A428 Black Cat to Caxton Gibbet improvements

TR010044

Volume 9

9.1 Applicant's Response to Relevant Representations

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The Infrastructure Planning (Examination Procedure) Rules 2010

A428 Black Cat to Caxton Gibbet improvements

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9.1 Applicant's Response to Relevant Representations

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1 Introduction

1.1.1 The Development Consent Order (DCO) application for the A428 Black Cat to Caxton Gibbet improvements scheme (the Scheme) was submitted by Highways England to the Secretary of State for Transport via the Planning Inspectorate on 26 February 2021 and accepted for Examination on 23 March 2021.

1.1.2 The purpose of this document is to set out the Applicant's response to the Relevant Representations (RRs) received from Interested Parties. These RRs were published on the Planning Inspectorate website on 23 June 2021.

1.1.3 A total of 123 responses were received during the RR period. Three additional submissions were accepted at the discretion of the Examining Authority (ExA) on 24 June 2021, one submission was accepted on 2 July 2021 and a further submission was accepted on 20 August 2021. Any representations made after this date will still be considered by the Applicant but will be addressed at the appropriate deadline.

1.1.4 The Applicant responses to the RRs and the additional submissions can be found in Chapter 2 of this report. For ease of reference, a table of abbreviations used in this report is provided in **Table 1-1**.

Table 1-1: Abbreviations Used

Abbreviation	
AMS	Archaeological Mitigation Strategy
AQO	Air Quality Objective
BBC	Bedford Borough Council
BMP	Biodiversity Management Plan
BMV	Best and Most Versatile
BNG	Biodiversity Net Gain
BoR	Book of Reference
CA	Compulsory Acquisition
CBC	Central Bedfordshire Council
CCC	Cambridgeshire County Council
CIfA	Chartered Intistute for Archaeologists
CRTN	Calculation of Road Traffic Noise
CWS	County Wildlife Site
DCO	Development Consent Order

Abbreviation	
dDCO	draft Development Consent Order
DfT	Department for Transport
DLL	District Level Licensing
DMRB	Design Manual for Roads and Bridges
EA	Environment Agency
EHO	Environmental Health Officer
EIA	Environmental Impact Assessment
EMP	Environmental Management Plan
EQS	Environmental Quality Standards
ES	Environmental Statement
ESC-DSS	Ecological Site Classification Decision Support System
EVs	Electric Vehicles
EWR	East West Rail
ExA	Examining Authority
FIEMP	First Iteration Environmental Management Plan
GCN	Great Crested Newt
GHG	Green House Gas
HDC	Huntingdonshire District Council
HE	Highways England
HoTs	Heads of Terms
HRA	Habitats Regulation Assessment
ICCI	In-combination Climate change Impact
LLFAs	Lead Local Flood Authority
LONI	Letter of No Impediment
LTN	Local Transport Note
mpc	Multi-Purpose Construction

Abbreviation	
NE	Natural England
NFU	National Farmers Union
NMP	Noise Management Plan
NMU	Non Motorised User
NNNPS	National Networks National Policy Statement
NO2	Nitrogen Dioxide
NPPF	National Planning Policy Framework
NSIP	Nationally Significant Infrastructure Project
OCTMP	Outline Construction Traffic Management Plan
PACE	Public archaeology and community engagement
PEI Report	Preliminary Environmental Information Report
PRoW	Public Rights of Way
REAC	Register of Environmental Actions and Commitments
RIS2	Road Investment Strategy 2
RPA	Root Protection Area
SCDC	South Cambridgeshire District Council
SM-EM	Semi Mature To Early Mature
SoCG	Statement of Common Ground
SoR	Statement of Reason
SRN	Strategic Road Network
SSA	Strong Strream Advice
SSB	Strategic Stakeholder Board
SSWSIs	Site Specific Written Schemes of Investigation
SuDS	Sustainable Urban Drainage System
TAG	Transport Appraisal Guidance
TIP	Transport Investment Plan

Abbreviation	
TSRGD	Traffic Signs Regulations and General Directions
VDM	Variable Demand Model
VDM	Variable Demand Model
VfM	Value for Money
WCH	Walkers, Cyclists and Horse Riders
WCHAR	Walking, Cycling and Horse-riding Assessment Report'
WMP	Water Management Plan
WRC	Water Recycling Centre
WSIs	Written Schemes of Investigation

2 Applicant Response to the Relevant Representations

RR-001 Abbey Developments Cambridgeshire Limited

Reference Number	Comment from Relevant Representation/Applicant Response
RR-001a	Abbey Developments Cambridgeshire Limited own the land under title number [Redacted] which is located to the south of the existing Caxton Gibbet roundabout which connects the A428 with the A1198. [Redacted] is divided by Cambridge Road. Our existing land essentially falls into three parcels as follows: 1) Land to the west of [Redacted] is developed as a food retail services site consisting of 4 units and a car park. Tenants include McDonald's, Costa Coffee and Subway. 2) Land to the centre of [Redacted] (west of Cambridge Road) is undeveloped land for which planning permission is being sought from South Cambridgeshire District Council for some small industrial units. 3) Land to the east of [Redacted] (east of Cambridge Road) is undeveloped land. We have held discussions with Highways England since the inception of the A428 proposals and appreciate the revisions that have been made to the scheme to reflect our comments. Our comments fall within three categories as set out below. Landscaping The proposal landscaping scheme is acceptable to us following the revisions that have been made. It is important for the viability of the food retail services site to ensure that good visibility of the site is available from roads and the landscaping scheme proposed within the DCO application achieves this. We would not wish to see the landscaping scheme alter from that currently and proposed and would request consultation be undertaken if changes are proposed.
Applicant Response	The acceptability of the proposed landscaping scheme to Abbey Developments Cambridgeshire Limited is noted by the Applicant. In the event that modifications to the design of this landscaping scheme are required, these will be submitted to the ExA by the Applicant during the course of the Examination, and will be made available on the Planning Inspectorate's website for review and comment.

Reference Number	Comment from Relevant Representation/Applicant Response
RR-001b	Signage We have discussed this matter in some detail previously with Highways England. We note the comments within Chapter 2 of the Environmental Statement which at paragraphs 2.5.77 to 2.5.79 state that: New road signage and markings would be installed across the Scheme to ensure route legibility for road users travelling on new and improved roads, and to support the Scheme objectives of cutting congestion and improving safety. As the Scheme would involve modifications to both the SRN and local road network, static road signage would be agreed with the relevant local authorities to ensure continuity is achieved along the following routes: a. The existing A428. b. Bedford Road. c. Roxton Road. d. Barford Road. e. B1046. f. Potton Road. g. B1428 Cambridge Road. h. Toseland Road. i. B1040. j. A1198. Where existing signs do not conform to new or modified road layouts within the Scheme, these would be removed and replaced with new signage containing updated information. New and modified sections of road would be permanently marked using a combination of road markings and road studs. We are disappointed that there are no details of signage at this stage given the importance of signage to the viability of the existing food retail services site. It is essential given the proposed level of the A428 road at Caxton Gibbet that appropriate signage is in place well before the junctions to enable customers to be aware of the service facilities so that they are able to plan to leave the proposed A428 in advance of the junction. This applies for vehicles travelling both east and west bound on the proposed A428. We would request that details of signage be provided at this stage and that adequate consultation be undertaken with ourselves and our tenants such that views can be exchanged and a signage design (or as a minimum a strategy) agreed. We consider that these matters are critical to the scheme and therefore we reserve the right to object to the scheme if signage details are not provided.
Applicant Response	Through consultation with this interested Party, the Applicant has confirmed that the existing services at Caxton Gibbet junction would be signed from the new dual carriageway. The design of the services signing will be developed as part of the detailed design and would be in accordance with the requirements of the current version of the Traffic Signs Regulations and General Directions (TSRGD) and the guidance given in the Traffic Signs Manual for the signing of trunk road service facilities. As the new road will not be a special road, branded signing cannot be used. The Applicant is committed to continuing engagement with this Interested Party and keeping them informed of the signage proposals as and when they are developed.

Reference Number	Comment from Relevant Representation/Applicant Response
RR-001c	CPO Area 14/17a We note the requirement for temporary possession and acquisition of an area of our land at the access from Cambridge Road to the centre of [Redacted]. We do not object to this requirement but, as already discussed with Highways England, would welcome ongoing communication in this regard given our current proposal to develop the centre parcel to which access is required over the CPO area. We would welcome further discussions in relation to the above matters particularly in respect of signage.
Applicant Response	The Applicant has consulted with the Interested Party on a number of occasions; meetings were held on 16 May 2017, 11 September 2018 and a Teams meeting on 28 April 2020. More recently in email correspondence dated 21 May 2021 the Interested Party was advised that plot 14/17a, shown on sheet 14 of the Land Plans **[APP-008],** is required to facilitate the diversion/undergrounding of utilities equipment in the highway and should not affect their ability to redevelop the adjoining land. The Applicant is open to continuing discussions on this matter and will appoint a liaison officer during construction works to help mitigate the impact of the works. On the issue relating to signage, the Applicant has written to the Abbey Group requesting information on the signage required so this can be discussed further.

RR-002 Alan Thawley

Reference Number	Comment from Relevant Representation/Applicant Response
RR-002a	I object to this scheme on the grounds that road capacity increases are incompatible with the climate emergency declared by this country. Rather than improving emissions, road schemes only create more traffic through induced demand, meaning they ultimately fail to alleviate congestion as well as emitting more carbon and diverting resources from genuine traffic reduction schemes.
Applicant Response	Chapter 14, Climate **[APP-083]** of the Environmental Statement presents an assessment of the Scheme against the UK Government's current carbon budgets, as required by Paragraph 5.17 of the National Policy Statement for National Networks (NPSNN): "*for road project applicants should provide evidence of the carbon impact of the project and an assessment against the Government's carbon budgets*". Paragraph 5.18 of the NPSNN clarifies that "*any increase in carbon emissions is not a reason to refuse development consent, unless the increase in carbon emissions resulting from the proposed scheme are so significant that it would have a material impact on the ability of Government to meet its carbon reduction targets*". The assessment within Chapter 14, Climate **[APP-083]** of the Environmental Statement has identified that the emissions arising as a result of the Scheme represent less than 0.012% of the total emissions in any of the 3rd, 4th or 5th Carbon Budget periods. Accordingly, the assessment has concluded that the greenhouse gas (GHG) emissions impact of the Scheme would not have a material impact on the UK Government meeting its legally binding carbon reduction targets. Although the 6th Carbon Budget was not legally binding when the Environmental Statement was written, an additional assessment of the 6th Carbon Budget, which became legally binding in June 2021, has been undertaken. This assessment concluded that the Scheme represents less than 0.024% of the total emissions in the 6th budget period and is also considered not to have a material impact on the UK Government meeting its carbon reductions target. For further information on how the cumulative impacts of the Scheme have been considered including in the context to RIS, refer to the response to Written Question Q1.4.1.1a in the Applicant's Response to the Examining Authorities First Round of Written Questions **[TR010044/EXAM/9.2]**.The design of the Scheme has been developed to reduce its potential effects on the climate and to provide resilience against the effects of climate change such as extreme weather events. Measures to mitigate the impact of the Scheme are presented in Chapter 14, Climate **[APP-083]** of the Environmental Statement. The GHG assessment within Chapter 14, Climate **[APP-083]** of the Environmental Statement presents a worst case scenario as it does not take into account the impact of the commitments made by DfT within the transport decarbonisation plan. It is anticipated that road user emissions will decrease in line with the

Reference Number	Comment from Relevant Representation/Applicant Response
	forecast emissions presented within the plan, for example, due to the increased use of electric and low-emission vehicles. The traffic forecasts take into account the effects of changes in travel cost as a result of the Scheme upon demand for travel using a Variable Demand Model (VDM). The VDM process is described in Chapter 5.4 of Appendix C Transport Forecasting Report of the Combined Modelling and Appraisal Report **[APP-253]**. While the Scheme does not generate (induce) trips, the VDM forecasts a very small transfer of trips from rail to road. The main impact of the Scheme results from drivers changing their destination as the Scheme reduces travel times between the A1 and Caxton Gibbet and also due to drivers using different routes to make their journey, such as using the Scheme rather than travelling through Toseland. This results in additional kilometres travelled. A comparison of the total vehicle distance with and without the Scheme for each modelled time period is presented in Tables 6-4 and 6-5 of Appendix C Transport Forecasting Report of the Combined Modelling and Appraisal Report **[APP-253]** for 2025 and 2040 respectively. This shows that the increase in vehicle kilometres as a result of the Scheme is very small, ranging between 0.4% to 0.5%.

RR-003 Amanda Yorwerth

Reference Number	Comment from Relevant Representation/Applicant Response
RR-003a	I oppose this scheme on the basis of the enormous carbon dioxide emissions that it's construction and use will cause. We are in a climate emergency and we should be spending money on carbon saving, not carbon emitting projects.
Applicant Response	The assessment within Chapter 14, Climate **[APP-083]** of the Environmental Statement has identified that the emissions arising as a result of the Scheme represent less than 0.012% of the total emissions in any of the 3rd, 4th or 5th Carbon Budget periods. Accordingly, the assessment has concluded that the GHG emissions impact of the Scheme would not have a material impact on the UK Government meeting its legally binding carbon reduction targets. Although the 6th Carbon Budget was not legally binding when the Environmental Statement was written, an additional assessment of the 6th Carbon Budget, which became legally binding in June 2021, has been undertaken. This assessment concluded that the Scheme represents less than 0.024% of the total emissions in the 6th budget period and is also considered not have a material impact on the UK Government meeting its carbon reductions target.

RR-004 Anglian Water Services Limited

Reference Number	Comment from Relevant Representation/Applicant Response
RR-004a	Anglian Water Services Limited (Anglian Water) is in active discussion with Highways England's legal advisors regarding the form of modified protective provisions within the DCO. Anglian Water is submitting this Relevant Representation following the advice in Advice Note 8.2 and in agreement with Highways England that to ensure clarity on our position as a utility provider and landowner/ occupier affected by the proposed scheme and so to assist the Examining Authority. Anglian Water has no in principle objection to the scheme and seeks to ensure that through the agreement of protective provisions we continue to provide customers with uninterrupted water and waste water services during construction and then the operation of the scheme. The issues on which we are in discussion with Highways England are in summary: 1. Definitions, in particular “apparatus”. 2. The application of NRSWA and specifically were it applies, notification(s) to Anglian Water. 3. Anglian Water's facilities and rights when alternative apparatus has been constructed and is in operation to our reasonable satisfaction. 4. Step in rights for approved works and notification. 5. Clarity regarding the undertakers works near to or which affect Anglian Water apparatus in part to assist the undertaker in flagging and so minimise the risk of damage by Highways England's contractors. 6. Time limits being able to be altered by written agreement between the undertaker and Anglian Water. 7. Safeguards to ensure emergency works on our apparatus by the undertaker are carried using best endeavours to keep the impact of those emergency works on Anglian Water’s apparatus and network on end-users/Anglian Water customers to a minimum. 8. Tightening up references so that paragraphs are self contained were possible including when we incur expense on the undertaker’s behalf. 9. Cost's as a result on the undertakers scheme which necessitate the provision of new Anglian Water infrastructure. 10. Ensuring definitions provide for adequate compensation following damage to Anglian Water's network by the undertaker.

Reference Number	Comment from Relevant Representation/Applicant Response
	11. The processes for exchange of documentation and requests by Anglian Water.
Applicant Response	The Applicant is continuing to work with Anglian Water in relation to the protective provisions with a view to agreeing the terms and will submit progress of this throughout the Examination.
RR-004b	12. A Memorandum of Understanding on stage payments to Anglian Water with reconciliation at the end or works. On land and rights acquisition, Anglian Water remains committed to reaching agreement on resolving the question of the access to the Chawston-Wyboston Water Recycling Centre (WRC) that Highways England seek to acquire permanently. Anglian Water's preference remains for the undertaker to maintain continuous access to the WRC to operate and maintain access to the site for our customers. Anglian Water therefore seek agreement to ensure that access is maintained until an acceptable replacement is constructed, operable and in Anglian Water's control as an occupier. Similarly, we seek to agree the approach of the undertaker to the proposed temporary use of Anglian Water's land and reservoir (covered) to the south-east of Rectory Farm Cottage and west of Potton Road, Eynesbury Hardwicke, St Neots.
Applicant Response	The Applicant is continuing to work with Anglian Water in relation to the stage payments with a view to reaching agreement. The Applicant will maintain access to the Chawston-Wyboston Water Recycling Centre and the land and reservoir to the south-east of Rectory Farm Cottage and west of Potton Road throughout the construction of the works or provide alternative access arrangements. In some instances, it may be necessary to restrict access for limited periods, however, the Applicant would seek to minimise the number and duration of any such restrictions as far as reasonably practicable. The Principal Contractor will liaise with Anglian Water to ensure that such disruption is minimised.

RR-005 Ann Kennedy

Reference Number	Comment from Relevant Representation/Applicant Response
RR-005a	I consider that the plans submitted by Highways England make inadequate provision for horse riders and carriage drivers, amongst the most vulnerable of road users. Cyclists appear to be being given priority over equestrian users. In particular, the arrangements between Roxton and Wyboston are, in my view, unacceptable as they make no provision for horses and make what is already a dangerous crossing even more so, compounding an error made when the A421 was built. I am told that the justification is that there is no need - but there are many local horses - who admittedly do not use the bridge much because it is dangerous - but would do so if it were safe. Just because people do not swim across a fast-flowing river because it is dangerous does not mean that there is no need for a bridge over that river!
Applicant Response	In the delivery of the Scheme, the Applicant is required to re-provide non-motorised user (NMU) routes that are severed or disrupted as a result of the Scheme. Where appropriate the Applicant seeks to deal with existing severance issues. Whilst wider interventions may sometimes be appropriate to address community severance resulting from the existing strategic road network, it is beyond the proper scope of the project to address all existing issues faced by existing users of the highways network. The NMU provision made between School Lane at Roxton and The Lane at Wyboston is a direct replacement for the shared unsegregated footway/cycleway that is currently adjacent to the A1 northbound carriageway. The existing route is unsuitable and would require pedestrians or cyclists to negotiate the new Black Cat junction. The proposed route provides a safer and more attractive alternative, away from the strategic road network, and it also links to National Cycle Route 12. It should be noted that the route along School Lane and from the east end of School Lane, northwards to the start of the Kelpie Marina access road, is to be dedicated as bridleway, as requested by Bedford Borough Council. The carriageway on the existing Bedford Road, Kelpie Marina access road, realigned Roxton Road and the new Roxton Road Link can be legally used by horses and carriages. The Roxton Road bridge has been provided to maintain connectivity across the Scheme and has an improved cross section compared to the existing bridge, as illustrated on Sheet 1 of the Engineering Sections (Part 3 – Structures General Arrangements) **[APP-019]**. This shows that the verge on the carriageway side of the bridge is 2.5m from the 1m high parapet railing. This is a standard (DMRB CD127 Cross sections and headrooms) minimum offset and parapet height (DMRB TD19/06 Requirements for road restraint systems) for bridges of this nature on roads for all users. On the footway/cycleway side, the

Reference Number	Comment from Relevant Representation/Applicant Response
	carriageway is offset by 5m from the parapet railing. The parapet railing on this side will be a minimum of 1.4m high for safety reasons as cyclists may be immediately adjacent to the railing. Correspondence received during the consultation suggested that Roxton Road 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 that counts were undertaken no horse riders were observed using the existing bridge. It should also be noted that there are no existing bridleways in the vicinity of this part of the Scheme. The Applicant acknowledges the suggestion that there would be greater interest in using this route if it were considered safer. The Applicant considers that the improved cross section on the bridge provides a safe and adequate route for all users. Should Bedford Borough Council as the local highway authority wish to extend the bridleway network within the area and provide an off-carriageway route across the bridge, the Scheme does not preclude any such extensions or alterations in the future.

RR-006 Astra Carter-Marsh

Reference Number	Comment from Relevant Representation/Applicant Response
RR-006a	I am objecting on the grounds that major road building projects will prevent the U.K. meeting it's carbon budget and contribute to climate change.
Applicant Response	Chapter 14, Climate **[APP-083]** of the Environmental Statement presents an assessment of the Scheme against the UK Government's carbon budgets at the time of writing. The assessment concluded that emissions arising as a result of the Scheme represent less than 0.012% of the total emissions in any five-year UK legally binding carbon budget during which they would arise. Accordingly, the assessment has concluded that the greenhouse gas emissions impact of the Scheme would not have a material impact on the UK Government meeting its legally binding carbon reduction targets. The 6th Carbon Budget was not legally binding when the Environmental Statement was written, however an additional assessment of the 6th Carbon Budget, which became legally binding during June 2021, has been undertaken. This assessment concluded that the Scheme represents less than 0.024% of the total emissions in the 6th budget period and is also considered not have a material impact on the UK Government meeting its carbon reductions target. The Applicant has considered GHG emissions from the Scheme in the context of the UK's new net zero target set in 2019 and does not consider that this gives cause to alter the assessment findings. The mitigation measures proposed for the Scheme are also detailed in Chapter 14, Climate **[APP-083]** of the Environmental Statement. During the development of the Scheme the Applicant will continue to review these mitigations and seek further opportunities to minimise carbon emissions as required by Design Manual for Roads and Bridges (DMRB) and in line with the net zero target.

RR-007 Barton & District Bridleways Group

Reference Number	Comment from Relevant Representation/Applicant Response
RR-007a	I am the Chairperson for Barton & District Bridleways Group, which currently has 148 members. The group is concerned that in The Black Cat to Caxton Gibbet consultation there appears to be a lack of safe equestrian access included. The project has also not taken into consideration opportunities for improving and enhancing the fragmented Rights of Way network. This is quite frankly unacceptable and should be addressed in the Development Consent Order.
Applicant Response	In the delivery of the Scheme, the Applicant is required to re-provide NMU routes that are severed or disrupted as a result of the Scheme. Where appropriate the Applicant seeks to deal with existing severance issues. Whilst wider interventions may sometimes be appropriate to address community severance resulting from the existing strategic road network, it is beyond the proper scope of the Scheme to address all existing issues faced by existing users of the highways network. Where existing bridleways are affected by the Scheme, suitable and safe alternatives are provided, such as the bridge carrying BW1/18 over the new dual carriageway to the east of the Cambridge Road junction and the underpass to the north of Eltisley, taking BW74/6 beneath the new dual carriageway. In addition the BW1/18 crossing of the existing A428 near Wintringham Farm is being improved.

RR-008a Bedford Borough Council

Reference Number	Comment from Relevant Representation/Applicant Response
RR-008aa	The Council is responding to this application for a Development Consent Order as Local Authority and Highway Authority. The Council will be making separate representations as a land owner.
Applicant Response	The Applicant notes the point that has been made. The Applicant will review all representations made.
RR-008ab	Bedford Borough Council (BBC) do not object to the overarching principle of the development and it is recognised that there are benefits of the scheme for the Borough as this is a strategic scheme that will reduce congestion and improve journey times, particularly in the BBC area in and around the Black Cat roundabout, albeit with some local network changes.
Applicant Response	The Applicant welcomes the support for the Scheme from Bedford Borough Council and agrees with the identified benefits resulting from the Scheme.
RR-008ac	At this stage further discussions are ongoing with the applicants and relevant Council Officers and some or all of the issues raised here may be resolved and clarified by the time we reach the hearings. At this time the key issues the Council wish to make representations about relate to: • Highways • Footpaths and Public Rights of Way • Heritage • Pollution and Noise • Air Quality • Contaminated Land • Borrow Pits • Wildlife and Ecology

Reference Number	Comment from Relevant Representation/Applicant Response
Applicant Response	Noted. Points relating to these matters are addressed below, please see the Applicant response from RR-008ad to RR-008abs.
Highways	
RR-008ad	The Traffic Operations team has agreed to the closure of three direct accesses onto the A1 (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.
Applicant Response	Noted. In addition, the closure of School Lane onto the A1 has been agreed with BBC.
RR-008ae	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.
Applicant Response	Noted. The Applicant is committed to continuing engagement with BBC on matters relating to de-trunking the existing A428.
RR-008af	With regards to traffic management, diversions and construction management plans, the Traffic Operations team will continue to engage with the relevant Highways England technical teams on the proposed plans and will continue to review these as the details emerge.
Applicant Response	Noted. The Applicant is committed to continuing engagement with BBC on matters relating to traffic management, diversion and construction management plans.
RR-008ag	The Transport Policy team has been kept informed of the development of the Traffic Model for the scheme by Highways England, and is in agreement with how it reflects the situation in Bedford Borough in current and future years.

Reference Number	Comment from Relevant Representation/Applicant Response
Applicant Response	Noted. The Applicant is committed to continuing engagement with the BBC on matters relating to the traffic impact assessment if queries arise.
RR-008ah	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. For cyclists, pedestrians and other non-motorised users, further discussion is required on local network access to and around the Black Cat junction.
Applicant Response	The Applicant is committed to continuing engagement with BBC on matters relating to bus services and local network access to and around the Black Cat junction for walkers, cyclists and horse-riders.
RR-008ai	The Council wishes to ensure that potential sustainable development in the area is not compromised by the design of the new road. It therefore wishes to be reassured that: • A junction on the new road to serve the proposed East West Railway stations in the area is deliverable. • Sufficient space to accommodate sustainable modes of travel is provided on the Barford Road overbridge. Sufficient space for north-south pedestrian and cycle paths adjacent to the East Coast Main Line under the new road is maintained.
Applicant Response	East West Rail has now completed their non-statutory route options consultation. Until East West Rail has determined the route and locations of the proposed stations, it is not possible for the Applicant to consider any specific provision for any new infrastructure which may be required as part of the East West Rail scheme. The design of Barford Road is a replacement of the existing infrastructure. The existing infrastructure does not include separate provision for walkers, cyclists and/or horse-riders and there is currently no community severance that would justify this intervention therefore this is not proposed in the design of the Barford Road side road diversion or overbridge.

Reference Number	Comment from Relevant Representation/Applicant Response
	The preliminary design for Barford Road including the bridge crossing was developed and agreed in consultation with Central Bedfordshire Council as the maintaining highway authority prior to the submission of the DCO Application. The proposed structure over the East Coast Main Line includes vehicular access through the side spans for landowners. No 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.
Footpaths and Public Rights of Way	
RR-008aj	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.
Applicant Response	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. Furthermore, the Applicant has re-provided public rights of way and designated routes that are severed or disrupted as a result of the Scheme.
Heritage	
RR-008ak	The Bedford Borough Historic Environment Team (hereafter Heritage Team) are satisfied that the pre-submission archaeological evaluation work comprising desk-based assessment, aerial photographic analysis, geophysical survey, and trial trenching provide an adequate baseline assessment of the archaeological potential within the proposed route. The assessment allows likely impacts on the archaeological remains to be predicted and a programme of archaeological mitigation work to be formulated.
Applicant Response	The Heritage Team's satisfaction in the pre-submission archaeological evaluation work is noted by the Applicant.
RR-008al	The 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 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:

Reference Number	Comment from Relevant Representation/Applicant Response
	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.
Applicant Response	Requirement 9 of the draft Development Consent Order (dDCO) **[APP-025]** requires the authorised development to be carried out, operated and maintained in accordance with the archaeological mitigation strategy. Paragraph 1.6.2 of the Archaeological Mitigation Strategy **[APP-238]** states: "*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. If the brief can be agreed, it will be included as an Appendix to the final AMS as Appendix B*". Paragraph 5.2.5 of the Archaeological Mitigation Strategy further states: "*A Joint Cambridgeshire and Bedfordshire brief for a programme of archaeological investigation was received on 11 December 2020. While this should be considered by the Principal Contractor and the Archaeological Contractor when preparing the SSWSIs, it should be noted that this has not been agreed. Subject to agreement, it may be appended to the final mitigation strategy*". Following a meeting held on 12 August 2021, a revised version of the Joint Cambridgeshire and Bedfordshire brief has been received and agreed. The Applicant will append this to the Archaeological Mitigation Strategy (AMS) **[APP-238]** as Appendix B. An Archaeological Mitigation Strategy **[APP-238]** was requested, to form an appendix to the Environmental Statement, at the first consultation meeting held with CCC and BBC on 18 September 2018. Section 2.2 of the Brief from the councils also requires the DCO to identify a 'robust mitigation strategy'. The Archaeological Mitigation Strategy **[APP-238]**, and in particular the mitigation areas, have been discussed with BBC and the mitigation areas have been agreed. Updates are being made to the AMS following further consultation with BBC.

Reference Number	Comment from Relevant Representation/Applicant Response
RR-008am	The Heritage Team do not believe requirement 9 (Archaeology) within the draft Development Consent Order provides sufficient detail on the nature of the archaeological work: indeed 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.
Applicant Response	Requirement 9 of the dDCO **[APP-025]** states that: "*The authorised development must be carried out, operated and maintained in accordance with the archaeological mitigation strategy"*. The Archaeological Mitigation Strategy **[APP-238]** includes a requirement for Site Specific WSIs (SSWSIs) in Section 5.2, with details of the contents in Section 6, details of post-excavation assessment and analysis in Section 13, publication in Section 13.5 and archiving in Section 14. Section 6.1 states that the SSWSIs must be submitted to the relevant curators.
RR-008an	The Heritage Team are not in agreement with the terminology used in assessing the impacts on below ground archaeological remains within Chapter Six of the Environmental Statement (Cultural Heritage), it seems somewhat misleading to describe the effect on remains which will be permanently destroyed as being of 'slight adverse effect (not significant)'.
Applicant Response	The impact assessment has been undertaken using Design Manual for Roads and Bridges (DMRB) LA104 Environmental Assessment and Monitoring (August 2020). This forms the methodology for assessing impacts for the EIA process for highways schemes. However, this has not been used in isolation. Paragraphs 6.3.15 and 6.3.16 of Chapter 6, Cultural Heritage **[APP-075]** of the Environmental Statement detail the other guidance documents that have informed the assessment. The impact assessment has also referenced the requirements of National Policy Statement for National Networks (NPSNN) and the National Planning Policy Framework (NPPF) which require the significance of heritage assets to be assessed. This has been completed for each affected heritage asset and archaeological site. The impact assessment process considers the value of each asset (taking the heritage significance of each asset into account), then, independently of the asset's value, a magnitude of impact is identified. Many of the sites with a slight adverse significance of effect have a moderate or large magnitude of impact but because the value of such archaeological features is considered to be low, the significance of

Reference Number	Comment from Relevant Representation/Applicant Response
	the effect is only slight. The assessment of the significance of effect is a reflection of both the value of the asset and the impact upon it. These levels are defined in Table 6.2 of Chapter 6, Cultural Heritage **[APP-075]** of the Environmental Statement.
RR-008ao	The Heritage Team feel that the setting impact assessment on designated heritage assets contained within Chapter Six of the Environmental Statement (Cultural Heritage) 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 the monument with little account taken of other aspects of the setting such as changes to tranquillity etc. through increased noise. Finally 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*).
Applicant Response	The assessment of visual impacts has been informed by evidence recorded through site visits, taking into consideration topography and existing screening. It also takes into account the contribution that views make to the understanding and appreciation of assets, in line with current guidance. This acknowledges that a change within a setting may not impact on its significance. The Applicant wishes to clarify that visualisations are only intended for use for visual receptors or where the extent of an impact is unclear. Visualisations developed as part of the landscape and visual effects assessment are presented on Figures 7.15.01.01 to 7.15.11.02 **[APP-123] [APP-124] [APP-125]** of the Environmental Statement. The Applicant can confirm that 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. This building comprises one of several listed buildings and non-designated assets within the Roxton Conservation Area, which have been considered collectively within the cultural heritage assessment. Paragraphs 6.9.219 – 6.9.221 within Chapter 6, Cultural Heritage **[APP-075]** of the Environmental Statement record 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.

Reference Number	Comment from Relevant Representation/Applicant Response
	The Applicant can confirm that 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.
RR-008ap	Following the information submitted in 7.7 'Black Cat Junction Design Options', the 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.
Applicant Response	The Applicant acknowledges BBC's agreement that there is no safe or viable way of retaining Brook Cottages in its current position whilst delivering the objectives of the Scheme, as demonstrated in the Black Cat Junction Design Options report **[APP-247]**.
RR-008aq	It is agreed with A.5.2.1 that demolishing without rebuilding Brook Cottages would constitute 'substantial harm' to its significance for the purposes of the NPPF.
Applicant Response	The Applicant acknowledges BBC's agreement within its conclusion regarding the substantial harm to the significance of Brook Cottages that would result from its demolition.
RR-008ar	However, the Heritage Team have advised that dismantling and reconstructing Brook Cottages could potentially result in a more preferable level of 'less than substantial harm' to its significance in this instance; particularly given the contribution currently made by setting and the method of the building's construction. 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.
Applicant Response	Paragraph 6.9.188 in Chapter 6, Cultural Heritage **[APP-075]** of the Environmental Statement concludes that construction of the Scheme would result in a large adverse effect (significant) on Brook Cottages. Paragraph 6.9.190 sets out that the effect on the cottages is considered to be substantial harm due to the loss of the building and a total loss of significance. As set out in Paragraph A5.1.5 in Appendix E of the Case for the Scheme **[APP-240]**, the Applicant 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 Brook Cottages for its continued residential use, or by

Reference Number	Comment from Relevant Representation/Applicant Response
	relocating Brook Cottages to a museum. The Applicant considers that neither option will reduce the substantial harm to Brook Cottages to less than substantial harm. 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. Notwithstanding this, the Applicant has continued to engage with a suitable receptor with a view to offering the elements of the cottages that are capable of reconstruction, thereby avoiding its total loss. Positive discussions are currently being held with a suitable receptor about the relocation of Brook Cottages.
RR-008as	The Heritage Team remain seriously concerned that Brook Cottages has not been subject 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.

Reference Number	Comment from Relevant Representation/Applicant Response
Applicant Response	The Applicant acknowledges that a detailed survey has not yet been undertaken for Brook Cottages. To date, it has not been possible to enter the premises to undertake the survey as access has not been granted to the property. However, the Applicant has continued to request access for the purposes of undertaking the survey, and a survey will be undertaken once the Applicant is in possession of the property. 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. This information includes the visit to Brook Cottages undertaken in March 2018, reported in Appendix 6.10 **[APP-178]** of the Environmental Statement. The Applicant 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. 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, the Applicant has applied the tests for designation as set out by Historic England. While it is accepted that relocating the building as a domestic property would retain elements of the historic fabric and maintain the building within its original use, it is assumed that the extent of works required to make it habitable and viable as a domestic building would erode enough of its historic interest to mean that it does not meet the criteria for listing. This loss of significance will also result in the substantial harm to the building being maintained.
RR-008at	The 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 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).

Reference Number	Comment from Relevant Representation/Applicant Response
Applicant Response	The Applicant wishes to clarify that as reported in Chapter 6, Cultural Heritage **[APP-075]** of the Environmental Statement, the recording of the Grade II listed building of Brook Cottages (HER 1311862) prior to and during their demolition is the essential mitigation proposed as part of the cultural heritage assessment for the Scheme. In addition to this mitigation, the Applicant is continuing to explore the opportunity to provide an enhancement (i.e. in addition to that considered as essential mitigation) for the relocation of Brook Cottages to a museum setting. At present, the Applicant is in discussions with a suitable receptor to understand the required methods of demolition and reconstruction on site, in addition to any future obligations on maintenance. Appendix E of the Case for the Scheme **[APP-240]**, sets out how the Applicant has considered the option of relocating the building for its continued residential use. Consideration of this option has also taken into account that the size and plan layout of the cottages could not be retained and that it would be likely that the two dwellings would need to be reconfigured to form one larger property in order to be viable for sale in the open market. Furthermore, reconstructing the cottages for residential use would require compliance with building regulations, although it may be possible to secure some dispensation as a result of its listed status. There would also be a loss of architectural and historic interest and a loss of group value when removed from its current context. Notwithstanding this, the Applicant is investigating options to re-locate Brook Cottages in a museum setting where there are greater opportunities for longevity of access, prolonged public use and understanding of the cottages.
RR-008au	For these reasons, Officers are of the opinion that the application cannot currently demonstrate that the listed building's total loss has been clearly justified, as per paragraph 194 of the NPPF and paragraph 5.131 of the National Policy Statement for National Networks.

Reference Number	Comment from Relevant Representation/Applicant Response
Applicant Response	The Applicant has set out the clear justification for the demolition of Brook Cottages in both the Case for the Scheme **[APP-240]** and the Black Cat Junction Design Options report **[APP-247]**. The Black Cat Junction Design Options report **[APP-247]** sets out that the demolition of Brook Cottages is necessary in order to deliver the significant improvements required to the existing Black Cat Roundabout that are compliant with national highway safety and design standards. The report also sets out that an alternative option had been considered which sought to retain Brook Cottages, however this resulted in an unacceptable impact on safety, was significantly more expensive, increased the potential for accidents and had poor operational resilience. Notwithstanding the need to demolish Brook Cottages, the Applicant has sought to engage with a suitable receptor with a view to offering the elements of the cottages that are capable of reconstruction, thereby avoiding its total loss. The Applicant considers that by relocating Brook Cottages to a museum there will also be an associated public benefit in enabling greater visibility and awareness of the structure, with educational benefits in highlighting former construction methods and living standards. The Applicant notes that BBC has agreed that there is no safe or viable way of retaining Brook Cottages in RR-008ap.
RR-008av	Requirement 16 of the DCO states that the method statement for demolition must “include an assessment to determine which structural elements of Brook Cottages are capable of reconstruction”. This should have already been resolved and should not be subject to a Requirement following the making of the Order given the building’s status. There is also concern that this work is of fundamental importance and not a matter which should be reserved for the post-Consent process. The question of whether the building can be reconstructed should be resolved prior to determination; with its eventual location (if feasible) subject to a Discharge of Requirement. On this matter, the Council would welcome the input of Historic England for guidance.

