Scheme is a reasonable approximation.</p> <p>The results of the baseline noise survey have been used to support a validation exercise for the traffic noise prediction modelling.</p> <p>Highways England considers that the noise monitoring data presented in Chapter 11 of the ES is reliable and representative of pre-Covid-19 traffic conditions on the road network.</p>			
<p><b>Noise and Vibration</b></p> <p>Construction and operational effects</p>	<p>Chapter 11, Noise and vibration [APP-080]</p>	<p>A thorough noise and vibration assessment has been undertaken for the construction and operation of the Scheme. The noise and vibration assessment concluded several significant effects in the construction and operational periods of the Scheme as described in Chapter 11, Noise and vibration [APP-080].</p>	<p><u>Matters raised within BBC's Relevant Representation</u></p> <p>BBC note that there is very little data to consider for the construction phase and borrow pits. Most of the assessment considers that this will be in further detail at the more detailed design stage but this does not allow Environmental Health to consider viability.</p>	<p>Under discussion</p>	



Issue	Document Reference	Highways England Position	Bedford Borough Council Position	Status	Date
<p><b>Noise and Vibration</b></p> <p>Embedded and essential mitigation</p>	<p>Chapter 2, The Scheme [APP-071]</p> <p>Chapter 11, Noise and vibration [APP-080]</p> <p>Environmental Masterplan [APP-091]</p> <p>First Iteration EMP [APP-234]</p> <p>Schedule of Mitigation [APP-235]</p> <p>Borrow Pits Optioneering Report [APP-246]</p>	<p>Highways England considers that:</p> <ul style="list-style-type: none"> <li>The embedded mitigation measures illustrated on the Environmental Masterplan [APP-091] and in Chapter 2, The Scheme [APP-071].</li> <li>The essential mitigation measures set out in the First Iteration EMP [APP-234]</li> </ul> <p>are appropriate to avoid, prevent, reduce, manage, control and (where necessary) monitor the adverse effects of the Scheme relating to noise and vibration during its construction and operation.</p> <p>The working hours as defined within Requirement 19 of the draft DCO [APP-025], will be adhered to throughout the Scheme construction.</p> <p>No mitigation is proposed regarding the possible re-siting of the borrow pits; this is because Highways England has undertaken a thorough and comprehensive site selection, appraisal and evaluation process to inform the selection of its preferred locations for these features. The process included noise and vibration as an appraisal criterion, based on the relationships between each identified site and noise-sensitive receptors, and the possible</p>	<p><u>Matters raised within BBC's Relevant Representation</u></p> <p>BBC note that with respect to the operation of the road once construction has completed, the information supplied suggests that with suitable mitigation road level noise increases would not be a cause for concern. However it should be noted that the exact mitigation is again proposed at the detailed design stage.</p> <p>BBC note in relation to noise and vibration that whilst proposed mitigation systems are suggested, these do not include re-siting of borrow pits and if the impact of those pits are unacceptable then this cannot be overcome other than potentially with the "temporary re-housing policy"</p> <p>The DCO should contain a detailed description of how each will be worked based upon a worst case scenario of extraction to the maximum</p>	<p>Under discussion</p>	

Issue	Document Reference	Highways England Position	Bedford Borough Council Position	Status	Date
		<p>effects associated with site preparation, operational works and restoration works. Full details of this process are reported in the Borrow Pits Optioneering Report [APP-246].</p> <p>The First Iteration EMP requires the Principal Contractor to implement a noise management plan which will include procedures for installation of noise insulation and temporary re-housing if required.</p>	<p>depth identified for each of them. This would include:</p> <ul style="list-style-type: none"> <li>• Identifying the area, height and location of soil stockpiles.</li> <li>• Method of extraction and numbers of plant and machinery on site.</li> <li>• The method of delivery to the road scheme.</li> <li>• Maximum daily numbers of HGV/material moving vehicles using haul routes.</li> <li>• Any processing of material on site.</li> <li>• Any phasing of the site.</li> <li>• How waste materials will be backfilled.</li> <li>• Operating times.</li> <li>• What happens if the amount of material extracted does not equal the amount of material backfilled.</li> </ul> <p>of material to be backfilled.</p>		