Reference Number	Comment from Relevant Representation/Applicant Response
Applicant Response	The Applicant acknowledges that further survey is required to establish the viability of moving Brook Cottages and continues to request access to the building in order to undertake the survey. To date, access has been denied due to the interests of the residential occupier of the property and the continued restrictions associated with the Covid-19 pandemic. Paragraph A5.4.5 of Appendix E within the Case for the Scheme **[APP-247]** sets out that the use of statutory powers to obtain access have been considered; however, the Applicant concluded at that stage that it was inappropriate to gain access using this method due to the interests of the residential occupier. Historic England is aware of the situation and the Applicant continues to engage with both parties on the matter.
RR-008aw	The Council requests an issue specific hearing on the impact on the historic environment.
Applicant Response	The Applicant notes BBC's request for an Issue Specific Hearing on the historic environment. The requirement for such a hearing is a matter for the ExA to determine.
Pollution and Noise	
RR-008ax	Whilst significant information has been supplied as to the potential impact of the operation of the prospective roads, 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 at this time.
Applicant Response	The description of the Scheme and information relating to its construction is presented in Chapter 2, The Scheme **[APP-071]** of the Environmental Statement. This has formed the basis upon which the noise and vibration assessment set out within Chapter 11, Noise and Vibration **[APP-080]** of the Environmental Statement has been undertaken. The level of detail regarding borrow pits presented in Chapter 2, The Scheme **[APP-071]** reflects the preliminary nature of the Scheme design, and summarises the planned approach to how these areas would be formed, worked and restored. With regard to the assessment undertaken to assess construction noise impacts from the Scheme, reasonable worst-case assumptions have been adopted. These include:

Reference Number	Comment from Relevant Representation/Applicant Response
	• The assumptions made by the Principal Contractor on the number and type of plant likely to be required during the construction phase are reasonable and robust. • All activities occurring in each month are assumed to occur at the same time, whereas some activities will occur sequentially and/or for a limited duration. • No benefit from temporary noise barriers or site hoardings has been assumed. This ensures that the results of the construction noise assessment are robust. The Applicant confirms that the excavation and backfilling of all potential borrow pits have been included in the predictions of construction noise presented within Chapter 11, Noise and Vibration **[APP-080]** of the Environmental Statement. The assessment demonstrates that activities at the borrow pits are not a direct source of potentially significant construction noise effects at nearby receptors. Annex B Noise and Vibration Outline Management Plan of the First Iteration Environmental Management Plan **[APP-234]**, sets out the generic measures which will be used by the contractor to control noise and vibration during the construction phase. These generic measures will be expanded upon to determine any additional specific mitigation measures to be applied to individual construction activities or receptors. It is not possible to determine specific mitigation measures at this stage before the details of the construction works are finalized, including those at the borrow pit locations. The First Iteration Environmental Management Plan **[APP-234]** includes a commitment to develop a Noise and Vibration Management Plan which will detail the management and monitoring to be applied at all construction sites, including borrow pits. This will build on the generic measures set out in the First Iteration Environmental Management Plan **[APP-234]** and will include adopting industry standard practice to: • Apply Best Practicable Means as defined in Section 72 of Control of Pollution Act. • Integrate noise control into preparation of all method statements for construction activities. This would include the selection of low noise plant, siting plant away from receptors where possible to minimise noise disturbance, using acoustic enclosures, using temporary site hoardings/barriers and using less intrusive reversing alarms. • Develop and implement noise monitoring protocols – locations, duration, methods to publish data. • Develop procedures for installing noise insulation and temporary rehousing residents where it is not possible to mitigate construction noise below relevant trigger levels as defined by BS 5228.

Reference Number	Comment from Relevant Representation/Applicant Response
	• Develop a process to ensure ongoing compliance with the Noise and Vibration Management Plan and for corrective actions required to address any non-compliance.
RR-008ay	Areas are of concern with the information supplied at this time are: The noise monitoring was undertaken in 2017 more than three years ago which raises the concern that it is no longer reliable.
Applicant Response	The Applicant undertook a baseline noise monitoring survey during November and December 2017. Discussions during 2019 and 2020 were held with BBC and other local authorities with regard to carrying out additional monitoring. This monitoring was intended to further supplement baseline monitoring undertaken in winter 2017; however, this additional monitoring was not progressed during 2020 due to the presence of non-standard traffic conditions resulting from the travel restrictions resulting from the Covid-19 pandemic. The purpose of the baseline survey was to assist with developing an understanding of the general noise climate along the proposed route of the Scheme, for example to identify if any other local noise sources (other than road traffic) were present and contribute significantly to the local noise climate. In addition, the results of the baseline noise survey have been used as part of a validation exercise for the traffic noise prediction modelling by comparing predicted traffic noise levels with measured ambient levels. The validation exercise compared the baseline ambient noise levels measured during 2017 and the predicted traffic noise levels using 2016 traffic data. An exact match would not be expected for a variety of reasons, for example: i) The noise predictions are based on typical weekday traffic conditions over a year, not the exact traffic conditions during the few weeks or hours of noise monitoring. ii) The prediction method is designed to be conservative in terms of the effect of wind direction whereas the wind direction is likely to vary throughout the monitoring period. iii) The noise predictions only consider road traffic noise, whereas the measurements include all ambient noise sources. The validation exercise concluded that at a majority of the locations where road traffic noise was dominant, there was a reasonable match between measured and predicted traffic noise levels. Further discussion of the comparison on the measured and modelled noise levels is provided in paragraphs 11.6.18-11.6.23

Reference Number	Comment from Relevant Representation/Applicant Response
	within Chapter 11, Noise and Vibration **[APP-080]** of the Environmental Statement. Overall, the comparisons provide confidence that the noise model developed to estimate the noise impacts of the Scheme is robust. No significant changes in baseline conditions in the study area have been identified between 2017 and 2021, with the exception of the ongoing development at Wintringham and the redevelopment of the former site of St Neots Footgolf and Golf Centre on Potton Road with nine residential properties. As noted above, the validation exercise to compare the 2017 measured baseline ambient noise levels and the predicted traffic noise levels was completed using 2016 traffic data. Comparable baseline traffic data has not been collated for 2021. However, the scale and location of these developments to date will not change the baseline ambient noise levels reported in Chapter 11, Noise and Vibration **[APP-080]** of the Environmental Statement. Taking the above into consideration, the Applicant considers that the baseline monitoring conditions reported in Chapter 11, Noise and Vibration **[APP-080]** of the Environmental Statement remain representative of the current environment. In addition, the conclusion of the validation exercise remains valid as the 2017 monitoring data was compared to predictions using comparable traffic data.
6.1 Chapter 11 Noise and vibration	
RR-008az	The Scoping assessment was undertaken in mid-2019 and no further baseline monitoring has been undertaken despite agreement with Local Authorities due to COVID.
Applicant Response	The Applicant refers BBC to its response to RR-008ay which clarifies its position regarding further noise monitoring.
RR-008aba	Precise information on construction works not currently available and suggested to be confirmed at detailed design stage.
Applicant Response	The Applicant refers BBC to its response to RR-008ax. The preliminary design and construction information described in Chapter 2, The Scheme **[APP-071]** of the Environmental Statement provides an appropriate level of detail on which to undertake the noise and vibration assessment. This preliminary design and construction information will be subject to further development and refinement as part of the detailed design phase.

Reference Number	Comment from Relevant Representation/Applicant Response
RR-008abb	Multiple phasing is set to last 45 months if consecutive. Construction works listed in the noise report include utility works, site clearance, earthworks wall construction bridge demolition and road works.
Applicant Response	Noted. Further details regarding the planned approach to construction of the Scheme and the associated works phases and activities are presented in Chapter 2, The Scheme **[APP-071]** of the Environmental Statement.
RR-008abc	Whilst it could be considered that earthworks may include the borrow pits there is no detailed information on these. 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" Without sufficient information on the use of borrow pits the information supplied at this time is insufficient.
Applicant Response	The Applicant refers BBC to its response to RR-008ax which provides clarification on the planned construction works, including earthworks and the operations associated with the borrow pits. The response to RR-008ax also provides clarification of how site- specific mitigation measures will be determined through the detailed design phase and set out in the Noise and Vibration Management Plan, prepared as part of the Second Iteration Environmental Management Plan. No mitigation is proposed regarding the possible re-siting of the borrow pits; this is because the Applicant has undertaken a thorough and comprehensive site selection, appraisal and evaluation process to inform the selection of its preferred locations for these features. Potential noise impacts formed part of this selection process through consideration of the proximity of the potential sites to noise sensitive receptors. Full details of this process are reported in the Borrow Pits Optioneering Report **[APP-246].**
RR-008abd	With respect to the operation of the road once construction has completed, the information supplied in the document 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

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	For this reason it would be appropriate for Environmental Health to speak at any formal meeting on this to raise our ongoing concerns and we must advise an objection at this time.
Applicant Response	The Applicant notes BBC's request to speak at any formal meeting about its noise and vibration concerns. Such opportunities will be at the discretion of the ExA. As noted in paragraph 1.1.8 of the First Iteration Environmental Management Plan **[APP-234]**, the proposed mitigation measures embedded in the Scheme design to minimise operational noise are shown on the Environmental Masterplan on Figure 2.4 **[APP-091]** of the Environmental Statement . These measures include the installation of both low noise surfacing materials throughout the Scheme and 3m high noise bunding in the vicinity of Roxton and Potton Road. Further details of these measures are provided in Table 7 within the Schedule of Mitigation **[APP-235]**, which include the performance assumed for low noise surfacing materials. Whilst slight refinements to the exact form of the bunds may occur at the detailed design stage, the bunds and low noise surfacing are embedded in the design. This is secured through Requirement 12 of the dDCO **[APP-025]** which states the detailed design must accord with the preliminary design used for the Environmental Statement, unless agreed in writing by the Secretary of State following consultation with the relevant local authority, and provided any amendments would not give rise to materially new or materially different effects. Paragraph 11.10.2 of Chapter 11, Noise and Vibration **[APP-080]** of the Environmental Statement confirms that the performance specification of specific operational mitigation measures (such as low noise surfacing materials) will be confirmed at the Scheme detailed design stage to ensure the performance of the measures assumed in the assessment is achieved. Surveys would be undertaken to ensure that measures, such as low noise surfacing materials were installed as required.
Air Quality	
RR-008abe	The air quality assessment indicated no significant air quality problems for Bedford residents.
Applicant Response	The Applicant notes BBC's observation of the findings of its air quality assessment **[APP-074]** and can confirm that no significant effects in relation to air quality have been recorded for Bedford residents.
Contaminated Land	

Reference Number	Comment from Relevant Representation/Applicant Response
RR-008abf	The associated report indicated no issues of contaminated land and the nature of the proposal is not one that would cause concern from contaminated land.
Applicant Response	The Applicant notes BBC's observation regarding contaminated land.
Borrow Pits	
RR-008abg	The principle of identifying borrow pits for major infrastructure projects is supported. However, borrow pits are virtual quarries/landfill sites and can have similar environmental impacts. In order to be able to assess any impacts, there needs to be a description of how a site will be worked and then restored.
Applicant Response	Chapter 2, The Scheme **[APP-071]** of the Environmental Statement presents details of how the borrow pits will be formed, worked and restored as part of Scheme construction. The level of information presented reflects the preliminary nature of the Scheme design at this stage of its development. The Applicant is continuing to engage on the proposed borrow pits and has prepared further information which has been shared with BBC and the relevant local authorities. The additional information provided includes reference to (but is not limited to) the environmental assessment, excavation methodology and restoration of the borrow pits. The Applicant is intending to submit this information at Deadline 3.
RR-008abh	As part of the pre-application process, the Council had asked for details of the borrow pits proposed in the Borough area, so that any impacts could be adequately evaluated as part of the environmental impact assessment process. However, a meeting on the optioneering report held a day before the submission of the DCO provided too little detail, too late.
Applicant Response	The Applicant is continuing to engage on the proposed borrow pits and has prepared further information which has been shared with BBC and the relevant local authorities. The additional information provided includes reference to (but is not limited to) the environmental assessment, excavation methodology and restoration of the borrow pits. The Applicant is intending to submit this information at Deadline 3.
RR-008abi	The Council is concerned that the only control over the borrow pits appears to be through the Environmental Management Plan (EMP).

Reference Number	Comment from Relevant Representation/Applicant Response
	The EMP sets out a list of standard practises that could be applied to any similar development and is not site specific. The EMP contains no assessment of any potential impacts. It is does not appear that any of the topic related chapters in the Environmental Statement (ES) contains any assessment of the operation of the proposed borrow pits.
Applicant Response	The Applicant wishes to clarify that the purpose of the First iteration Environmental Management Plan **[APP-234]** is to present the outline best practice and site-specific mitigation measures that will be developed and implemented during construction of the Scheme to manage, control and, where required, monitor works and activities that have the potential to result in environmental effects. The document does not report the likely environmental effects of the Scheme; these are reported separately in the Environmental Statement. BBC is correct in that the First Iteration Environmental Management Plan **[APP-234]** will be used as the mechanism to control any environmental effects relating to borrow pit activities; however, the detail of these measures will be subject to further development and refinement as part of the Second Iteration Environmental Management Plan, subject to the Scheme being consented. The purpose of the First Iteration Environmental Management Plan **[APP-234]** is to provide for mitigation to address effects which have been adequately assessed in the Environmental Statement, not to carry out the assessment itself. A requirement has been included within Schedule 2, Part 1 of the draft DCO **[APP- 025]** which requires that the Second Iteration Environmental Management Plan must be submitted to and approved in writing by the Secretary of State, following consultation with the relevant planning authority and relevant highway authority prior to commencement of the authorised development. This requirement enables BBC, in its role as either the relevant planning authority or relevant highway authority, to inform the development of the mitigation measures within the Second Iteration Environmental Management Plan at the detailed design stage of the Scheme. The Applicant refers BBC to its response to RR-008ax which clarifies how the topic assessments reported in the Environmental Statement have assessed borrow pit operations as an integral part of Scheme construction.
RR-008abj	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

Reference Number	Comment from Relevant Representation/Applicant Response
	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.
Applicant Response	The Applicant can confirm that no further environmental assessments will be undertaken to inform the Second Iteration Environmental Management Plan. This is because the Environmental Impact Assessment has taken account of the likely impacts and effects associated with the formation, operation and restoration of the borrow pits included within the Scheme. The Applicant refers BBC to its response to RR-008abg which explains the detail included within the application at the preliminary design stage. This level of detail is considered sufficient and appropriate to undertake an assessment of the likely significant effects of the Scheme to meet the requirements of The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017.
RR-008abk	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 detail rather than the relevant local authority.
Applicant Response	As the Secretary of State is the decision maker for the application seeking development consent it is appropriate that they are also the decision maker in discharging requirements. The Secretary of State will have the benefit of consultation responses from various parties depending on the requirement. In this way the local authorities are able to input and potentially influence the Secretary of State's decision in the discharge of requirements on matters related to their function.
RR-008abl	Requirement 24 – Register of Requirements Following on from the point above, 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. This applies to the smallest of developments. Why is it, that some of the largest developments in the country may be ‘invisible’ on the planning record after such a short time? The aftercare period for maintaining the landscaping may still apply after the requirement to keep a record of the approved details has expired.
Applicant Response	Maintaining a register of requirements for three years after the completion of construction is a standard requirement for development consent orders made.

Reference Number	Comment from Relevant Representation/Applicant Response
Wildlife and Ecology	
RR-008abm	Agreed Points A suitable range of up-to-date ecological surveys which are based on evidence from the Bedfordshire & Luton Biodiversity Recording and Monitoring Centre and pre-application discussions have been completed.
Applicant Response	The Applicant welcomes BBC's agreement of its ecological surveys, the evidence gathered and the pre-application discussions regarding its biodiversity assessment Chapter 8, Biodiversity **[APP-077]** of the Environmental Statement.
RR-008abn	The DCO in Bedford Borough does not include any statutory or non-statutory wildlife sites, however, it does cross areas of the countryside with wildlife value and several significant commuting and/or foraging corridors.
Applicant Response	The assessment presented within Chapter 8, Biodiversity **[APP-077]** of the Environmental Statement has identified areas within those parts of the Scheme's Order Limits located in BBC's jurisdiction that are considered to be of value to wildlife, including those that represent significant commuting and foraging corridors.
RR-008abo	Points for Further Clarification 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 on the current structure diagram.
Applicant Response	The fencing arrangement shown in Engineering Section – Structures General Arrangements **[APP-019]** for the mammal underpass has been reviewed in light of this comment. The current fencing arrangement has been included for safety, security of the structure and to allow passage of mammals. The height of the underpass will be increased by 5cm to allow more space whilst not compromising safety and security

Reference Number	Comment from Relevant Representation/Applicant Response
RR-008abp	In 8.8.23 (it actually says 6.1.1, I think in error) the ES Chapter 8: Biodiversity makes reference to a Biodiversity Management Plan. The LPA's representative have been unable to find this amongst the available documents but it is key to achieving the biodiversity enhancements and successful mitigation measures built into the scheme. Monitoring the use of the bat tunnel during the operational phase will be vital for evaluating the success of this mitigation feature within this scheme and for future bat mitigation elsewhere. The LPA's representative was also unable to find monitoring plans within the documents provided, they should be part of the Biodiversity Management Plan.
Applicant Response	The outline Biodiversity Management Plan is contained within Annex D of the First Iteration Environmental Management Plan **[APP-234]**. Table 3-1 of Annex D presents the proposed programme and activities associated with bat monitoring. The monitoring will be undertaken at least once during the construction phase of the Scheme, and also in the first, second and third years post-opening of the Scheme. The purpose of the monitoring will be to help determine the success of the mitigation and enhancement measures proposed to be delivered as part of the Scheme.
RR-008abq	This 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 road 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 would only become effective once the planting has matured and we would encourage early planting where possible.
Applicant Response	The Applicant and the Principal Contractor will explore opportunities to deliver early planting where construction sequencing and land acquisition allows.
RR-008abr	There are no issues which need to be discussed at the formal hearing.
Applicant Response	The Applicant welcomes BBC's confirmation.

Reference Number	Comment from Relevant Representation/Applicant Response
RR-008abs	**Conclusion** At the stage there are areas which have been highlighted where the proposal is lacking detail and information. The Council will continue to work to seek clarification and agreement on these matters with the applicants prior to the hearings and some of these may require further in depth examination.
Applicant Response	The Applicant does not agree with BBC's assertion that the application is lacking in detail and information. The Applicant will seek to understand where the Council thinks the proposal is lacking in detail. In addition, the Applicant will continue to work with the authority to address clarifications and seek agreements on matters, where possible, through the Statement of Common Ground.

RR-008b Carter Jonas LLP on behalf of Bedford Borough Council

Reference Number	Comment from Relevant Representation/Applicant Response
RR-008ba	RELEVANT REPRESENTATION OF BEDFORD BOROUGH COUNCIL – LAND TO EAST OF GREAT NORTH ROAD, CHAWSTON, BEDFORD 1 I write on behalf of Bedford Borough Council (the 'Council') responding to the A428 Black Cat to Caxton Gibbett improvement scheme (the 'Scheme') being promoted by Highways England Company Limited ('Applicant'). 2 The Council owns the freehold interest in approximately 66 acres of land at Black Cat Roundabout, Great North Road, Roxton held in title P128267, Z1440Z, Z1441Z, Z1444Z (the 'Land'). The Land is located to the immediate east of the existing Black Cat Roundabout. It is bounded to the west by the Black Cat Roundabout and A1, and to the west by the Great Ouse River. 3 This Relevant Representation relates to the Council's interest of the Land only. Other matters relevant to the Council will be referred to in seperate representations. 4 The Land comprises a partially reinstated quarry; mineral extraction is expected to be finished by the commencement of construction of the Scheme. 5 The Council has development aspirations for the western part of the Land which is strategically located in a sustainable location for employment development with direct access onto the Black Cat Roundabout, the A1, A421 and the strategic highway network beyond. EFFECTS OF SCHEME 6 The Land is affected by the Scheme, as summarised below: - Plot 1/8p – 575 sqm, temporary possession and permanent rights - 1/8q – 30,994 sqm, temporary possession - 1/8r – 148,549 sqm, permanent acquisition - 1/8s – 18 sqm, permanent acquisition - 1/8t – 1,156 sqm, temporary possession - 1/8u – 1,706 sqm, temporary possession - 1/8v – 474 sqm, permanent acquisition - 3/3a – 69,824 sqm, permanent acquisition - 3/3b – 4,796 sqm, temporary possession and permanent rights - 3/3c – 5,426 sqm, temporary possession - 3/4a – 128 sqm, permanent acquisition 7 The Scheme's core economic rational is to support new development and growth: "Economic growth: Enable growth by improving connections between people and jobs and supporting new development projects." (paragraph 2.2.1 of 'Introduction to the Application').

Reference Number	Comment from Relevant Representation/Applicant Response
Applicant Response	The Applicant notes this response.
RR-008bb	8 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.
Applicant Response	The Applicant discussed this matter 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. The Scheme proposals do not preclude development of the land in question. With no development proposal in place or included within the approved Local Plan, the Scheme is not able to take into account, to any additional degree, the Council's aspirations 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. Department for Transport Circular 02/2013[1] sets out that in relation to access to the strategic road network (paragraphs 37 to 44), that "*Where appropriate, proposals for the creation of new junctions or direct means of access may be identified and developed at the Plan-making stage in circumstances where it can be established that such new infrastructure is essential for the delivery of strategic planned growth".* At the time of writing, Highways England is not aware of a strategic growth test being received by DfT.
RR-008bc	9 The Scheme affects the Land more specifically as follows: MAINLINE CARRIAGEWAY

[1] DfT Circular 02/2013 - The Strategic Road Network and the Delivery of Sustainable Development, Department for Transport, 10 September 2013

Reference Number	Comment from Relevant Representation/Applicant Response
	10 Approximately 10 hectares (permanent acquisition) comprising a strip of land running east to west to the north of the Land is identified for the mainline carriageway, extension of the Black Cat Roundabout and associate landscaping.
Applicant Response	The Applicant notes this response and is willing to engage further on this issue if required.
RR-008bd	FLOOD COMPENSATION 11 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 circumstances. The case of 'R(oao FCC Environment (UK) Ltd) v Secretary of State for Energy & 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. 12 At a meeting between the Council's agent and the Applicant (11th 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 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. 13 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.
Applicant Response	Appendix 13.4 (Flood Risk Assessment (FRA)) **[APP-220]** of the Environmental Statement, in paragraph 4.7.8 (and Section 5.3) explains that the floodplain storage compensation assessment is based upon the Environment Agency's 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.

Reference Number	Comment from Relevant Representation/Applicant Response
	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. The Applicant does not agree with 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 DCO (that is land identified for permanent acquisition on the Land Plans **[APP-008]**), is the minimum land-take necessary to achieve the objectives of the Scheme and flood compensation forms part of them. The Applicant has sought to achieve a balance between minimising land-take 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 BoR **[APP-032]**. The BoR **[APP-032]** 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. The Applicant notes that BBC considers that temporary possession of the land proposed for flood compensation would be sufficient for the Scheme to progress, and that BBC is willing and ready to enter into discussions with the Applicant to enter into covenants or management agreements necessary to satisfy the Applicant's requirements in relation to the BBC land. The Applicant welcomes BBC's willingness to enter into negotiations regarding this land, outside the compulsory acquisition process, and is happy to continue with these negotiations. However, as the physical ground lowering works within 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 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. Also, alternatives to compulsory acquisition (CA), including covenants, options and leases, are contractual documents, the terms of which could be breached through non-compliance. CA powers need to be provided within the DCO in relation to the entirety of the route for the Scheme, should the contractual

Reference Number	Comment from Relevant Representation/Applicant Response
	arrangement of an option or lease be breached by a landowner and therefore potentially fall away and no longer apply. If the required CA powers were not available, the Scheme could be prevented from being constructed and delivered, despite the DCO being made. Whilst any use of the land for floor mitigation could be temporary in nature it would also be periodic and at unreduced times. The nature of use and possession – by its nature would be depriving the landowner of possession makes it inappropriate to acquire a right under the Order but if terms can be agreed by negotiation then the Applicant will seek to achieve that.
RR-008be	UTILITIES DIVERSIONS & 'WORKING ROOM (TEMPORARY POSSESSION AND PERMANENT RIGHTS) 14 It is assumed the use refers to utility diversions and construction works. The Council requires full details of uses proposed on this area of the Land.
Applicant Response	The Applicant is willing to discuss this matter with BBC. However, it requires clarification in respect of the land areas to which this section relates.
RR-008bf	15 The effect of permanently acquiring the land identified for flood storage would in effect 'landlock' this part of the Land identified for temporary acquisition for 'Permanent Access Rights' and 'Working Room'. The Council therefore objects to the current proposals in the absence of further information and safeguards.
Applicant Response	The Applicant met on 25 June 2021 and discussed this land and will continue to work with BBC to ensure that the issue of access to the landlocked areas is resolved. Options that are being discussed include granting rights of access over the permanent land-take, acquiring the land permanently or transferring the permanent land-take back to BBC once works are completed with a restrictive covenant.
RR-008bg	CONSTRUCTION COMPOUND – TEMPORARY ACQUISITION (PLOT 1/8Q) 16 This part of the Land comprises approximately 3.1 hectares. A direct access onto the new Black Cat Roundabout is proposed. We understand a construction compound of approximately three years duration will be located here. The Scheme's Statement of Works states the use as follows: "Required to provide a temporary construction area. Required to provide temporary storage, laydown areas, access and working space for this construction area, the construction of the realigned Greenacres access track, the construction of the flood compensation area south east of the new Black Cat junction circulatory, and the

Reference Number	Comment from Relevant Representation/Applicant Response
	quarry restoration works." This part of the land is suitable for a sustainable employment development and the Council seeks agreement with the Applicant to ensure this potential is not fettered by the Scheme.
Applicant Response	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 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.
RR-008bh	PROVISION OF LAND AND RIGHTS BY AGREEMENT 17 The Council now seeks urgent engagement with the Applicant aimed at reaching agreement to provide the land and rights necessary to deliver the Scheme while also safeguarding the potential of a sustainable strategic employment development on the Land. Specifically the Council seeks the following: i. Securing access to the Land in this location from the Black Cat Roundabout and which will be suitable for the proposed development ii. Design sufficient capacity into the new road layout to accommodate associated traffic iii. Agreement on terms for condition of this part of plot 1/8q when possession is returned to the Council iv. Protective provisions for satisfactory drainage v. Minimisation of the flood storage area to maximise the developable area on a sustainable and well-connected development and ensure that drainage strategy does not prejudice the delivery of development on what is a strategically important site vi. Agreement to provide rights sufficient to satisfy Scheme flood mitigation requirements on the Land, there-by obviating the need for permanent compulsory acquisition.
Applicant Response	i. The Councils development proposals are not defined to the required detail to provide this assurance. Please also refer to the Applicant's response to RR-008bb. ii. Please refer to the Applicant's response to RR-008bb. iii. The Applicant will seek to continue discussions with the landowner on the condition and handover of Plot 1/8q on completion of the works.

Reference Number	Comment from Relevant Representation/Applicant Response
	iv. The Applicant is continuing to engage with BBC in relation to the protective provisions so far as they relate to their role as a drainage authority. v. Please refer to the Applicant's response to RR-008bd. vi. The Applicant is reviewing the need to permanently acquire the Flood Compensation Area (FCA), but must be confident that the land will remain as FCA. As a minimum, the Applicant will secure the necessary protection and seek to return the land to BBC via sale.

RR-009 Wilkin Chapman LLP on behalf of Bedfordshire and River Ivel Internal Drainage Board

Reference Number	Comment from Relevant Representation/Applicant Response
RR-009a	The Bedfordshire and River Ivel Internal Drainage Board (Board) is a public body and is named in the draft DCO which proposes to disapply section 23 and 32 of the Land Drainage Act 1991 (LDA91). in addition the DCO disapplies the Board's byelaws made pursuant to section 66 of the LDA91. The draft protective protections proposed by the DCO are not yet agreed by the Board and our representation is in connection with ensuring that the Board can continue to exercise its general supervision of all matters relating to the drainage of land and all other matters pursuant to the LDA 1991 within the relevant geographical areas affected by the Scheme.
Applicant Response	The Applicant is continuing to liaise with the Bedfordshire and River Ivel Internal Drainage Board (Board) regarding the draft DCO **[APP-025]** in Part 3 of Schedule 9 which contains protective provisions for the Board in its role as a drainage authority. The discussions on the terms of the protective provisions and the disapplication of section 23 and 32 of the Land Drainage Act 1991 are ongoing and the Applicant will submit progress of this throughout the Examination.

RR-010 Brian Challis

Reference Number	Comment from Relevant Representation/Applicant Response
RR-010a	I wish to register an interest in this upgrade, as I use the route frequently to travel from my home to Stanbridge, Beds. to visit my daughter. Alternative routes are much longer and less convenient.
Applicant Response	When construction of the Scheme begins, the Applicant will use many ways of keeping customers up to date with the traffic situation in the A428 region. As a principle, the Principal Contractor will be required to minimise disruptive works. For those that are unavoidable, the Principal Contractor will be required to plan such works, e.g. road or junction closures, well in advance. Notifications will be shown on the Applicant's website A428 Black Cat to Caxton Gibbet improvements - Highways England, via email traffic updates if requested, via the Scheme's Facebook page A428 Black Cat to Caxton Gibbet - Home | Facebook, and via Twitter and other forms of social media. The Applicant will publicise these channels widely as the onset of construction work approaches. The Applicant's Helpdesk is also available to contact at any time info@highwaysengland.co.uk and 0300 123 5000. During construction, the Applicant will keep this information up to date and the Helpdesk will be available to provide current information at any time. Customers should allow extra time for their journeys, however real-time message boards will be installed on approach routes to provide onward journey-time information, giving confidence of customers' expected arrival time at their destination.

RR-011 Henry H Bletsoe & Son LLP on behalf of C Croft & Sons

Reference Number	Comment from Relevant Representation/Applicant Response
RR-011a	This representation is made on behalf of Michael Croft, Neil Croft and Joyce Croft T/A C Croft & Sons of [redacted] as occupies of land affected by the A428 scheme. These representations are made without prejudice to making further objections/representations for different reasons, or to amplify these representations. We have reviewed the plans included within the Developer's application insofar as they relate to our client and these representations are based upon the information contained therein. The proposed scheme affects land occupied by C Croft & Sons located to the west of Black Cat Roundabout on the north and south side of the A421. Based on the information available part of the land to the north of the A421 has been identified as permanent acquisition and the land to the south of the A421 has been identified as temporary acquisition. The proposed scheme affects the main entrance to the land located to the north of the A421. The existing access to this land is via a gate adjacent to the Travel Lodge which is included within the permanent acquisition. Once the new scheme has been developed, it appears that the remaining area of this land will be accessed off the new link road between 'Roxton Road' and 'The Lane'. It is important that this access is as equally commodious as the existing access, and is at a similar level to the finished road level to allow for a safe and efficient operation when exiting the access point with heavy loads and restricted maneuverability such as tractors, sprayers and combines.
Applicant Response	Detailed requirements of accommodation works will be agreed with the landowner as part of the detailed design by the Principal Contractor. It is the Applicant's intention that any replacement access will replicate as far as practicable the existing access.
RR-011b	The land identified also benefits from an existing land drainage scheme and appropriate arrangements should be put in place to provide for, and deal with the continuation of the existing land drainage scheme, so as not to impact the drainage of the remainder of the field to the north. The land located to the south of the A421 has been identified a temporary acquisition, this land should be reinstated to it's former condition and level before being returned back to the landowners.

Reference Number	Comment from Relevant Representation/Applicant Response
Applicant Response	Any impacts on the existing land drainage systems will be dealt with as part of the detailed design and implemented by the Principal Contractor. During detailed design the Applicant will consider the individual needs of each land parcel. Any land drainage severed by the Scheme will be captured by drainage systems such as overland ditches along the Scheme to ensure no worse than the existing land drainage. The Applicant notes the comment on the return of land and will reinstate the land and field drainage in a condition to enable agricultural use post-construction.
RR-011c	We require further details on the proposed accommodation works to ascertain the full impact on my client's leasehold interest. As a minimum, our client requires commodious access, post scheme land drainage, and fencing and hedge of boundaries to mitigate the detrimental affect of this scheme. This representation has been made by Verity Garlick BSc (Hons) MRICS FAAV of Bletsoes, as Agent on behalf of C Croft & Sons.
Applicant Response	Any land drainage severed by the Scheme will be captured by proposed drainage systems such as overland ditches along the Scheme to ensure no worse than the existing land drainage. Any impacts on the existing land drainage systems both as a direct consequence of the scheme (as referred to above) or as a result of construction activities will be dealt with as part of the detailed design and implemented by the Principal Contractor. The individual needs of each land parcel will be considered by the Applicant during the detailed design stage.

RR-012 CMS Cameron McKenna LLP on behalf of Cadent Gas Limited

Reference Number	Comment from Relevant Representation/Applicant Response
RR-012a	Cadent is a licensed gas transporter under the Gas Act 1986, with a statutory responsibility to operate and maintain the gas distribution networks in North London, Central and North West England. Cadent's primary duties are to operate, maintain and develop its networks in an economic, efficient and coordinated way. Cadent wishes to make a relevant representation to the A428 Black Cat to Caxton Gibbet Improvements DCO in order to protect its position in light of infrastructure which is within or in close proximity to the proposed DCO boundary. Cadent's rights to retain its apparatus in situ and rights of access to inspect, maintain, renew and repair such apparatus located within or in close proximity to the order limits including should be maintained at all times and access to inspect such apparatus must not be restricted. The documentation and plans submitted for the above proposed scheme have been reviewed in relation to impacts on Cadent's existing apparatus located within this area, and Cadent has identified that it will require adequate protective provisions to be included within the DCO to ensure that its apparatus and land interests are adequately protected and to include compliance with relevant safety standards.
Applicant Response	Discussions with Cadent have been ongoing for some time and there are detailed discussions about the diversion and protection of its asset. The Applicant has no objection to including protective provisions within the draft DCO **[APP-025]** and discussions regarding the form of those protective provisions are ongoing with Cadent. The Applicant will update on the progress of these discussions during the course of the Examination.
Protective Provisions	
RR-012b	Cadent has high pressure gas pipelines and associated apparatus located within the order limits which are affected by works proposed and which may require diversions subject to the impact. Proposed diversions have not yet reached detailed design stage and so the final positioning, land rights and consents required for these gas diversions are not confirmed. At this stage, Cadent cannot be satisfied that the DCO includes all land and rights required to accommodate such diversions as detailed design studies will need to influence these requirements. Cadent will not decommission its existing apparatus and/or commission new apparatus until it has sufficient land and rights in land (to its satisfaction) to do so, whether pursuant to the DCO or otherwise.

Reference Number	Comment from Relevant Representation/Applicant Response
	Cadent will require its protective provisions to be included within the DCO. This is the position with all of the Applicant's NSIP projects. Cadent's protective provisions are appended at Appendix 1.
Applicant Response	Discussions with Cadent have been ongoing for some time and there are detailed discussions about the diversion and protection of its asset. While the final detailed design stage has not yet been reached the design options being considered are within the current limits of deviation as shown on the Works Plans **[APP-009** and **APP-010]** and as such there is sufficient land within the Order limits to accommodate the diversion of Cadent's asset. The Applicant has no objection to including protective provisions within the draft DCO **[APP-025]** and discussions regarding the form of those protective provisions are ongoing with Cadent. The Applicant will update on the progress of these discussions during the course of the Examination.
RR-012c	Cadent has been in detailed discussion with the Applicant over the form of protective provisions in relation to a number of schemes. These are substantially agreed, save for three points of dispute which Cadent and the Applicant have not yet agreed. These three points have been the subject of detailed submissions on the Applicant's M25 J28 Scheme, and the Examining Authority for the Applicant's M25 J28 Scheme has adopted Cadent's preferred form of protective provisions (see Appendix 2). Cadent's protective provisions reflect the Examining Authority's recommended draft of the protective provisions on the Applicant's M25 J28 Scheme.
Applicant Response	The discussions in relation to protective provisions are ongoing with Cadent. The Applicant will update on the progress of these discussions during the course of the Examination.
Work No.51	
RR-012d	Cadent has engaged with the Applicant throughout the pre-application process in relation to Work No.51 and accepts the Applicant's environmental assessment in respect of archaeology, the consequence of which is that Work No.51 is (until the archaeology is removed) an NSIP in its own right.
Applicant Response	The Applicant welcomes Cadent's confirmation of its engagement in the pre-application process regarding Work No. 51 and the environmental assessment undertaken and the classification that should the thresholds as set out in section 20 of the Planning Act 2008 be met when constructed Work No. 51 would be considered an NSIP in its own right.

Reference Number	Comment from Relevant Representation/Applicant Response
RR-012e	Cadent is aware that the Applicant has programmed the delivery of Work No.51 as an advanced work and that it has secured planning permission for the removal of archaeology. Cadent agrees with the need for article 19 of the draft DCO, which is required to cover the circumstance where Cadent undertakes Work No.51 in advance of the grant of the DCO pursuant to its permitted development rights. There would be a number of matters that would need to be satisfied before Cadent undertook such works in advance of the grant of the DCO, as explained in the Applicant's explanatory memorandum.
Applicant Response	Thank you and noted.
Land Rights	
RR-012f	Cadent has experience of promoters securing insufficient rights in land within DCOs for necessary diversions of its apparatus, or securing rights for the benefit of incorrect entities. It is important that sufficient rights are granted to Cadent to allow Cadent to maintain its gas distribution network in accordance with its statutory obligations. As a responsible statutory undertaker, Cadent's primary concern is to meet its statutory obligations and ensure that any development does not impact in any adverse way upon those statutory obligations. Adequate protective provisions for the protection of Cadent's statutory undertaking are therefore required and are in discussion between parties but not yet agreed. Cadent wishes to reserve the right to make further representations as part of the examination process but in the meantime will seek to engage with the promoter with a view to reaching a satisfactory agreement.
Applicant Response	While the final detailed design stage has not yet been reached the design options being considered are within the current limits of deviation as shown on the Works Plans **[APP-009** and **APP-010]** and as such there is sufficient land within the Order Limits to accommodate the diversion of Cadent's asset. The Applicant has no objection to including protective provisions within the draft DCO **[APP-025]** in order to ensure Cadent is able to meet its statutory obligations subject to those provisions being agreeable and discussions regarding the form of those protective provisions are ongoing with Cadent. The Applicant will update on the progress of these discussions during the course of the Examination.

RR-013 Cambridgeshire County Council / RR 048 Huntingdonshire District Council / RR 100 South Cambridgeshire District Council

Reference Number	Comment from Relevant Representation/Applicant Response
RR-013a RR-048a RR-100a	Cambridgeshire County Council (CCC), Huntingdonshire District Council (HDC) and South Cambridgeshire District Council (SCDC) are reviewing the A428 Black Cat to Caxton Gibbet Development Consent Order Application (the Application) and believe that discussion, further information, and changes to the Application will be required in the areas set out below. This is based on the current understanding of the information and may be altered, added to or amended as the review continues and discussion with Highways England begins. These are the combined representations of CCC, HDC and SCDC
Applicant Response	The Applicant notes the matters raised in the CCC, HDC and SCDC relevant representation. The Applicant is continuing to liaise with the local authorities on the content of the DCO application, and is seeking to agree matters through the development of its draft joint Statement of Common Ground.
Biodiversity	
RR-013b RR-048b RR-100b	There are concerns about the robustness of the baseline survey data. The Councils are seeking firm commitment to biodiversity net gain from an agreed baseline and measured using established methodology. The assessment of net gain and the total has not used standard methodology
Applicant Response	The Applicant notes the concerns raised by the local authorities regarding the robustness of the baseline survey data within Chapter 8, Biodiversity **[APP-077]** of the Environmental Statement. The Applicant can confirm that the scope of the baseline data gathered using a combination of desk-based and site-based surveys and investigations is comprehensive in its coverage, and robustly provides the basis upon which both the assessment of likely significant effects has been undertaken and mitigation measures have been developed.