Issue	Document Reference	Highways England Position	Bedford Borough Council Position	Status	Date
			<ul style="list-style-type: none"> <li>• Appropriate plans and cross sections to support the above.</li> <li>• Each section of the ES to be updated to assess the impact of the proposals.</li> </ul>		
<p><b>Population and Human Health</b></p> <p>Data collection methods, baseline data and the identification and sensitivity of relevant features and receptors</p>	<p>Chapter 12, Population and human health [APP-081]</p>	<p>The baseline conditions have been collated using desk-based and field-based techniques, and through consultation with stakeholders.</p> <p>Highways England considers the scope, coverage and timing of surveys undertaken to establish the baseline conditions and sensitive features and receptors (e.g. effects on users of the existing PRoW network, and recreational users of the River Great Ouse) are in line with best practice and appropriate to inform the assessment of direct and indirect effects reported in Chapter12, Population and human health assessment [APP-081].</p>	<p>BBC is content that the scope and coverage of surveys undertaken as part of the assessment are sufficiently comprehensive to identify the likely effects of the Scheme on PRoW and recreational users.</p>	<p>Under discussion</p>	
<p><b>Population and Human Health</b></p> <p>Construction and operational effects</p>	<p>Chapter 12, Population and human health [APP-081]</p>	<p>The population and human health assessment concluded one significant effect in the construction period as a result of the Scheme within BBC. This relates to a temporary moderate adverse effect upon recreational users of the River Great Ouse due to closure during</p>	<p>BBC is content with the conclusions of the assessment and the significance of the reported effects.</p>	<p>Under discussion</p>	

Issue	Document Reference	Highways England Position	Bedford Borough Council Position	Status	Date
		<p>construction. This is reported in Chapter 12, Population and human health [APP-081].</p> <p>No significant effects were reported for the operation of the Scheme.</p>			
<p><b>Population and Human Health</b></p> <p>Embedded and essential mitigation</p>	<p>Chapter 2, The Scheme [APP-071]</p> <p>Chapter 12, Population and human health [APP-081]</p> <p>Environmental Masterplan [APP-091]</p> <p>First Iteration EMP [APP-234]</p> <p>Schedule of Mitigation [APP-235]</p>	<p>The embedded mitigation measures illustrated on the Environmental Masterplan [APP-091] are considered appropriate to avoid, prevent or reduce the adverse effects of the Scheme on PRoW and recreational users in relation to:</p> <ul style="list-style-type: none"> <li>• Maintaining connectivity between existing routes, roads and communities.</li> <li>• Providing safe crossing provision over the new dual carriageway.</li> </ul> <p>The essential mitigation measures set out in the First Iteration EMP [APP-234] are considered appropriate to manage and control the adverse effects of the Scheme on recreational users of the River Great Ouse and PRoW temporarily affected by construction of the Scheme.</p>	<p>BBC is content with the form, nature and extent of the embedded mitigation measures incorporated into the design of the Scheme, and the essential mitigation measures that would be implemented during construction of the Scheme.</p>	<p>Under discussion</p>	
<p><b>Road Drainage and the Water Environment</b></p>	<p>Chapter 13, Road drainage and the water</p>	<p>The baseline conditions have been collated using desk-based and field-</p>	<p>BBC is content that the scope and coverage of surveys undertaken as part of the</p>	<p>Under discussion</p>	

Issue	Document Reference	Highways England Position	Bedford Borough Council Position	Status	Date
Data collection methods, baseline data and the identification and sensitivity of relevant features and receptors	environment [APP-082]	<p>based techniques, and through consultation with stakeholders.</p> <p>Highways England considers the scope, coverage and timing of surveys undertaken to establish the baseline conditions and sensitive features and receptors are in line with best practice and appropriate to inform the assessment of direct and indirect effects reported in Chapter 13, Road Drainage and the Water Environment assessment [APP-082]. The baseline information collected is appropriate for this Scheme.</p>	assessment are sufficiently comprehensive to identify the likely effects of the Scheme on road drainage and the water environment.		
<p><b>Road Drainage and the Water Environment</b></p> <p>Construction and operational effects</p>	Chapter 13, Road drainage and the water environment [APP-082]	<p>The road drainage and the water environment assessment [APP-077] has identified that adverse and beneficial effects on water quality, hydromorphology, groundwater and drainage would result from construction and operation of the Scheme; however, none of these effects would be significant.</p> <p>Highways England considers that the assessment findings accurately reflect the likely effects of the Scheme.</p>	BBC is content with the conclusions of the assessment and the significance of the reported effects.	Under discussion	
<p><b>Road Drainage and the Water Environment</b></p>	Chapter 13, Road drainage and the water	The assessment has concluded that flood risk to and from the construction and operational stages of the Scheme from fluvial, surface water, groundwater and	BBC are content with the findings of the flood risk assessment.	Under discussion	

Issue	Document Reference	Highways England Position	Bedford Borough Council Position	Status	Date
Flood risk assessment	environment [APP-082] Flood Risk Assessment [APP-220]	sewer flooding would be low, and accordingly there would be no significant flooding-related effects.			
<b>Road Drainage and the Water Environment</b>  Embedded and essential mitigation	Chapter 2, The Scheme [APP-071] Chapter 13, Road drainage and the water environment [APP-082] Environmental Masterplan [APP-091] First Iteration EMP [APP-234] Schedule of Mitigation [APP-235]	Highways England considers that: <ul style="list-style-type: none"> <li>The embedded mitigation measures illustrated on the Environmental Masterplan [APP-091].</li> <li>The essential mitigation measures set out in the First Iteration EMP [APP-234]</li> </ul> are appropriate to avoid, prevent, reduce, manage, control and (where necessary) monitor the adverse effects of the Scheme in relation to water quality, hydromorphology, groundwater, drainage and flood risk during its construction and operation.	BBC is content with the form, nature and extent of the embedded mitigation measures incorporated into the design of the Scheme, and the essential mitigation measures that would be implemented during construction of the Scheme.	Under discussion	
<b>Climate</b>  Data collection methods, baseline data and the identification and sensitivity of relevant features and receptors	Chapter 14, Climate [APP-083]	The baseline conditions have been collated using desk-based techniques and through consultation with stakeholders.  Highways England considers the scope, coverage and timing of surveys undertaken to establish the baseline conditions and sensitive features and	BBC is content that the data used to inform the assessment is sufficiently comprehensive to identify the likely effects of greenhouse gas emissions on climate, and the resilience of the Scheme to the effects of climate change.	Under discussion	

Issue	Document Reference	Highways England Position	Bedford Borough Council Position	Status	Date
		receptors are in line with best practice and appropriate to inform the assessment of direct and indirect effects reported in Chapter 14, Climate assessment [APP-083].			
<b>Climate</b> Construction and operational effects	Chapter 14, Climate [APP-083]	The assessment has concluded that no significant effects associated with greenhouse gas emissions and climate change would result from the Scheme.	BBC is content with the conclusions of the assessment and the significance of the reported effects.	Under discussion	
<b>Climate</b> Embedded and essential mitigation	Chapter 2, The Scheme [APP-071] Chapter 14, Climate [APP-083] Environmental Masterplan [APP-091] First Iteration EMP [APP-234] Schedule of mitigation [APP-235]	Highways England considers that: <ul style="list-style-type: none"> <li>• The embedded mitigation measures illustrated on the Environmental Masterplan [APP-091] and within Chapter 2, The Scheme [APP-071].</li> <li>• The essential mitigation measures set out in the First Iteration EMP [APP-234]</li> </ul> are appropriate to reduce the temporary effects of greenhouse gas emissions, during construction of the Scheme.	BBC is content with the form, nature and extent of the embedded mitigation measures incorporated into the design of the Scheme, and the essential mitigation measures that would be implemented during construction of the Scheme.	Under discussion	
<b>Assessment of Cumulative Effects</b>  Baseline data	Chapter 15, Assessment of Cumulative Effects [APP-084] Appendix 15.1 Long list of other	Highways England has undertaken an assessment of the likely significant cumulative effects of the Scheme on the environment resulting from the cumulation of effects with other existing and/or approved developments and	BBC is content with the developments and projects identified within both the long list and shortlist, and how these have been categorised within the assessment.	Under discussion	

Issue	Document Reference	Highways England Position	Bedford Borough Council Position	Status	Date
	<p>developments [APP-228]</p> <p>Appendix 15.2 Assessment matrix [APP-229]</p>	<p>projects. The assessment has considered:</p> <ul style="list-style-type: none"> <li>• Existing completed projects.</li> <li>• Approved but uncompleted projects.</li> <li>• Ongoing activities.</li> <li>• Plans or projects for which an application has been made and which are under consideration by consenting authorities.</li> <li>• Plans and projects which are reasonably foreseeable.</li> </ul> <p>Cumulative developments and projects were initially identified through a long list [APP-228], with qualifying developments subsequently shortlisted [APP-229] for consideration in the assessment.</p> <p>Highways England considers that its approach to identifying other development projects, their shortlisting and subsequent inclusion in the cumulative effects assessment is robust and appropriate.</p>			
<p><b>Assessment of Cumulative Effects</b></p>	<p>Chapter 15, Assessment of Cumulative Effects [APP-084]</p>	<p>The cumulative effects assessment has concluded that significant adverse cumulative effects would occur in relation to the effects of the following topics interacting cumulatively with the effects</p>	<p>BBC is content with the conclusions of the assessment and the significance of the reported effects.</p>	<p>Under discussion</p>	