<table>
<tr><th>Reference Number</th><th>Comment from Relevant Representation/Applicant Response</th></tr>
<tr><td></td><td>Biodiversity Net Gain (BNG) calculations have been undertaken by the Applicant using the Highways England metric. This is a recognised methodology based on the metric developed by Defra that has been successfully applied on other strategic highway developments promoted by Highways England.

The BNG methodology applied and the calculations undertaken are reported in Appendix 8.19 Biodiversity Net Gain [APP-206] of the Environmental Statement , the findings of which report a positive biodiversity net gain across the Scheme of 20.5%, when compared to baseline values.

Notwithstanding the above, the Applicant is currently undertaking a calculation of BNG using the Defra Metric 2.0 methodology, the findings of which will be submitted to the Examination on or before Deadline 3 as set out in its response to Written Question Q1.3.2.1 within the Applicant’s Response to the Examining Authorities First Round of Written Questions [TR010044/EXAM/9.2].</td></tr>
<tr><td>RR-013c
RR-048c
RR-100c</td><td>Changes to the proposed species mix and habitats in some areas may be required.

Mitigation for impact to other habitats such as arable field margins needs to be discussed and agreed</td></tr>
<tr><td>Applicant Response</td><td>The proposed species mixes are set out in Tables L1 to L12 of the Landscape and Ecology Management Plan, included in Annex L of the First Iteration Environmental Management Plan [APP-234]. A Draft of the Landscape and Ecology Management Plan was shared with Cambridgeshire County Council landscape officers on 3 November 2020. Comments were received on 17 December 2020, which included items relating to the proposed species mix. These comments were taken into account when finalising the applicable document(s) included in the Application.

The Applicant wishes to highlight an error which has been identified in Table L-4 of Annex L of the First Iteration Environmental Management Plan [APP-234] regarding the proportion of Birch in the planting mix.

The following table replaces Table L-4 and corrects the percentages within the indicative woodland species mix (LE 2.1).
<table>
<tr><th>Latin Name</th><th>Common Name</th><th>Form and Girth/cm</th><th>Size/cm</th><th>Root*</th><th>Percentage</th></tr>
<tr><td>Acer campestre</td><td>Field maple</td><td>Transplant</td><td>40-60</td><td>BR</td><td>20%</td></tr>
</table>
</td></tr>
</table>

Reference Number	Comment from Relevant Representation/Applicant Response
	<table><tr><td>*Alnus glutinosa*</td><td>Alder</td><td>Transplant</td><td>40-60</td><td>BR</td><td>5%</td></tr><tr><td>*Betula pendula*</td><td>Silver birch</td><td>Transplant</td><td>40-60</td><td>BR</td><td>5%</td></tr><tr><td>*Corylus avellana*</td><td>Hazel</td><td>Transplant</td><td>40-60</td><td>BR</td><td>10%</td></tr><tr><td>*Populus tremula**</td><td>Aspen</td><td>Transplant</td><td>40-60</td><td>BR</td><td>5%</td></tr><tr><td>*Prunus avium*</td><td>Bird cherry</td><td>Transplant</td><td>40-60</td><td>BR</td><td>10%</td></tr><tr><td>*Quercus robur*</td><td>Oak</td><td>Transplant</td><td>40-60</td><td>BR</td><td>25%</td></tr><tr><td>*Rosa canina*</td><td>Dog rose</td><td>Transplant</td><td>40-60</td><td>BR</td><td>10%</td></tr><tr><td>*Salix alba*</td><td>White willow</td><td>Transplant</td><td>40-60</td><td>BR</td><td>5%</td></tr><tr><td>*Sorbus aria*</td><td>Whitebeam</td><td>Transplant</td><td>40-60</td><td>BR</td><td>5%</td></tr></table> There will be further opportunity for the local authorities to comment on the final species mixes during preparation of the Second Iteration Environmental Management Plan.
RR-013d RR-048d RR-100d	The Environmental Masterplan needs to be updated. It is currently incomplete, doesn't reflect general works arrangement and doesn't maximise biodiversity opportunities

Reference Number	Comment from Relevant Representation/Applicant Response
Applicant Response	The Environmental Masterplan presented in Figure 2.4 **[APP-091]** of the Environmental Statement presents the embedded biodiversity mitigation measures incorporated into the Scheme. The Environmental Masterplan is not incomplete, and the illustrative measures presented therein are of an appropriate level of detail for the preliminary design phase. With regards to the Environmental Masterplan not reflecting the 'general works arrangement', the Applicant assumes that the local authorities are referring to the General Arrangement Plans **[APP-011]**. The design information illustrated on the Environmental Masterplan presented in Figure 2.4 **[APP-091]** is consistent with that shown on the General Arrangement Plans **[APP-011]**. Chapter 2, The Scheme **[APP-071]** of the Environmental Statement provides a description of the preliminary design of the Scheme and identifies where biodiversity improvement opportunities have been identified. Paragraphs 2.5.119, 2.5.122, and 2.5.125 of Chapter 2, The Scheme **[APP-071]** identify how these opportunities have been taken into account within the adopted landscape design principles.
RR-013e RR-048e RR-100e	CCC requirements from other disciplines (e.g. requirement for underpasses / works to the local roads) will need to be incorporated into the ecological assessment
Applicant Response	The Applicant requests that further clarification is provided on what is meant by CCC's requirements from *'other disciplines will need to be incorporated into the ecological assessment'*, as the Applicant can confirm that the design-development and EIA processes have taken account of inter-relationships and overlaps between environmental topics, mitigation measures and design features.
RR-013f RR-048f RR-100f	The borrow pit remediation should be reconsidered to improve biodiversity
Applicant Response	The Applicant refers the local authorities to paragraphs 2.6.289 and 2.6.291 in Chapter 2, The Scheme **[APP-071]** of the Environmental Statement which states that the proposals for restoration of the borrow pits would be completed at the detailed design phase, and that the final choice of the long-term use for the borrow pit sites post restoration would also be defined and specified at that phase.

Reference Number	Comment from Relevant Representation/Applicant Response
RR-013g RR-048g RR-100g	Further consideration of the impact on Hen Brook and Wintringham Brook is required in terms of biodiversity and water quality.
Applicant Response	The Applicant is unclear what *'further consideration of the impact'* the local authorities are referring to, and further clarification is requested. It is the view of the Applicant that thorough and comprehensive assessments of Hen Brook and Wintringham Brook have been undertaken, as reported in Chapter 13, Road Drainage and the Water Environment **[APP-082]**, and Chapter 8, Biodiversity **[APP-077]** of the Environmental Statement.
RR-013h RR-048h RR-100h	Some of the assessments of ecological impact do not present robust evidence to justify the predicted impact.
Applicant Response	The Applicant notes the concerns raised by the local authorities regarding the robustness of the evidence contained within the biodiversity assessment Chapter 8, Biodiversity **[APP-077]** of the Environmental Statement. However, the Applicant can confirm that the scope of the baseline data gathered using a combination of desk-based and site-based surveys and investigations is comprehensive in its coverage, and provides a robust basis upon which the assessment of likely significant effects has been undertaken. The Applicant is currently undertaking a suite of surveys covering terrestrial habitats, aquatic habitats, bats, Barn Owl and Great Crested Newt, and is carrying out searches for any new records of flora and fauna, to ensure the baseline data relied upon in the Biodiversity assessment is kept up to date.
Landscape	
RR-013i RR-048i RR-100i	HE's commitment to timing of planting, and maintenance regime needs to be clarified
Applicant Response	The planned maintenance regime is presented in outline within the Landscape and Ecology Management Plan, included in Annex L of the First Iteration Environmental Management Plan **[APP-234]**. This planting

Reference Number	Comment from Relevant Representation/Applicant Response
	will take place in the first available planting season and at a time of the year appropriate to the species being planted.
RR-013j RR-048j RR-100j	Changes to some planting mixes and species may be necessary.
Applicant Response	The Applicant refers the local authorities to its responses to RR-013c, RR-048c and RR-100c.
RR-013k RR-048k RR-100k	Some areas (St Neots, Caxton-Toseland) are likely to need more landscape mitigation proposals.
Applicant Response	The Applicant considers the landscape mitigation measures embedded into the design of the Scheme, as illustrated on the Environmental Masterplan presented in Figure 2.4 **[APP-091]** of the Environmental Statement, to be appropriate. The design has been developed in accordance with the landscape design principles of the Scheme, as set out in Chapter 2, The Scheme **[APP-071]** and Chapter 7, Landscape and Visual Effects **[APP-076]** of the Environmental Statement. The landscape design of the Scheme responds to the character of the existing landscape, balanced against the need to avoid, prevent, reduce or offset adverse effects, for example on people's views and visual amenity. The amenity of the road user has also been a consideration. In the sections of the Scheme identified by the local authorities, the new dual carriageway would be located up to 700m north of the existing A428 and would pass through an area characterised by large, open arable fields interspersed with large blocks of woodland and shelter belts. This is reflected at all scales of landscape character assessment, and the landscape design of the Scheme accordingly responds to this. Views north from Eltisley and south from Yelling and Toseland are distant and largely screened by these existing blocks of woodland and hedgerows.
RR-013l RR-048l RR-100l	Limited connections are provided between some habitats (specifically near Hen Brook) and should be improved

Reference Number	Comment from Relevant Representation/Applicant Response
Applicant Response	The Applicant has undertaken a detailed assessment of the Scheme's effects on biodiversity and has incorporated mitigation measures into the design which seek to introduce, replace and reconnect habitats, as illustrated on the Environmental Masterplan presented in Figure 2.4 **[APP-091]** of the Environmental Statement. These include, for example, the inclusion of an underpass structure at Hen Brook which will facilitate the movement of fauna. Accordingly, the Applicant does not agree with the local authorities' assertion that limited connections are provided between some habitats and should be improved.
RR-013m RR-048m RR-100m	Hedgerows are not considered in the application and this is potentially a significant issue
Applicant Response	The Applicant does not agree with the local authorities' assertion that hedgerows have not been considered in the application. Chapter 7, Landscape and Visual Effects **[APP-076]** of the Environmental Statement provides details on how existing hedgerows contribute to local landscape character and feature in existing views. It also explains the impacts and effects on hedgerows, and how new hedgerows have been incorporated into the design of the Scheme. The locations of these proposed hedgerows are illustrated on the Environmental Masterplan presented in Figure 2.4 **[APP-091]** of the Environmental Statement. As part of the biodiversity assessment for the Scheme, Appendix 8.3 Terrestrial Habitats including Hedgerows **[APP-190]** presents the hedgerow survey undertaken by the Applicant to identify the ecological condition of each hedgerow within the adopted study area. This information has been used to inform the assessment of biodiversity impacts and effects on hedgerows, as reported in Chapter 8, Biodiversity **[APP-077]** of the Environmental Statement.

Reference Number	Comment from Relevant Representation/Applicant Response
RR-013n RR-048n RR-100n	The borrow pit remediation should be reconsidered from a landscape perspective
Applicant Response	The Applicant refers the local authorities to its responses to RR-013f, RR-048f and RR-100f, and requests clarification on what aspects relating to landscape should be reconsidered in relation to the proposed approach to the restoration of borrow pits.
RR-013o RR-048o RR-100o	An agricultural mitigation strategy should be provided to clarify the removal and reinstatement of agricultural grade land
Applicant Response	The Environmental Actions and Commitments register contained within the First Iteration Environmental Management Plan **[APP-234]** includes the commitment ESS – GS1, which states that the '*Principal Contractor will implement the requirements for soil reinstatement, monitoring, and aftercare as detailed in the outline Soil Management and Handling Plan presented in the First Iteration EMP…'.* The outline Soil Management and Handling Plan within Annex E of the First Iteration Environmental Management Plan **[APP-234]** outlines the procedures and techniques that will be followed and applied during the stripping, movement, storage and reinstatement of soil resources during construction of the Scheme, including soils of agricultural grade.
Noise	
RR-013p RR-048p RR-100p	Commitment to hours of operation of works, and monitoring during construction and operation is required
Applicant Response	The Applicant can confirm that the working hours are secured through Requirement 19 of the dDCO **[APP-025].** The First Iteration Environmental Management Plan **[APP-234]** includes the Register of Environmental Action and Commitments (REAC) for the Scheme. The REAC includes ESS – NV4 which commits the Applicant to the following: '*Monitoring would be undertaken during the Scheme construction stage to*

Reference Number	Comment from Relevant Representation/Applicant Response
	*ensure that the mitigation measures and procedures set out within the outline Noise Management Plan (NMP) as presented in the First Iteration EMP **[TR010044/APP/6.8]** are being appropriately implemented'*. In relation to operational monitoring, the Applicant refers the local authorities to paragraph 11.10.2 of Chapter 11, Noise and Vibration **[APP-080]** of the Environmental Statement which confirms that the performance specification of specific operational mitigation measures would be confirmed at the Scheme detailed design stage to ensure the performance assumed in the assessment is achieved. Surveys would be undertaken to ensure that measures, such as low noise surfacing materials were installed as required. No further monitoring is proposed once the Scheme is open to traffic.
RR-013q RR-048q RR-100q	Commitment to officer input and control during construction is required
Applicant Response	Section 1.3 of the Outline Noise and Vibration Management Plan within Annex B of the First Iteration Environmental Management Plan **[APP-234]** states that construction of the Scheme shall be undertaken such that: a. The works comply with any requirements of the Environmental Health Officer (EHO) including, but not limited to, hours of working, mitigation measures and working methods. b. Consent is sought from the EHO for works variations and/or over-run of activities, and night-working. c. Data can be recorded, reviewed and provided to the EHO, when requested. d. The EHO can be informed of any work that is likely to require communication with members of the public. The Applicant accordingly considers that these commitments will provide the EHOs of the local authorities with opportunities during construction of the Scheme to input into, and control, working practices. Furthermore, prior to the commencement of construction the local authorities will have an opportunity to review and comment on the noise mitigation and control measures contained in the Second Iteration Environmental Management Plan through the provisions of Requirement 3 of the dDCO **[APP-025]**.

Reference Number	Comment from Relevant Representation/Applicant Response
RR-013r RR-048r RR-100r	Cambourne West receptors have not been assessed
Applicant Response	The Applicant can confirm that the change in traffic noise environment in the Cambourne West development has been assessed, and is reported in paragraph 11.8.4 of Chapter 11, Noise and Vibration **[APP-080]** of the Environmental Statement. The assessment has recorded that a moderate increase in traffic noise is predicted in the area of that development located closest to the Scheme, which would result from the greater volume of traffic flowing through the Caxton Gibbet junction at higher speeds. It also acknowledges that traffic noise will continue to dominate the acoustic environment in the development area, as it does currently. Effects on individual properties in the Camborne West development have not been reported in the assessment as these are not predicted to be occupied prior to the start of construction. Accordingly, future residents of these properties will not experience a change in noise as a consequence of either construction or operation of the Scheme.
RR-013s RR-048s RR-100s	Commitment to detailed local management plans required for specific areas is required
Applicant Response	The Applicant refers the local authorities to its responses to RR-013q, RR-048q and RR-100q. The First Iteration Environmental Management Plan **[APP-234]** contains the individual management plans for the Scheme. The outline measures within these plans will be refined and updated as part of the Second Iteration Environmental Management Plan, and where necessary will detail control measures to be implemented that are location or area specific.
RR-013t RR-048t RR-100t	Insufficient reasons have been given for the decision to discount mitigation at the eastern end of the scheme. Further explanation must be given and discussed with the Councils. Commitment is required for works not to start until certain conditions are met (i.e. affected properties insulated or residents relocated)
Applicant Response	The Applicant considers its approach to identifying noise mitigation measures is robust. It has been informed by considering those measures which will result in the Scheme meeting the policy aims set out in

Reference Number	Comment from Relevant Representation/Applicant Response
	paragraph 5.195 of the National Policy Statement for National Networks, within the context of Government Policy on sustainable development. Paragraph 11.3.69 of Chapter 11, Noise and Vibration **[APP-080]** of the Environmental Statement summarises the factors which have been considered by the Applicant when identifying sustainable noise mitigation measures to be included in the Scheme. Such factors include cost versus benefit, engineering practicality, generation of non-acoustic impacts and consultation and stakeholder engagement responses. Paragraph 11.9.79 of Chapter 11, Noise and Vibration **[APP-080]** of the Environmental Statement confirms that consideration has been given to the installation of noise barriers at a number of locations at the eastern end of the Scheme. However, these barriers have not been included in the Scheme as they were not identified to be sustainable noise mitigation measures when the factors described above were considered. If required, the Applicant will discuss its approach and the basis of its decisions regarding mitigation in further detail as part of its ongoing discussions on the draft joint Statement of Common Ground.
Air Quality	
RR-013u RR-048u RR-100u	The Summary report has been reviewed and currently it is not expected to be a significant issue, unless there are changes to the Transport Assessment
Applicant Response	The Applicant notes this comment.
RR-013v RR-048v RR-100v	Commitment to officer input and control during construction required
Applicant Response	The outline Air Quality Management Plan located within Annex A of the First Iteration Environmental Management Plan **[APP-234]** states in Section 1.3 Consents requirements, that construction of the Scheme must be undertaken such that: a) The works comply with the requirements of the DCO. b) Data can be recorded, reviewed and provided to the Environmental Health Officer, when requested.

Reference Number	Comment from Relevant Representation/Applicant Response
	In addition, Table A-1 and A-3 (Section 1.4 General control measures) within Annex A, of the First Iteration Environmental Management Plan **[APP-234]** the Principal Contractor is committed to undertake and record regular inspections, monitor dust emissions and make the logs available to the relevant local authority upon request. The Applicant refers the local authorities to its responses to RR-013q, RR-048q and RR-100q which detail how these measures will be developed as part of the Second Iteration Environmental Management Plan.
Contaminated Land	
RR-013w RR-048w RR-100w	Summary report reviewed, unlikely to be a material issue but commitment and further detail on approach to backfilling borrow pits required
Applicant Response	The approach to backfilling the borrow pits is outlined in Chapter 2, The Scheme **[APP-071]** of the Environmental Statement and the Borrow Pits Optioneering Report **[APP-246]**. Also, as set out in Table 4-1 'Consents and permissions that may be required' of the First Iteration Environmental Management Plan **[APP-234]**, the borrow pits will be restored using excavated material arisings that pass re-use acceptability criteria (based on findings of quantitative risk assessment), with these areas subsequently reinstated with the intention of returning them to agricultural standards. Furthermore, as provided in Section 1.8.4 and 1.8.7 of Annex H – Material Management Plan of the First Iteration Environmental Management Plan **[APP-234]**, no materials will be used in the backfilling of borrow pits where the results indicate exceedance of the reuse acceptability criteria (which will include the subjection of material to geotechnical laboratory analysis and assessed against the material classification and reuse acceptability criteria), which will be developed to be protective of human health and controlled waters in respect to its proposed end use.
Cultural Heritage	
RR-013x RR-048x RR-100x	Requirement for the joint authorities' archaeology brief to be fully integrated into the application

Reference Number	Comment from Relevant Representation/Applicant Response
Applicant Response	Paragraph 1.6.2 of the Archaeological Mitigation Strategy **[APP-238]** states: *"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. If the brief can be agreed, it will be included as an Appendix to the final AMS as Appendix B".* Paragraph 5.2.5 of the Archaeological Mitigation Strategy further states: *"A Joint Cambridgeshire and Bedfordshire brief for a programme of archaeological investigation was received on 11 December 2020. While this should be considered by the Principal Contractor and the Archaeological Contractor when preparing the SSWSIs, it should be noted that this has not been agreed. Subject to agreement, it may be appended to the final mitigation strategy".* This will, once agreed, be appended as Appendix B. While it is stated that the Brief is not yet agreed, discussions are ongoing, and it is anticipated that this will be agreed during Examination. In the meantime, it is proposed to have further discussions with CCC to resolve these concerns.
RR-013y RR-048y RR-100y	Officers require agreement and approval of areas of the excavation strategy affected by an over-simplification of evaluation evidence
Applicant Response	Discussions regarding the mitigation areas are ongoing. It is not agreed that the strategy has been based on an over-simplification of evaluation evidence. The design of the mitigation strategy has been based on the results of all archaeological evidence to define the areas for archaeological mitigation. These have been further defined through a research focus to ensure maximum knowledge gain and public benefit.
RR-013z RR-048z RR-100z	Commitment that temporary works will not affect archaeological excavation areas

Reference Number	Comment from Relevant Representation/Applicant Response
Applicant Response	Section 11.2 of the Archaeological Mitigation Strategy **[APP-238]** provides the detail of the methodology required for archaeological sites to be fenced off. Other areas where archaeological mitigation is identified will not be utilised for construction activity until the archaeological mitigation has taken place.
RR-013aa RR-048aa RR-100aa	Changes needed on applicant's objectives and methods for archaeological investigation and post excavation assessment
Applicant Response	The Applicant will provide a response once details of the suggested changes are provided; however, the Applicant can confirm that the objectives and methods are in line with the "Joint Cambridgeshire and Bedfordshire brief for a programme of archaeological investigation" received in December 2020.
RR-013ab RR-048ab RR-100ab	Inconsistency of approach within the proposed scheme at specific areas e.g. land adjacent to Wintringham Scheduled Ancient Monument needs adjustment for clarification
Applicant Response	The Applicant will provide a response once details of the specific areas are provided. The Applicant can confirm that there are no works proposed on land adjacent to the Wintringham Scheduled Monument (this site is located approximately 275m from the Scheme). The mitigation area matches that identified by CCC on 15 October 2020.
RR-013ac RR-048ac RR-100ac	Consideration within the application of archaeology at affected watercourses required, key areas likely to be Hen Brook and Wintringham Brook
Applicant Response	Section 10 of the Archaeological Mitigation Strategy **[APP-238]** details the requirements of geoarchaeological and palaeoenvironmental assessment. This includes work focused on Hen Brook at Site 19 (Field 58-62, either side of Hen Brook), colluvium identified at Site 10 (Field 53) and adjacent to the unnamed watercourse between Fields 69 and 70 (Site 35). This work was based on the results of the evaluation excavation. This concluded that there was limited potential for palaeoenvironmental potential except in Fields 44 and 53, where investigation is proposed. The results also concluded that deposit modelling in the tributaries of the River Great Ouse would be of value, and again this has been included in the Archaeological Mitigation Strategy **[APP-238]**. It should be noted that alluvial deposits associated with

Reference Number	Comment from Relevant Representation/Applicant Response
	the River Great Ouse were only found in 11 trenches and was only 0.1m thick on average. Colluvium was recorded more widely.
RR-013ad RR-048ad RR-100ad	Changes to the DCO application needed, to include mapping the archaeological investigation and protection areas on the General Arrangement drawings
Applicant Response	The General Arrangement drawings present the overall layout and composition of the Scheme and does not include specific details on the mitigation, investigation or protection areas. This information is shown in the Archaeological Mitigation Strategy **[APP-238]**.
RR-013ae RR-048ae RR-100ae	Engagement with CCC Museums Liaison Officer required for the Public Archaeology and Community Engagement Strategy
Applicant Response	Appendix E of the Archaeological Mitigation Strategy **[APP-238]** details the requirements for the development of the public archaeology and community engagement (PACE) strategy, with paragraph E.1.1.6 stating that the Archaeological Contractor will prepare a Scheme specific PACE strategy detailing the results of audience mapping, the targeted audiences, and the activities to be undertaken. The Applicant sees no reason why this would not include engagement with CCC's Museums Liaison Officer. Full details will be contained within the PACE strategy.
RR-013af RR-048af RR-100af	Commitment to skills development and training in the area of cultural heritage
Applicant Response	Guidance from the Chartered Institute for Archaeologists (CIfA) on field evaluation states that *"The WSI should specify how the project team meets CIfA standards. It should set out how individual and corporate competences will be maintained and enhanced through training and CPD built into the project where appropriate."* This information should be included in the Site Specific Written Schemes of Investigation and is stated in paragraph 6.1.2 of the Archaeological Mitigation Strategy **[APP-238]**.

Reference Number	Comment from Relevant Representation/Applicant Response
Minerals and Waste	
RR-013ag RR-048ag RR-100ag	• Insufficient detail exists on the borrow pits to meaningfully assess the proposals and impacts that will arise from them, including cumulative impacts and implications for wider specialisms such as cultural heritage. • Clarity required on the restoration and biodiversity net gain benefits from the borrow pits • Borrow pits have not been considered in cumulative assessment which is a potentially significant concern. • The works and associated haul routes etc. need to be controlled properly from the outset. Changes to drafting and Requirements needed
Applicant Response	The Applicant is continuing to engage on the proposed borrow pits and has prepared further information which has been shared with the relevant local authorities. The additional information provided includes reference to (but is not limited to) the environmental assessment, excavation methodology and restoration of the borrow pits. The Applicant is intending to submit this information at Deadline 3. The environmental assessment has considered, fully, the impacts of the proposed borrow pits as part of the Scheme and therefore these sites and operations do not need to be considered within a cumulative assessment. The formation, operation and management of the borrow pits and haul routes will be included and detailed in the management plans as listed within the First Iteration Environmental Management Plan **[APP-234**]. The addition of this construction related information will form the subsequent iterations of the Environmental Management Plan as it is developed. In relation to borrow pit restoration, the Applicant refers the local authorities to its responses to RR-013f, RR-048f and RR-100f.

Reference Number	Comment from Relevant Representation/Applicant Response
Flooding and Drainage	
RR-013ah RR-048ah RR-100ah	Lead Local Flooding Authorities (LLFA) are responding jointly to the application, noting that the Environment Agency's concerns are largely addressed Protective Provisions for CCC as Lead Local Flood Authority are required
Applicant Response	The Applicant notes that the Environment Agency concerns in relation to the protective provisions have largely been addressed. The Applicant has liaised with CCC as LLFA in relation to protective provisions and the draft DCO **[APP-025]** includes protective provisions for the LLFA in Part 3 of Schedule 9. The Applicant is working with CCC as LLFA to reach agreement on the protective provisions and will submit progress of this throughout the Examination.
RR-013ai RR-048ai RR-100ai	The dis-application of s23 of the Land Drainage Act 1991 has not been agreed
Applicant Response	The discussions on the dis-application of s23 of the Land Drainage Act 1991 are ongoing with CCC as LLFA.
RR-013aj RR-048aj RR-100aj	CCC noted as maintaining ponds and outfalls although this hasn't been discussed and isn't agreed
Applicant Response	The proposed SuDS form part of the highway drainage of those side roads that will fall to Cambridgeshire County Council (CCC) to maintain in its capacity as Local Highway Authority and not in CCC's capacity as LLFA. The ponds and ditches are shown in the same locations as were included in the General Arrangement plans during consultation of the Scheme.
RR-013ak RR-048ak RR-100ak	Preference for the design to include reed planting instead of treatment plants Design for watercourses and ponds needs early engagement as soon as possible

Reference Number	Comment from Relevant Representation/Applicant Response
Applicant Response	The Applicant has undertaken consultation on watercourses during the pre-application stage of the DCO process through the Flood Risk Water Management Working Group and watercourse technical notes that were submitted to CCC. The Applicant's pond designs are in accordance with the Highways England design code (DMRB) and the SuDS Manual (CIRIA, C753). Pond design details are provided in the Scheme Drainage Strategy Report **[APP-219]**.
RR-013al RR-048al RR-100al	There is a need to discuss and agree how much work will be using LLFA consenting routes
Applicant Response	The Applicant is uncertain from the above statement what the specific concern is with regards to this matter and would like to request clarification. If it is an understanding of the number of possible Land Drainage Consent Applications, then Tables 13.7-9 of Chapter 13, Road Drainage and the Water Environment **[APP-082]** of the Environmental Statement proposed surface water outfalls, culverts, watercourse diversions and realignments that are likely to require a Land Drainage Consent where the watercourse is Ordinary. However, it may be possible to group contiguous works affecting the same Ordinary Watercourse into a single application. Please also note that discussions on the dis-application of s23 of the Land Drainage Act 1991 are ongoing with CCC as LLFA.
RR-013am RR-048am RR-100am	Further consideration of the impact on Hen Brook and Wintringham Brook is required in terms of biodiversity and water quality
Applicant Response	The Applicant is unclear what *'further consideration of the impact'* the local authorities are referring to, and further clarification is requested. It is the view of the Applicant that thorough and comprehensive assessments of Hen Brook and Wintringham Brook have been undertaken, as reported in Chapter 13, Road Drainage and the Water Environment **[APP-082]**, and Chapter 8, Biodiversity **[APP-077]** of the Environmental Statement.
RR-013an RR-048an RR-100an	Further evidence is needed to demonstrate there are no downstream flooding issues at Wintringham Brook

Reference Number	Comment from Relevant Representation/Applicant Response
Applicant Response	The Applicant does not agree that further evidence is needed to demonstrate there are no downstream flooding issues at Wintringham Brook as the 1D modelling of Wintringham Brook shows that there is no out of bank flows at the Scheme crossings or increase in flows downstream. The Applicant has undertaken a comprehensive flood assessment as part of the environmental assessment for the Scheme. A Flood Risk Assessment **[APP-220]** has been undertaken based upon the preliminary design of the Scheme as presented in Chapter 2, The Scheme **[APP-071]** of the Environmental Statement, which is supported by the following appendices: • Appendix 13.4 - Flood Risk Assessment - Annex A - River Great Ouse Hydraulic Modelling Report **[APP-221].** • Appendix 13.4 - Flood Risk Assessment - Annex B - Ordinary Watercourse Modelling Report **[APP-222].** • Appendix 13.4 - Flood Risk Assessment - Annex C - Ordinary Watercourse Hydrology Report **[APP-223].**
RR-013ao RR-048ao RR-100ao	Flood modelling impact on neighbouring communities needs to be updated and reviewed if changes are made to the scheme
Applicant Response	The Applicant notes this comment. Should changes be made to the Scheme, the relevant assessments would be updated accordingly to ensure no impact on neighbouring communities, particularly sensitive receptors such as residential properties.
Climate Change	
RR-013ap RR-048ap RR-100ap	The authorities have concerns about the carbon and climate change impact of the project
Applicant Response	The Applicant notes this comment but would request further information from the local authorities in order to respond fully.

Reference Number	Comment from Relevant Representation/Applicant Response
RR-013aq RR-048aq RR-100aq	Impact of induced traffic potentially significant
Applicant Response	The traffic forecasts take into account the effects of changes in travel cost as a result of the Scheme upon demand for travel using a Variable Demand Model (VDM). The VDM process is described in Chapter 5.4 of Appendix C of the Combined Modelling and Appraisal Report; Transport Forecasting Report [APP-253]. Whilst the Scheme does not generate (induce) trips, the VDM forecasts a very small transfer of trips from rail to road. The main impact of the Scheme results from drivers changing their destination as the Scheme reduces travel times between the A1 and Caxton Gibbet and also due to drivers using different routes to make their journey. For example, using the Scheme rather than travelling through Toseland. This results in additional kilometres travelled. A comparison of the total vehicle distance with and without the Scheme for each modelled time period is presented in Tables 6-4 and 6-5 of Appendix C Transport Forecasting Report of the Combined Modelling and Appraisal Report **[APP-253]** for 2025 and 2040 respectively. This shows that the increase in vehicle kilometers as a result of the Scheme is very small, and even this figure needs to be seen in the context of the wider benefits held in prospect by the scheme. The assessment within Chapter 14, Climate [APP-083] of the Environmental Statement has identified that the emissions arising as a result of the Scheme represent less than 0.012% of the total emissions in any of the 3rd, 4th or 5th Carbon Budget periods. Accordingly, the assessment has concluded that the GHG emissions impact of the Scheme would not have a material impact on the UK Government meeting its legally binding carbon reduction targets. Although the 6th Carbon Budget was not legally binding when the Environmental Statement was written, an additional assessment of the 6th Carbon Budget, which became legally binding in June 2021, has been undertaken. This assessment concluded that the Scheme represents less than 0.024% of the total emissions in the 6th budget period and is also considered not have a material impact on the UK Government meeting its carbon reductions target. For further information on how the cumulative impacts of the Scheme have been considered including in the context to RIS, please refer to the Response to Written Question 1.4.1.1a in the Applicant's Response to the Examining Authorities First Round of Written Questions **[TR010044/EXAM/9.2]**. Greenhouse gas emissions have been calculated by comparing a Do-minimum scenario (baseline) where the Scheme does not go ahead, against a Do-something scenario where the Scheme is built. The variation

Reference Number	Comment from Relevant Representation/Applicant Response
	in emissions between the two scenarios represents additional emissions as a result of the Scheme. Over the 60 life of the Scheme emissions have been calculated at just over 3 million tCO2e. It should be noted however that the methodology to calculate road user emissions, which account for over 90% of total Scheme emissions, does not take into account the impact of recent Government policy on decarbonising transport (Transport Decarbonisation Plan (TDP)[2]) or Highways England' Net Zero Plan[3]'. The TDP presents Government commitments and initiatives to decarbonise transport in the UK to net zero by 2050 while Highways England's Net Zero Plan presents how they will support the implementation of the TDP. The emissions presented in the Environmental Statement Chapter 14, Climate **[APP-083]** of the Environmental Statement are therefore considered to be a highly conservative, worst case scenario. The GHG assessment within Chapter 14, Climate **[APP-083]** of the Environmental Statement presents a worst case scenario as it does not take into account the impact of the commitments made by DfT within the transport decarbonisation plan. It is anticipated that road user emissions will decrease in line with the forecast emissions presented within the plan, for example, due to the increased use of electric and low-emission vehicles.
RR-013ar RR-048ar RR-100ar	Clarity needed on conflicts within the documents (i.e. are EV in assessment)

[2] Decarbonising Transport: a better, greener Britain https://www.gov.uk/government/publications/transport-decarbonisation-plan
[3] Net zero highways: our 2030 / 2040 / 2050 plan https://highwaysengland.co.uk/netzerohighways/#plan

Reference Number	Comment from Relevant Representation/Applicant Response
Applicant Response	The Applicant requests that further information on '*conflicts within the documents*' are provided by the local authorities. Notwithstanding this, with regards to Electric Vehicles (EVs), Chapter 14, Climate **[APP-083]** of the Environmental Statement states that the uptake of lower carbon fuels, EVs and increased vehicle technology are partially accounted for within the assessment of operational GHG emissions using Defra's Emissions Factors Toolkit. This includes a conservative uptake assumption of 30% EVs by 2030 and no further future increase. It is accepted that technological advances and changes further to the assumptions above are likely to beneficially contribute to reducing GHG emissions in the future.
RR-013as RR-048as RR-100as	Impacts on neighbouring communities were raised in scoping but are not covered in the application
Applicant Response	Chapter 14, Climate **[APP-083]** of the Environmental Statement considers three aspects of climate impact: the GHG impact of the Scheme on the climate, the vulnerability of the Scheme to climate change; and the In-combination Climate change Impact (ICCI) of the Scheme and climate change on receptors in the surrounding environment. The ICCI assessment specifically considers the combined impact of the Scheme and future climate change on receptors identified within other environmental topic assessments. Relevant impacts provided by disciplines with a focus on community impacts are recorded in Table 14-13, including Population, Human Health and landscape within Chapter 14, Climate **[APP-083]** of the Environmental Statement. Further consideration to the impact on neighbouring communities has been given in the Flood Risk Assessment **[APP-220]**. Chapter 13, Road Drainage and the Water Environment **[APP-082]** presents the output of the flood risk assessment which was undertaken at the following levels: 40% CC was used for highway drainage and SuDs. Watercourses have been assessed using 35% for flood compensation and 65% for Flood modelling.

Reference Number	Comment from Relevant Representation/Applicant Response
RR-013at RR-048at RR-100at	6th Carbon Budget and its assessment within the DCO application requires clarification and discussion
Applicant Response	Chapter 14, Climate **[APP-083]** of the Environmental Statement presents an assessment of the Scheme against the UK Government's current carbon budgets, as required by Paragraph 5.17 of the NPSNN: *"for road project applicants should provide evidence of the carbon impact of the project and an assessment against the Government's carbon budgets".* Paragraph 5.18 of the NPSNN clarifies that *"any increase in carbon emissions is not a reason to refuse development consent, unless the increase in carbon emissions resulting from the proposed scheme are so significant that it would have a material impact on the ability of Government to meet its carbon reduction targets".* The assessment has identified that the emissions arising as a result of the Scheme represent less than 0.012% of the total emissions in any of the 3rd, 4th or 5th Carbon Budget periods. Accordingly, the assessment has concluded that the GHG emissions impact of the Scheme would not have a material impact on the UK Government meeting its legally binding carbon reduction targets. Although the 6th carbon budget was not legally binding at the time of the assessment, for context emissions from the Scheme have been compared against the 6th carbon budget. This assessment concluded that the Scheme represents less than 0.024% of the total emissions in the 6th budget period and is also considered not have a material impact on the UK Government meeting its carbon reductions target. For further information on how the cumulative impacts of the Scheme have been considered including in the context to RIS, please refer to the Response to Written Question 1.4.1.1a in the Applicant's Response to the Examining Authorities First Round of Written Questions **[TR010044/EXAM/9.2]**.
RR-013au RR-048au RR-100au	The cumulative impact and relationship of the project with EastWestRail / other projects require clarification and discussion
Applicant Response	The Applicant wishes to clarify two matters in response to this point: a) how East West Rail has been identified and categorised as within the cumulative effects assessment; and b) how this project has been accounted for as a planned future development specifically within the climate assessment.