Issue	Document Reference	Highways England Position	Bedford Borough Council Position	Status	Date
Construction and operational effects	<p>Appendix 15.1 Long list of other developments <b>[APP-228]</b></p> <p>Appendix 15.2 Assessment matrix <b>[APP-229]</b></p>	<p>of other planned projects and developments:</p> <ul style="list-style-type: none"> <li>• Landscape and visual effects <b>[APP-076]</b>.</li> <li>• Noise and vibration <b>[APP-080]</b>.</li> </ul> <p>No significant cumulative effects have been identified in relation to other environmental topics.</p> <p>Highways England considers that the outcomes of the cumulative effects assessment (in relation to development interactions) are accurate.</p>			

**Table 3-5 – Archaeological Matters**

Issue	Document Reference	Highways England Position	Bedford Borough Council Position	Status	Date
<b>Archaeology mitigation areas</b>	Archaeological Mitigation Strategy [APP-238]	<p>The extent and methodology of the all the mitigation areas within Bedford Borough have been agreed and are listed below:</p> <ul style="list-style-type: none"> <li>• Site 1, Field 3</li> <li>• Site 2, Field 5</li> <li>• Site 3, Field 9</li> <li>• Site 8, Fields 47 and 48</li> <li>• Site 9, Field 49</li> <li>• Site 41, Field 26</li> </ul>	<p>The BBC Heritage Team agree with the extent of the archaeology mitigation areas. The overarching Archaeological Mitigation Strategy is being revised and the detailed methodology for each mitigation area will be set out in a Site Specific Written Scheme of Investigation to be approved by BBC ahead of work commencing at a site.</p>	Agreed	
<b>Council archaeology brief</b>	Archaeological Mitigation Strategy [APP-238]	<p>A brief has been prepared by the Curators at the councils. This is designed to facilitate the production of the Site Specific Written Schemes of Investigation (SSWSIs) by the Archaeological Contractor. The contents of this brief have been taken into account when detailing the overarching scope of works in Part Two of the Archaeological Mitigation Strategy. The majority of the brief is agreed, and is expected to be included as an Appendix to the final AMS as Appendix B.</p>	<p>BBC note that a brief must be in place. A revised Design brief has been sent to Highways England following a meeting on 12/08/2021.</p>	Under discussion	

Issue	Document Reference	Highways England Position	Bedford Borough Council Position	Status	Date
Archaeology requirement 9		Requirement 9 states: "9. The authorised development must be carried out, operated and maintained in accordance with the archaeological mitigation strategy." The detail of the requirement for Site Specific WSIs, fieldwork methodology and post-excavation assessment is detailed in that document. It is expected that the council brief will also be finalised and appended to the Archaeological Mitigation Strategy.	The Heritage Team do not believe requirement 9 (Archaeology) within the draft DCO provides sufficient detail on the nature of the archaeological work. Alternative wording detailing the programme of work to include preparation of Site Specific WSI's, fieldwork, post-excavation assessment and analysis, and publication and archiving should be agreed. Clear reference also needs to be made to the archaeological work following an Archaeological Mitigation Strategy and Site Specific WSI's approved by the relevant LPA's and prepared in accordance with the Archaeological Design Brief.		

**Table 3-6 – Highways, Design, Public Rights of Way and WCH**

Issue	Document Reference	Highways England Position	Bedford Borough Council Position	Status	Date
<p><b>Highways Design General Matters</b></p>					
<p>Closure of accesses onto the A1 and reprovision of Local Road Access</p>	<p>Bedford Borough Council Relevant Representation <b>[RR-008]</b></p>	<p>As part of the Scheme, the Applicant is committed to improving the safety standards of existing conditions. The Scheme proposes closure of four direct accesses onto the A1 at (School Lane, Chawston Lane, Nags Head Lane and The Lane) and has agreed with Bedford Borough Council preliminary designs for a new link road accessed from a new roundabout junction on Roxton Road, which allows access to all affected properties. The Scheme has also agreed with the local authority preliminary designs for the reconstruction and slight realignment of Roxton Road overbridge, and for new access arrangements to Kelpie Marina.</p> <p>The proposals are included within the General Arrangement Plans <b>[APP-011]</b></p>	<p>The Traffic Operations team has agreed to the closure of four direct accesses onto the A1 (School Lane, Chawston Lane, Nags Head Lane and The Lane) and has agreed preliminary designs for a new link road accessed from a new roundabout junction on Roxton Road, which allows access to all affected properties. The team has also agreed preliminary designs for the reconstruction and slight realignment of Roxton Road overbridge, and for new access arrangements to Kelpie Marina.</p>	<p>Agreed</p>	