Reference Number	Comment from Relevant Representation/Applicant Response
	a) The Applicant can confirm that the Chapter 3, Assessment of Cumulative Effects **[APP-084]** of the Environmental Statement has been undertaken in accordance with the staged assessment approach contained in the Planning Inspectorate's *Advice note seventeen: Cumulative effects assessment relevant to nationally significant infrastructure projects (version 2) (2019)*, which required the Applicant to first establish a long list of 'other existing development and/or approved development'. The long list of developments identified in Stage 1 of the assessment included, amongst others, the "East West Railway" proposals (hereafter East West Rail project), which are referenced as ID002 in Appendix 15.1 **[APP-228]** of the Environmental Statement. All identified development plans and projects were first allocated into the following tiers, based on their current status, their geographical relationship to the Scheme, and the availability of information regarding their likely environmental effects and delivery timescales: • Tier 1 – comprising developments which have the highest level of certainty attached to them (i.e. being under construction, having approved planning applications or undetermined planning applications). • Tier 2 – comprising developments which have some degree of certainty attached to them (i.e. where a scoping report has been submitted). • Tier 3 – comprising developments that have limited certainty attached to them (i.e. those which do not have a scoping report submitted, or developments identified within local development plans and frameworks). The Applicant categorised the East West Rail project as a Tier 3 development as a scoping report had not yet been prepared, and because information within the public domain regarding the proposed route options was limited. As the Stage 1 assessment recorded potential for the East West Rail project to interact environmentally with the Scheme, the development was progressed to Stage 2 of the assessment. Stage 2 acknowledged that whilst the scale and nature of the East West Rail project may result in significant environmental effects in isolation, it was not possible to confirm the position, or shortlist, this development for inclusion in the cumulative effects assessment at Stages 3 and 4 as very limited information regarding its likely environment effects, or when they could occur, was available to inform such an assessment.

Reference Number	Comment from Relevant Representation/Applicant Response
	Accordingly, the East West Rail project was discounted from further consideration in the cumulative effects assessment. Notwithstanding this, the Applicant continues to review the progression of the East West Rail project and will accordingly update its status within the cumulative effects assessment in the event of a scoping report or similar information being published for the project during the DCO Examination. b) In relation to how the East West Rail project has been accounted for in the climate assessment, as the receptor for the greenhouse gas assessment is the global climate, it is not appropriate to consider the cumulative impact of the Scheme with only existing development and/or approved development. The UK carbon budgets have been used to identify the impact of the scheme on the climate, and in line with the requirements of DMRB 114 an assessment of project GHG emissions against UK government's 3rd, 4th 5th and 6th Carbon Budgets has been undertaken, the findings of which are presented in Chapter 14, Climate **[APP-083]** of the Environmental Statement. The UK carbon budgets provide a legally binding limit of GHG emissions that can be emitted by the UK over defined five-year periods. Accordingly, comparing emissions from the Scheme in the context of the UK carbon budgets inherently provides a cumulative assessment. As the construction and operational phase traffic forecasts include the traffic associated with other developments, as explained in paragraph 15.3.24 of Chapter 14, Climate **[APP-083]** of the Environmental Statement, the assessment is inherently cumulative and accordingly represents the cumulative effect of the Scheme's effects, and those of other developments, on climate. Further, the receptor for the impact that the Scheme would have on the climate is global, and is tested against the UK Carbon Budgets, which are already the cumulative value in the UK for carbon emissions.
NMU and Rights of Way	
RR-013av RR-048av RR-100av	Significant detailed design, routing, and procedural issues to discuss and resolve

Reference Number	Comment from Relevant Representation/Applicant Response
Applicant Response	The Applicant is committed to continuing engagement with the local authority on detailed design of the proposed Walkers, Cyclists and Horse riders (WCH) routes and Rights of Way. The proposed WCH routes and Rights of Way are identified in the DCO Application, specifically shown in the General Arrangement Plans **[APP-011]**, the Streets, Rights of Way and Access Plans **[APP-013]** and within the draft DCO **[APP-025]**. The Applicant requests further detailed information on the procedural issues that the local authority wishes to discuss and resolve.
RR-013aw RR-048aw RR-100aw	There is currently insufficient support for NMUs. The applicant needs to set out further consideration of the relevant policy requirements regarding supporting NMUs including Government Guidelines, the Cambridgeshire and Peterborough Local Transport Plan and Local Plan policies, which require new development to contribute to an enhanced transport network that supports an increasing proportion of journeys being undertaken by sustainable travel modes and seeks an proposal affecting a PROW or other formal NMU route to protect and enhance it.
Applicant Response	Appendix A of the Case for the Scheme **[APP-240]** 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 **[APP-242]**. 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. The Walking, Cycling and Horse Riding Assessment and Review **[APP-242]**, in section 2, considers relevant sections of the CCC Local Transport Plan in relation to WCHs. 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 the new 3m footpaths/cycleway from Cambridge Road in Eltisley to the Caxton Gibbet junction and similarly introduced between Chawston and Roxton as well as along Toseland Road which adjoins the existing A428 by Whitehall Farm Industrial Estate. The Scheme

Reference Number	Comment from Relevant Representation/Applicant Response
	will also introduce 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.
RR-013ax RR-048ax RR-100ax	Changes to DCO proposals are required
Applicant Response	The Applicant is committed to continuing engagement with the local authority and would like confirmation of the changes CCC consider should be made to the DCO Application.
RR-013ay RR-048ay RR-100ay	Some NMU provision is proposed to be downgraded, this hasn't been agreed
Applicant Response	The Applicant requests further detailed information on the proposed NMU provisions that are to be downgraded. The Applicant is committed to continuing engagement with the local authority to agree matters relating to NMU and Rights of Way.
RR-013az RR-048az RR-100az	Comments in work packages have not been addressed
Applicant Response	The Applicant requests further specific details of the comments in the work packages that have not been addressed. The Applicant is committed to continuing engagement to discuss and resolve comments.
RR-013ba RR-048ba RR-100ba	Generally, connectivity to local communities is poor
Applicant Response	Of the eight existing Public Rights of Way that are impacted by the new dual carriageway within the area of Cambridgeshire County Council, the Applicant is proposing five crossing facilities to maintain the connectivity within the area.

Reference Number	Comment from Relevant Representation/Applicant Response
	In the area of the Wintringham Development, of the three Public Rights of Way where crossings are not provided, two alternative crossings are within close proximity. These crossings have been developed to align with the Public Rights of Way provision of the Wintringham Development, and the severed routes, stopped up. Through this section of the Scheme, on the south eastern side of the new dual carriageway these routes are to be connected by a new route running parallel to the new road providing improved connectivity. Further details on the assessment of these proposals is provided in Chapter 12, Population and Human Health **[APP-081]** of the Environmental Statement and the Transport Assessment – Part 2 **[APP-241]**. The Applicant has proposed provision of NMU facilities adjacent to the carriageway where existing routes would be severed by the new dual carriageway. Specifically, shared footway/cycleways are proposed at Cambridge Road and Caxton Gibbet junctions. These routes have been upgraded from a footway to shared use facilities. Furthermore, new provision is proposed through Eltisley link (shared footway/cycleway) and along Toseland Road (footway) to ensure connectivity over the new dual carriageway. These proposals complement the objectives of Cambridgeshire County Council's Transport Investment Plan, specifically TIP 134.
RR-013bb RR-048bb RR-100bb	There are unnecessary gaps in continuous route provision
Applicant Response	The Applicant is committed to continuing engagement with the local authority and would like confirmation of what is meant by "unnecessary gaps in continuous route provision".
Traffic Modelling	
RR-013bc RR-048bc RR-100bc	Some routing in the base and forecast year models isn't realistic, insufficient information has been supplied to the transport authority to enable it to be checked
Applicant Response	The base year Strategic Traffic model was calibrated and validated to the Department for Transport TAG standards. The model was validated using traffic flow and journey time data and checks on routes between a number of origins/destinations were carried out as part of the calibration process to ensure that the modelled routeings were logical.

Reference Number	Comment from Relevant Representation/Applicant Response
	The development of the base model is described in the Combined Modelling and Appraisal Report **[APP-250]**. Based upon the excellent validation achieved by the model, it is considered that the model provides a reliable prediction of routes taken by traffic in both the base and future years, with and without the Scheme. It is noted that cordon versions of both the Base and Future Models with and without the Scheme, have been provided to Cambridgeshire County Council. Provision of these models therefore provides the means for the authority to check any routes for which they may have concerns. It would be helpful if the Authority could provide more specific details of those routes that are considered unrealistic and the reasons why these routes were identified.
RR-013bd RR-048bd RR-100bd	Strategic model flows have been used to build the local junction models but these flows haven't been validated for this purpose
Applicant Response	For the wider network junctions wherever assessed using VISSIM models base year model calibration and validation has been undertaken. For the Scheme junctions, base year calibration and validation of the junctions were not considered necessary due to the significant nature of reconfiguration of the junctions—both in terms of layouts and operations. The base year strategic model has been calibrated and validated to the acceptable criteria of the TAG guidance. It is accepted that those local junction models in the wider area that were assessed using individual junction models such as ARCADY or PICADY, were based on output from the strategic model and were not calibrated/ validated to observed traffic flows. However, these models relate to junctions indirectly affected by the Scheme and their results do not impact on the design of or justification of the Scheme itself. Within Cambridgeshire, at the junctions concerned, either (a) their capacity is significantly improved by the Scheme; or (b) they are predicted to remain well within capacity. A detailed explanation of the development of the local junction models is provided in the Junction Modelling Technical Note, document reference **TR010044/EXAM/9.10**, which has been submitted at Deadline 1 and sets out the reasons for the approach taken in the local junction modelling to assess the impacts of the scheme.
RR-013be RR-048be RR-100be	Impacts of the scheme on particular areas of the local road network are of concern and need to be understood in more detail (specifically St Neots, Girton Interchange, Coton, others)

Reference Number	Comment from Relevant Representation/Applicant Response
Applicant Response	The forecast impacts of the Scheme in the St Neots area are presented in Section 5 of Appendix W of the Consultation Report **[APP-069]**. This demonstrated that on the main routes into and out of St Neots there is a forecast reduction in traffic of 5% with the Scheme compared to without the Scheme in 2040. There are also very significant reductions in traffic on the existing A428 at St Neots and on other roads including those through central and northern St Neots. The impacts at Coton are addressed in document **TR010044/EXAM/9.8** Traffic Routeing Impacts at Coton which has been submitted at Deadline 1. The Applicant is currently undertaking further analysis for the Girton interchange and this will be reported in a Technical Note. Further guidance is sought from the local authorities relating to specific concerns at “other locations”,
RR-013bf RR-048bf RR-100bf	Construction traffic flows need to be understood in more detail to assess impacts on local communities and the highway asset
Applicant Response	The Applicant has provided comprehensive construction traffic flow impacts in the Transport Assessment **[APP-241** and **APP-242]** and the Transport Assessment Annex **[APP-243]**. Results from the assessments undertaken have been presented to local councillors, officers and local forums of all the local authorities. In addition, Cambridgeshire County Council has been provided with the strategic (SATURN) models of the 4 construction Phases together with the local junction models. The Applicant seeks confirmation on the specific information required with respect to any further specific information that is being sought.
Cycling	
RR-013bg RR-048bg RR-100bg	LTN 1/20 compliance required for any asset to be maintained by, or handed over to CCC. A compliant route is required between Cambourne and St Neots

Reference Number	Comment from Relevant Representation/Applicant Response
Applicant Response	The guidance outlined in LTN 1/20 is specifically for the local authorities and the development of new cycling infrastructure. There is no proposed development along the existing A428 between Cambourne and St Neots, where the assets are to be de-trunked and maintained by the local authority. The Applicant is proposing unsegregated shared footway/cycleway facilities at Cambridge Road junction, Eltisley Link and Caxton Gibbet junction in accordance with the Design Manual for Road and Bridges – 'CD 143 Designing for walking, cycling and horse-riding' and the associated National Application Annex. The Applicant does not consider it appropriate to adopt the principles of LTN 1/20 for the Scheme for the following reasons: • Highways England is not required to adopt the principles of Local Transport Notes. These are advisory documents produced by the DfT and recommended to local highway authorities for use on their roads. Compliance of the LTN1/20 is not compulsory for the local highway authority and therefore the requirements of the Design Manual for Roads and Bridges is the appropriate standard to be complied with, including the assessment and review process in GG142. • The existing A428 and the local roads are not new roads, a status not changed by the de-trunking process.The scheme is not being funded through a grant to Local Authorities. The design of the walking, cycling and horse-riding provision proposed on the local highway network is in accordance with DMRB standards. This provision does not preclude the local authority complying with the advice contained in LTN 1/20.
RR-013bh RR-048bh RR-100bh	Provision for users seems to be sub-standard with a lack of segregation and gaps in provision (for example at Eltisley).
Applicant Response	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 Cambridge Road junction, Eltisley Link and Caxton Gibbet junction. The continuity of the route at Eltisley would require improvement works to the existing A428 – this is outside of the scope of the Scheme. The existing A428 will be de-trunked and will become part of the local road network. Whilst this cannot be provided as part of the Scheme, there is an opportunity to explore this further as part of the Scheme's legacy discussions.

Reference Number	Comment from Relevant Representation/Applicant Response
RR-013bi RR-048bi RR-100bi	Crossings are not acceptable, specifically at A1198 where a grade separated crossing would meet LTN 1/20 guidance and an underpass for cyclists and pedestrians could also be used as a bat crossing.
Applicant Response	The Scheme proposes an at-grade crossing which is also in accordance with the guidance outlined in LTN 1/20. Signalised crossings will be provided where the shared footway/cycleways cross the slip roads and also at the A1198 on the north side of the Caxton Gibbet junction.
RR-013bj RR-048bj RR-100bj	Eltisley Link North roundabout needs to facilitate cyclists who wish to continue north up the B1040 with a suitable transition from off to on road and be designed to slow traffic speeds.
Applicant Response	The Applicant is considering the matter further and will seek to agree the issue through the draft joint Statement of Common Ground.
RR-013bk RR-048bk RR-100bk	• Lack of crossing facility on the old A428 between Abbotsley Rd and the proposed footway/cycle track on Toseland Rd • The proposed footway/cycle track on the proposed bridge on Toseland Rd needs to allow for cyclists continuing north with a suitable transition from off to on road • Lack of safe crossing facilities at New Cambridge Rd junction where the proposed footway/cycle track crosses the slip roads. • The proposed bridge on the B1046 should have provision for cyclists and pedestrians to facilitate a future segregated route between the villages and St. Neots. • Some provision for cyclists (Toseland Road) has been removed from the application
Applicant Response	The users of the proposed footway on Toseland Road are expected to use the existing crossing facility currently on the existing A428. The volume of traffic along the existing A428 will be significantly lower when the new dual carriageway is open for traffic and safe gaps in traffic for crossing will be more frequent.

Reference Number	Comment from Relevant Representation/Applicant Response
	The proposed footway along Toseland Road does not cater for cyclists and therefore transitions from off to on road are not required. Signalised crossings will be provided where the shared footway/cycleway crosses the slip roads. The design of the B1046 is a replacement of the existing infrastructure. The existing infrastructure does not accommodate separate provision for walkers, cyclists and/or horse-riders and therefore it is not proposed in the design of the road or the overbridge. The Applicant is not aware that any cycling provision along Toseland Road has been removed from the Application. It has always been the Applicant intention to only provide a footway along Toseland in relation to the footpath 278/7 diversion.
Highway Design	
RR-013bl RR-048bl RR-100bl	An enforceable commitment from the applicant to Vision Zero is required
Applicant Response	The Applicant cannot commit to the enforceable imposition of Vision Zero. The strategic highways network is operated, maintained and managed by Highways England which, by 2040, aims for no one to be killed or seriously injured while travelling on or working on the network. The Scheme has considered these targets through proposals to ensure that the Applicant aligns with Highways England's targets. This aligns with the principles set out in Vision Zero that no human being should be killed or seriously injured as the result of a road collision and sets ambitious targets for a 50% reduction in people killed and seriously injured by 2030 and working towards zero fatalities and severe injuries by 2040.
RR-013bm RR-048bm RR-100bm	Approval In Principle for highway design including Standards not yet agreed

Reference Number	Comment from Relevant Representation/Applicant Response
Applicant Response	The Applicant has provided draft local road standards to the local authority for their review, comment and engagement. The Applicant is committed to continuing engagement with the local authority on the matters relating to highway design.
RR-013bn RR-048bn RR-100bn	The submitted plans do not take account of the County Council's requirements regarding Local Road Highway Design Principles. As such the proposals include unnecessary Departures of Standard for carriageway widths/cross sections. The principles to be applied in the design and construction of the Scheme's local roads within Cambridgeshire are as follows: • Consistent application of MCDHW standards and specifications. • Full compliance with standards wherever possible, but departures from standard are not justified for carriageway width/cross section. • The methods of highway drainage should be considered at the preliminary design stage. • Holistic design approach is required to avoid unnecessary maintenance risk/cost to the County Council.
Applicant Response	The Applicant has designed the roads in accordance with Design Manual for Roads and Bridges (DMRB) being the appropriate standard to be complied with and as Cambridgeshire County Council has confirmed is required. The non-trunk roads (B1046/Potton Road, Toseland Road and the B1040) have been designed to suit the nature of the existing road, which in some cases are old roads, that have not been designed to any standard. The Applicant is committed to keeping the nature of the existing road to remove unnecessary safety risks. Having localized areas of wider road has been shown to increase driver speeds and increase the temptation for drivers to attempt overtaking which may lead to accidents. The highway drainage has been considered in the preliminary design stage to ensure that adequate sustainable drainage systems are provided, and the necessary land is acquired. The highway drainage will be considered in more detail at the detailed design stage The Applicant is committed to continuing engagement with the local authority on the matters relating to highway design.

Reference Number	Comment from Relevant Representation/Applicant Response
RR-013bo RR-048bo RR-100bo	A lighting strategy is not in place and will be required to secure acceptable lighting design for both the new assets and those on the sections to be detrunked.
Applicant Response	The proposed extent of lighting is shown on the General Arrangement Plans **[APP-011]** and will be developed further at detailed design. Requirement 17 of the dDCO **[APP-025]** 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. The Applicant is committed to continuing engagement with the local authority on matters relating to the lighting design and strategy.
RR-013bp RR-048bp RR-100bp	Commitment to the principle that no street lighting assets should be older than 2 years old at the point of handover whether on new or detrunked sections is required.
Applicant Response	The Applicant is committed to continuing engagement with the local authority on matters relating to the handover of street lighting assets.
RR-013bq RR-048bq RR-100bq	Detrunking and Assets requires extensive discussion
Applicant Response	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. The Applicant is committed to continuing engagement with the local authority on the matters relating to de-trunking and handover of assets.

Reference Number	Comment from Relevant Representation/Applicant Response
RR-013br RR-048br RR-100br	Boundaries need to be defined, including the land to be handed over. In principle, CCC will not accept land that is not required for highways purposes.
Applicant Response	It is the intention of the Applicant to only handover so much of the Scheme as is required for highways purposes (or any other statutory duty CCC may have).
RR-013bs RR-048bs RR-100bs	Changes to DCO drafting required to ensure appropriate protective provisions in relation to asset handover of local road network, NMU routes, and RoW
Applicant Response	The draft side agreement currently being negotiated with CCC includes provisions in relation to asset handover for the local road network. Further discussions about the handover of the NMU routes and the RoW are continuing with CCC.
RR-013bt RR-048bt RR-100bt	Detrunking process as set out is unacceptable and requires changes to the drafting of the DCO to follow a process agreed with the Highway Authority. De-trunked roads should not be handed over to the Highway Authority until they are at a reasonable standard agreed with the Highway Authority.
Applicant Response	The Applicant has produced and shared a draft side agreement for the consideration of CCC which will deal with the handover of de-trunked roads and the standard to which they must be maintained prior to handover. The need for a side agreement does not need to be reflected in the drafting of the dDCO **[APP-025]**.
RR-013bu RR-048bu RR-100bu	In particular the DCO should require either Protective Provisions with regard to Highway matters, or entry into an agreement as to handover of new and de-trunked roads. The agreed Handover Plan and Legal Agreement to be required under the DCO
Applicant Response	The Applicant has produced and shared a draft side agreement for the consideration of CCC which will deal with the handover of de-trunked roads and the design of local roads. The presence of the side agreement means that there are no changes required to the drafting of the dDCO **[APP-025]**.

Reference Number	Comment from Relevant Representation/Applicant Response
RR-013bv RR-048bv RR-100bv	Numbering of detrunked roads needs to be included within the application
Applicant Response	The numbering of detrunked roads has been included within the application. Please refer to Part 2 of Schedule 3, Classification of Roads, of the dDCO **[APP-025]**.
Highway Network Impact	
RR-013bw RR-048bw RR-100bw	Impact on network from construction traffic and re-routing needs to be understood and how any adverse impacts will be mitigated
Applicant Response	The Applicant has provided comprehensive construction traffic flow impacts in the Transport Assessment **[APP-241** and **APP-242]** and the Transport Assessment Annex **[APP-243]**. Results from the assessments undertaken have been presented to local councillors, officers and local forums of all the local authorities. The Applicant seeks confirmation on the specific information required and in which parts of the network.
RR-013bx RR-048bx RR-100bx	Proposals in the DCO relating to Traffic Manager responsibilities are unacceptable and will require redrafting to allow for an agreed process
Applicant Response	The Outline Construction Traffic Management Plan **[APP-244]** 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 Outline Construction Traffic Management Plan has been informed through discussions with the Strategic Road Users Technical Working Group which includes representatives from local authorities. 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 Outline Construction Traffic Management Plan **[APP-244]**. Requirement 11 of the draft DCO **[APP-025]** 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

Reference Number	Comment from Relevant Representation/Applicant Response
	discharge the requirement, a summary report is required to be prepared which must include the written responses from any parties consulted with.
RR-013by RR-048by RR-100by	Permitted construction network routes need to be revised and the restrictions clarified
Applicant Response	Paragraph 3.3.1 of the Outline Construction Traffic Management Plan **[APP-244]** sets out a number of restrictions as follows: • 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. • 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. • 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 Construction Traffic Management Plan **[APP-244]** sets out drawings showing the diversion routes. • The approach to operating lanes at Black Cat junction, Cambridge road junction and Caxton Gibbet junction. • Speed restrictions and temporary speed limits (to be dealt with by temporary traffic regulation orders). 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 substantially accord with the Outline Construction Traffic Management Plan **[APP-244]**. Requirement 11 of the draft DCO **[APP-025]** 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.

Reference Number	Comment from Relevant Representation/Applicant Response
RR-013bz RR-048bz RR-100bz	Effective ways of measuring and managing temporary traffic diversions need to be secured
Applicant Response	Appendix D of the Outline Construction Traffic Management Plan **[APP-244]** sets out strategic diversion routes. The proposed traffic diversions will be secured through the Outline Construction Traffic Management Plan **[APP-244]** as Schedule 10 of the draft Development Consent Order (dDCO) **[APP-025]** sets out that it would become a certified document if consent was granted for the Scheme. 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 substantially accord with the Outline Construction Traffic Management Plan **[APP-244]**. Requirement 11 of the draft DCO **[APP-025]** 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.
RR-013ca RR-048ca RR-100ca	More information required on the construction programme and timings for closures
Applicant Response	The construction programme is set out in Chapter 2, The Scheme **[APP-071]** of the Environmental Statement. Further detailed construction works information will be provided at the detailed design stage of the Scheme. Indicative timings for closures are set out in the Outline Construction Traffic Management Plan **[APP-244]**. The Applicant is committed to continuing engagement with the local authority on matters relating to traffic management, diversion and construction management plans. It should also be noted that relevant local highway authorities will have the opportunity to comment on a Traffic Management Plan, which must substantially accord with the Outline Construction Traffic Management Plan **[APP-244]**. Requirement 11 of the draft DCO **[APP-025]** 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

Reference Number	Comment from Relevant Representation/Applicant Response
	discharge the requirement, a summary report is required to be prepared which must include the written responses from any parties consulted with.
Digital Connectivity	
RR-013cb RR-048cb RR-100cb	The Councils request that the opportunity is taken as part of this major investment to install a fibre backbone along the route to enable connectivity along the corridor
Applicant Response	The installation of fibre cables does not form part of the application for development consent as it does not support the construction of the Scheme and it is not required to help address its impacts. As such it would not meet the definition of associated development in section 115(2) of the Planning Act 2008 or as set out in relevant Guidance and is not appropriate to include in the DCO application.
Other Matters	

	• There has been no discussion to date of Development Consent Obligations
	• There is no provision or discussion of a legal agreement or Protective Provisions covering Highway matters although this has been requested
	• There has been no discussion to date of the detail of drafting in the DCO
	• There has been limited discussion to date of matters for the Statement of Common Ground
	• Finally agreement in principle is required in the following areas, followed by agreement and execution of a detailed legal agreement as part of the DCO as referred to above and specifically covering:
	  ○ Commuted sums
	  ○ Remedial maintenance of local highway assets impacted by the project
	  ○ Adoption of assets
	  ○ Funding to cover resource costs in the development of the scheme and ongoing matters via a Planning Performance Agreement or other mechanism

Reference Number	Comment from Relevant Representation/Applicant Response
	○ Commitment to minimise cost pressure on the Cambridgeshire Local Authorities
Applicant Response	• Legal Agreement – A draft legal agreement was provided to CCC on 11 June 2021. The draft legal agreement between CCC and Highways England will provide a framework for the process of de-trunking the existing A428 part of which will become a local road to be maintained by CCC. • The legal agreement will also provide a mechanism for handing over the local roads constructed as part of the Scheme that are to be maintained by CCC as local highway authority. The measures contained in this agreement are appropriate for the Scheme. • The legal agreement will provide sufficient control and protection to CCC as local highway authority and as such protective provisions for highway matters are not necessary to be included in the dDCO **[APP-025]**. The Applicant is committed to continuing engagement with the local authority on the matters to be included in the legal agreement and any comments they have on the dDCO **[APP-025]**. In addition to the draft legal agreement referred to above, the Applicant has now met with CCC to discuss its comments on the dDCO **[APP-025]**. The comments made in relation to the dDCO will be considered and the Applicant will continue to engage with the Councils on this matter.

RR-014 Cambridgeshire Local Access Forum

Reference Number	Comment from Relevant Representation/Applicant Response
RR-014a	The Cambridgeshire Local Access Forum (CLAF) is a statutory consultee for all Local Authorities and Statutory undertakers. We are concerned at the lack of Non-Motorised Users (NMU) access included in the project and the missed opportunities for improving and enhancing the rights of way network. Equally disappointing is that despite everything that has been learnt about the need for active travel safe access, the importance to health and well being of access to the countryside etc., the excuse for not providing this type of amenity as part of the project is that the project was conceived before the pandemic therefore the need for better access was not included. We find this utterly unacceptable to create a transport network now which will be in use for years and years and not to incorporate the massive changes that Covid has made on our society.
Applicant Response	The Applicant has proposed upgrades to the Public Rights of Way and walking, cycling and horse-riding facilities that have been severed or disrupted by the Scheme. Chapter 12, Population and Human Health **[APP-081]** of the Environmental Statement sets out the potential impacts of the Scheme for Walkers Cyclists and Horse riders as well as design, mitigation and enhancement measures. Whilst wider interventions may sometimes be appropriate to address community severance resulting from the existing strategic road network, it is beyond the proper scope of the Scheme to address all existing issues faced by existing users of the highways network.

RR-015 Camcycle

Reference Number	Comment from Relevant Representation/Applicant Response
RR-015a	Camcycle is a volunteer-led charity with over 1,550 members working for more, better and safer cycling for all ages and abilities in the Cambridge region. We focus on cycling as a mode of sustainable general transportation for everyday purposes. Many of our members transport themselves and their families using a wide variety of cycles, such as cargo cycles, tandems, tricycles, disability-adapted cycles and cycles with trailers. Our interest in the A428 scheme is to ensure that the five core design principles of Local Transport Note 1/20 are achieved for people cycling, alongside other active travel users. Those design principles are: safety, coherency, comfort, directness and attractiveness. Inclusivity must be integral to all of those principles.
Applicant Response	Whilst the Applicant agrees with the design principles stated, it is not considered appropriate to adopt LTN 1/20 for the Scheme. Walking, cycling and horse-riding infrastructure has been designed in accordance with Design Manual for Road and Bridges – 'CD 143 Designing for walking, cycling and horse-riding' and the associated National Application Annex. The design of the walking, cycling and horse-riding provision proposed on the local highway network is in accordance with DMRB standards. This provision does not preclude the local authority complying with the advice contained in LTN 1/20.
RR-015b	Furthermore, the A428 scheme as proposed will significantly increase motor traffic levels in the region, and correspondingly, it will significantly increase air pollution and carbon emissions. In light of the climate emergency, it is absolutely vital that every step be taken to prevent or reduce the increase of carbon emissions, and those steps must include major enhancements to active travel.
Applicant Response	The Applicant refers Camcyle to Chapter 5, Air Quality **[APP-074]** and Chapter 14, Climate **[APP-083]** of the Environmental Statement which report the air quality and climate effects associated with construction and operation of the Scheme. Both assessments have concluded that no significant effects would occur in either phase. Chapter 5, Air Quality **[APP-074]** of the Environmental Statement presents the results of an assessment of the likely significant effects of the Scheme on existing air pollution concentrations and potential air quality impacts associated with the construction and operation of the Scheme. Nitrogen dioxide (NO_2) pollution from roads disperses over short (200m) distances and therefore NO_2 concentrations at sensitive receptors are influenced by both the location of emissions and the total emissions generated by the Scheme. Once the Scheme is operational, local air quality for communities adjacent to the existing A428 is expected to

Reference Number	Comment from Relevant Representation/Applicant Response
	improve as a result of traffic transferring onto the new dual carriageway. Some reductions in air quality are predicted to occur at properties close to the new alignment for the Scheme as a result of the proximity of the vehicles on the new road. However, concentrations of pollutants are predicted to remain under the relevant air quality objective value at these receptors. Therefore, there are no significant effects predicted for air quality during the operational phase and therefore there are no mitigation measures proposed for the operation of the Scheme. Chapter 14, Climate **[APP-083]** of the Environmental Statement presents an assessment of the Scheme against the UK Government's current carbon budgets, as required by Paragraph 5.17 of the NPSNN: *"for road project applicants should provide evidence of the carbon impact of the project and an assessment against the Government's carbon budgets".* Paragraph 5.18 of the NPSNN clarifies that *"any increase in carbon emissions is not a reason to refuse development consent, unless the increase in carbon emissions resulting from the proposed scheme are so significant that it would have a material impact on the ability of Government to meet its carbon reduction targets".* The assessment within Chapter 14, Climate **[APP-083]** of the Environmental Statement has identified that the emissions arising as a result of the Scheme represent less than 0.012% of the total emissions in any of the 3rd, 4th or 5th Carbon Budget periods. Accordingly, the assessment has concluded that the GHG emissions impact of the Scheme would not have a material impact on the UK Government meeting its legally binding carbon reduction targets. Although the 6th Carbon Budget was not legally binding when the Environmental Statement was written, an additional assessment of the 6th Carbon Budget, which became legally binding in June 2021, has been undertaken. This assessment concluded that the Scheme represents less than 0.024% of the total emissions in the 6th budget period and is also considered not have a material impact on the UK Government meeting its carbon reductions target. For further information on how the cumulative impacts of the Scheme have been considered including in the context to RIS, please refer to the response to Written Question 1.4.1.1a in the Applicant's Response to the Examining Authorities First Round of Written Questions **[TR010044/EXAM/9.2]**.

Reference Number	Comment from Relevant Representation/Applicant Response
RR-015c	Issues to be raised: 1. The A428 project must provide active travel connectivity for the existing and future settlements between St Neots and Cambourne. As currently planned, the A428 project mainly caters for motor vehicle users in that region, with only crumbs for active travel. This is unsuitable and does not comply with the government's Gear Change policy (2020), which requires all highway projects to provide active travel infrastructure in compliance with the five principles outlined above. We accept that active travel connectivity is best provided on a separate alignment from the dual carriageway; however, it is the principle of providing connectivity that must be established as part of this process.
Applicant Response	The Applicant has proposed no loss of NMU facilities adjacent to the carriageway where existing routes would be severed by the proposed all-purpose trunk road. The Scheme has sought to maintain connectivity and specifically, shared footway/cycleways are proposed along Roxton Road Link, Roxton Road, Bedford Road and Kelpie Marina access for the replacement of infrastructure on the A1. Furthermore, shared footway/cycleways are proposed at Cambridge Road and Caxton Gibbet junctions. These routes have been upgraded from a footway to shared use facilities. New provision is proposed through Eltisley link (shared footway/cycleway) and along Toseland Road (footway) to ensure connectivity over the new dual carriageway. These proposals complement the objectives of Cambridgeshire County Council’s Transport Investment Plan, specifically TIP 134.
RR-015d	2. The A428 project must provide suitably safe and convenient active travel crossings of busy roads and junctions, usable by people of all ages and abilities. As currently planned, the A428 project proposes several hazardous uncontrolled at-grade crossings of roads and junctions forcing people to brave very wide expanses of carriageway and high-volume, high-speed motor traffic. This is unsuitable: these crossings must be redesigned to make them much safer to use, so that they are accessible to everyone, as required by Gear Change and the Equality Act (2010). It is perfectly possible to design safe crossings for these contexts, however the project team has made it clear that they will do so only if they are directed to do so by higher authorities.

Reference Number	Comment from Relevant Representation/Applicant Response
Applicant Response	The Applicant proposes shared footway/cycleway crossings that have been designed in accordance with the Design Manual for Road and Bridges – 'CD 143 Designing for walking, cycling and horse-riding' and the associated National Application Annex, which are subject to Road Safety Audits throughout the design development and construction. The Applicant does not consider the at-grade crossings of roads and junctions as hazardous. The Applicant proposes signalised crossings where the shared footway/cycleways cross all slip roads and on the A1198 on the north side of the Caxton Gibbet junction.
RR-015e	3. The A428 project (a) must not sever existing active travel routes and (b) where structures are planned to be built for the benefit of motorists who need to cross existing barriers (such as the A1, the River Great Ouse and the East Coast Main Line) those structures should incorporate provision that allows active travel users also to cross those barriers, such as with suitably designed active travel user side-paths on bridges. This effort may be coordinated with the East West Rail project, which is also designing infrastructure in the same region.
Applicant Response	The Applicant proposes that all Public Rights of Way and WCH facilities, that are impacted by the Scheme proposals, are either maintained or a suitable alternative route is provided. Where the Applicant proposes WCH facilities on new structures, adequate provision is proposed. The Applicant does not believe it is appropriate to make WCH provision on structures that does not tie into existing routes and are therefore inaccessible. East West Rail completed their non-statutory route options consultation in June 2021, and a Preferred Route Announcement is not anticipated until 2022. Therefore, since East West Rail has not yet determined the route and locations of the proposed stations, it is not appropriate for the Applicant to make provision for or coordinate WCH provision due to uncertainty about the route option selected.

RR-016 Central Bedfordshire Council

Reference Number	Comment from Relevant Representation/Applicant Response
RR-016a	Central Bedfordshire Council is responding to this application for a Development Consent Order. As the Council it has a wide range of functions and responsibilities including its role as local planning authority, this representation and its participation in this application process reflects and draws on the breadth of its relevant functions and responsibilities. Only a small section of the route is located directly within the Central Bedfordshire Local Authority Area, with a short section of the new proposed dual carriageway to the south of Little Barford, passing under Barford Road. Notwithstanding this, Advice Note 2 (S18) encourages local authorities to register to take part in the process. On behalf of Central Bedfordshire District Council my representations are likely to be limited to the effects the proposal may have on this local authority area rather than the broader issues of the proposal. The issues that are likely to be relevant to Central Bedfordshire comments will include: (1) The implications within Central Bedfordshire for the highway network to the south of the scheme, in particular the A1.
Applicant Response	The Applicant has set out all impacts on the wider road network (including the A1 junctions) within the Transport Assessment Annex **[APP-243]**. Table 3-91 of the Transport Assessment Annex **[APP-243]** sets out that for the A1/A603 in Sandy, the predicted traffic flow impact is negligible with some increases in flow on the A1 and decreases on the A603-B1042. The predicted operational impact is a marginal increase in delay in 2025 but with a more significant reduction in delay in 2040. Paragraph 3.22.5 of the Transport Assessment Annex **[APP-243]** sets out that the A1/A603 junction will be the subject of a Monitor and Manage approach in which the performance of the network will be monitored, and consideration will be given by Highways England to the potential need for interventions, if required.
RR-016b	(2) A need for the preparation and agreement of appropriate traffic management and improvement schemes and / or the identification of alternate routes for larger vehicles or abnormal loads, prior to the construction works in question commencing. In particular, (although not limited to), the proposed use of Station Road, Tempsford for construction traffic. (3) The implications with Central Bedfordshire of diversionary routes during road closures considered necessary to facilitate the construction works.

Reference Number	Comment from Relevant Representation/Applicant Response
Applicant Response	Traffic management measures are set out in the Outline Construction Traffic Management Plan **[APP-244]**. The Applicant is committed to continuing engagement with the local authority on matters relating to this plan. The Applicant has advised the local authority, through ongoing engagement on the Outline Construction Traffic Management Plan, that access for construction vehicles along Station Road through Tempsford would be limited to specific elements of work including the gas main diversion works and construction of the east abutment of the East Coast Main Line Railway; both of which are early activities. This route is already being used for access to archaeological clearance works and is a minor route which will only be used for the early activities. Once these specific elements of work are completed, it will then become a prohibited route for construction traffic. 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 substantially accord with the Outline Construction Traffic Management Plan **[APP-244]**. Requirement 11 of the draft DCO **[APP-025]** 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.
RR-016c	(4) The impact of the development on a known archaeology landscape. Specifically the need to design a robust and consistent mitigation strategy whether carried out as Advanced Works/Enabling Works or Main Works
Applicant Response	The impact of the development on archaeology and the historic landscape is detailed in Section 6.9 of Chapter 6, Cultural Heritage **[APP-075]** of the Environmental Statement. The Archaeological Mitigation Strategy **[APP-238]** details the strategy for the archaeological mitigation areas. Sites 4-7, as detailed in Appendix B of the Archaeological Mitigation Strategy **[APP-238]**, are within Central Bedfordshire and these areas have been agreed with the CBC Archaeologist.
RR-016d	(5) Noise impacts for the construction or operational use of the development

Reference Number	Comment from Relevant Representation/Applicant Response
Applicant Response	During the construction phase of the Scheme, the First Iteration Environmental Management Plan **[APP-234]** includes a range of control measures to manage noise emissions resulting from construction related activities, these include (but not limited to): • All ancillary plant such as generators, compressors and pumps will be positioned so as to cause minimum noise disturbance. If necessary, acoustic barriers or enclosures will be provided, where appropriate. • Working methods will be developed specific to the area and will consider use of equipment and methods of operations to minimise noise. • Whenever possible, fabrication of materials will be undertaken off-site. • All plant and machinery in intermittent use will be shut down in intervening periods between work or throttled down to a minimum. • Proper use of plant with respect to minimising noise emissions with regular maintenance will be undertaken. All vehicles and mechanical plant used for the purpose of the works will be fitted with exhaust silencers and be maintained in good working order. • Minimising the drop height of materials into hoppers, lorries or other plant. • Use of less intrusive alarms on vehicles, for example broadband vehicle reversing warnings. • Consideration of low vibration working methods, including non-vibratory compaction plant where possible. • Haul routes within the site boundary will be kept in good condition • The removal of obstructions that can cause, or add, resonance e.g. concrete bases. • No start-up or shut down of large vibratory rollers (approximately 13 tonnes) within 50m of receptors and medium vibratory rollers (approximately 3.5 tonnes) within 15m of receptors. • The use of cut-off trenches to disrupt direct vibration movement through the ground. • The use of pre-bores for piles.

Reference Number	Comment from Relevant Representation/Applicant Response
	During the operational phase of the Scheme, design measures such as constructing parts of the route alignment in cutting and the use of low noise road surfacing within the Scheme would reduce operational noise levels as far as practicable.
RR-016e	(6) Air quality impact on the Sandy AQMA, caused by increased traffic on the A1 south from this proposal.
Applicant Response	Using the traffic models and data generated for the Scheme, the air quality effects within the Sandy AQMA, as set out in Chapter 5, Air Quality **[APP-074]** of the Environmental Statement are predicted to be, at worst, imperceptible worsenings, with some small improvements recorded. Predicted changes would be -0.7 to +0.2 µg/m^3 in annual mean nitrogen dioxide. These effects are not considered to be significant for air quality based on advice within the DMRB LA 105 air quality standard applied. As such, no mitigation would be required to manage air quality effects associated with the Scheme.
RR-016f	The Council wishes to participate in the Examination as and when it would aid the Planning Inspectorate in determining the proposal and will send either detailed written representation or relevant officers to the Examination discussions.
Applicant Response	The Applicant notes this point.

RR-017 Charlotte Ditchburn

Reference Number	Comment from Relevant Representation/Applicant Response
RR-017a	I wish to record my OBJECTION to the Development Consent Order as submitted because of the failure to include opportunities for equestrians which I believe has occurred due to the lack of consultation with equestrians unlike the consultation with cyclists. I would like to have the opportunity to explain my views to the Inspector due to the failure to accommodate the needs of equestrians contrary to National and Local Policies. For example: • The failure to provide for equestrian usage of the new bridge over the A421 at Roxton compounds an omission made when the A421 was built. The Society accepts that this current bridge is rarely used by horses because local riders consider it to be too dangerous. But there is a demand for it to be equestrian safe in order to create some riding circuits in an area has a shortage of bridleways. Further, the bridge will be used by a significantly higher number of HGVs than is currently the case making the need to segregate horses from the carriageway even greater. The Society considers it wholly unacceptable, and contrary to policy, that the proposed cycleway is not a bridleway in order to protect the safety of horse riders.
Applicant Response	The Applicant has also made efforts to ensure the British Horse Society were made aware of the Scheme. Prior to submission of the application for development consent, the Applicant set up a number of working groups, one of which covered Walkers, Cyclists and Horse Riders. Appendix M (Part 1.1) of the Consultation Report **[APP-046]** sets out that the British Horse Society and the Byways and Bridleways Trust were invitees to the Technical Working Group, which met on four occasions (October 2019, December 2019, March 2020 and June 2020). Furthermore, the British Horse Society were invited to the launch of the supplementary consultation, held in June and July 2020. Since submission of the DCO application, the Applicant met with the British Horse Society in April 2021 to discuss their concerns in greater detail. In terms of future consultation, the British Horse Society will be invited to engage with the Scheme during the detailed design phase. In the delivery of the Scheme, the Applicant is required to re-provide NMU routes that are severed or disrupted as a result of the Scheme. The NMU provision made between School Lane at Roxton and The Lane at Wyboston is a direct replacement for the shared unsegregated footway/cycleway that is currently adjacent to the A1 northbound carriageway. The existing route is unsuitable and would require pedestrians or cyclists to negotiate the new Black Cat junction. The proposed route provides a safer and more attractive alternative, away from the strategic road network, and it also links to National Cycle Route 12. It should be

Reference Number	Comment from Relevant Representation/Applicant Response
	noted that the route along School Lane and from the east end of School Lane, northwards to the start of the Kelpie Marina access road, is to be dedicated as bridleway, as requested by Bedford Borough Council. The carriageway on the existing Bedford Road, Kelpie Marina access road, realigned Roxton Road and the new Roxton Road Link can be legally used by horses and carriages. The Roxton Road bridge has been provided to maintain connectivity across the Scheme and has an improved cross section compared to the existing bridge, as illustrated on Sheet 1 of the Engineering Sections (Part 3 – Structures General Arrangements) **[APP-019]**. This shows that the verge on the carriageway side of the bridge is 2.5m from the 1m high parapet railing. This is a standard (DMRB CD127 Cross sections and headrooms) minimum offset and parapet height (DMRB TD19/06 Requirements for road restraint systems) for bridges of this nature on roads for all users. On the footway/cycleway side, the carriageway is offset by 5m from the parapet railing. The parapet railing on this side will be a minimum of 1.4m high for safety reasons as cyclists are immediately adjacent to the railing. Correspondence received during the consultation suggested 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 that counts were undertaken no horse riders were observed using the existing bridge. It should also be noted that there are no existing bridleways in the vicinity of this part of the Scheme. The Applicant acknowledges the suggestion that there would be greater interest in using this route if it were considered safer. The Applicant considers that the improved cross section on the bridge provides a safe and adequate route for all users. Should Bedford Borough Council wish to extend the bridleway network within the area and provide an off-carriageway route across the bridge, the proposed Scheme does not preclude any such extensions or alterations in the future.
RR-017b	• Caxton Gibbet roundabout. Needs safe and segregated NMU access for all users including equestrians. Failure to provide this facility will be disadvantage equestrians in perpetuity from accessing any A428 NMU provision. Opportunities to link to the new peripheral bridleway at Cambourne West have been ignored. • Bridleway 74/6 - could be provided no must be included in the project • New foot cycleway Cambourne to St. Ives – needs to be NMU • Minutes of NMU Meetings with CCC. Need for new NMU path alongside de trunked A428 was recorded as was path alongside new A428

Reference Number	Comment from Relevant Representation/Applicant Response
	• 4.4 NMU data survey – no equestrian activity bears no reflection on suppressed demand where facilities are inadequate. Huge changes since 2017
Applicant Response	The route through the Caxton Gibbet junction is for walkers and cyclists. A new route to replace the existing route between Caxton Gibbet roundabout and Brockley Road will be created as part of the Scheme – this will be designated as a bridleway. The Cambourne West development is separate from this Scheme and is subject to local planning. There is no provision within this development for walkers, cyclist and horse-riders on its western side adjacent to the A1198, therefore there is no opportunity to provide a link from the Caxton Gibbet junction. The Applicant proposes an underpass crossing of the new dual carriageway to maintain Bridleway 74/6. The Applicant requests further clarification on the reference to a new footway/cycleway between Cambourne and St Ives. It is envisaged that this route is not part of the proposed Scheme and therefore any upgrade is beyond the scope of this Scheme. The existing A428 will be detrunked as part of the Scheme, and will become part of the local highway network. Volumes of traffic on the route will decrease as a result of this Scheme. It will be for the local highway authority to determine future use and incorporation of dedicated routes for horse riders. The Applicant notes the comments made about survey data, however the provision of new facilities, where there is no evidence of need, is outside the scope of the Scheme. Whilst national and local planning policy requires schemes to consider opportunities to enhance access for walkers, cyclists and horse-riders, there is no policy requirement to provide facilities where it is considered there is suppressed demand.
RR-017c	• 2.21.2 Data from Jacobs survey in no way captures the suppressed demand from all three users arising from the lack of facilities. How was this information captured? Massive changes in demand since lockdown. Building for the future not the past.
Applicant Response	The Applicant notes the comments made about survey data, however the provision of new facilities, where there is no evidence of need, is outside the scope of the Scheme. Whilst national and local planning policy requires schemes to consider opportunities to enhance access for walkers, cyclists and horse-riders, there is no policy requirement to provide facilities where it is considered there is suppressed demand. It will be for the local highway authority to determine future use and incorporation of dedicated routes for horse riders.

Reference Number	Comment from Relevant Representation/Applicant Response
RR-017d	• 2.15.1 Equality Act – females not mentioned.
Applicant Response	The impacts of the Scheme in relation to the Equality Act 2010 have been assessed by the Applicant as part of the Equality Impact Assessment **[APP-245]**. This has identified where the impacts of the Scheme could have a potential disproportionate or differential effect on protected characteristic groups. This includes any effects on women which are included under the protected characteristic of sex.
RR-017e	Wintringham. The proposals made in the WCHAR only provide for cycling and walking whereas the existing footpaths are all to be upgraded to bridleways. This information was provided by the BHS but clearly has been ignored.
Applicant Response	The Public Rights of Way that the Scheme is affecting in this area are public footpaths. Three of these are to be stopped up in between the existing A428 and the new dual carriageway as it is known that the continuation of those routes on the west side of the existing A428 will be stopped up as part of the Wintringham development. The Applicant cannot advocate the upgrade of the remaining footpaths to public bridleways as part of the Scheme as there is no justification for acquiring the additional land that would be required to do this.
RR-017f	Constant reference throughout the document for the need to provide shared cycling and pedestrian access which is contrary to the Cambridgeshire and Peterborough Local Transport Plan requirement for Active Travel provision i.e. pedestrians, cyclists and equestrians.
Applicant Response	The 'Walking, Cycling and Horse-riding Assessment Report' (WCHAR), set out in the Transport Assessment **[APP-242]** has considered the existing walking, cycling and horse-riding policies and strategies. The level of WCH provision proposed for the Scheme is considered to be measured and appropriate to this assessment and the impact of the Scheme.
RR-017g	The provision of NMU access is not a 'nicety' 'if money allows' but of high importance in terms of health and wellbeing. Any route should be designed to be safe, enjoyable and welcoming to use for all NMU's and not simply something squeezed on to the edge of the carriageway. Identification of funds and their source should be part of the Planning Inspectorate approval.

Reference Number	Comment from Relevant Representation/Applicant Response
Applicant Response	The National Policy Statement for National Networks (NPSNN), requires applicants to mitigate impacts upon accessibility for non-motorised users. 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 new shared footway/cycleway provision adjacent to the Roxton Road link and Kelpie Marina access tracks, Cambridge Road junction, Eltisley link and Caxton Gibbet junction. In addition, a footway is proposes along Toseland Road as part of the footpath 278/7 diversion. The Scheme will also introduce a new bridleway along School Lane connecting to the Kelpie Marina access track. Further information on 'Public rights of way and other routes' can be found in Chapter 2, The Scheme **[APP-071]** of the Environmental Statement. The Planning Act 2008 (PA 2008) does not give the Panel or the Secretary of State any powers to require applicants to identify funds and their sources for improvements to the PRoW network. While PA 2008 provides opportunities for applicants of Nationally Significant Infrastructure Projects (NSIPs) to acquire land and rights over land through compulsory acquisition; Section 122 of PA 2008 explains that in order to do so, the land has to be required for development to which the development consent relates; is required to facilitate or is incidental to that development; or is replacement land which is to be given in exchange for the order land under Section 131 or 132. There also has to be a compelling case in the public interest for the order land to be acquired compulsorily. Provision of improved NMU access beyond the Order limits would not meet these compulsory acquisition tests and so could not be delivered as part of this DCO application.

RR-018 Charlotte Freeman

Reference Number	Comment from Relevant Representation/Applicant Response
RR-018a	I am interested in horse riders of Eltisley protecting our bridle paths and ensuring there are safe access routes around the new roads and layouts for safe equestrian activities.
Applicant Response	The Applicant proposes safe routes for bridleways and designated routes that are severed or disrupted as a result of the Scheme. With particular reference to the bridleway in Eltisley, a new underpass is being proposed for bridleway 74/6 to maintain connectivity. The underpass has been designed to accommodate a horse to be ridden through the structure so that disabled riders do not have to dismount - a concern raised at consultation. The NMU provision across Eltisley link has been provided to align with Cambridgeshire County Council's Transport Investment Plan (TIP 134) within the area, which does not include for equestrian facility improvements. The Eltisley Link does not connect to existing bridleways other than the above mentioned for which an underpass is provided. Whilst wider interventions may sometimes be desired, it is beyond the proper scope of the project to address all existing issues faced by existing users of the highways network.

RR-019 Chris Turner

Reference Number	Comment from Relevant Representation/Applicant Response
RR-019a	Increased traffic volumes on the A428 eastbound will encounter the inadequate Girton Interchange with the M11 and A14 where the A428 reduces to a single lane and queues form. This will cause some traffic to seek an alternative route and 'rat run' through the village of Dry Drayton where the class C road is already overloaded and its 30 mph speed limit is continuously exceeded. In my opinion, the A428 scheme should be required to also improve the Girton Interchange
Applicant Response	Impacts at wider junctions, including the Girton Interchange, have been assessed and reported in the Transport Assessment Annex **[APP-243]**. Table 3-89 sets out that for the M11 J14 Girton Interchange, there would be a significant increase in eastbound flow along the A428, offset to some extent by decreases on the M11 and A14. The predicted operational impact analysis of the eastbound merge taper suggests that additional capacity may potentially be required at the A428/M11 eastbound merge. Paragraph 3.22.5 of the Transport Assessment Annex **[APP-243]** sets out that the M11 J14 Girton Interchange will be the subject of a Monitor and Manage approach in which the performance of the network will be monitored and consideration will be given by Highways England to the potential need for interventions, if required.

RR-020 Christine Mayles

Reference Number	Comment from Relevant Representation/Applicant Response
RR-020a	I have two points to make about the area affected by the proposals for the Black Cat Roundabout and the surrounding; 1) Firstly, there needs to be an air and noise pollution monitors put in the village of Roxton. We are currently sandwiched between two major roads. With a big expansion of the Black Cat Interchange the village should have its air quality and noise levels monitored now to provide a baseline and continually monitored during construction and thereafter when this new junction is in use. This will enable public health issues to be predicted and dealt with as they happen and enable the parish council to re-assure residents for both now and for any future developments that they are safe from particulate matter and nitrous oxides and other associated pollutants.
Applicant Response	Air quality effects within Roxton, as set out in Chapter 5, Air Quality **[APP-074]** of the Environmental Statement, are predicted to be not significant. Baseline measurement data is used within the assessment to verify air quality model performance and to establish baseline conditions within the study area. NO_2 concentrations at receptors in Roxton is predicted to be well under the 40 µg/m^3 objective value, which is set for the protection of human health, with the highest concentration predicted with the Scheme of 14.8µg/m^3. PM_{10} and $PM_{2.5}$ concentrations are predicted to be under the relevant air quality objective values, which are set for the protection of human health, in the base year. The maximum predicted concentration of PM_{10} in Roxton is 16.8 µg/m^3 which is under the Air Quality Objective (AQO) of 40µg/m^3. The maximum predicted concentration of $PM_{2.5}$ in Roxton is 10.2 µg/m^3 which is under the AQO of 25µg/m^3. Therefore, PM_{10} and $PM_{2.5}$ have not been considered for the opening year as there will be no impact on the achievement of either objective as a result of the Scheme. As no significant air quality effects are predicted with the Scheme, no operational air quality monitoring is proposed. A comprehensive noise and vibration assessment (presented in Chapter 11, Noise and Vibration **[APP-080]** of the Environmental Statement) has been undertaken as part of the environmental impact assessment for the Scheme. This assessment has identified the construction and operational impacts and the subsequent mitigation and monitoring to minimise the significant effects of the Scheme. Baseline noise monitoring was completed as part of the assessment as set out in section 11.6 of Chapter 11, Noise and Vibration **[APP-080]** of the Environmental Statement, this included three locations in

Reference Number	Comment from Relevant Representation/Applicant Response
	Roxton. The baseline noise monitoring results were utilised as part of a verification exercise to provide confidence that the noise model developed to estimate the noise impacts of the Scheme is robust. During the construction phase, adverse noise impacts are predicted to occur at properties in Roxton, as set out in Chapter 11, Noise and Vibration **[APP-080]** of the Environmental Statement. These impacts will be controlled with the implementation of a Noise and Vibration Management Plan, an outline of which is provided in Annex B Noise and Vibration Management Plan of the First Iteration EMP **[APP-234]**. The First Iteration EMP **[APP-234]** also includes the Register of Environmental Action and Commitments (REAC) for the Scheme. The REAC includes ESS – NV4 which commits the Applicant to the following: *'Monitoring would be undertaken during the Scheme construction stage to ensure that the mitigation measures and procedures set out within the Outline Noise Management Plan (NMP) as presented in the First Iteration EMP [TR010044/APP/6.8] are being appropriately implemented'.* Adverse traffic noise effects are also predicted to occur in Roxton due to the Scheme. Measures included in the Scheme designed to minimise these effects include 3m high noise bunding alongside the A421 to the north of Roxton and low noise surfacing materials along the length of the Scheme. These measures are illustrated on the Environmental Masterplan **[APP-091]** presented in Figure 2.4 of the Environmental Statement. In relation to operational monitoring, paragraph 11.10.2 of Chapter 11, Noise and Vibration **[APP-080]** of the Environmental Statement confirms that the performance specification of specific operational mitigation measures (such as low noise surfacing materials) will be confirmed at the Scheme detailed design stage to ensure the performance of the measures assumed in the assessment is achieved. Surveys would be undertaken to ensure that measures, such as low noise surfacing materials were installed as required. No further long-term monitoring is proposed once the Scheme is open to traffic.
RR-020b	2) Roxton and Wyboston suffer from a distinct lack of bridleways nearby. To get to a bridleway involves a long initial ride on roads and there are no accessible circular routes. As a horse owner whose horse resides in Wyboston, the current bridge over the Bedford Bypass is dangerous as it does not have high enough barriers to make it safe for horse riders. Myself and my children do not use it on horseback for that reason. This needs to be changed to make it safe for riders. Plus any plans for the road network need to take into account walkers and riders access to current routes both during and after construction.
Applicant Response	The NMU provision made between School Lane, Roxton and The Lane at Wyboston is a direct replacement for the shared unsegregated footway/cycleway that is currently adjacent to the A1 northbound carriageway. The existing route is unsuitable and would require pedestrians or cyclists to negotiate the new Black Cat junction. The proposed route provides a safer and more attractive

Reference Number	Comment from Relevant Representation/Applicant Response
	alternative, away from the strategic road network, and it also links to National Cycle Route 12. It should be noted that the route along School Lane and from the east end of School Lane, northwards to the start of the Kelpie Marina access road, is to be dedicated as bridleway, as requested by Bedford Borough Council. The carriageway on the existing Bedford Road, Kelpie Marina access road, realigned Roxton Road and the new Roxton Road Link can be legally used by horses and carriages. The Roxton Road bridge has been provided to maintain connectivity across the Scheme and has an improved cross section compared to the existing bridge, as illustrated on Sheet 1 of the Engineering Sections (Part 3 – Structures General Arrangements) **[APP-019]**. This shows that the verge on the carriageway side of the bridge is 2.5m from the 1m high parapet railing. This is a standard (DMRB CD127 Cross sections and headrooms) minimum offset and parapet height (DMRB TD19/06 Requirements for road restraint systems) for bridges of this nature on roads for all users. On the footway/cycleway side, the carriageway is offset by 5m from the parapet railing. The parapet railing on this side will be a minimum of 1.4m high for safety reasons as cyclists are immediately adjacent to the railing. Correspondence received during the consultation suggested 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 that counts were undertaken no horse riders were observed using the existing bridge. It should also be noted that there are no existing bridleways in the vicinity of this part of the Scheme. The Applicant acknowledges the suggestion that there would be greater interest in using this route if it were considered safer. The Applicant considers that the improved cross section on the bridge provides a safe and adequate route for all users. Should Bedford Borough Council wish to extend the bridleway network within the area and provide an off-carriageway route across the bridge, the proposed Scheme does not preclude any such extensions or alterations in the future. Further information on how walkers, cyclists and horseriders will be catered for during construction is given in the Outline Construction Traffic Management Plan **[APP-244].**

RR-021 Claudia Zennig

Reference Number	Comment from Relevant Representation/Applicant Response
RR-021a	this highways development presents a unique opportunity (in terms of funding and access to land) to work in partnership with the consultants, developers, local highway authority and Local Access Forum to ensure that existing Public Rights of Way are both protected and enhanced (by changing from Footpath (walkers) to Bridleway (walkers, cyclists, horse riders) or Restricted Byways (all non-motorised users). Also we wish to see that all possible new opportunities are taken to increase the PRoW network in an inclusive way by the provision of new routes, both to provide circular routes, to provide links in broken networks, and to link villages and communities together, with safe crossing points. The standard has already been set with the A14 work from which much can be seen as good example and also much can be learnt in terms of mistakes made. We are pleased to see the same Highways England lead person is employed on the A428 as was on the A14."" My representation supports the representations of the British Horse Society (Lynda Warth) and Swavesey & District Bridleways Association
Applicant Response	The overall net gain in PRoW (i.e. footpath or bridleway) length is 4.13km with an overall net gain in NMU route (i.e. combined unsegregated footway/cyleway) length of 2.334km. More information on the results of the walkers, cyclists and horse rider counts can be found within Chapter 12, Population and Human Health **[APP-081]** of the Environmental Statement which describes the assessment on population and human health.

RR-022 Colin Star Butterlin

Reference Number	Comment from Relevant Representation/Applicant Response
RR-022a	my property is directly affected by the proposed routes
Applicant Response	The Applicant would be happy to engage further with the Affected Person to understand the nature of the representation made.

RR-023 CPRE Cambridgeshire and Peterborough

Reference Number	Comment from Relevant Representation/Applicant Response
RR-023a	PRE Cambridgeshire and Peterborough (CPRE) agrees with various local authorities who expressed concerns about the lack of provision of technical information and the applicants disregard the to responses sent during the pre-application stage. There was a one way consultation. CPRE received no response to our letter dated 22/04/2017. CPRE's comments were not included in the "A428 Black Cat to Caxton Gibbet Improvements Report on Public Consultation", February 2019. Likewise CPRE received no response (apart from acknowledgement of receipt) to our letter of 26/07/2019. There appears to be a lack of transparency by the applicant. The applicant appears to consider this application to be a 'fait-accompli'.
Applicant Response	The Applicant considers that the consultation undertaken was inclusive and fair where all customers and stakeholders were treated equally. The Applicant consulted with a wide range of stakeholders and all views have been considered in the development of the Scheme. The Consultation Report appendices **[APP-064, APP-065, APP-066, APP-067 AND APP-068]** set out how the Applicant had regard to the consultation responses received from the Statutory Consultation, held from 3 June 2019 to 28 July 2019 and the Supplementary Consultation, held from 24 June 2020 to 28 July 2020. The decision on the preferred route and development of the Scheme proposals has been made based on a number of factors, including environmental impact and economic return. The local community and technical bodies fed into the route selection process and the design of the Scheme. The preferred route was the most popular amongst people who responded to the non-statutory consultation. As the design developed, strong support for the Scheme was received through the statutory and supplementary consultations.
RR-023b	CPRE Cambridgeshire and Peterborough is concerned that the consultation only provided road based solutions to the A428 corridor. CPRE's report, The End of the Road? (https://www.cpre.org.uk/resources/the-end-of-the-road-challenging-the-road-building-consensus/) reveals that road-building is failing to provide the congestion relief and economic boost promised, while devastating the environment.

Reference Number	Comment from Relevant Representation/Applicant Response
Applicant Response	The Applicant does not agree that only road-based solutions have been considered as part of the Scheme development. As part of early options appraisal, the Applicant considered a range of alternative approaches to addressing the problems in the A428 corridor. These are set out in a report "A428 Black Cat to Caxton Gibbet – Option Assessment Report" available at this link: https://highwaysengland.citizenspace.com/he/a428-black-cat-to-caxton-gibbet/supporting_documents/A428%20Options%20Assessment%20Report.pdf As part of the initial sift public transport options and non-motorised user options were considered and assessed using a sifting tool that assessed likely performance against the identified problems, route objectives deliverability and feasibility. However, these options were discounted in favour of other better performing options which provided larger benefits. The Options Assessment Report was made available for comment at a non-statutory consultation held in March 2017.
RR-023c	CPRE is also concerned that the A428 scheme needs to be integrated into other RIS2 studies in particular the A1 study, with its potential impact on the Black Cat junction, road modelling/alignment and resulting traffic flow changes.
Applicant Response	The Roads Investment Strategy (RIS) does not currently include any major capital scheme to deliver changes to the A1 in the vicinity of the Black Cat junction. However, the RIS recognizes that substantial plans for local development (as proposed by the National Infrastructure Commission) may require improvements to the A1 to be considered in the future.
RR-023d	There is a failure to outline in detail how the A428 proposals form part of a joined up approach to a multi-modal transport solution. Consideration should be given to integration opportunities with other transport projects, ongoing and planned, in the A428 corridor or nearby. These include the proposed East-West Rail, Greater Cambridge Partnership Busway Programme and Cambourne to Cambridge Better Transport project and other 'last mile' proposals.

Reference Number	Comment from Relevant Representation/Applicant Response
Applicant Response	The Application for development consent focusses on the specific issues relating to this part of the road network which need to be addressed notwithstanding other projects in the region. However, it should be noted that the wider context is set out in relevant regional and national policy documents including the following: • Connecting People, Transforming Journeys – Regional Transport Strategy, England's Economic Heartland, February 2021[4]. • The Cambridgeshire and Peterborough Local Transport Plan, Cambridgeshire and Peterborough Combined Authority, January 2020[5]. • Road Investment Strategy: for the 2015/16 – 2019/20 Road Period, Department for Transport, March 2014[6]. • Road Investment Strategy 2: 2020 to 2025, Department for Transport, March 2020[7]. In terms of the East West Rail Scheme, the Applicant is open to developing a joined-up approach where there emerge opportunities to do so, and this will be part of ongoing discussions between the two projects. However, it should be noted that East West Rail completed their non-statutory route options consultation in June 2021, and a Preferred Route Announcement is not anticipated until 2022. Therefore, since East West Rail has not determined the route and locations of the proposed stations it is too early to define integration opportunities. It should also be noted that the Applicant holds a quarterly Strategic Stakeholder Board (SSB) which is attended by representatives from the Department for Transport, Cambridgeshire County Council, Bedford Borough Council, Central Bedfordshire Council, Huntingdonshire District Council, South Cambridgeshire District Council, the Cambridgeshire and Peterborough Combined Authority, Greater Cambridgeshire. Shared Planning, England's Economic Heartland and East West Rail. The SSB provides guidance on the strategic direction of the Scheme as well as providing an opportunity for updates from all organisations in order to facilitate a joined up approach. The SSB ensures effective working is maintained between key parties throughout the life of the project by providing stakeholder context and information, monitoring activity at a strategic level and providing direction.
RR-023e	There is a lack of adequate traffic modelling and demonstration of best value and a potential non-compliance with National Planning Policy statements on biodiversity effects of new developments.

Reference Number	Comment from Relevant Representation/Applicant Response
Applicant Response	The primary purpose of the A428 Strategic Traffic Model is to assess the traffic impacts of the Scheme and provide inputs to the economic and environmental appraisal. In addition, it has been used to inform the buildability (construction and traffic management) of the Scheme, as well as the operation and design of its junctions. The suite of models follows the principles set out in the DfT's Transport Analysis Guidance (TAG), comprising: • A trip-end model, used for estimating the number of trips generated / attracted by a specific zone. Base year demand has been refined as part of the PCF Stage 3 works. • A Variable Demand Model (VDM), used for estimating how travellers will respond to changes in their travel costs, including modal considerations. • Highway Assignment Model (HAM), used for estimating travel costs and identifying the routes travellers may take through a congested road network. The development of these models have followed guidance set out in the DfT's TAG. Most notably, this includes: • TAG Unit A1.3: User and Provider Impacts (March 2017). • TAG Unit M1.2: Data Sources and Surveys (January 2014). • TAG Unit M2: Variable Demand Modelling (May 2019). • TAG Unit M3.1: Highway Assignment Modelling (January 2014). • TAG Unit M4: Forecasting and Uncertainty (May 2019). • TAG Databook (May 2019 Databook provided by DfT). The Do Minimum (DM) scenario represents the situation in which the Scheme has not been implemented (without the Scheme). The Do Something (DS) scenario represents the situation in which the Scheme has been implemented (with the Scheme).

[4] https://eeh-prod-media.s3.amazonaws.com/documents/Connecting_People_Transforming_Journeys_av.pdf
[5] https://cambridgeshirepeterborough-ca.gov.uk/what-we-deliver/transport/local-transport-plan/
[6] https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/408514/ris-for-2015-16-road-period-web-version.pdf
[7] https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/951100/road-investment-strategy-2-2020-2025.pdf

Reference Number	Comment from Relevant Representation/Applicant Response
	The A428 Strategic Traffic Model has also been used to assess the impacts of low and high growth scenarios around the core assumptions in accordance with guidance in TAG Unit M4 (published May 2019). Construction period scenarios have also been modelled as part of this assessment. Traffic forecasts have been developed for the following forecast years: • 2025, the Scheme opening year. • 2040, the design year 15 years after Scheme opening. • 2051, the horizon year for use in the economic appraisal. There have been four scenarios modelled: • The core scenario, which has central growth assumptions, for the DM and DS. • The high growth scenario, which has higher growth assumptions, for the DM and DS. • The low growth scenario, which has lower growth assumptions, for the DM and DS. • The construction scenario, which includes the traffic arrangements in place during construction The local junction models using VISSIM, ARCADY and PICADY software were undertaken by AECOM independently on behalf of HE. Further details of the strategic models are provided in: • Combined Modelling and Appraisal Report **[APP-250].** • Traffic Data Collection Report **[APP-251].** • Local Model Validation Report **[APP-252].** • Transport Forecasting Package: Traffic Forecasting Report **[APP-253].** • The Transport Assessment **[APP-241]**. For the assessment of the Scheme a Strategic Traffic Model was developed in accordance with the requirements of the HE Project Control Framework. This is set out in the Combined Modelling and Appraisal Report together with detailed appendices and submitted to the Planning Insepctorate as follows: • Combined Modelling and Appraisal Report **[APP-250].** • Traffic Data Collection Report **[APP-251].** • Local Model Validation Report **[APP-252].** • Transport Forecasting Package: Traffic Forecasting Report **[APP-253].**

Reference Number	Comment from Relevant Representation/Applicant Response
	• Economic Appraisal Package: Economic Assessment Report **[APP-254].** • Economic Appraisal Package: Appraisal Summary Table and Supporting Worksheets Report **[APP-255].** • Economic Appraisal Package: Distributional Impacts Report **[APP-256].** Value for Money (VfM) is expressed as a Benefit to Cost Ratio (BCR). The core scenario was reported as 1.9 with low and high growth scenarios giving 1.8 and 2.2 respectively. A sensitivity test was undertaken to assess further economic projections issued in July 2020 as part of the Fiscal Sustainability Report (FSR) of the medium-term impact of COVID-19 on the economy to 2025. This resulted in a reduction of the BCR for the core scenario from 1.9 to 1.55. The Department of Transport uses six VfM categories. Both BCR results fall within the category of "medium" VfM. The Applicant does not agree that a potential non-compliance with National Planning Policy statements occur on biodiversity as a result of the Scheme. A comprehensive biodiversity assessment of the construction and operational phases of the Scheme has been undertaken, as presented within Chapter 8, Biodiversity **[APP-077]** of the Environmental Assessment. As part of this assessment the Scheme has been considered against the relevant and applicable international, national, regional and local policy relating to biodiversity. The Applicant would welcome further discussion with the Interested Party to understand where the perceived non-compliance is present.
RR-023f	How does this scheme fit in with the UK Government's agenda of "Zero Carbon" and target of net zero greenhouse gas emissions by 2050? In short, this scheme as proposed will increase greenhouse gas emissions, making national reduction targets harder to achieve, while simultaneously increasing the risk of ill health to current and future generations arising from increased polluting emissions such as PM2.5 particulates and oxides of nitrogen. For the reasons outlined above CPRE Cambridgeshire and Peterborough opposes the proposals and wishes to be registered as an interested party in the DCO process.
Applicant Response	Chapter 14, Climate **[APP-083]** of the Environmental Assessment presents an assessment of the Scheme against the UK Government's current carbon budgets, as required by Paragraph 5.17 of the NPSNN: "*for road project applicants should provide evidence of the carbon impact of the project and an assessment against the Government's carbon budgets*". Paragraph 5.18 of the NPSNN clarifies that "*any increase in carbon emissions is not a reason to refuse development consent, unless the increase in*

Reference Number	Comment from Relevant Representation/Applicant Response
	carbon emissions resulting from the proposed scheme are so significant that it would have a material impact on the ability of Government to meet its carbon reduction targets". The assessment has identified that the emissions arising as a result of the Scheme represent less than 0.012% of the total emissions in any of the 3rd, 4th or 5th Carbon Budget periods. Accordingly, the assessment has concluded that the GHG emissions impact of the Scheme would not have a material impact on the UK Government meeting its legally binding carbon reduction targets. Although the 6th carbon budget was not legally binding when the Environmental Statement was written, an additional assessment of the 6th Carbon Budget, which became legally binding during June 2021, has been undertaken. This assessment concluded that the Scheme represents less than 0.024% of the total emissions in the 6th budget period and is also considered not have a material impact on the UK Government meeting its carbon reductions target. The mitigation measures proposed for the Scheme are also detailed in Chapter 14, Climate **[APP-083]** of the Environmental Assessment. Air quality effects, as set out in Chapter 5, Air Quality **[APP-074]** of the Environmental Statement, are not considered to be significant. Emissions from road traffic disperse over short (200m) distances away from roads. and therefore, pollutant concentrations at sensitive receptors are much more heavily influenced by the location of emissions, than the total emissions generated by the Scheme. The local air quality assessment for the operation of the Scheme has predicted imperceptible changes in NO_2 pollution (less than 1% of the objective) at the majority of modelled sensitive receptors. Whilst some increases in pollutant concentrations are predicted at individual receptors, where these are greater than imperceptible, air quality is good (both with and without the Scheme) with concentrations below the air quality objective values, which are set for the protection of human health. Similarly, some decreases in pollutant concentrations are predicted at receptors, particularly those located along the existing A428. As concentrations of pollutants are predicted to remain under the relevant air quality objective value at these receptors these changes are not considered significant. $PM_{2.5}$ concentrations are predicted to be under the relevant air quality objective value in the base year (the maximum predicted concentration of $PM_{2.5}$ in the base year is 21.3 µg/m^3 which is under the Air Quality Objective (AQO) of 25µg/m^3). Therefore $PM_{2.5}$ has not been considered for the opening year as there will be no impact on the achievement of the $PM_{2.5}$ objective as a result of the Scheme.

RR-024 CTC Cambridge (part of Cycling UK)

Reference Number	Comment from Relevant Representation/Applicant Response
RR-024a	A428 Black Cat to Caxton Gibbet Road Improvement scheme Planning Inspectorate Reference: TR010044 Relevant Representation Summary from CTC Cambridge CTC Cambridge are the local member group of Cycling UK. CTC Cambridge is the local member group of Cycling UK. Our primary activity is a local cycling club that organises led rides for members and guests. Our rides take in a wide area of Cambridgeshire and the neighbouring counties and the area that is affected by the A428 scheme is well within our riding range. We understand that good quality cycling infrastructure should be included as part of all new transport projects in order to comply with the latest Government policies on Active Travel and to meet the Government target for Greenhouse Gas emission reductions. We think Highway England have failed to update their plans to reflect these new requirements and the active travel elements need to be greatly expanded in order to match the ambition of these Government policies on Active Travel. We think the scheme as currently proposed by Highways England fails to meet this new level of ambition for Active Travel and is therefore incompatible with the Government's published objectives to make a step change in actions to support active travel. It is also incompatible with the Government's published objectives to reduce greenhouse gas emissions. We therefore argue that this scheme needs to be redesigned and expanded in scope to include a more complete (continuous) network of direct, well-designed, separated cycle routes as an integral part of this SRN scheme. We have identified some of the needed changes in our earlier letter and again in this submission. We understand that Highways England should be designing new road schemes in accordance with RIS2. We consider that this scheme does not meet the relevant requirements laid down in RIS2 for non-motorised users. For example, RIS2 contains the following statements: Page 22: Improved provision for non-motorised users: As well as short-term action to make it easier for these users to travel along or across the SRN, in the longer-term good quality alternative routes for non-motorised users will be an integral part of the design of the SRN. Page 42: Cyclists, pedestrians and equestrians Investment in the SRN can support this agenda by improving cycling and walking provision along trunk 'A' roads, and reducing severance effects where local cycling and walking routes cross the SRN or are separated completely by it. Together with the Department's new future of mobility strategy, they are designed to promote mode shift and assist the transition to a greener and cleaner society. In the long-term, our vision will mean that non-motorised users will be able to access good quality routes for their journeys segregated from an SRN that primarily serves long-distance, higher speed traffic. Provision for these users will be considered in plans

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	for enhancements and major renewals to the network from the start, ensuring that all current users of the SRN benefit from investments. We argue that the current plans for the A428 scheme fall well short of providing the good quality cycling and walking routes that are required under RIS2 as specified in these extracts. Highways England claims that any necessary active travel infrastructure can be provided as part of the Users and Communities Designated Fund scheme within RIS2. We think this is a wrong interpretation of RIS2 and we consider that this is also wholly unrealistic for the reasons detailed below. Failure to provide much more substantial active travel infrastructure as part of the planned A428 scheme is therefore incompatible with the latest Government Policy. RIS2 makes several strong statements about the need to improve provision for active travel. RIS2 does recognise that further improvements to the active travel network can be delivered by the designated funds scheme, but the key words here are “further improvements.” The Designated Funds scheme offers very limited funding and it cannot provide a meaningful replacement for inadequate provision for active travel in the original scheme. As a concrete example, we think a complete active travel route between Cambourne and St Neots should be included in the SRN scheme from the start. This cannot realistically be postponed and/or delegated to the designated fund scheme for several reasons. Most obviously the scheme is too large to be funded using designated funds: the designated fund scheme is a national scheme that can only deliver relatively small improvements to the active travel networks. The scheme funding is spread too thinly and has insufficient funds to deliver major pieces of active travel infrastructure. Moreover the designated funds scheme requires matched funding from local authorities and again a scheme of this magnitude is not affordable by the cash-strapped local authorities. On top of this, it is also much more expensive to add this scale of active travel infrastructure later as part of a separate project due to the difficulties of the land acquisition that will be required (without having the benefit of the land purchase powers that are provided as part of the core scheme) and it is also more cost effective to build the active travel elements at the same (e.g. using the same contractor for all the work). For all these reasons we argue that much more active travel infrastructure work must be included within the SRN scheme itself and cannot be excluded from the core scheme as currently proposed. For the A428 scheme there are several areas where the scheme fails to address the needs for Active Travel Users and where major changes to the plans are needed. 1) The need for a continuous active travel route between Cambourne and St Neots.