Issue	Document Reference	Highways England Position	Bedford Borough Council Position	Status	Date
Impact on Public Transport Services	Bedford Borough Council Relevant Representation [RR-008p]	<p>Transport Assessment Report [APP-241]</p> <p>The Applicant proposes permanent relocation of the existing bus stop located on the northbound carriageway of the A1 (Wyboston Footbridge) 180m to the north to improve safety.</p> <p>The applicant further proposes to permanently relocate the existing bus stop, located on the southbound carriageway of the A1 (Wyboston Footbridge) approximately 400m north to improve safety.</p> <p><b>Table 8-2</b> of the Transport Assessment Report [APP-241] shows that there are seven routes which do not pass through the Scheme but which are within the surrounding local highway network which may be indirectly impacted during the Scheme construction. It is expected that the impact of the Scheme construction on this group of bus services will be minimal.</p>	Discussions have taken place between Highways England and the Transport Policy team on the impact of the scheme for bus users. However, further discussions will be required on the implications of detailed design during and after construction on the location of bus stops on the A1, and the impact on local bus services in adjacent villages.	Under Discussion	
Impact on Sustainable Development	Bedford Borough Council Relevant Representation [RR-008q]	East West Rail has now completed their non statutory consultation. However, until East West Rail has determined the route and locations of the proposed stations, it is not	The Council wishes to ensure that potential sustainable development in the area is not compromised by the design	Under Discussion	

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		<p>appropriate for the Applicant to make or coordinate any specific provision for any new infrastructure which may be required as part of the East West Rail scheme.</p> <p>The design of Barford Road is a replacement of the existing infrastructure. The existing infrastructure does not include provision for walkers, cyclists and/or horse-riders and therefore this is not proposed in the design of the Barford Road side road diversion or overbridge.</p> <p>Furthermore, there are no public rights of way connecting to the existing Barford Road in close proximity to the Scheme. The preliminary design for Barford Road including the bridge crossing has been developed and agreed in consultation with Central Bedfordshire Council as the maintaining highway authority.</p> <p>The proposed structure over the East Coast Main Line includes vehicular access through the side spans for landowners. No separate provision has been made for pedestrians and cyclists alongside the East Coast Main Line as there are no existing rights of way within the area. It is envisaged that there</p>	<p>of the new road. It therefore wishes to be reassured that:</p> <ul style="list-style-type: none"> <li>• A junction on the new road to serve the proposed East West Railway stations in the area is deliverable.</li> <li>• Sufficient space to accommodate sustainable modes of travel is provided on the Barford Road overbridge.</li> <li>• Sufficient space for north-south pedestrian and cycle paths adjacent to the East Coast Main Line under the new road is maintained.</li> </ul>		

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		<p>will be sufficient space for WCH through the shared use of the vehicular access through the side span</p> <p>Details of the proposals are included within the General Arrangement Plans <b>[APP-011]</b> and the WCH provisions are included within the Streets, Rights of Way and Access Plans <b>[APP-013]</b></p>			
Impact of Construction Phase upon the Highway Network	Transport Assessment <b>[APP-241]</b> and <b>[APP-242]</b> and the Transport Assessment Annex <b>[APP-243]</b> .	<p>The Applicant has provided comprehensive construction traffic flow impacts in the Transport Assessment <b>[APP-241]</b> and <b>[APP-242]</b> and the Transport Assessment Annex <b>[APP-243]</b>. Results from the assessments undertaken have been presented to local councillors, officers and local forums of all the local authorities.</p>	<p>BBC is satisfied that the applicant has provided comprehensive construction traffic flow impacts in the Transport Assessment documents, and that results from the assessments undertaken have been presented to local councillors, offices and local forums of Bedford Borough Council. BBC welcomes the opportunity for further discussions on the local impact of construction traffic as the scheme progresses.</p>	Under discussion	
The Outline Construction Management Plan <b>[APP-244]</b>	The Outline Construction Traffic Management Plan (OCTMP) <b>[APP-244]</b>	<p>The Outline Construction Traffic Management Plan (OCTMP) <b>[APP-244]</b> sets out the temporary traffic management processes that will be followed for the safe and efficient construction phases of the Scheme. The development of the OCTMP has been informed through discussions with the Strategic Road</p>	<p>BBC is satisfied that the temporary traffic management processes set out in the Outline Construction Traffic Management Plan have been developed in discussion with the Strategic Road Users TWG.</p> <p>BBC welcomes the opportunity for further discussions on the local impact</p>	Under discussion	

Issue	Document Reference	Highways England Position	Bedford Borough Council Position	Status	Date
		<p>Users Technical Working Group which includes representatives from local authorities.</p> <p>Following a grant of development consent for the Scheme, relevant local highway authorities will have the opportunity to comment on a Traffic Management Plan, which must accord with the OCTMP <b>[APP-244]</b>. Requirement 11 of the draft Development Consent Order (dDCO) <b>[APP-025]</b> makes provision for the preparation of a Traffic Management Plan, that must be consulted upon with the relevant local highway authority before being submitted to the Secretary of State for approval. In making an application to discharge the requirement, a summary report is required to be prepared which must include the written responses from any parties consulted with.</p> <p>The Applicant is committed to continuing engagement with the local authority on matters relating to the outline construction traffic management plan.</p>	<p>of construction traffic as the scheme progresses.</p>		
The Outline Construction Traffic	Bedford Borough Council Relevant Representation <b>[RR-008n]</b>	The restrictions sought are sufficiently set out in the Outline	With regards to traffic management, diversions and construction management plans, the Traffic Operations team will continue to engage	Under discussion	



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Management Plan [APP-244]		<p>Construction Traffic Management Plan as noted below.</p> <p>Chapter 3 of the Outline Construction Traffic Management Plan [APP-244] sets out a number of restrictions as follows:</p> <ul style="list-style-type: none"> <li>• Construction traffic will not be permitted to use a number of specifically identified side roads for the duration of the Scheme construction phase. Appendix C of the Outline Construction Traffic Management Plan [APP-244] sets out the restricted routes.</li> <li>• Carriageway and lane restrictions will be used to create safe working spaces. Indicative closure times are set out in Table 3.1 within the Outline Construction Traffic Management Plan [APP-244]. The indicative closures are shown as being operational for overnight periods.</li> <li>• Strategic diversion routes will be in place when there are closures on sections of the A428, A421 and the A1. Appendix D of the Outline</li> </ul>	with the relevant Highways England technical teams on the proposed plans and will continue to review these as the details emerge.		

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		<p>Construction Traffic Management Plan <b>[APP-244]</b> sets out drawings showing the diversion routes.</p> <ul style="list-style-type: none"> <li>The number of operating lanes approaching the Black Cat junction on the A1 and A421 will only be reduced (from the existing two lanes in each direction) during off peak hours. Full carriageway closures will only be implemented at night or at weekends, with narrow lane working during daytime. Para 3.6.2 of the Outline Construction Traffic Management Plan <b>[APP-244]</b> Speed restrictions and temporary speed limits (to be dealt with by temporary traffic regulation orders).</li> </ul> <p>Following the grant of development consent for the Scheme, relevant local highway authorities will have the opportunity to comment on the Traffic Management Plan, which must substantially accord with the Outline Construction Traffic Management Plan <b>[APP-244]</b>. Requirement 11 of the draft Development Consent Order (dDCO) <b>[APP-025]</b> makes</p>			

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		<p>provision for the preparation of a Traffic Management Plan, that must be consulted upon with the relevant local highway authority before being submitted to the Secretary of State for approval. In making an application to discharge the requirement, a summary report is required to be prepared which must include the written responses from any parties consulted with.</p>			
<p>The Construction Programme</p>	<p>Outline Construction Traffic Management Plan <b>[APP-244]</b></p>	<p>Sufficient information regarding the construction programme is contained within the Applicant in Chapter 2, The Scheme of the Environmental Statement <b>[APP-071]</b>. Further detailed construction works information will be provided at the detailed design stage of the Scheme.</p> <p>Sufficient information for this stage is provided within the Application about the timings of closures with indicative timings for closures set out in the Outline Construction Traffic Management Plan <b>[APP-244]</b>.</p> <p>The relevant local highway authorities will have the opportunity to comment on a Traffic Management Plan, which must accord with the Outline</p>	<p>With regards to the OCTMP, the Traffic Operations team will continue to engage with the relevant Highways England technical teams on the proposed detailed designs for construction works and timings of road closures, and will continue to review these as the details emerge.</p>	<p>Under discussion</p>	

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		<p>Construction Traffic Management Plan <b>[APP-244]</b>. Requirement 11 of the draft Development Consent Order (dDCO) <b>[APP-025]</b> makes provision for the preparation of a Traffic Management Plan, that must be consulted upon with the relevant local highway authority before being submitted to the Secretary of State for approval. In making an application to discharge the requirement, a summary report is required to be prepared which must include the written responses from any parties consulted with.</p>			
<b>Geometry and Design Standards</b>					
Design Standards for Junctions and Roads in Bedford Borough Council (BBC) area		<p>Highways England has designed sections of non-trunk roads to suit the nature of the existing road, which in some cases are old roads that have not been designed to any standard.</p> <p>Design guides or standards such as the Design Manual for Roads and Bridges (DMRB) or Manual for Streets (MfS) have been used to facilitate this.</p> <p>The Applicant developed local road design proposals in collaboration</p>		Agreed	