Reference Number	Comment from Relevant Representation/Applicant Response
Applicant Response	The existing A428 will provide a continuous local route between St Neots and Caxton Gibbet. Traffic on the existing A428 between Caxton Gibbet and east of St Neots is forecast to reduce by over 90% with the Scheme. This will therefore be more attractive to cyclists. The existing A428 will be de-trunked and will become the responsibility of the relevant local highway authority, it will be for them to determine if further measures are appropriate. The suggestion that designated funds projects require match funding from the Local Authority is misleading. More correctly, proposals should maximise opportunities for joint funding or partnerships with other organisations. It can include public, third and private sector. Highways England cannot seek to acquire land beyond that which is strictly necessary for the delivery of the Scheme as defined in the Roads Investment Strategy.
RR-024b	2) The need for signal controlled or grade-separated crossings on any new roads where the expected traffic volume and traffic speed make this the required option under LTN 1/20.
Applicant Response	Signalised at -grade crossings will be provided where the shared footway/cycleways cross the slip roads and also the A1198 on the north side of the Caxton Gibbet junction, in accordance with the requirement of the Design Manual for Road and Bridges (DMRB). Highways England is not required to adopt the principles of Local Transport Notes. These are advisory documents produced by the DfT and recommended to local highway authorities for use on their roads. Compliance of the LTN1/20 is not compulsory for the local highway authority and therefore the requirements of the Design Manual for Roads and Bridges is the appropriate standard to be complied with. The requirements of the DMRB are conducive with the guidance outlined in LTN 1/20.
RR-024c	3) The need for an improved crossing of the A1 for Non-Motorised Users in the vicinity of the Black Cat junction.
Applicant Response	The Applicant has not identified the need for an additional crossing of the A1 for walkers, cyclists and horse-riders in the vicinity Black Cat junction. The Applicant proposes a new shared footway/cycleway along the Roxton Road Link, Roxton Road, Bedford Road and Kelpie Marina access as a replacement for the existing footway adjacent to the A1 northbound carriageway.
RR-024d	4) Mitigation measures on the adjacent road network especially where the traffic levels are significantly affected by the proposed scheme.

Reference Number	Comment from Relevant Representation/Applicant Response
Applicant Response	Mitigation measures on the adjacent road network are the responsibility of the relevant local highway authority. The current traffic model outputs predict that the impacts on the local network around the Scheme are largely positive. The Applicant will consider with local highways authorities a mechanism to enable the management of any potential adverse impacts, in particular post-implementation monitoring.
RR-024e	Of these items, we consider that only last item (4) can be reasonably delivered by the Designated Funds scheme and that the other three should therefore be provided as part of the core scheme. In conclusion, we would remind you that CTC Cambridge, along with other campaigners, have been talking to Highways England and asking for these changes since the first plans for this scheme were published. Despite our patient and detailed engagement with them, Highways England have refused to make any substantial expansion of their limited plans for active travel infrastructure. Instead they have proposed to use the Designated Funds scheme, despite this being manifestly unsuitable as detailed above. We hope that this enquiry will use its powers to demand that HE make the needed changes to add a much more substantial quantity of Active Travel infrastructure into the core SRN scheme. CTC Cambridge; June 2021
Applicant Response	As stated above, the existing A428 will provide a continuous local route between St Neots and Caxton Gibbet. Traffic on the existing A428 between Caxton Gibbet and east of St Neots is forecast to reduce by over 90% when the Scheme has been constructed. This will therefore be more attractive to cyclists. The existing A428 will be de-trunked and will become the responsibility of the relevant local highway authority, it will be for them to determine if further measures are appropriate.

RR-025 Brown & Co on behalf of D.H.T. Limited

Reference Number	Comment from Relevant Representation/Applicant Response
RR-025a	This representation is made on behalf of D.H.T. Limited who are the owners of the plots 1/1/37a, 1/37b, 3/1a, 3/1b, 3/1c and 3/1d as detailed within the Book of Reference. My clients strongly object to the proposed A428 works and feel that they will detrimentally impact upon the surrounding area and offer minimal benefit to the local community. My clients live within close proximity to the proposed route and this will have a detrimental impact upon their enjoyment of their property. The Directors of D.H.T. Limited retain their residential property to the north of the proposed A428 and my client is concerned that access is maintained at all times during construction.
Applicant Response	The Applicant will seek to maintain access to all properties and roads throughout the construction of the Scheme or provide alternative access arrangements. In some instances, it may be necessary to restrict access for limited periods, however, the Applicant would seek to minimise the number and duration of any such restrictions as far as reasonably practicable. The Principal Contractor will liaise with the affected landowner to ensure that such disruption is minimised.
RR-025b	My client also owns a number of commercial units which enjoy access directly from the A1. This access is being replaced by a new link road. This will primarily be for traffic to exit the services and so my client will be required to cross passing traffic in order to access their property. My client is concerned with the safety of passing oncoming traffic and seeks clarity on the speed restriction enforcement following completion of the scheme. The current occupiers of the commercial units have expressed concerns to my clients that they will lose passing trade. My client wants to ensure that access can be taken at all times during the scheme to his property and also the commercial units.
Applicant Response	The Applicant proposes a 40mph speed limit along the A1 Services Link as detailed in the Permanent Speed Limit Plans **[APP-015]**. The design of the A1 Services Link is intended to promote a low-traffic, low-speed environment and it has been designed to accommodate vehicles turning into and out of accesses serving private land. Once the Scheme opens, these vehicles will benefit from not having to turn directly on and off the A1 main carriageway.
RR-025c	It is unclear when the new link road will be constructed. My clients existing access is suitable for HGV's and as such seeks clarification on the design and width of the new access point. Due to the commercial businesses on site it is crucial that HGV access is maintained throughout the scheme.

Reference Number	Comment from Relevant Representation/Applicant Response
Applicant Response	The Principal Contractor will keep the landowner informed of the construction programme associated with the A1 Service Link as this is developed. The modified access will be designed to accommodate heavy goods vehicles into and out of the property.
RR-025d	My clients land is identified as being used as a Borrow Pit. This land has previously been used for gravel extraction and as such is identified as filled land. Survey work undertaken by the Highways England team was taken outside of the borrow pit area and as such my clients feels that a borrow pit in this area is unnecessary. My client feels that increasing the size of other borrow pits in the area would be better and more effective. My clients request that this area is removed from the Development Consent Order. If the borrow pit is to be located on my clients land then my clients seek details of the bund to be put in place to protect his existing properties together with details of security fencing to ensure that his property is protected during the works. My client also seeks clarification on the measures to be put in place to control noise and dust during construction and also what equipment will be used to monitor vibration and the impact on their residential property. Accordingly our client will represent that the DCO should be amended to reflect the points set out above.
Applicant Response	The selection process for the preferred borrow pit sites is detailed in the Borrow Pit Optioneering Report **[APP-246]**. The Applicant has undertaken appropriate investigation and that the quantity and quality of material for the construction of the works is adequate. The existing bunding which provides protection to the landowner's property will be maintained. Additional bunding will be provided using topsoil and subsoil material stripped from the proposed borrow pit site. Further details of this bunding and fencing will be provided by the Principal Contractor when it is developed. The proposed measures to mitigate noise and vibration effects during the construction phase are set out in Annex B Noise and Vibration Outline Management Plan within the First Iteration EMP **[APP-234].** Examples of such measures include:

Reference Number	Comment from Relevant Representation/Applicant Response
	• All ancillary plant such as generators, compressors and pumps will be positioned so as to cause minimum noise disturbance. If necessary, acoustic barriers or enclosures will be provided, where appropriate. • Working methods will be developed specific to the area and will consider use of equipment and methods of operations to minimise noise. • Whenever possible, fabrication of materials will be undertaken off-site. • All plant and machinery in intermittent use will be shut down in intervening periods between work or throttled down to a minimum. • Proper use of plant with respect to minimising noise emissions with regular maintenance will be undertaken. All vehicles and mechanical plant used for the purpose of the works will be fitted with exhaust silencers and be maintained in good working order. • Minimising the drop height of materials into hoppers, lorries or other plant. • Use of less intrusive alarms on vehicles, for example broadband vehicle reversing warnings. • Consideration of low vibration working methods, including non-vibratory compaction plant where possible. • Haul routes within the site boundary will be kept in good condition • The removal of obstructions that can cause, or add, resonance e.g. concrete bases. • No start-up or shut down of large vibratory rollers (approximately 13 tonnes) within 50m of receptors and medium vibratory rollers (approximately 3.5 tonnes) within 15m of receptors. • The use of cut-off trenches to disrupt direct vibration movement through the ground. • The use of pre-bores for piles. Exact details of the locations and equipment to be used to monitor vibration have not been defined at this early stage. However, Annex B Noise and Vibration Outline Management Plan within the First Iteration EMP **[APP-234]** commits the contractor to evaluate the potential for significant vibration to result from construction activities and carry out vibration monitoring at the associated location. Annex B Noise and Vibration Outline Management Plan within the First Iteration EMP **[APP-234]** also commits to informing nearby residents of such works and the vibration control measures which will be implemented. Only piling and works using vibratory rollers have been identified as a potentially significant source of vibration during the works.

Reference Number	Comment from Relevant Representation/Applicant Response
	The proposed measures to control dust emissions and noise levels throughout the construction phase of the Scheme are set out in Annex A Air Quality Management Plan of the First Iteration EMP **[APP-234]**. For the management of emissions of dust these cover activities such as general dust management measures, earthworks, surfacing works, construction, demolition and trackout. Examples of these measures include: • Remove materials that have the potential to produce dust from site as soon as possible, unless being re-used on site. If they are being re-used on-site, cover as appropriate. • Impose and signpost a maximum-speed-limit on surfaced and un-surfaced haul roads and work areas (if long haul routes are required these speeds may be increased with suitable specific control measures provided). • Ensure equipment is readily available on site to clean any dry spillages and clean up spillages as soon as reasonably practicable after the event using wet cleaning methods. • Avoid scabbling (roughening of concrete surfaces) if possible. • Use water-assisted dust sweeper(s) on access and local roads, to remove, as necessary, any material tracked out of the site. This may require the sweeper being continuously in use.

RR-026 David Morton

Reference Number	Comment from Relevant Representation/Applicant Response
RR-026a	Dear Sirs, My representation is that I oppose this scheme, primarily because of the increase in greenhouse gases that would entail not only due to its construction, but the inevitable increase in road traffic. The climate and ecological emergency is upon us. Other considerations are the effect on local wildlife, air quality and the lack of provision for active travel which should be promoted instead. It may also have an impact on the availability of agricultural land that is going to be required in future years. Thank you for your consideration.
Applicant Response	Air quality effects, as set out in the Chapter 5, Air Quality **[APP-074]** of the Environmental Statement, are not considered to be significant for air quality. NO_2 pollution from roads disperses over short (200m) distances and therefore NO_2 concentrations at sensitive receptors are much more heavily influenced by the location of emissions, than the total emissions generated by the Scheme. The local air quality assessment for the operation of the Scheme has predicted imperceptible changes in NO_2 pollution at the majority of modelled sensitive receptors. Whilst some increases in pollutant concentrations are predicted at individual receptors, where these are greater than imperceptible (i.e. more than 1% of the objective value), air quality is good with concentrations under the air quality objective values. Similarly, some decreases in pollutant concentrations are predicted at receptors, particularly those located along the existing A428. As concentrations of pollutants are predicted to remain under the relevant air quality objective value at these receptors these changes are not considered significant. As such, no mitigation would be required to manage air quality effects associated with the Scheme. Chapter 14, Climate **[APP-083]** of the Environmental Statement presents an assessment of the Scheme against the UK Government's current carbon budgets, as required by Paragraph 5.17 of the NPSNN: "*for road project applicants should provide evidence of the carbon impact of the project and an assessment against the Government's carbon budgets*". Paragraph 5.18 of the NPSNN clarifies that "*any increase in carbon emissions is not a reason to refuse development consent, unless the increase in carbon emissions resulting from the proposed scheme are so significant that it would have a material impact on the ability of Government to meet its carbon reduction targets*". The assessment has identified that the emissions arising as a result of the Scheme represent less than 0.012% of the total emissions in any of the 3rd, 4th or 5th Carbon Budget periods. Accordingly, the assessment has concluded that the GHG emissions impact of the Scheme would not have a material impact on the UK Government meeting its legally binding carbon reduction targets. Although the 6th Carbon Budget was not legally binding when the Environmental Statement was written, an additional assessment of the 6th Carbon Budget, which became legally binding during June 2021, has been undertaken. This assessment concluded that the Scheme

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	represents less than 0.024% of the total emissions in the budget period and is also considered not have a material impact on the UK Government meeting its carbon reductions target. The proposed mitigation measures are also detailed in Chapter 14, Climate **[APP-083]** of the Environmental Statement. Chapter 8, Biodiversity **[APP-077]** of the Environmental Statement concluded that there will be no significant effects on the local wildlife including those species of national and international importance during construction and operation of the Scheme. In the delivery of the Scheme, the Applicant is required to re-provide NMU routes that are severed or disrupted as a result of the Scheme. More information on the results of the walkers, cyclists and horse rider counts can be found within Chapter 12, Population and Human Health **[APP-081]** of the Environmental Statement which describes the assessment on population and human health.

RR-027 Carter Jonas LLP on behalf of Davison & Company (Great Barford) Limited

Reference Number	Comment from Relevant Representation/Applicant Response
RR-027a	1. INTRODUCTION 1.1. This is the Relevant Representation of Davison & Company (Great Barford) Limited (the 'Landowner') to the A428 Black Cat to Caxton Gibbet Road Improvement Development Consent Order (the 'Scheme') application being promoted by Highways England Company Limited (the 'Applicant'). 1.2. The Landowner's property at Crow Green (the 'Land') comprises 164 hectares situated to the northeast of Caxton Gibbet junction. If consented, the Scheme would impact a significant proportion of the Land as follows: • Plot 14/16a (35.04ha) – proposed Permanent acquisition powers for 'borrow-pits' purposes. • 14/16b (3.53ha) – proposed temporary possession powers to provide temporary storage, laydown areas, access and working space to facilitate a construction area • 15/6a (0.36ha) – permanent acquisition powers for highway purposes. • 15/6b (6.79ha) – temporary possession powers for construction compound and ecology areas purposes 1.3. The Landowner has advanced proposals for a strategically important major employment development on the Land. They seek agreement with the Applicant to safeguard the proposed development of the Land, which may otherwise be adversely impacted by the Scheme. In the absence of such safeguards and protective provisions the Landowner objects to the details of the Scheme and the proposed permanent and temporary compulsory purchase powers sought by the Applicant over the Land.
Applicant Response	The Applicant is committed to continuing engagement with this landowner on matters relating to permanent and temporary land acquisition/possession sought, in particular around safeguarding the landowner's development aspirations. The Scheme proposes to return the borrow pits back to agricultural use and will offer the previous landowner the opportunity to purchase the land back. This will not preclude the landowner from achieving their development aspirations.
RR-027b	2. THE LAND 2.1. The Land is being promoted by the Landowner and Endurance Estates as part of a sustainable strategic employment development for allocation in the emerging Greater Cambridge Local Plan (the 'Proposed Development'). The Planning Authority has recently carried out a consultation on the emerging Local Plan and they aim to consult on a Preferred Option in summer or autumn 2021 with a Draft Plan prepared by summer 2022.

Reference Number	Comment from Relevant Representation/Applicant Response
	2.2. 77 hectares of the Land is suitable for built development with the remainder for green infrastructure and solar photovoltaic electricity generation. The Proposed Development can accommodate a range of end-user requirements within Use Classes B1b (R&D), B1c (light industry), B2 (general industrial) and B8 (storage & distribution). Using 'employment density' figures from Homes & Communities Agency guidance, it is estimated that the Proposed Development could provide between 4,500 and 6,500 new jobs FTE. 2.3. While the Proposed Development is deliverable with or without the Scheme it is considered to be consistent with the Scheme's core economic rational: "Economic growth: Enable growth by improving connections between people and jobs and supporting new development projects." (paragraph 2.2.1 of 'Introduction to the Application') 2.4. The Proposed Development and the Scheme are therefore complimentary in principle and purpose. However much of the Land is included in the DCO for permanent acquisition and there is also the significant risk that absent suitable safeguards and protective provisions that the Scheme could fetter or complicate access to the Proposed Development (compared to existing arrangement).
Applicant Response	Similar to RR-027a, the Applicant is committed to continuing engagement with this landowner on matters relating to permanent and temporary land acquisition/possession sought, in particular around safeguarding the landowner's development aspirations. The Scheme proposes to return the borrow pits back to agricultural use and will offer the previous landowner the opportunity to purchase the land back. This will not preclude the landowner from achieving their development aspirations.
RR-027c	3. COMPULSORY ACQUISITION & AGREEMENT 3.1. The Landowner seeks urgent detailed engagement with the Applicant aimed at reaching agreement both to safeguard delivery of the Proposed Development and secure relevant synergies with the Scheme. 3.2. Specifically, the Landowner is seeking to enter into an agreement with the Applicant providing them with the temporary rights necessary in respect of plot 14/16a (for the purposes of borrow pits) thereby rendering the proposed permanent acquisition of this land as provided for in the draft DCO unnecessary. Borrow pits are areas of land where materials are extracted (typically clay, sand and gravel) to supply construction material where there is a net deficit. 3.3. The Applicant's has confirmed they do not intend to permanent retain Plot 14/16a, which could be returned to the Landowner. While the suite of DCO application documents, including the statement of reasons, is silent on this point, we understand the Applicant is seeking permanent compulsory acquisition

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	of this land because the borrow pit works would result in permanent change to the land (notwithstanding their planned restoration). We do not consider this is an adequate public interest justification for the permanent acquisition of the land, among other things, when: a. The Applicant has been granted approval for a succession of new highway DCO's with powers of temporary possession providing for permanent alteration of land (which then reverts to the landowner on completion). b. The temporary possession provisions in the Scheme draft DCO (Article 40 'Temporary use of land for carrying out the authorised development') include powers for the Applicant to "construct any permanent works" [paragraph (1)(d)] and to not be required to "restore the land on which any permanent works have been constructed under paragraph (1)(d)" [paragraph (4)(d)]. c. In accordance with the Planning Act 2008 ('2008 Act'), the Secretary of State may only authorise the permanent compulsory acquisition of land where there is a compelling case in the public interest for the proposed acquisition [S.122(3) 2008 Act]. The DCO's 'Statement of Reasons' is silent on the reasons for permanent acquisition of land required for borrow pits. It states however that the Applicant will seek to acquire land by negotiation wherever practicable. The case of 'R(oao FCC Environment (UK) Ltd) v Secretary of State for Energy & Climate Change [2015] EWCA Civ 55' considered the requirements in S.122(3) of the 2008 Act. Three examples were given in that case by the Secretary of State (paragraph 11) of circumstances where a decision maker may conclude that there is not a compelling case in the public interest for the proposed compulsory acquisition notwithstanding an established need for the proposed DCO development, namely where: - Land proposed to be acquired may be excessive because development proposals can be constructed without needing the land to be acquired; - Acquisition of a right over the land, rather than its acquisition, might suffice; - Land may be necessary for the development, but the landowner may be willing to agree to sell. d. Subject to agreement, the Landowner is open in principle to granting the Applicant such reasonable and proportionate temporary rights over the Land as are reasonably necessary for the purposes of the construction of the Scheme, thereby obviating the need for the proposed permanent and temporary powers of compulsion sought in the application for the Scheme over the land. 3.4. For the main reasons summarised above (to be further particularised in the Written Representations) the Landowner considers that there is no or no compelling case in the public interest for the permanent acquisition of the Land (and in particular Plot 14/16a) given that powers of temporary possession will suffice, and the Landowner is, in any event, willing to enter into a suitably worded agreement with the

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	Applicant to grant them, subject to appropriate safeguards and protective provisions, the temporary rights necessary for the purposes of the Scheme. 3.5. The Landowner has been open to negotiating an agreement with the Applicant at the pre examination stage and requested an early meeting with the Applicant's representatives to discuss matters which was held on 23 June 2020. At this meeting the Applicant agreed to a number of actions necessary to reaching a suitable agreement including: - Preparing draft agreements for acquisition of land and rights - Providing estimates of the soil to be removed from borrow pits - Providing the proposed justification for the permanent acquisition of Plot 14/16a - layout and location of construction compound. 3.6. Some 12 months on from this meeting, while progress has been made on some issues (e.g. location of SUDS pond) the bulk of these actions remain outstanding. 3.7. The Landowner requests that the Applicant now proactively engages with it in detailed discussions to agree a suitably worded lands agreement to provide the temporary rights for the construction of the Scheme, while protecting the Landowner's ability to deliver the Proposed Development. 3.8. In the absence of a suitable agreement being reached which avoids the permanent acquisition of Plot 14/16a and secures appropriate safeguards to avoid or mitigate significant adverse impacts of the Scheme on the Proposed Development, the Landowner objects to the details of the Scheme and the proposed powers sought over the Land.
Applicant Response	A part of the land included within Plot 14/16/a, shown on Sheet 14 of the Land Plans **[APP-008]**, is required for permanent works comprising a section of proposed new carriageway. The Applicant is willing to discuss temporary occupation of the other land included within Plot 14/16a required for the borrow pit and is exploring the possibility of reaching an agreement to use this land under a short term private lease arrangement, subject to it being a suitable alternative and provide the Applicant with the rights necessary to carry out the works. Discussions with the landowner on this proposal have taken place and it was discussed in meetings held between the Applicant and the landowner on the 15 and 23 June 2021. The Applicant is currently awaiting draft Heads of Terms (HoTs) from the landowner in order to move matters forward. The Applicant however maintains the position that all land within Plot 14/16a, including the borrow pit land should remain in the Order as Permanent Acquisition, due to the nature of the works proposed on the land and the extent to which it will be materially altered.

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	To impose material changes on a landowner through temporary possession powers and expect the land to be returned to the landowner in a materially changed condition would not be acceptable, therefore permanent acquisition is required. Furthermore, although the land will be materially altered by extraction, the Applicant does not consider that it will be constructing permanent works on this land, so it would be required to reinstate under the current provisions for temporary possession included in the DCO if relied upon. This requirement would be incompatible with the intended use of the land and the extent to which it will be materially altered. The Applicant has prepared further information in relation to borrow pits. The additional information provided includes reference to (but is not limited to) the environmental assessment, excavation methodology, restoration of the borrow pits and the amount of soil to be removed from each borrow pit. The Applicant is intending to submit this information at Deadline 3.

RR-028 Bletsoes on behalf of Diane Angela Sharman

Reference Number	Comment from Relevant Representation/Applicant Response
RR-028a	We represent the interests of Mrs Diane Sharman and the Partners of the farming partnership, H G Sharman & Son of [redacted], who are directly affected by the Scheme; the current partners are Diane Sharman, Robert Sharman, Cathryn Sharman & Rebecca Sharman. Mrs Diane Sharman owns land directly affected by the Scheme, which is farmed by the partnership. In addition, the partnership are tenant of several parcels of land directly affected by the Scheme. On behalf of Mrs Sharman and the partnership, we are instructed to make outline representations. Representations are made without prejudice to making further objections/representations at a later stage for different reasons, or to amplify these representations. We have reviewed the plans included within the Developer's application insofar as they relate to our clients' and these representations are based upon the information contained therein. The plans do not provide sufficient detail to ascertain the full impact on my clients' requisite interest. We would therefore like to formally record our principle concerns, based upon the information that is available. We do not wish to be put in a position whereby when it comes to the 'detailed design stage' we are told that design issues raised should have been dealt with earlier on in the scheme and it is too late. The Developer cannot say they will deal with matters in dispute at a later stage. These issues should either be dealt with during the application process or determined by the Planning Inspectorate. We submitted representations to the supplementary consultation held in July 2020. To date, we have not received a formal response. Our clients' wish to make clear their principle concerns: Land East of Roxton Road and North of A421: The northern part of this parcel of land is owned by Mrs Sharman, and the southern part is rented by the partnership; both parts are currently farmed as one by the partnership. During previous consultation with the Developer, we requested detailed design information concerning the proposed accesses to assess whether access will be equally commodious. From the information available, it is not clear whether the existing access will be affected. We have had verbal assurance from the Developer's representatives the existing access will not be affected, and my clients' have relied upon that assurance. During previous consultation, we questioned the need for a proposed new ditch given the free draining nature of the soil in this location. If a ditch is considered necessary, we requested that the ditch be aligned closer to the Scheme to reduce the amount of land lost. Following recent discussions with the Developer, we are told the alignment is necessary to avoid an existing underground gas pipeline. The Developer confirmed they would seek confirmation as to whether the ditch is required. Our clients' object to the provision of the ditch in this location and its proposed alignment.

Reference Number	Comment from Relevant Representation/Applicant Response
Applicant Response	The Applicant has provided a response to all comments received from the Supplementary Consultation and these are set out in Appendix V **[APP-068]** of the Consultation Report which was submitted as part of the Application. The Applicant confirms that the existing access off Roxton Road, north of the A421 and the proposed Roxton Road roundabout, for access to land to the east, will be retained as part of the Scheme. The Applicant confirms that the cut-off ditch is required and, as noted by the landowner, the alignment of the drainage ditch is dictated by the presence of the underground high pressure gas main. Any opportunity for refinement of the ditch alignment, closer to the gas main constraint, will be dealt with at detailed design by the Principal Contractor and is subject to the pipeline access and maintenance requirements.
RR-028b	Land South-East of Roxton Garden Centre: The northern part of this parcel is rented by the partnership. The southern part is owned by Mrs Sharman and farmed by the partnership; both parts are currently farmed as one. During previous consultation, we highlighted the short-term development potential of this land. The land is being actively promoted for commercial development in conjunction with Roxton Garden Centre and other adjoining land. We understand that a Planning Application has been submitted in respect of this land. Therefore, the land has an increased value over and above its agricultural value, meaning the compensation will be vastly greater than for agricultural land without development potential and the cost to the taxpayer will be greater. The provision of a new access to Kelpie Marina and a flood storage area will require the permanent acquisition of the majority of my clients' own land, and a significant amount of land they rent. During previous consultation, we requested the new access road to Kelpie Marina be aligned closer to the A1, and the flood storage area moved to land without development potential, to mitigate compensation. Neither of these requests have been accepted. In recent discussions with the Developer, we reiterated the development potential of this land and once again urged the Developer to reconsider their plans for the new access to Kelpie Marina and the flood storage area. The Developer confirmed they would investigate whether their plans could be changed. For the avoidance of doubt, our clients' object to the current proposals and require the access road to be routed elsewhere or aligned closer to the A1, and the flood storage area to be moved to land without significant development potential. If the Scheme is consented in its current form, the Developer has confirmed that a separate legal access will be provided to my clients' land distinct from the land they rent. My clients' have relied upon this assurance.

Reference Number	Comment from Relevant Representation/Applicant Response
Applicant Response	The alignment of the Kelpie Marina access has been designed to mitigate any impact to the existing high pressure gas main. It has been determined not possible to realign the proposed access road further to the east. The land to the west of the access road is required to provide a flood storage area due to the crossing of Rockham ditch for the Kelpie marina access road. The size of this compensation areas has been determined by modelling and its location has to be as close to the source as possible and upstream of the ditch crossing. Further information is contained in Chapter 13, Road Drainage and the Water Environment **[APP-082]** of the Environmental Statement, the Flood Risk Assessment and Drainage Strategy included at Appendix 13.4 and Appendix 13.3 of **[APP-219** to **APP-223]** of the Environmental Statement**.** A planning application does not appear to have been submitted in respect of the relevant land at this stage based on the initial planning enquiries undertaken by the Applicant. It is also not clear whether the application would have any effect on the value of the relevant land.
RR-028c	Land North of Chawston Lane, Chawston: This parcel of land is rented and farmed by the partnership. Our clients' primary concern relates to the proposed layout of the new junctions onto Chawston Lane. The new junctions are offset from each other by approximately 50m, effectively creating a chicane for vehicles. This may present a problem for vehicles with restricted maneuverability, such as heavy goods vehicles and agricultural traffic. We understand the proposed side road will be the principal access to H E Payne (Transport) Ltd who operate a significant fleet of heavy goods vehicles. We once again urge the Developer to reconsider their proposals and align the junctions opposite each other or as close to that as possible. We understand local residents have expressed similar concerns.
Applicant Response	The design of the junction layout has been undertaken in consultation with Bedford Borough Council and has given full consideration to the expected traffic including the use by heavy goods vehicles. In addition, the staggered junction has been used in this location to create a safer route as it will assist with controlling traffic speeds along the Roxton Road link. A swept-path analysis has been undertaken which has verified and confirmed its suitability for HGV use. The staggered junction also lends itself well to imposing a 40mph speed limit on Roxton Road link (south), then 30mph on Roxton Road link (north).
RR-028d	Accommodation Works: We have on numerous occasions reiterated the need for accommodation works. We require further details on the proposed accommodation works to ascertain the full impact on our clients' requisite interest. As a minimum, our clients' require commodious access, post scheme land drainage, and fencing and hedging of boundaries to mitigate the detrimental impact of this Scheme.

Reference Number	Comment from Relevant Representation/Applicant Response
Applicant Response	The Applicant is committed to continuing engagement with this landowner on matters relating to accommodation works including drainage and boundary treatment during and post construction. The embedded mitigation proposed as part of the Scheme, including boundary treatments, is shown on Figure 2.4 of the Environmental Masterplan **[APP-091].** Detailed requirements of accommodation works will be finalised at detailed design by the Principal Contractor and in consultation with the landowner.
RR-028e	East West Rail: We have also asked the Developer for further detail on how their Scheme will relate to the proposed East West Rail, as in some places it appears to use the same land.
Applicant Response	In terms of the East West Rail Scheme, the Applicant is seeking to provide a joined up approach where there are opportunities to do so, and this is part of ongoing discussions between the two projects. However, it should be noted that East West Rail completed their non-statutory route options consultation in June 2021, and a Preferred Route Announcement is not anticipated until 2022. Therefore, since East West Rail has not determined the route and locations of the proposed stations it is too early to define integration opportunities.

RR-029 Dr Larch Maxey

Reference Number	Comment from Relevant Representation/Applicant Response
RR-029a	Will include a number of points all pertaining to A428 Black Cat to Caxton Gibbet Road Improvement scheme Planning Inspectorate Reference: TR010044: Firstly, that the proposed development would contribute significant Carbon emissions (these have been estimated at 3 Million Tons of CO2 from vehicle emissions alone. Additional CO2e emissions from soil disturbance and other sources need consideration which I will address in my detailed written representation. These CO2 and CO2e emissions need consideration against a range of relevant national policies including the UK's target for zero Cargon by 2050.
Applicant Response	Chapter 14, Climate **[APP-083]** of the Environmental Statement presents an assessment of the Scheme against the UK Government's current carbon budgets, as required by Paragraph 5.17 of the NPSNN: "*for road project applicants should provide evidence of the carbon impact of the project and an assessment against the Government's carbon budgets". Paragraph 5.18 of the NPSNN clarifies that "any increase in carbon emissions is not a reason to refuse development consent, unless the increase in carbon emissions resulting from the proposed scheme are so significant that it would have a material impact on the ability of Government to meet its carbon reduction targets*". The assessment has identified that the emissions arising as a result of the Scheme represent less than 0.012% of the total emissions in any of the 3rd, 4th or 5th Carbon Budget periods. Accordingly, the assessment has concluded that the GHG emissions impact of the Scheme would not have a material impact on the UK Government meeting its legally binding carbon reduction targets. Although the 6th Carbon Budget was not legally binding when the Environmental Statement was written, an additional assessment of the 6th Carbon Budget, which became legally binding during June 2021, has been undertaken. This assessment concluded that the Scheme represents less than 0.024% of the total emissions in the 6th budget period and is also considered not have a material impact on the UK Government meeting its carbon reductions target. Over the Schemes 60-year lifecycle GHG emissions are estimated to be approximately 3.1M tonnes of CO_2e. Approximately 2.9M tCO_2e of this total is from road user emissions however this is considered a conservative estimate as it does not fully consider the GHG reduction impact of the Government's policy on the ban of sales of new petrol and diesel cars by 2030 and the ban of sales of new diesel HGVs by 2040.

Reference Number	Comment from Relevant Representation/Applicant Response
	The proposed mitigation measures are also detailed in Chapter 14, Climate **[APP-083]** of the Environmental Statement. During the development of the Scheme the Applicant will continue to review these mitigations and seek further opportunities to minimise carbon emissions as required by DMRB and in line with the net zero target. DMRB LA114 has been followed with respect to land use change and as such, GHG emissions mobilised from vegetation have been included. Carbon stock loss from soil was not relevant to the assessment due to the proposed storage and reuse of soil on site.
RR-029b	Secondly, there is also a risk of significant biodiversity impacts from the proposed development and these impacts must be considered against relevant national policies and local biodiversity priorities.
Applicant Response	A comprehensive biodiversity assessment of the construction and operational phases of the Scheme has been undertaken, as presented within Chapter 8, Biodiversity **[APP-077]** of the Environmental Statement. As part of this assessment, the Scheme has been considered against the relevant and applicable international, national, regional and local policy relating to biodiversity. The biodiversity assessment set out in Chapter 8, Biodiversity **[APP-077]** of the Environmental Statement has concluded that there will be no significant effects on designated sites, habitats and species.
RR-029c	Thirdly, the proposed development would add significant air pollution risks to those living near to the proposed development. There are a growing number of relevant policies which seek to address this, given the growing data on deaths from air pollution which, in the UK are approximately 40 000 premature deaths/year and the UK has recently had a landmark case linking air pollution with the death of a child.
Applicant Response	Air Quality objectives are set out in the Clean Air Strategy published by Defra and are set to be protective of human health. For the pollutants considered in the assessment of effects on air quality for this Scheme the objectives are: • 40µg/m^3 for annual mean nitrogen dioxide (NO_2). • 40µg/m^3 for annual mean particulate matter (PM_{10}). • 25µg/m^3 for annual mean particulate matter ($PM_{2.5}$).

Reference Number	Comment from Relevant Representation/Applicant Response
	Areas where annual mean concentrations are within these air quality thresholds are not considered to be areas where likely significant effects would occur, as set out in DMRB LA 105. There is a risk of significant effects at locations above these health-based objective values. Within the air quality study area for the scheme the vast majority of receptors are predicted to experience annual mean concentrations below these objective values and therefore no significant effects on air quality are predicted at these receptors. There is one area (comprising seven properties located close to the A1 in the Sandy AQMA) where receptors are predicted to be above the objective value. Within the Sandy AQMA at these seven receptors an imperceptible (less than 1% of the objective value) increase is predicted. These effects are not considered to be significant for air quality based on advice within the air quality standard (DMRB LA 105) applied in the assessment. As such, no mitigation would be required to manage air quality effects associated with the Scheme.

RR-030 Savills (UK) Limited on behalf of Duncan Buchanan

Reference Number	Comment from Relevant Representation/Applicant Response
RR-030a	In response to Highways England's proposals, we are instructed to give notice of our client's objection to the Scheme and to make the following representations: (i) There has been no meaningful engagement between Highways England and our Client to discuss the Order and the potential acquisition of our Client's Land, despite repeated requests. No offer has been made that has enabled appropriate discussions that could have enabled early acquisition by agreement before resorting to making the Order, which goes against the guidance set out in MHCLG's Guidance on the Compulsory Purchase Process and the Crichel Down Rules.
Applicant Response	The Applicant has sought to engage with the landowner with meetings held on 29 May 2019 and 17 July 2019. The Applicant was informed on 10 May 2019 by the previous owner that the site had been sold to the current landowner, the current owner attended the consultation event on 13 June 2019 at Wyboston Lakes. A meeting was offered on 9 April 2020 and was declined. A further request for a meeting was sent on 27 May 2021 with a response on 9 June postponing the meeting until their consulting engineers have spoken with them. The Applicant has sought to open discussions regarding early acquisition by sending out negotiation letters, the first was issued 18 September 2020 with a follow up letter sent on 29 June 2021 with no response. In the meantime, a request to open discussions has been received and the valuer met with landowner on 16 August 2021. On the design aspects, the Applicant requested on 19 July to meet and discuss with no response to date.
RR-030b	(ii) Insufficient information or explanation has been provided to our Client to enable proper understanding of why the inclusion of the Property is required for the Scheme. In particular the changes in the design of the Scheme between the 2019 and 2020 consultation that included additional land for the creation of the flood storage area.
Applicant Response	A detailed response setting out why their property is included within the scheme was emailed to the landowner on 21 April 2020, which was a response to their email of 14 April 2020. Further flood modelling following the 2019 consultation identified the need for additional flood storage areas to the east and west sides of the Roxton Road Link (north), near The Lane, where the route crosses Begwary Brook to mitigate flood risk. This addition was included within the 2020 supplementary consultation. The Applicant's SuDS drainage design has been designed to store surface water runoff during an extreme 1 in 100 year event with a 40% allowance for climate change to minimise flood risk to

Reference Number	Comment from Relevant Representation/Applicant Response
	surrounding lands from the proposed road, while minimising land take, where possible. The proposed SuDs provide the most viable water quality and flood risk solution at this location.
RR-030c	(iii) From the limited information provided to date there is no supporting evidence to demonstrate the benefits of using our Client's land, as opposed to using alternative sites or as to whether any alternative methods could have been considered to reduce the impact on our Client's land.
Applicant Response	The Applicant has proposed a link between The Lane and Chawston Lane due to the closures of The Lane, Nagshead Lane and Chawston Lane accesses on the A1. The link maintains appropriate connectivity for the Chawston and Wyboston communities to access the A1 via Black Cat junction. Due to associated constraints, including the Scheduled Monument to the west of the land in question, the proposed route was determined to be the most appropriate, especially in maintaining a connection to Nagshead Lane. The Applicant has engaged with the landowner and has from those discussions subsequently refined the extents of landscaping and permanent acquisition to reduce the impact on the land. During these communications with the landowner, the Applicant has endeavored to explain alignment and land take decisions.