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		with Bedford Borough Council during early engagement with the local authority.			
Design Standards for Junctions and Roads in Bedford Borough Council (BBC) area	Works Plans <b>[APP-009]</b> to <b>[APP-010]</b> ; General Arrangement Plans <b>[APP-011]</b> and Permanent Speed Limit Plans <b>[APP-015]</b> .	<p>For:-</p> <ul style="list-style-type: none"> <li>• Roxton Road.</li> <li>• Roxton Link Road.</li> <li>• The Lane.</li> <li>• Kelpie Marina Access Road.</li> <li>• Bedford Road.</li> <li>• Nags Head Lane Link.</li> <li>• Chawston Lane.</li> <li>• A1 Services Link</li> </ul> <p>matters including the width of the verges; design speeds; locations of drainage ditches and vertical clearances for power cables are shown in the relevant Works Plans <b>[APP-009]</b> to <b>[APP-010]</b>; General Arrangement Plans <b>[APP-011]</b> and Permanent Speed Limit Plans <b>[APP-015]</b> and have been agreed in principle with the local authorities.</p> <p>Some matters, including road junction drainage collection systems design will not be finalised until detailed design stage, when</p>		Agreed	

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		the host authorities will be consulted.			
Lighting Strategy	General Arrangement Plans <b>[APP-011]</b>	A detailed lighting strategy will be developed at the detailed design stage. However, the proposed extent of lighting is shown on the General Arrangement Plans <b>[APP-011]</b> . Requirement 17 of the dDCO <b>[APP-025]</b> sets out that no part of the authorised development may be brought into use until a written scheme of the proposed highway lighting for that part has been approved by the Secretary of State, following consultation with the relevant local highway authority on matters relating to its function.	BBC is satisfied with this approach to the lighting strategy.	Under discussion	
Management and Maintenance Responsibilities		<p><b>Highways</b></p> <p>The links and junctions as defined in the draft DCO <b>[APP-025]</b> Schedule 3 and within the area of Bedford Borough Council will be the responsibility of Bedford Borough Council highways authority. Bedford Borough Council will maintain the Kelpie Marina road from Bedford Road heading south to Rockham Ditch (including culvert) and the 2 way section of the A1 Services Link.</p>	BBC will continue to discuss the details for management and maintenance responsibilities for the detrunked highways, structures, drainage and landscaping features set out in APP-025.	Under discussion	

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		<p>Highways England will maintain the one way section of the A1 Services Link, but the road will be adopted by the Bedford Borough Council. Bedford Borough Council will be responsible for the traffic enforcements along the entire link (Red Route).</p> <p><b>Structures</b></p> <p>Highways England will maintain Roxton Road Bridge, (overbridge). Bedford Borough Council will be responsible for the maintenance of the carriageway construction above the waterproofing for the bridge structures that pass 'over' the trunk road.</p> <p><b>Drainage</b></p> <p>Bedford Borough Council will be the maintaining authority for the drainage assets servicing the proposed local highway network, including but not limited to the attenuation basins, Sustainable Drainage Systems (SuDS) and culverts..</p> <p><b>Landscaping</b></p> <p>The extent of maintenance responsibility for landscape will be determined at detailed design in</p>			

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		collaboration with Bedford Borough Council.			
<b>Existing A428</b>					
Detrunking Process	Bedford Borough Council Relevant Representation [RR-008m]	<p>The Applicant is committed to continuing engagement with the local authority on the matters relating to de-trunking the existing A428 and handover of assets.</p> <p>A side agreement is currently being negotiated between the parties which will, when agreed, contain an acceptable process for the handover of the de-trunked A428. This will ensure that the highway is at a reasonable standard as agreed with the Highway Authority.</p>	<p>The Traffic Operations team has agreed to the scope and basic principles of the proposed de-trunking scheme, and will continue to work with Highways England on the detail of these proposals, particularly with reference to the viaduct over the River Great Ouse to the south of St Neots.</p>	Agreed	
De-trunking: Maintenance responsibility		<p>The existing A428 will be de-trunked from the Wyboston Roundabout through to Caxton Gibbet junction. Maintenance responsibility for the section of the existing A428 within Bedford Borough Council will be transferred to Bedford Borough Council highway authority.</p>	<p>BBC will continue to discuss the details for management and maintenance responsibilities for the detrunked section and features, including transfer of assets to Bedford Borough Council.</p>	Under discussion	