RR-031 Bletsoes on behalf of Edward Wootton

Reference Number	Comment from Relevant Representation/Applicant Response
RR-031a	The proposal affects a small parcel of land - Plot 2/17a. Access from the new road to the adjacent land should be provided at this location. Screening should be provided.
Applicant Response	The Scheme proposals do not sever or alter existing access to the land in question and therefore a new access is not justified. Plot 2/17a, as shown on Sheet 2 of the Land Plans **[APP-008]**, is required to construct the proposed Roxton Road Link, enable works to the Chawston Irrigation water pipe and to maintain permanent third party rights. As shown on the Environmental Masterplan **[APP-091]** presented in Figure 2.4 of the Environmental Statement, a native species hedgerow will be planted along the western side of the Link Road to reinstate field boundaries and restore locally characteristic features. This will reduce the impact of traffic using the Link Road on views locally.

RR-032 David Pope on behalf of Elsworth Parish Council

Reference Number	Comment from Relevant Representation/Applicant Response
RR-032a	As a Parish we adjoin the A428 as it passes Cambourne. Our village suffers from rat running from vehicles avoiding the traffic jams at the Caxton Gibbet roundabout. We are concerned on two accounts: 1. That the absence of a free flow junction from the A1198 will mean vehicles will still rat run through our village
Applicant Response	With the Scheme there is a forecast reduction in traffic on Rogues Lane between the B1040 north of Papworth and Elsworth village. Compared to the without Scheme scenario in 2040, the Scheme would reduce traffic flows by approximately 3,000 vehicles per average day on the A1198 between Papworth and the A428 at Caxton Gibbet, due to less traffic rat-running through local villages. As well as less traffic approaching from Papworth on the A1198, the opposing traffic volumes at the new northern roundabout at Caxton Gibbet would be much lower with the Scheme as most A428 traffic would pass over the junction. This would significantly reduce delays to A1198 traffic approaching from Papworth such that a separate turn lane from the A1198 (north) to A428 (east) will not be necessary. Capacity assessments of the proposed Caxton Gibbet junction indicate the junction is predicted to operate within capacity with minimal delays in the future years assessed. Further details are provided in Section 6.9 of the Transport Assessment **[APP-241]**.
RR-032b	2. The possible siting of a new train station and then extra housing in this location, just north of the A428, will mean that there will be increased traffic at this junction and at Cambourne. Again the Caxton junction should encourage traffic flowing southbound on A1198 from Papworth (and from villages north) to use the A428 rather than rat run to get to the station.

Reference Number	Comment from Relevant Representation/Applicant Response
Applicant Response	For traffic forecasting purposes DfT guidance has been followed to ensure consistency of approach with other transport schemes. Using this approach requires proposed developments to have a degree of certainty in terms of proceeding for them to be included within the forecasting process. The East West Rail scheme and possible new developments connected with the new railway did not have the required level of certainty when the Uncertainty Log was developed for this stage of the Scheme and therefore are not included in the traffic forecasts submitted for the DCO. It is considered that the design of the new junction at Caxton Gibbet will encourage traffic to use the A1198 to access the A428 and detailed junction analysis has shown that drivers will incur much less delay at the new junction compared to the existing roundabout. This should reduce the amount of 'rat running' along alternative roads.

RR-033 Eltisley Parish Council

Reference Number	Comment from Relevant Representation/Applicant Response
RR-033a	Eltisley has been plagued with increasing rat run traffic for many years because of its proximity to the junction of the A428 and the B1040, which many drivers try to avoid. We hope that the new scheme will end our nightmare, but we fear that the opposite will be the case. Although the new scheme channels east west traffic past the village, it does nothing to alleviate the north south traffic short-cutting through the village. In fact, the proposed new layout of the Eltisley junction exacerbates the desire for traffic to find the shortest route. We have found that a significant volume of traffic travelling west from Cambridge on the A428 and then heading south on the B1040 will drive through the village to cut the corner to take a perceivably shorter and therefore faster route. We have evidence to show that around 300 cars a day take this route. Although cutting the corner through the village may not be faster, it is human nature to seek out a perceived faster route. A proportion of this traffic exceeds the village speed limits (speed watch data), alongside the village playground. Similarly, traffic travelling north on the B1040 will be unable to join the new trunk road at Eltisley, so will have to travel East on the old A428. Again, they are likely to cut through the village to access the old road because of the perceived short cut.
Applicant Response	The traffic model demonstrates that without the Scheme, most traffic that currently travels through Eltisley is B1040 north-south traffic and not from the Cambridge direction. This is due to the amount of delay incurred by traffic turning right from the B1040 at the A428 junctions, particularly during peak periods. Therefore, it is quicker to travel through Eltisley rather than using the existing A428 and experiencing queues at the A428 junction. With the Scheme in place the traffic model predicts a general reduction in traffic using the village roads in Eltisley. This is because traffic levels are predicted to be much lower at both A428 junctions with the Scheme resulting in a reduction in the delay incurred by right turning traffic from the B1040 and fewer vehicles travelling through Eltisley. On St Neots Road and Cambridge Road, the forecast reductions in daily flows with the Scheme are predicted to be around 3000 vehicles in total in 2040. The traffic forecasts are documented in the Transport Forecasting Report, (Appendix C of the Combined Appraisal and Modeling report) **[APP-250]**. The Transport Assessment Annex **[APP-243]** includes detailed assessments of the main traffic effects in some locations within and adjacent to the Scheme area. In addition, a local junction capacity model has been developed to assess the capacity of the junction between the current A428 and the B1040 (south) and it has demonstrated that this junction remains within

Reference Number	Comment from Relevant Representation/Applicant Response
	capacity through to 2040 with the scheme in place, thus removing the incentive for B1040 south-north traffic to rat-run through the village.
RR-033b	Looking into the future we fear that the geometry of the new Eltisley Link junction will continue to perpetuate the rat running problem and an opportunity to solve it will be missed. Unfortunately, the Eltisley Link is designed as a dogleg with north south traffic expected to travel a significant distance along the 'old' A428 before turning back onto the B1040. We believe this will offer motorists, especially those with local knowledge, the temptation to continue to 'cut the corner' through the village. Compounding this is the design of the southerly roundabout at Eltisley. Traffic from the north arriving at the junction will be expected to turn right to head south on the B1040, whereas the natural expectation will be to take the southerly exit which will take traffic through the village. While signage will encourage drivers to take the correct route there will be many with local knowledge, entrenched habits and satnavs which will take them through the village. So, it would be much safer if drivers were denied that option by repositioning the roundabout. We would like to see north south traffic exit the southernmost Eltisley roundabout directly to the B1040. This would appear a cost-effective solution to keeping through traffic out of Eltisley, and making the village a safer, greener, and more pleasant environment.
Applicant Response	Please refer to the Applicant response to RR-033a. A local junction capacity model has been developed to assess the capacity of the junction between the current A428 and the B1040 (south) and has demonstrated that this junction remains within capacity through to 2040 with the Scheme in place. It is the Applicant's view that this further assessment show that there will no longer be an incentive for B1040 south-north traffic to travel through the village. The proposed Eltisley Link roundabouts have been designed to provide an offline buildability solution appropriate to the design speeds of the approach roads. The proposed solution reduces health and safety risks and would likely provide better management of traffic during construction compared to the alternative proposed The relocation of the southern roundabout away from the eastern entrance to the village and at the existing A428/B1040 junction would have the following impacts: • A more elevated link between the roundabouts therefore with greater earthworks. • Road geometries that are below desirable minimums which would have potential safety impacts • The need for a wider structure over the new dual carriageway to accommodate sight stopping lines on the approach to the northern roundabout and therefore inefficient capital and maintenance costs

Reference Number	Comment from Relevant Representation/Applicant Response
	• A requirement to modify existing infrastructure including affected utilities, watercourses, and realignment of the approach roads with associated effects on surrounding land. For these reasons, Eltisley Parish Council's alternative is not considered necessary or appropriate. The Applicant has engaged further with Eltisley Parish Council, post submission of the DCO Application, on a proposed modification to the Eltisley Link southern roundabout – adjusting the location to the west. This proposal was received favourably by the Parish Council and the change will be developed during detailed design and agreed with Cambridgeshire County Council, as the local highway authority.

RR-034 Emily de Gray

Reference Number	Comment from Relevant Representation/Applicant Response
RR-034a	I have been loaning a horse in Wyboston for the last 3 years and we need more access to bridlesways as the current ones are around 2 miles away. If the cycleway over the bridge was changed so it included riders we would have more access to safe routes. The bridge isn't current used by horse riders as the parapets are too low which makes it dangerous to cross. If the parapets were higher we would be safe to cross the bridge and it would open up access for a large equine community who currently either live in Wyboston or keep their horses in the village. Please give this some careful consideration and allow access for horse riders too.
Applicant Response	In the delivery of the Scheme, the Applicant is required to re-provide NMU routes that are severed or disrupted as a result of the Scheme. Where appropriate the Applicant seeks to deal with existing severance issues. The carriageway on the existing Bedford Road, Kelpie Marina access road, realigned Roxton Road and the new Roxton Road Link can be legally used by horses and carriages. The Roxton Road bridge has been provided to maintain connectivity across the Scheme and has an improved cross section compared to the existing bridge, as illustrated on Sheet 1 of the Engineering Sections (Part 3 – Structures General Arrangements) **[APP-019]**. This shows that the verge on the carriageway side of the bridge is 2.5m from the 1m high parapet railing. This is a standard (DMRB CD127 Cross sections and headrooms) minimum offset and parapet height (DMRB TD19/06 Requirements for road restraint systems) for bridges of this nature on roads for all users. On the footway/cycleway side, the carriageway is offset by 5m from the parapet railing. The parapet railing on this side will be a minimum of 1.4m high for safety reasons as cyclists may be immediately adjacent to the railing. Correspondence received during the consultation suggested that Roxton Road 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 that counts were undertaken no horse riders were observed using the existing bridge. It should also be noted that there are no existing bridleways in the vicinity of this part of the Scheme. The Applicant acknowledges the suggestion that there would be greater interest in using this route if it were considered safer. The Applicant considers that the improved cross section on the bridge provides a

Reference Number	Comment from Relevant Representation/Applicant Response
	safe and adequate route for all users. Should Bedford Borough Council as the local highway authority wish to extend the bridleway network within the area and provide an off-carriageway route across the bridge, the proposed Scheme does not preclude any such extensions or alterations in the future.

RR-035 Brown & Co on behalf of Emma Louise Banks

Reference Number	Comment from Relevant Representation/Applicant Response
RR-035a	1. Our client is Miss Emma Louise Banks. Our client is the freehold owner of plot 1/45a and the land is currently occupied by Bates Bros (Farms) Ltd. 2. Our client is concerned that the works within this area do not impact on their retained land and are concerned about drainage flows within this area.
Applicant Response	Plot 1/45a, as shown on Sheet 1 of the Land Plans **[APP-008]**, is required as part of the flood compensation area for Rockham ditch. It is not anticipated that any works will impact on drainage flows or existing ground/field drainage in the area.
RR-035b	3. Our client does not see the relevance of plot 1/45a to the scheme and request that it is removed from the Development Consent Order.
Applicant Response	Plot 1/45a, as shown on Sheet 1 of the Land Plans **[APP-008]**, is required as part of the flood compensation area for Rockham ditch.

RR-036 Environment Agency

Reference Number	Comment from Relevant Representation/Applicant Response
Flood Risk	
RR-036a	**Issue 1.1 - Flood Risk Activity Permits:** The River Great Ouse We would wish to retain the ability to agree the crossing for the River Great Ouse. This is due to the potential for changes within the detailed design phase to result in structural impacts upon localised hydrology and flood risk. **Impact** The DCO proposal requests disapplication of regulation 12 of the Environment Permitting Regulations 2016. This relates to the formal requirement for a flood risk activity permit for permanent and temporary works in, under, over or within 8 metres of any designated main river. Alterations to the engineering design during the detailed design phase could impact upon flood water conveyance and potentially affect third parties. **Solution** In the draft DCO, the applicant has sought to dis-apply regulation 12 of the Environment Permitting Regulations 2016 and so make unnecessary the requirement for separate flood risk activity permits from the Environment Agency. Section 150 of the Planning Act 2008 provides such disapplication cannot take place without our specific consent. We are not currently in a position to give this consent but have provisionally agreed to dis-apply regulation 12 subject to being able to agree protected provisions. We are continuing to engage with discussions with the applicant on this matter.
Applicant Response	The Applicant is continuing to work with the Environment Agency in relation to the protective provisions and the need for any amendments to allow the disapplication of regulation 12 of the Environment Permitting Regulations 2016. The Environment Agency has agreed in principle to the disapplication of regulation 12, subject to the protective provisions being acceptable.

Reference Number	Comment from Relevant Representation/Applicant Response
RR-036b	**Issue 1.2 - Potential for changes at the detailed design stage to result in increase in flood risk to third party land** **Impact** If any changes to the design of the watercourse crossings are made at the detailed design stage, this could result in an increase in flood levels within third party land that has not been identified in the Flood Risk Assessment (FRA), unless sufficient mitigation is provided. **Solution** The FRA should include a commitment that if any significant changes to the design of the watercourse crossings need to be made then further hydraulic modelling will be undertaken and submitted to us for review. The FRA should also clarify that if the results of this modelling show any increase in flood levels within third party land then further mitigation will need to be provided to ensure there is no increase in flood risk to third party land. If further mitigation is not possible then the relevant landowners will need to be informed of the predicted increase in flood risk to their land and evidence of their acceptance of this will need to be provided. A specific requirement may be needed due to the unknown increases in flood risk and required mitigation as a result of any changes at the detailed design stage.
Applicant Response	A commitment that if any significant changes to the design watercourse crossings are made, further hydraulic modelling will be undertaken and submitted to the Environment Agency for review. Discussions have been and are continuing to be undertaken with the landowners that are impacted by the increase in floodplain depths on their land. An agreement will be sought with any landowner that may be impacted by flood risk because of the Scheme.
RR-036c	**Issue 1.3 - Increase in flood risk to third party land** The FRA identifies an area of land adjacent to the River Great Ouse and outside the scheme red line boundary where an increase in flood depths of up to 16mm is predicted. **Impact** Although the scale of this increase in flood risk within agricultural land may be relatively small, the relevant landowner needs to be fully informed of the increase in flood risk to their land, in terms of increased duration, frequency and depths of flooding, so that an informed decision can be made on the acceptability of this increase in flood risk.

Reference Number	Comment from Relevant Representation/Applicant Response
	Solution A drawing has been included in a Technical Note dated 27 May 2021 that shows the location of this increase in flood risk and the predicted increase in flood depths within third party land. We understand that discussions are ongoing with the relevant landowner. However, evidence that the relevant landowner is in acceptance of this increase in flood risk needs to be provided to inform the decision making process.
Applicant Response	As noted, the Applicant is engaging further with the landowner on this matter with the aim to securing their acceptance on the predicted increase in flood depth. Agreement with landowners for the identified modelled increased flood risk at the viaduct crossing is anticipated for the following reasons: • The small extent of increased flood risk at the corner of the site that already floods. • The overall reduction in flood depth across the site. There is a reduced Climate Change Allowance (CCA) that needs to be applied to the Scheme, following the July 2021 Government CCA applicable to the Scheme. This reduction in climate change would reduce or remove any flood risk increase on the site.
RR-036d	**Issue 1.4 - Floodplain compensation area commencement prior to relevant road construction** The FRA needs to explain why it is so important that the floodplain compensation areas are constructed prior to the commencement of construction of the relevant road sections, to prevent an overall loss of floodplain. **Impact** During construction of the road, if the relevant floodplain compensation areas have not been contoured and there is a flood event, this could result in floodwater moving elsewhere and increase the risk of flooding to others. It could also hamper the works as flood water will try to take its natural route and could move into areas that are under construction. Construction activity will result in the compaction of soils which will increase the velocity of surface water run-off. Compensation areas are required to prevent this run-off causing deterioration to water quality in receiving watercourses. **Solution** The FRA should include a commitment that the phasing of each relevant road section will trigger the relevant flood compensation area to be constructed prior to the commencement of that construction phase. This principle needs to feed into the phasing plan for the scheme at the detailed design phase.

Reference Number	Comment from Relevant Representation/Applicant Response
Applicant Response	Where commitments have been proposed, these are further being refined, for incorporation into a Flood Risk Assessment Technical Note which will be available at Deadline 3.
RR-036e	**Issue 1.5 - Continued operational access for river maintenance** We require the retention of our ability to access the River Great Ouse in order to undertake our permissive powers for maintenance or evidence gathering. **Impact** Any prevention, through lack of access or operation development, of our access to main rivers could result in the potential exacerbation of flood risk. This would occur in the event that we were unable to access locations to remove debris, repair flood defences or river banks etc. **Solution** We need to ensure that our operational team retain the ability to access the River Great Ouse to undertake our permissive powers. This could be achieved either through expanding upon paragraph 25 of the Protective Provisions, a requirement of the DCO or an agreement between our organisation and the applicant with regard to access provision throughout the detailed design period. Any agreement should also cover phasing arrangements for the scheme to ensure year round access. We propose to have ongoing discussions with the applicant with regards to this point and can hopefully provide further update within the pre-examination phase of the DCO process.
Applicant Response	The Applicant has proposed a maintenance access track along the north side of the River Great Ouse viaduct which will provide access to the watercourse north of the proposed new dual carriageway. A vehicular access route under the viaduct is provided for the Environment Agency, having a minimum headroom of 2.4m beneath the spans over the floodplain, thereby retaining access to the watercourse south of the proposed new dual carriageway to undertake maintenance or evidence gathering. River piers are also set back a minimum of 2.0m from the river. The Applicant is continuing to work with the Environment Agency in relation to paragraph 25 of the protective provisions which the Environment Agency agrees in principle is adequate for maintaining the Environment Agency's access subject to ongoing discussions over the specifics.
RR-036f	**Issue 1.6 - Temporary use of land**

Reference Number	Comment from Relevant Representation/Applicant Response
	Figure 2.5 of the Environmental Statement shows the areas of land identified for the potential location of construction compounds. However, no evidence has been provided to show that these will be located outside the existing floodplain to ensure there is no increase in flood risk during the construction phase. In addition, no drawings have been provided to show the proposed location of any soil storage areas in relation to the floodplain. **Impact** If any construction compounds or soil storage areas are located within the floodplain, this would reduce flood storage capacity and increase flood risk elsewhere. In addition, any soil storage areas may be prone to floodwater ingress which could wash some of materials away and deposit them within the river system, causing blockages and increased flood risk elsewhere. **Solution** We have requested that drawings are provided showing the location of both construction compounds and soil storage areas in relation to the floodplain extent, which should be included in the DCO.
Applicant Response	The Scheme construction compounds and soil storage areas are illustrated on the Environmental Masterplan **[APP-091]**. To assist the Environment Agency, the Applicant has prepared the information requested that does indicate some compounds may be located within 100 year storm event floodplains. Flood mitigation is to be provided by the Applicant where required, to ensure no increased flood risk to surrounding sites.
RR-036g	**Issue 1.7 - Completion of quarry restoration works** The hydraulic modelling undertaken for the River Great Ouse assumes that the Black Cat Quarry restoration works will be complete before the commencement of any works. However, we understand that the restoration works are still ongoing. **Impact** Given that the River Great Ouse floodplain compensation area is adjacent to the quarry, if the restoration works are not completed prior to construction works commencing, this could have an impact on the functioning of the floodplain compensation area and potentially result in an increase in flood risk elsewhere. **Solution**

Reference Number	Comment from Relevant Representation/Applicant Response
	Written confirmation of the completion date for the restoration works should be sought from Breedon Cement. If it not possible to confirm that the restoration works will be complete before the commencement of any construction works then it needs to be demonstrated that there will be no loss of floodplain or increase in flood risk elsewhere based on existing land levels at the quarry.
Applicant Response	The Applicant has obtained recently acquired topographical data for the existing quarry site, and this is being used to update baseline modelling of the River Great Ouse floodplain. This updated modelling will assess if the data would have any significant impact on the Scheme design or Order Limits. It is anticipated that the updated modelling, using existing quarry levels, will demonstrate no loss of floodplain or increase in flood risk elsewhere.
Navigation	
RR-036h	As the Navigation Authority for the Great Ouse we are responsible for ensuring the navigation channel and any adjoining defined spaces are appropriate to allow the safe movement of traffic on the river. We define this as the 'Navigation Envelope'. The minimum channel width is 12 metres and the minimum headroom or "airdraft" is 3 metres above normal retention levels (of the water in that channel). Any reduction in the Navigation envelope with temporary and permanent structures should be eliminated or minimised in both the construction and operational phases related to the proposed Black Cat to Caxton Gibbet Road Improvement Scheme.
Applicant Response	The River Great Ouse Viaduct has been designed to achieve an "airdraft" of at least 3m height across a channel width in excess of 12m, therefore the navigation envelope will be unaffected. The dimensions of the viaduct are shown on Sheet 7 of the Engineering Sections (Part 3 – Structures General Arrangements) **[APP-019]**. During periods where construction works need to take place over the river, the navigation will be closed and a safety boat deployed in the river to manage this process. As part of this arrangement the Applicant will install mooring facilities for boats waiting for the river to reopen. Closures of the navigation will be pre-planned, coordinated and minimised wherever possible.
Protecting Main River Navigation	
RR-036i	We therefore need to protect this navigation route to ensure that the works do not unreasonably impede the rights of other river users and that any restriction on navigation is kept to a minimum. **Impact**

Reference Number	Comment from Relevant Representation/Applicant Response
	There are many impacts associated with the loss of the Navigation Envelope; in particular this would impede the rights of the river users who are legally registered to navigate under the Anglian Water Authority act 1977 and the Environment Agency (Inland Waterway) Order 2010. **Solution** We believe this can be secured within Article 58 of the DCO. We wish to continue discussions with the Applicant to reword where necessary the current provisions relating to Navigation in Article 58.
Applicant Response	The Applicant is continuing to work with the Environment Agency in relation to Article 58 of the dDCO **[APP-025]**. The Environment Agency has confirmed in discussions that it is largely content with Article 58, subject to confirming the practicalities and ensuring that there is clarity in the definitions.
Construction and Phasing	
RR-036j	We recommend that the applicant should tell local river-based clubs (angling and boat clubs) about their plans for the works and discuss any concerns they may have. In making the arrangements the applicant or their contractors should ensure that the works do not unreasonably impede the rights of other river users, such as fishermen or boats in transit. The applicant must liaise with these clubs to inform them about the works and erect signs and notices to inform club members, (and others), of the works planned. We recommend that the applicant place notices advising all river users the works are taking place – ideally upstream and downstream of the event site. We advise the applicant to carry out works over the river only during the hours of daylight and in good visibility conditions. To reduce the impact on river users we advise the works take place during the winter months from 01 November through to 31st March or Easter whichever is sooner. We advise that the applicant provide an adequate number of safety boats suitable for rescue, manned by competent personnel, along with a sufficient number of marshals throughout the area of the works, and to be alert to potential risks related to flooding.
Applicant Response	During the construction stage, the Principal Contractor will establish a Community Relations Manager (as set out in the Project team roles and responsibilities of the First Iteration EMP **[APP-234]**) for the duration of the construction phase to liaise with the public, stakeholders, Interested Parties and affected landowner(s) to minimise disruption.

Reference Number	Comment from Relevant Representation/Applicant Response
	The Principal Contractor's Community Relations Manager will open lines of communication with the river-based clubs and other stakeholders so that all parties can be kept informed and up to date with the construction programme and the best practicable means of minimising impacts on river users for business or leisure. The Applicant refers the Environment Agency to section 4.4 of Annex F of the First Iteration EMP **[APP-234]** which details how works affecting navigation along the River Great Ouse will be undertaken. Set out in paragraphs 4.4.1 and 4.4.2 are the extent of closures (estimated 10 weeks over an 8 month period) and when the works would be undertaken. Set out at paragraph 4.4.3 of Annex F of the First Iteration EMP **[APP-234]** is an outline methodology for the physical closure of the river, including the use of a dory type safety boat. Paragraph 4.4.3 also confirms that the Environment Agency will be consulted during further development of the proposed construction methodology at the detailed design stage.
Flood Warning/ Strong Stream Notification	
RR-036k	We advise in times of flood, the works over the river are suspended, cancelled or postponed in the interests of safety. We issue Strong Stream Advice (SSA) to inform river users when river levels are increasing and when locks are being prepared to discharge flood water. We will happily discuss this issue further with the applicant at the detailed design phase to ensure its consideration within the construction process and to ensure the health, safety and well being of any on-site contractors.
Applicant Response	The construction team responsible for the works over the river and in the floodplain will subscribe to the Environment Agency's SSA service and will take action to suspend, cancel or postpone any activities where these cannot be commenced or continued safely due to increased river levels. The Applicant will take the opportunity to engage further with the Environment Agency on this matter during the detailed design phase.
Pollution Prevention	
RR-036l	The development may affect the water environment in the following key areas: • water quality in surface water and groundwater as a result of routine highway run-off

Reference Number	Comment from Relevant Representation/Applicant Response
	• pollution resulting from accidental spillages on the highway surface water or groundwater quality as a result of maintenance activities • pollution resulting from activities in relation to the construction phase of the development We are satisfied with the proposed road drainage design. The applicant has stated the mitigation in place regarding solids and metals, as well as the ponds. The inclusion of pollution control devices and appropriate engineering such as interceptors must be implemented at every opportunity to facilitate more effective containment of chemical and fuel spillage and surface water run-off. Written proposals for long term effective maintenance and repair of pollution prevention assets must be included and adhered to. It has been stated that there will be space for penstocks valves, but that they may not be installed. It would be good practice to install them to give the ponds and watercourses another level of protection against highway spills such as fuel/oil from road traffic accidents. In addition the Water Environment (Water Framework Directive) Regulations 2017 require maintenance or improvement of water quality standards within local water bodies. Therefore impacts on water quality must not be negative. Pollution containment methods and effective assessment of impacts are vital and must be included as essential measures from the outset of the scheme (i.e. as mitigation measures prior to construction).
Applicant Response	The Applicant is pleased that the Environment Agency is satisfied with the proposed drainage design for the Scheme. Paragraph 13.8.6 of Chapter 13, Road Drainage and the Water Environment **[APP-082]** of the Environmental Statement states "*The water quality risk assessment presented in Appendix 13.2 of the Environmental Statement includes an assessment of spillage risk. This assessment has concluded that the risk of a serious chemical spillage from all road catchments is low and within the standards set out in the LA 113. Should a spillage occur this would be contained where possible on the highway by sealing nearby drains, or otherwise within the highway drainage system, where it could be pumped out, rather than contaminating any treatment ponds that are included. Penstocks have not been proposed on outfalls in the current design. However, space for penstocks is available at the majority of mainline road catchments in case future re-assessments say they are needed*." The assessment presented in Appendix 13.2 Assessment of Road Runoff and Spillage Risk to Watercourses **[APP-152]** of the Environmental Statement is based on a robust risk assessment that has

Reference Number	Comment from Relevant Representation/Applicant Response
	demonstrated that the risk is low and below the threshold for which specific spillage containment measures are required. As described above, in the unlikely event that a large spillage occurs, there are other opportunities to contain the spillage within the drainage system upstream of the receiving watercourse. The Applicant looks forward to discussing this matter further through its Statement of Common Ground with the EA. Section 18 of Appendix 13.3 Drainage Strategy Report **[APP-152]** of the Environmental Statement provides information on future maintenance requirements of the proposed drainage system (to include both carrier drainage system and SuDS such as ponds, ditches and filter drains). Highways England will take responsibility of the drainage and SuDS proposed within the new dual carriageway, whilst local highway authorities will adopt any SuDS which manage surface water runoff from local roads and any retained de-trunked sections of the A428. Paragraph 13.3.6 of Chapter 13, Road Drainage and the Water Environment **[APP-082]** of the Environmental Statement states that "*Within the scoping opinion, the Inspectorate agreed with Highways England that activities associated with the future maintenance of the Scheme would have limited potential to result in significant effects on the water environment. Accordingly, the effects associated with the maintenance/ management phase of the Scheme were scoped out of the assessment and are not considered further*." The Environment Agency also refers to the need to consider the risk of spillages from maintenance activities; however, the Applicant can confirm that maintenance activities were scoped out of the assessment. The risk from chemical spillages from road traffic accidents (that has a greater potential for adverse impacts) was assessed and not found to be significant.
Emergency & Accident Planning	
RR-036m	We would expect to be consulted on and included in the process of accident and emergency planning for the proposed route and construction. Detailed drainage plans and documented emergency procedures, particularly for spillage, to be reviewed regularly and supplied without delay to the local Environment Management department to furnish off-site incident management support data, facilitating fast and effective emergency response for protection of the environment.
Applicant Response	The Outline Water Management Plan contained within Annex F of the First Iteration EMP **[APP-234]** sets out a draft action plan which contains measures that will be employed in the event of an incident or

Reference Number	Comment from Relevant Representation/Applicant Response
	emergency, including spillages. Table F4-3 of Annex F sets out incident categories, monitoring outcomes and proposed actions. The content of the draft action plan will be developed and refined further by the Principal Contractor, in consultation with the EA, and incorporated into the Second Iteration EMP. This is set out in Paragraph 4.6.2 of Annex F Water Management Plan of the First Iteration EMP **[APP-234]**.
Groundwater Protection and Contamination	
RR-036n	The scheme has the potential to cause adverse impacts to the water environment during both construction and operational phases. The draft DCO seeks to disapply Section 24 of the Water Resources Act 1991(b). In order for us to agree to this we would need, in advance: • a satisfactory groundwater risk assessment • an acceptable construction dewatering strategy containing all of the information that would normally be required for an abstraction licence application. We have previously engaged with the applicant regarding an earlier iteration of the groundwater risk assessment for the proposed scheme (Appendix 13.7 Groundwater Risk Assessment Report TR010044/APP/6.3). A summary of our comments regarding the risk assessment presented in Appendix 13.7 are as follows:
Applicant Response	Additional groundwater quality and level monitoring data, including in-situ permeability data, has been collected from locations within the Scheme's Order Limits. The data will be processed and used to update the conceptual models/assessments used in the Groundwater Risk Assessment **[APP-226]** of the Environmental Statement. A revised groundwater risk assessment technical note incorporating the additional data will be prepared and submitted to the Environment Agency for comment/feedback and approval before being submitted into the Examination. A construction dewatering strategy (See Sections 4.1, 4.5 and 4.6 of Annex F within the First Iteration EMP **[APP-234]**) will be included as part of the Second Iteration EMP. The Second Iteration EMP will be written and approved prior to main construction work starting in late 2022. Prior to approval by the Secretary of State, the Environment Agency will have the opportunity to review this document and provide comments to ensure that all mitigation measures are detailed and

Reference Number	Comment from Relevant Representation/Applicant Response
	satisfactory. Additionally, the Applicant would work closely with the Environment Agency prior to submission of any permits/licence applications, to ensure all relevant information is included.
Construction Dewatering	
RR-036o	The Qualitative Risk Assessments for the proposed construction dewatering are acceptable. However, we have further detailed comments to make regarding the values the applicant uses in their assessments. The Quantitative Risk Assessments models, although used widely within the industry, are approximations. Experience has shown that, even with 'conservative' parameters, the results from such models may significantly underestimate real-life impacts. It is therefore likely that we will require continuous groundwater level monitoring at strategic points during the construction phase, so that any unforeseen unacceptable impacts can be identified at an early stage, and mitigation measures provided.
Applicant Response	The limitations of the quantitative risk models and the need for further real-time groundwater level monitoring are acknowledged by the Applicant. The values used in the modelling have been presented to the Environment Agency and meetings have been held to provide further clarification. The outcome of these discussions will be documented in the Statement of Common Ground. The Applicant has been undertaking groundwater level monitoring at strategic locations across the Scheme since October 2019, and this will continue during the construction phase of the Scheme. Subject to agreement with the Environment Agency, and where necessary, prior to construction, a programme of groundwater quality monitoring will be undertaken to address any potential impact further, particularly in areas where temporary groundwater dewatering may be required during construction and for a short period post-construction works. The scope of monitoring will be defined during detailed design post-DCO consent (further details on monitoring are provided in Sections 4.1.1, 4.5 and 1.8.16 of Annex F of the First Iteration EMP **[APP-234]**). Provision for additional monitoring boreholes, as required, and any strategic monitoring points will be discussed and agreed with the Environment Agency prior to finalising the programme.

Reference Number	Comment from Relevant Representation/Applicant Response
Permanent Dewatering	
RR-036p	It is noted that permanent dewatering may be required for some elements of the scheme. We would not support proposals for permanent dewatering. Therefore, we urge the applicant to design the scheme to avoid any requirement for permanent dewatering
Applicant Response	The Applicant notes the comment from the Environment Agency relating to permanent dewatering. At the time of DCO submission the possibility of permanent dewatering was assessed as a worst case (see paragraph 13.9.118-123 within Chapter 13, Road Drainage and the Water Environment **[APP-082]** of the Environmental Statement). The Applicant is investigating the need for permanent dewatering further and is seeking to resolve this issue through discussion with the Environment Agency. The outcome of these discussions will be documented in the Statement of Common Ground.
Construction Water Quality Assessments	
RR-036q	We understand that dewatering water from the proposed scheme may be discharged to surface watercourses. The Water Quality Risk Assessment should therefore be revised to take into account Environmental Quality Standards (EQS) protective of fresh inland waters. Further assessment of the potential impacts from the Eversden-Eltisley landfill may be required, depending upon the outcome of more conservative quantitative dewatering assessment for the glacial till in this location.
Applicant Response	As set out in Section 4.1.8 – 4.1.9 of Annex F within the First Iteration EMP **[APP-234]**, and as part of the Second Iteration EMP, a construction dewatering strategy will be prepared. This will include a Water Quality Risk Assessment which will be reviewed and revised as required to consider Environmental Quality Standards (EQS) and ensure a best practice approach is followed. This approach seeks to adequately protect fresh inland waters, avoiding significant adverse impacts and compliance with the Water Framework Directive for receiving watercourses. However, please note that groundwater ingress to deep excavations such as around the A1 Underpass will where possible be undertaken using a method that seeks to avoid or minimise any groundwater ingress (e.g. secant piled or retaining walls) – as part of the detailed design stage (Refer to Section 4.1.12 of the Annex F (Outline Water Management Plan) of the First Iteration EMP **[APP-234]**. Also, as provided in Section 4.1.8 – 4.1.9 of the First Iteration EMP **[APP-234]**, methods to reduce further ingress

Reference Number	Comment from Relevant Representation/Applicant Response
	of groundwater into borrow pits/dewatering during excavation will also be considered including working in a smaller area at a time or sealing the borrow pit/excavation by a suitable method. It is expected that some temporary dewatering will still be required during the construction phase, and the Water Management Plan will be updated to ensure that it includes suitable methods in consultation with the Environment Agency to manage any risk identified from ongoing water quality monitoring. At the time of DCO submission the possibility of permanent dewatering was assessed as a worst case (see paragraph 13.9.118-123 of Chapter 13, Road Drainage and the Water Environment **[APP-082]** of the Environmental Statement). However, it has since been confirmed that no permanent dewatering is required. Based on additional in-situ test permeability determined for the glacial till, undertaken in June 2021, a more conservative quantitative dewatering assessment for potential excavation that may require temporary dewatering in this location (i.e. the Eltisley Landfill Area) is being prepared – this assessment will be included in the groundwater risk assessment addendum report being prepared and will be shared/discussed with the Environment Agency in due course for review and approval, before submission to the Examining Authority.
Biodiversity	
RR-036r	Further updates to ecological surveys are likely to be required as the scheme progresses, to provide up-to-date ecological information.
Applicant Response	The Applicant is currently undertaking a suite of surveys covering terrestrial habitats, aquatic habitats and certain species, and is carrying out searches for any new records of flora and fauna, to ensure the baseline data relied upon in the biodiversity assessment is kept up to date. The following lists indicate the surveys being or completed during 2021 and outlines the pre-construction surveys planned for 2022. **2021 Ecological Surveys** • Terrestrial habitats including Phase 1 Habitat and flora surveys – Survey(s) completed. • Aquatic Habitats – Survey(s) completed. • Bats – Survey(s) ongoing. • Barn Owl – Survey(s) completed. • Retile – Completed. • Great Crested Newts: Survey(s) completed.

Reference Number	Comment from Relevant Representation/Applicant Response
	2022 Pre-construction ecological surveys The following pre-construction are currently envisaged to be undertaken in the applicable survey window(s) in 2022. The scope and extent of these surveys will be dependent on the relevant and applicable findings of the 2021 surveys: • Terrestrial habitats including Phase 1 Habitat and flora surveys. • Aquatic Habitats. • Bats. • Badger. • Otter and water vole. • Other Mammals. • Breeding Birds. • Wintering Birds. • Hobby. • Red Kite. • Barn Owl. • Reptiles. • Great Crested Newts. • Invasive Non-native species.
RR-036s	Consideration should be given to timings of works within watercourses to avoid sensitive times around fish spawning.
Applicant Response	As set out within the First Iteration EMP **[APP-234]**, the proposed works to watercourses would be programmed to minimise impacts during fish spawning (typically March-June), where possible.
RR-036t	Given the adverse ecological impacts associated with culverts, new and/or replacement culverts should be kept as short as possible, with culverts being oversized and set below natural bed level (>30cm). Positioning should not inadvertently result in invert levels creating a potential barrier to eel and fish migrations. Mammal ledges should also be included.
Applicant Response	Across the Scheme, specific culverts, which provide underpasses including mammal ledges, will be installed to allow wildlife to cross the new dual carriageway.

Reference Number	Comment from Relevant Representation/Applicant Response
	Where a culvert conveys a public watercourse, the design shall be determined in consultation with the Environment Agency. Culvert designs will also consider the use of softer engineering for scour and erosion protection that allows for some continued channel movement, maintenance of habitat condition and water treatment, where appropriate and practical.
RR-036u	Designing ponds and wetland areas with shallow bank slopes and variation in plan-form can help to improve their ecological value. Planting should consist of native species characteristic of the local area, ideally sourced locally.
Applicant Response	The Applicant wishes to clarify that the preliminary scheme design does not include the creation of ponds. The creation of wetland areas would be located around the proposed attenuation basins that form part of the drainage strategy for the Scheme. Planting around these features, including that of wetland areas, will be determined at the detailed design stage and will be developed to follow the general planting principles included within Section 3 of Annex L Landscape and Ecology Management Plan of the First Iteration EMP **[APP-234]**.
RR-036v	Measures will be required during construction phases to prevent sediment run-off, as well as other polluting substances, from entering watercourses.
Applicant Response	Commitment ESS – RD1 in Table 3-12 of the Register of Environmental Actions and Commitments (REAC) within the First Iteration EMP **[APP-234]** confirms that: '*The Principal Contractor will develop and implement a Water Management Plan (WMP) based upon the outline Water Management Plan in the First Iteration EMP.* *The outline Water Management Plan will include, but not be limited to, information relating to the delivery of the following:* • *Controlling and minimising the risk of pollution to surface waters and groundwater by managing construction site runoff and the risk of chemical spillages; and* • *Managing pollution and physical impact risks when undertaking works within, over, under and adjacent to water bodies*.' These measures will be further developed by the Principal Contractor during the detailed design stage and incorporated into the Second Iteration EMP.