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De-trunking: Name of road		The existing A428 will be renamed A1428 and B1428 as per the extents shown on the Classification of Road Plans <b>[APP-016]</b> and contained within the draft DCO <b>[APP-025]</b> Schedule 3, Part 2 – Classified Roads.	BBC will continue to engage in discussions with Highways England on renaming the A428, in association with Central Bedfordshire Council and Cambridgeshire County Council.	Under discussion	
Land Ownership: Restoring of stopped up land		<p>The land required for, or affected by, the proposed development is shown on the Land Plans <b>[APP-008]</b>. Further reduction/ refinement may be developed during detailed design.</p> <p>Where highways are being stopped up and there is no existing title plot associated, the half-width of the road will be returned to the adjacent landowners, unless Highways England are seeking permanent acquisition.</p>	BBC is willing to enter into further discussions on this matter where necessary.		
<b>PROW and WCH Matters</b>					
Impact of the Scheme upon Walkers, Cyclists and Horse riders (WCH)	Bedford Borough Council Relevant Representation <b>[RR-008p]</b>	The design of the proposed WCH routes is acceptable and are identified in the DCO Application, specifically shown in the General Arrangement Plans <b>[APP-011]</b> , the Streets, Rights of Way and Access	For cyclists, pedestrians and other non-motorised users, further discussion is required on local network access to and around the Black Cat junction.	Under discussion	

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		<p>Plans [APP-013] and within the draft DCO [APP-025].</p> <p>In the delivery of the Scheme, the Applicant is required to re-provide Public Rights of Way and designated routes that are severed or disrupted as a result of the Scheme. Wider interventions outside of the Scheme area (such as links to the wider network) are outside of the scope of the Scheme.</p> <p>The Roxton Road bridge has been provided to maintain connectivity across the Scheme.</p> <p>Correspondence received during the consultation highlighted that this route is used by horse riders. However, since the supplementary consultation, survey counts were undertaken on the existing bridge to understand the current level of usage by walkers, cyclists and horse riders. On the days counts were undertaken no horse riders were observed on the existing bridge, and therefore the barriers on each side of the new Roxton road bridge have not been designed to comply with DMRB standards for horse riders. Furthermore, the bridge does not connect to official bridleways,</p>			

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		<p>hence there is no requirement to provide higher parapets as for a bridleway bridge. More information on the results of the walkers, cyclists and horse rider counts can be found within Chapter 12, Population and Health within volume 1 of the Environmental Statement <b>[APP-081]</b> which describes the assessment on Population and Health.</p>			
<p>Walkers, Cyclists and Horse riders (WCH) Provision in Application</p>	<p>Bedford Borough Council Relevant Representation <b>[RR-008r]</b></p>	<p>Appendix A of the Case for the Scheme <b>[APP-240]</b> sets out an assessment of the Scheme against the paragraphs contained within the National Networks National Policy Statement (NNNPS). In response to paragraph 5.216 of the NNNPS, which expects that impacts on accessibility for non-motorised users will be mitigated, it is stated that as part of development of the Scheme, a Walking, Cycling and Horse Riding Assessment and Review was undertaken <b>[APP-242]</b>. It further states that the requirements of these users have been identified and appropriate mitigation measures have been incorporated into the design of the Scheme.</p>	<p>No significant objections to the proposal however it must be ensured appropriate linkages for pedestrians and cyclists are maintained and created particularly where the new road crosses the railway lines.</p>	<p>Under discussion</p>	

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		<p>The Scheme will provide new and diverted footpaths, cycleways and bridleways which will provide many benefits to the local population such as increased access to community facilities, improved safety while travelling, encouragement to take part in recreational activity and the increased opportunity to travel using sustainable transport modes. This includes a new 2m wide section of footway next to a new bus shelter on the A1 Great North Road as well as a new bridleway which will be established along the length of School Lane.</p> <p>No provision has been made for pedestrians and cyclists over the East Coast Main Line as there are no existing rights of way within the area.</p>			
Cycling Provision		<p>The Applicant has proposed unsegregated shared footway/ cycleway in accordance with the Design Manual for Roads and Bridges - 'CD 143 Designing for walking, cycling and horse-riding' at the following locations:</p> <ul style="list-style-type: none"> <li>• Roxton Road.</li> <li>• Roxton Link Road.</li> </ul>		Under Discussion	

A428 Black Cat to Caxton Gibbet improvements  
Draft Statement of Common Ground with Bedford Borough Council

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		<ul style="list-style-type: none"><li>• Kelpie Marina Access Road.</li><li>• Bedford Road.</li></ul> Furthermore, A footway has been provided for the A1 Services Link.			