RR-037 Carter Jonas LLP on behalf of Eynesbury Group

Reference Number	Comment from Relevant Representation/Applicant Response
RR-037a	Eynesbury Group consists of two separate companies; Eynesbury Plant Hire Co Ltd and Eynesbury warehousing operating out of our site at Potton Rd, Saint Neots, PE19 6XJ (the 'Site'). Numerous customers visiting our Site each day; typically 30 – 40 HGV movements a day in addition to vans and cars. Together the companies have 17 employees. If approved the A428 scheme would take land from the entrance of the Site on both a temporary and permanent basis. Our principle objective is to protect the business and jobs of our employees by ensuring unfettered access to the Site is maintained throughout the A428 construction and operational phases. Specifically we note the following concerns and reserve our position to raise any further issues during the DCO Examination as relevant to the potential impact of the scheme on the Site: 1. The Site entrance needs to be able to accommodate large STGO HGV's. Vehicle tracking design to be undertaken for vehicles entering and existing our premises from both directions. This is to include large rigid and articulated HGVs as well as emergency vehicles and refuse.
Applicant Response	The preliminary design of the access junction has been checked for the vehicle tracking for an articulated HGV entering and exiting the property in accordance with DMRB. This will be further reviewed and, if necessary, refined at detailed design. The Applicant requests the Interested Party provides full details of the STGO HGVs for assessment on the local highway network.
RR-037b	2. Local road to be moved as far back from our premises as possible to maintain suitable and safe access, vision splays & drainage.
Applicant Response	The Applicant engaged with the landowner on this matter pre-submission of the DCO Application and has reviewed and modified the preliminary design. The alignment of the proposed Potton Road has been adjusted to minimize the amount of land permanently acquired and maintain suitable and safe access, vision splays and drainage.
RR-037c	3. We will need signage from the Abbotsley road B1046, directing HGV's and visitors to 'Eynesbury warehouse and Plant Hire depot' otherwise all our HGV traffic following our postcode is likely to miss the turn towards us and end up in Abbotsley village where it would be difficult for HGV traffic to turn around.

Reference Number	Comment from Relevant Representation/Applicant Response
Applicant Response	Currently, there is no existing signage on the B1046 to the business and therefore consideration for the sign will need to be discussed and developed at detailed design in conjunction with the local highway authority.
RR-037d	4. Our Business name board that is currently situated by our entrance will need to be repositioned.
Applicant Response	The Applicant will seek to reposition the business name board. This will be dealt with at detailed design and implemented by the Principal Contractor.
RR-037e	5. The junction off the B1046 that will bring traffic to us needs to be large enough and suitable for large STGO HGV's to access the new link road towards our premises bearing in mind there could be more than one HGV at the junction at any one time.
Applicant Response	The preliminary design of the access junction has been checked for the vehicle tracking for an articulated HGV entering and exiting the junction in accordance with DMRB and is deemed suitable. This will be further reviewed and, if necessary, refined checked at detailed design. The Applicant requests the Interested Party provides full details of the STGO HGVs for assessment on the local highway network.
RR-037f	6. The surface water drainage from the direction of Abbotsley golf course and neighbouring property's that runs along the eastern edge of the road and under our main entrance into the adjacent ditch, needs to be considered as this will be cut off further downstream by the new bypass. Both our premises and neighbouring properties discharge into this ditch. We are therefore concerned how the surface water drainage will work once removed. Our neighbours had problems a few years ago when the part of the drainage system became blocked and caused properties to flood. Once the underground blockage had been cleared, the water drained away down the ditch freely so we know any interruption to the current drainage system could course serious issues.
Applicant Response	Any impacts on the existing surface water drainage systems will be dealt with as part of the detailed design and implemented by the Principal Contractor. Outline details of the drainage strategy along Potton Road and the B1046 are provided in the Engineering Sections (Part 1 – Drainage Layouts) **[APP-017]**. The Applicant will ensure this drainage ditch connects to the proposed drainage system and the Applicant considers that there is sufficient provision within the Scheme to facilitate this connection.

Reference Number	Comment from Relevant Representation/Applicant Response
RR-037g	7. We require our new entrance to be constructed of reinforced concrete as it is now. Tarmac will not be suitable. Once works complete we need to maintain freehold ownership of our entrance/crossover abutting the public highway as we do now.
Applicant Response	The pavement design of the private access will be undertaken at detailed design stage and implemented by the Principal Contractor. The Applicant proposes that the extent of the permanent land acquisition will form part of the highway, (i.e. plot 5/7a and 5/8a as shown on Sheet 5 of the Land Plans **[APP-008]**) and the responsibility for future maintenance of the highway will remain with the local highway authority.
RR-037h	8. We need to ensure that noise levels from the new bypass are kept to a minimum by introducing noise reducing measures. Not only for us but also for our neighbours.
Applicant Response	Noise mitigation measures are presented within Chapter 2, The Scheme **[APP-071]** and Chapter 11, Noise and Vibration **[APP-080]**, and illustrated on Figure 2.4 **[APP-091]** of the Environmental Statement. The Applicant proposes noise mitigation, in the form of earth bunding, on the eastern and western sides of the new dual carriageway where the alignment is in close proximity to the properties along Potton Road. In addition, low noise surfacing is proposed along the length of the Scheme.
RR-037i	9. Landscaping between our premises and the new by-pass to be carried out to minimise the impact the new bypass will have on us.
Applicant Response	Landscape mitigation measures incorporated into the design of the Scheme are illustrated on Figure 2.4 Environmental Masterplan **[APP-091]** of the Environmental Statement. The Applicant proposes landscaping along the proposed new dual carriageway to mitigate the visual impacts to the properties along Potton Road.
RR-037j	10. 24 hour access to our premises will be required during the works otherwise we will come to a complete standstill as we have multiple vehicles and HGV's visiting both our Plant Hire Depot and warehousing facility.

Reference Number	Comment from Relevant Representation/Applicant Response
Applicant Response	The Applicant will seek to maintain access to all properties and roads throughout the construction of the works or provide alternative access arrangements. In some instances, it may be necessary to restrict access for limited periods, however, the Applicant would seek to minimise the number and duration of any such restrictions as far as reasonably practicable. The Principal Contractor will liaise with the affected landowner to ensure that such disruption is minimised.
RR-037k	11. Electric, phone lines, Broadband, water supply and drainage etc needs to be maintained at all times whilst services are redirected.
Applicant Response	The Applicant will seek to maintain all utility supplies to the property throughout the construction of the works. In some instances, it may be necessary to restrict the supply for limited periods, however, the Applicant would seek to minimise the duration of any such restrictions as far as reasonably practicable. The Principal Contractor will liaise with the affected landowner to ensure that such disruption is minimised.

RR-038 Frances Stephen

Reference Number	Comment from Relevant Representation/Applicant Response
RR-038a	I am the owner of 2 horses, and regularly visit Wyboston to ride with friends. At present we won`t use the current bridge as it is unsafe to do so. Any new bridge MUST provide a safe passing for riders by installing a horse height parapet. My daughter rides with me, and I would be terrified to allow her to pass over a bridge that meant that she could fall over the bridge should her horse spook at something. A bridge crossing must have the correct safety in place for all users to be deemed safe to use and not discriminating against those sections of society who use it for their own personal leisure pursuits.
Applicant Response	The Roxton Road bridge has been provided to maintain connectivity across the Scheme and has an improved cross section compared to the existing bridge, as illustrated on Sheet 1 of the Engineering Sections (Part 3 – Structures General Arrangements) **[APP-019]**. This shows that the verge on the carriageway side of the bridge is 2.5m from the 1m high parapet railing. This is a standard (DMRB CD127 Cross sections and headrooms) minimum offset and parapet height (DMRB TD19/06 Requirements for road restraint systems) for bridges of this nature on roads for all users. On the footway/cycleway side, the carriageway is offset by 5m from the parapet railing. The parapet railing on this side will be a minimum of 1.4m high for safety reasons as cyclists may be immediately adjacent to the railing. Correspondence received during the consultation suggested that Roxton Road 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 that counts were undertaken no horse riders were observed using the existing bridge. It should also be noted that there are no existing bridleways in the vicinity of this part of the Scheme. The Applicant considers that the improved cross section on the bridge provides a safe and adequate route for all users. Should Bedford Borough Council as the local highway authority wish to extend the bridleway network within the area and provide an off-carriageway route across the bridge, the proposed Scheme does not preclude any such extensions or alterations in the future. More information on the results of the walkers, cyclists and horse rider counts can be found within Chapter 12, Population and Human Health **[APP-081]** of the Environmental Statement which describes the assessment on population and human health.

RR-039 Brown & Co on behalf of Gemma Jane Gape Tucker

Reference Number	Comment from Relevant Representation/Applicant Response
RR-039a	This representation is made on behalf of Mrs GJG Tucker as owner and [Redacted] of the land identified as plots 14/8a, 14/8b, 14/8c, 14/8d, 14/8e and 14/8f. My client is concerned regarding the electrical diversion on their land as this is the supply for Pastures Farmhouse and the agricultural buildings. My client wants to ensure that an adequate supply is put in place for the dwellings and buildings following the scheme and diversion.
Applicant Response	The Applicant proposes to divert the existing overhead power line to the farm where it is impacted by the scheme. There is no intention to change the existing power supply.
RR-039b	My client has also agreed with Highways England that they will be contacted during these works to ensure that appropriate services can also be connected to their retained farm buildings.
Applicant Response	The Applicant will seek to maintain the electricity power supply to the farm throughout the construction of the works. It may be necessary to restrict the supply for limited periods, however, the Applicant would seek to minimise the duration of any such restrictions as far as reasonably practicable. The Principal Contractor will establish a Community Relations Manager (as set out in the Project team roles and responsibilities of the First Iteration Environmental Management Plan (EMP) [**APP-234**] for the Scheme) for the duration of the construction phase to liaise with affected landowner(s) to minimise disruption. Smaller works such as these have not yet been discussed with the Statutory undertaker, however Highways England has committed to engaging with the landholder at the appropriate time. Typically, Highways England will reinstate connection on a like for like basis unless otherwise agreed.
RR-039c	My client understands from the plans submitted for the Development Consent order that a new roundabout access is to be included as the Caxton Gibbet West roundabout and my clients request further details on the width and type of access to be created here.
Applicant Response	The Applicant proposes a minimum 6m wide access off the Caxton Gibbet junction south-west roundabout. Detailed requirements of accommodation works will be finalised at detailed design by the Principal Contractor and in consultation with the landowner.

Reference Number	Comment from Relevant Representation/Applicant Response
RR-039d	It is also noted that the cycle lane included from Caxton Gibbet running south is not linking to any of the proposed paths included within the Cambourne development and my client would ask that the scheme revisit the proposed cycle path to ensure it links appropriately with local cycle networks.
Applicant Response	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. The Applicant has proposed provision of a shared footway/cycleway through Caxton Gibbet junction such that cyclist who are using the carriageway do not have to negotiate the roundabouts, but have a safer separate provision. Wider interventions to the Cambourne development are outside of the scope of the Scheme and are the responsibility of the local highway authority.
RR-039e	My client is concerned regarding land drainage on the fields affected by the scheme. My client seeks confirmation that drainage surveys will be undertaken prior to entry to ensure that land drainage can be put in place prior to any damage being caused.
Applicant Response	Land drainage and over land drainage has been is considered as part of the Scheme and will be refined further as part of the detailed design. During detailed design the Applicant will consider the individual needs of each land parcel including land drainage where this is appropriate. Pre-earthworks ditches will be installed prior to the start of the major construction. The Applicant will obtain copies of any land drain plans, to identify where connections to temporary and/or permanent drainage channels or watercourses will be made. In the absence of plans, the Principal Contractor will connect those land drains which become evident as new drainage or ditch is installed.
RR-039f	My client practices Regenerative Agriculture and has invested considerable time and money into creating high quality, biologically healthy, well structured soil. My client seeks confirmation that appropriate soil surveys and consideration will be given to this on the temporary land take to ensure they are returned to them in the same condition following completion of the scheme.
Applicant Response	Section 9.4 within Chapter 9, Geology and Soils **[APP-078]** of the Environmental Statement explains that soils sampling to inform the geology and soils assessment were planned to be carried out in 2020, however, due to the Covid-19 pandemic and associated local lockdown restrictions, these were unable to be undertaken. The Applicant has committed to undertake this sampling in 2021 subject to the lifting of

Reference Number	Comment from Relevant Representation/Applicant Response
	lockdowns. Following the completion of the fieldwork and the analysis of findings, a report will be prepared by the Applicant and submitted to the Examination on or before Deadline 6. The Applicant is unable to provide the assurances being sought by the Interested Party (IP) requesting that soils will be returned in the same condition following completion of the Scheme. The reinstatement of topsoils and subsoils on land temporarily acquired to construct the Scheme will be managed in accordance with the control measures outlined in Annex E Soil Handling and Management Plan located within the First Iteration EMP **[APP-234]**. These mitigation and control measures aim to reduce disturbance and keep the movement of soils to a minimum; however, segregation of individual landowner soils to ensure condition is the same to that prior to the Scheme being commenced is not practicable on a Scheme of this nature and size. Notwithstanding this, the Principal Contractor will consult with the Interested Party to identify possible interventions to retain soil condition.
RR-039g	My client also seeks confirmation of the boundary treatments along the route to ensure the security of his property both during construction and following completion.
Applicant Response	The embedded mitigation proposed as part of the Scheme, including boundary treatments, is shown on the Environmental Masterplan **[APP-091]** presented as Figure 2.4 of the Environmental Statement. Detailed requirements of accommodation works will be finalised at detailed design by the Principal Contractor and in consultation with the landowner.
RR-039h	My client will require access to all land at all times during construction of the project and seeks confirmation that this will be available and details on the proposed method of works to ensure that access is not interrupted. Accordingly our client will represent that the DCO should be amended to reflect the matters set out above.
Applicant Response	The Applicant will seek to maintain access to all properties and roads throughout the construction of the works or provide alternative access arrangements. In some instances, it may be necessary to restrict access for limited periods, however, the Applicant would look to seek to minimise the number and duration of any such restrictions as far as reasonably practicable. The Principal Contractor will liaise with the affected landowner to ensure that such disruption is minimised. The Applicant will seek to record all matters discussed with the Interested Party, including details of any agreements reached, within a Position Statement instead of inclusion in the Development Consent Order.

RR-040 Geoffrey Digby

Reference Number	Comment from Relevant Representation/Applicant Response
RR-040	This new road layout is important for the improvement of the local area and will reduce the fumes from the traffic delays.
Applicant Response	The Applicant welcomes this comment setting out support for the Scheme.

RR-041 Geraldine Pearson

Reference Number	Comment from Relevant Representation/Applicant Response
RR-041a	I cannot use the crossings at Black Cat and A428 when riding or driving my horse. The present arrangement is too dangerous due to the proximity of heavy goods vehicles and fast moving traffic. I could make far more use of the area with the right type of crossing facility with high sides that can't be jumped over and a wide and comfortable surface. Mounting blocks either end are also necessary for mounting larger horses who may be upset due to the traffic noise and speed below. Geraldine Pearson
Applicant Response	The carriageway on the existing Bedford Road, Kelpie Marina access road, realigned Roxton Road and the new Roxton Road Link can be legally used by horses and carriages. The Roxton Road bridge has been provided to maintain connectivity across the Scheme and has an improved cross section compared to the existing bridge, as illustrated on Sheet 1 of the Engineering Sections (Part 3 – Structures General Arrangements) **[APP-019]**. This shows that the verge on the carriageway side of the bridge is 2.5m from the 1m high parapet railing. This is a standard (DMRB CD127 Cross sections and headrooms) minimum offset and parapet height (DMRB TD19/06 Requirements for road restraint systems) for bridges of this nature on roads for all users. On the footway/cycleway side, the carriageway is offset by 5m from the parapet railing. The parapet railing on this side will be a minimum of 1.4m high for safety reasons as cyclists may be immediately adjacent to the railing. Correspondence received during the consultation suggested that Roxton Road 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 that counts were undertaken no horse riders were observed using the existing bridge. It should also be noted that there are no existing bridleways in the vicinity of this part of the Scheme. The Applicant considers that the improved cross section on the bridge provides a safe and adequate route for all users. Should Bedford Borough Council as the local highway authority wish to extend the bridleway network within the area and provide an off-carriageway route across the bridge, the proposed Scheme does not preclude any such extensions or alterations in the future. Mounting blocks at either end of the bridge will be considered as part of the detailed design. More information on the results of the walkers, cyclists and horse rider counts can be found within Chapter 12, Population and Human Health **[APP-081]** of the Environmental Statement which describes the assessment on population and human health.

RR-042 Girton Parish Council

Reference Number	Comment from Relevant Representation/Applicant Response
RR-042a	The point we wish to make is that the proposed dualling of the A428 from Caxton Gibbet is a continuation of the existing dual carriageway section of the A428 to Cambridge. A possibly unforeseen consequence of this development will be to increase traffic movements along this road leading to unacceptably high congestion where it meets the A14 east bound and the M11 southbound. The recent A14 upgrade has provided a link to the A14 westbound but that to the east is only via a single lane. No improvements have been made to the M11 access which remains via the single carriageway A1303 where it crosses the M11. Following the removal of the link to the A14 East bound at Oakington/Dry Drayton Road, this junction is the only link to the southbound M11 other than directly from the A14 at Bar Hill. Current traffic flows mean that there is constant congestion along the A1303 at Madingley Hill and any increased traffic will make this intolerable. While the current pandemic has prevented proper assessment of congestion as the A428 leads to the A14 east it is likely that the restriction to one lane will lead to congestion and increase in air pollution in this area which already has poor air quality. We request therefore that as part of this project the links between the A428 and the M11 and A14 be upgraded to allow improved traffic flows. This will effectively mean an upgrade to the Girton Interchange to allow 4 way traffic movements. We would add that this must be achieved without adding to the level of noise and air pollution already experience by Girton village from the current raised sections of carriageway at this junction.
Applicant Response	Impacts at wider junctions, including the Girton Interchange, have been assessed and reported in the Transport Assessment Annex **[APP-243]**. Table 3-89 sets out that for the M11 J14 Girton Interchange, there would be a significant increase in eastbound flow along the A428, offset to some extent by decreases on the M11 and A14. The predicted operational impact sets out that analysis of the eastbound merge taper suggests that additional capacity may potentially be required at the A428/M11 eastbound merge. Paragraph 3.22.5 of the Transport Assessment Annex **[APP-243]** sets out that the M11 J14 Girton Interchange will be the subject of a Monitor and Manage approach in which the performance of the network will be monitored by Highways England as highway authority for the strategic road network and consideration will be given to the potential need for future interventions outside of the Scheme, if required. Air quality effects have been predicted within Girton, including within the Air Quality Management Area, as set out in Chapter 5, Air Quality **[APP-074]** of the Environmental Statement. These predictions include changes in traffic flows, and congested conditions, on roads within the air quality study area which

Reference Number	Comment from Relevant Representation/Applicant Response
	includes the A14/M11 junction. Air quality effects at receptors in Girton are predicted to be imperceptible (a change of less than 1% of the objective) at receptors closest to the A14, as shown on Figure 5.4, sheet 42 **[APP-097]**. Air quality at these receptors is predicted to be well under the 40 µg/m^3 objective value with the highest concentration predicted with the Scheme of 21.3µg/m^3 for annual mean nitrogen dioxide. Locations where imperceptible changes occur and where air quality is below the objective value are not considered to be significant for air quality.

RR-043 Bletsoes on behalf of H G Sharman & Son

Reference Number	Comment from Relevant Representation/Applicant Response
RR-043a	We represent the interests of Mrs Diane Sharman and the Partners of the farming partnership, H G Sharman & Son of [redacted], who are directly affected by the Scheme; the current partners are Diane Sharman, Robert Sharman, Cathryn Sharman & Rebecca Sharman. Mrs Diane Sharman owns land directly affected by the Scheme, which is farmed by the partnership. In addition, the partnership are tenant of several parcels of land directly affected by the Scheme. On behalf of Mrs Sharman and the partnership, we are instructed to make outline representations. Representations are made without prejudice to making further objections/representations at a later stage for different reasons, or to amplify these representations. We have reviewed the plans included within the Developer's application insofar as they relate to our clients' and these representations are based upon the information contained therein. The plans do not provide sufficient detail to ascertain the full impact on my clients' requisite interest. We would therefore like to formally record our principle concerns, based upon the information that is available. We do not wish to be put in a position whereby when it comes to the 'detailed design stage' we are told that design issues raised should have been dealt with earlier on in the scheme and it is too late. The Developer cannot say they will deal with matters in dispute at a later stage. These issues should either be dealt with during the application process or determined by the Planning Inspectorate. We submitted representations to the supplementary consultation held in July 2020. To date, we have not received a formal response. Our clients' wish to make clear their principle concerns: Land East of Roxton Road and North of A421: The northern part of this parcel of land is owned by Mrs Sharman, and the southern part is rented by the partnership; both parts are currently farmed as one by the partnership. During previous consultation with the Developer, we requested detailed design information concerning the proposed accesses to assess whether access will be equally commodious. From the information available, it is not clear whether the existing access will be affected. We have had verbal assurance from the Developer's representatives the existing access will not be affected, and my clients' have relied upon that assurance. During previous consultation, we questioned the need for a proposed new ditch given the free draining nature of the soil in this location. If a ditch is considered necessary, we requested that the ditch be aligned closer to the Scheme to reduce the amount of land lost. Following recent discussions with the Developer, we are told the alignment is necessary to avoid an existing underground gas pipeline. The Developer confirmed they would seek confirmation as to whether the ditch is required. Our clients' object to the provision of the ditch in this location and its proposed alignment.

Reference Number	Comment from Relevant Representation/Applicant Response
Applicant Response	The Applicant has provided a response to all comments received from the Supplementary Consultation and these are set out in Appendix V **[APP-068]** of the Consultation Report which was submitted as part of the Application. The Applicant confirms that the existing access off Roxton Road, north of the A421 and the proposed Roxton Road roundabout, for access to land to the east, will be retained as part of the Scheme. The Applicant confirms that the cut-off ditch is required and, as noted by the landowner, the alignment of the drainage ditch is dictated by the presence of the underground high pressure gas main. Any opportunity for refinement of the ditch alignment, closer to the gas main constraint, will be dealt with at detailed design by the Principal Contractor and is subject to the pipeline access and maintenance requirements.
RR-043b	Land South-East of Roxton Garden Centre: The northern part of this parcel is rented by the partnership. The southern part is owned by Mrs Sharman and farmed by the partnership; both parts are currently farmed as one. During previous consultation, we highlighted the short-term development potential of this land. The land is being actively promoted for commercial development in conjunction with Roxton Garden Centre and other adjoining land. We understand that a Planning Application has been submitted in respect of this land. Therefore, the land has an increased value over and above its agricultural value, meaning the compensation will be vastly greater than for agricultural land without development potential and the cost to the taxpayer will be greater. The provision of a new access to Kelpie Marina and a flood storage area will require the permanent acquisition of the majority of my clients' own land, and a significant amount of land they rent. During previous consultation, we requested the new access road to Kelpie Marina be aligned closer to the A1, and the flood storage area moved to land without development potential, to mitigate compensation. Neither of these requests have been accepted. In recent discussions with the Developer, we reiterated the development potential of this land and once again urged the Developer to reconsider their plans for the new access to Kelpie Marina and the flood storage area. The Developer confirmed they would investigate whether their plans could be changed. For the avoidance of doubt, our clients' object to the current proposals and require the access road to be routed elsewhere or aligned closer to the A1, and the flood storage area to be moved to land without significant development potential. If the Scheme is consented in its current form, the Developer has confirmed that a separate legal access will be provided to my clients' land distinct from the land they rent. My clients' have relied upon this assurance. Land

Reference Number	Comment from Relevant Representation/Applicant Response
Applicant Response	The alignment of the Kelpie Marina access has been designed to mitigate any impact to the existing high pressure gas main. It has been determined not possible to realign the proposed access road further to the east. The land to the west of the access road is required to provide a flood storage area due to the crossing of Rockham ditch for the Kelpie marina access road. The size of this compensation areas has been determined by modelling and its location has to be as close to the source as possible and upstream of the ditch crossing. Further information is contained in Chapter 13, Road Drainage and the Water Environment **[APP-082]** of the Environmental Statement, the Flood Risk Assessment and Drainage Strategy included at Appendix 13.4 and Appendix 13.3 **[APP-219** to **APP-223]** of the Environmental Statement. A planning application does not appear to have been submitted in respect of the relevant land at this stage based on the initial planning enquiries undertaken by the Applicant. It is also not clear whether the application would have any effect on the value of the relevant land.
RR-043c	North of Chawston Lane, Chawston: This parcel of land is rented and farmed by the partnership. Our clients' primary concern relates to the proposed layout of the new junctions onto Chawston Lane. The new junctions are offset from each other by approximately 50m, effectively creating a chicane for vehicles. This may present a problem for vehicles with restricted maneuverability, such as heavy goods vehicles and agricultural traffic. We understand the proposed side road will be the principal access to H E Payne (Transport) Ltd who operate a significant fleet of heavy goods vehicles. We once again urge the Developer to reconsider their proposals and align the junctions opposite each other or as close to that as possible. We understand local residents have expressed similar concerns.
Applicant Response	The design of the junction layout has been undertaken in consultation with Bedford Borough Council and has given full consideration to the expected traffic including the use by heavy goods vehicles. In addition, the staggered junction has been used in this location to create a safer route as it will assist with controlling traffic speeds along the Roxton Road link. A swept-path analysis has been undertaken which has verified and confirmed its suitability for HGV use. The staggered junction also lends itself well to imposing a 40mph speed limit on Roxton Road link (south), then 30mph on Roxton Road link (north).
RR-043d	Accommodation Works: We have on numerous occasions reiterated the need for accommodation works. We require further details on the proposed accommodation works to ascertain the full impact on our clients' requisite interest. As a minimum, our clients' require commodious access, post scheme land drainage, and fencing and hedging of boundaries to mitigate the detrimental impact of this Scheme.

Reference Number	Comment from Relevant Representation/Applicant Response
Applicant Response	The Applicant is committed to continuing engagement with this landowner on matters relating to accommodation works including drainage and boundary treatment during and post construction. The embedded mitigation proposed as part of the Scheme, including boundary treatments, is shown on Figure 2.4 of the Environmental Masterplan **[APP-091].** Detailed requirements of accommodation works will be finalised at detailed design by the Principal Contractor and in consultation with the landowner.
RR-043e	East West Rail: We have also asked the Developer for further detail on how their Scheme will relate to the proposed East West Rail, as in some places it appears to use the same land.
Applicant Response	In terms of the East West Rail Scheme, the Applicant is seeking to provide a joined up approach where there are opportunities to do so, and this is part of ongoing discussions between the two projects. However, it should be noted that East West Rail completed their non-statutory route options consultation in June 2021, and a Preferred Route Announcement is not anticipated until 2022. Therefore, since East West Rail has not determined the route and locations of the proposed stations it is too early to define integration opportunities.

RR-044 Hannah Hambleton-Jewell

Reference Number	Comment from Relevant Representation/Applicant Response
RR-044a	I am a veterinary surgeon & horse rider who lives in the local area. We have 4 horses on our yard, each with different riders. I have personally experienced many near misses riding on the roads in the area as I believe commuters often skip through the villages from the black cat roundabout to avoid traffic. These road users are often very impolite and drive very close, leaving minimal room & are unwilling to slow down. I really do fear for my safety, the safety of the drivers, other riders, cyclists & my horse. I have personally through work seen the damage that can be done in road traffic accidents involving horses & I believe it is only a matter of time a until a tragedy occurs on our roads. I also had an accident on my horse two years ago, where a bridleway bridge gave away underneath us and my horse got trapped. Thankfully I managed to get away without being injured but it was extremely scary. I also ended up having to call the fire brigade to help free my horse from this bridge. All of which could have been completely avoidable if there were more appropriate off road hacking routes in our area. It is for this reason I strongly urge you to consider the safety of people's daughters/children/wives/mothers/fathers who all just enjoy getting out in the countryside with their horses and provide safer routes whilst there is the opportunity (during a time of development-which I suspect will only make the roads busier & more dangerous) and hence prevent an inevitable accident under the current circumstances.
Applicant Response	The Scheme would reduce the number of vehicles seeking alternative routes around the Black Cat junction because the junction will have greater capacity than the existing roundabout and eastbound traffic on the A421 will no longer be using the A1 Wyboston junction. In addition, the direct accesses onto the A1 via Chawston Lane and The Lane are being closed. For these reasons, the Applicant believes that there will be a reduction in the interaction been vehicle and equestrian users resulting in a reduced risk of incidents. In the delivery of the Scheme, the Applicant is required to re-provide NMU routes that are severed or disrupted as a result of the Scheme. Where appropriate the Applicant seeks to deal with existing severance issues. The Applicant will seek to manage safety impacts on the directly affected bridleways and the local road network during construction in line with the proposals in the Outline Construction Traffic Management Plan **[APP-244]**. For detail on how public rights of way will be affected please see Chapter 12, Population and Human Health **[APP-081]** of the Environmental Statement. This covers the potential impacts of the Scheme for Walkers Cyclists and Horse riders as well as design, mitigation and enhancement measures.

RR-045 Hilton Parish Council

Reference Number	Comment from Relevant Representation/Applicant Response
RR-045a	Hilton Parish Council is registering as an interested party on the consultation on the A428 Black Cat to Caxton Gibbet Road Improvement scheme Planning Inspectorate Reference: TR010044 because it wishes to express its desire for Highways England to take steps to prevent any construction traffic from using the B1040 through the village to and from the site when a suitable alternative route is available along the A1307 and along the A1198 for access to and from sites to the north of the new routing. During the construction of the A14 southern by pass Highways England made promises they were unable to honour concerning construction traffic not coming through the village so we would like this to be written into the DCO from the outset.
Applicant Response	The Applicant has submitted an Outline Construction Traffic Management Plan **[APP-244]** with the DCO application. This details proposals for traffic management during the construction period. Construction vehicles will be instructed to use specific routes, and any breaches to this will be managed by the Applicant and their contractors. Construction traffic will not be routed through the village of Hilton as there is no requirement to obtain or transit materials for the Scheme from the vicinity of the village.

RR-046 Historic England

Reference Number	Comment from Relevant Representation/Applicant Response
RR-046a	Historic England (retaining the formal title of the Historic Buildings and Monuments Commission for England) is the government service championing England's heritage and giving expert, constructive advice. We summarise our representation regarding this proposed project as follows: 1. The development would include construction and operation of a new section of the A428 in Cambridgeshire and Bedfordshire including 16km of new carriageway with crossings over the River Great Ouse, the East Coast Mainline railway and multiple minor roads, a three level junction with the A1 at the Black Cat roundabout with associated slip roads and an improved junction at the Caxton Gibbet roundabout facilities. 2. The applicant has carried out an assessment of the historic environment within a defined study area. Assets within this area which could be affected by the proposed development include 11 scheduled monuments, one grade II* registered historic park, nine grade II* listed buildings, 124 grade II listed buildings and five conservation areas along with 406 undesignated heritage assets. We will comment on the assessment of and impact on the grade II* listed buildings, the scheduled monuments and the grade II* registered park where there is potential for impact on their setting. We will defer advice on grade II listed buildings and conservation areas to the respective local planning authorities with the exception of four grade II listed buildings which would be physically affected by the development. These are three milestones on the existing A428 and Brook Cottages near Wyboston. We will comment on these grade II listed assets specifically.
Applicant Response	The Applicant notes which assets that Historic England will provide comment on.
RR-046b	3. The development has the potential to harm archaeological deposits of interest, both directly and indirectly. A mitigation strategy has been presented by the applicant, which includes a programme of archaeological works including geoarchaeological boreholes that will inform preservation strategies, either preserving remains in situ or by record. We will comment on this strategy and associated document to ensure that the significance of the impacted remains/deposits is not lost.
Applicant Response	The Applicant notes that Historic England will comment on the Archaeological Mitigation Strategy **[APP-238]**.

RR-047 Howard James Rees

Reference Number	Comment from Relevant Representation/Applicant Response
RR-047a	With forecast carbon emissions of over three million tonnes, this scheme is not consistent with the UK's commitments under the Paris Agreement. It also falls foul of many areas of Government commitments, policy and legislation regarding limits on greenhouse gas emissions and the protection of biodiversity.
Applicant Response	Chapter 14, Climate **[APP-083]** of the Environmental Statement presents an assessment of the Scheme against the UK Government's current carbon budgets, as required by Paragraph 5.17 of the NPSNN: *"for road project applicants should provide evidence of the carbon impact of the project and an assessment against the Government's carbon budgets".* Paragraph 5.18 of the NPSNN clarifies that *"any increase in carbon emissions is not a reason to refuse development consent, unless the increase in carbon emissions resulting from the proposed scheme are so significant that it would have a material impact on the ability of Government to meet its carbon reduction targets".* The assessment within Chapter 14, Climate **[APP-083]** of the Environmental Statement has identified that the emissions arising as a result of the Scheme represent less than 0.012% of the total emissions in any of the 3rd, 4th or 5th Carbon Budget periods. Accordingly, the assessment has concluded that the GHG emissions impact of the Scheme would not have a material impact on the UK Government meeting its legally binding carbon reduction targets. Although the 6th Carbon Budget was not legally binding when the Environmental Statement was written, an additional assessment of the 6th Carbon Budget, which became legally binding during June 2021, has been undertaken. This assessment concluded that the Scheme represents less than 0.024% of the total emissions in the 6th budget period and is also considered not have a material impact on the UK Government meeting its carbon reductions target." The proposed mitigation measures proposed for the Scheme are also detailed in Chapter 14, Climate **[APP-083]** of the Environmental Statement. During the development of the Scheme the Applicant will continue to review these mitigations and seek further opportunities to minimise carbon emissions as required by Design Manual for Roads and Bridges (DMRB) and in line with the net zero target. A comprehensive biodiversity assessment of the construction and operational phases of the Scheme has been undertaken, as presented within Chapter 8, Biodiversity **[APP-077]** of the Environmental Statement. As part of this assessment the Scheme has been considered against the relevant and applicable international, national, regional and local policy relating to biodiversity. Based upon the preliminary design for the Scheme and using the Highways England's method for calculating the net change in biodiversity, the Scheme achieves a net biodiversity gain of 20.5%.

RR-048 Huntingdonshire District Council

Reference Number	Comment from Relevant Representation/Applicant Response
RR-048	(See RR-013: Cambridgeshire County Council)

RR-049 Isaac Beevor

Reference Number	Comment from Relevant Representation/Applicant Response
RR-049a	The expansion of a road is a travesty in a climate emergency. 1) This scheme will not produce long-term benefits due to the induced demand, a well evidenced and documented issue, that means that any minimals gains in traffic/commute time will be lost within a decade.
Applicant Response	The Scheme will produce significant benefits by reducing congestion along the existing A428 between Caxton Gibbet and the A1 at Black Cat along with significant savings in journey times. It will also provide significant traffic relief to other local routes as a result of traffic transferring to the Scheme. The traffic forecasts take into account the effects of changes in travel cost as a result of the Scheme upon demand for travel using a Variable Demand Model (VDM). The VDM process is described in Chapter 5.4 of Appendix C of the Combined Modelling and Appraisal Report; Transport Forecasting Report **[APP-253]**. While the Scheme does not generate (induce) trips, the VDM forecasts a very small transfer of trips from rail to road. The main impact of the Scheme results from drivers changing their destination as the Scheme reduces travel times between the A1 and Caxton Gibbet and also due to drivers using different routes to make their journey. This results in additional kilometres travelled. A comparison of the total vehicle distance with and without the Scheme for each modelled time period is presented in Tables 6-4 and 6-5 of Appendix C Transport Forecasting Report of the Combined Modelling and Appraisal Report **[APP-253]** for 2025 and 2040 respectively. This shows that the increase in vehicle kilometres as a result of the Scheme is very small, ranging between 0.4% to 0.5%.
RR-049b	2) This scheme will negatively impact the environment by: a) encouraging more cars on the road. b) the embodied emissioms created through the materials needed to build the road
Applicant Response	Chapter 14, Climate **[APP-083]** of the Environmental Statement presents an assessment of the construction and operation of the Scheme against the UK Government's current carbon budgets, as required by Paragraph 5.17 of the NPSNN: "*for road project applicants should provide evidence of the carbon impact of the project and an assessment against the Government's carbon budgets".* Paragraph 5.18 of the NPSNN clarifies that *"any increase in carbon emissions is not a reason to refuse development consent, unless the increase in carbon emissions resulting from the proposed scheme are so significant that it would have a material impact on the ability of Government to meet its carbon reduction targets".* The assessment within Chapter 14, Climate **[APP-083]** of the Environmental Statement has identified that the emissions arising as a result of the construction and operation of the Scheme represent less than 0.012% of the total emissions in any of the 3rd, 4th or 5th Carbon Budget periods. Accordingly, the

Reference Number	Comment from Relevant Representation/Applicant Response
	assessment has concluded that the GHG emissions impact of the Scheme would not have a material impact on the UK Government meeting its legally binding carbon reduction targets. Although the 6th carbon budget was not legally binding when the Environmental Statement was written, an additional assessment of the 6th Carbon Budget, which became legally binding during June 2021, has been undertaken. This assessment concluded that the Scheme represents less than 0.024% of the total emissions in the 6th budget period and is also considered not to have a material impact on the UK Government meeting its carbon reductions target. The climate assessment has been undertaken in line with the DMRB LA114 Climate standard, which requires that greenhouse gas (GHG) emissions are calculated for each relevant lifecycle stage including construction (embodied carbon in materials, transportation of materials, waste and workers to site, energy use for construction activities, emissions mobilised from vegetation or soil during construction) and during operation (emissions from road users, maintenance and repair). As stated above, emissions from construction including, embodied carbon in materials, even when combined with road user emissions are not considered to have a material impact. The proposed mitigation measures proposed for the Scheme are also detailed in Chapter 14, Climate **[APP-083]** of the Environmental Statement. During the development of the Scheme the Applicant will continue to review these mitigations and seek further opportunities to minimise carbon emissions as required by DMRB and in line with the net zero target.
RR-049c	3) Due to this widening of the section of the road it will just replace the bottleneck further down the road, causing the traffic jam to be somewhere else.
Applicant Response	The road network including the links and the junctions in the downstream of the Scheme has been identified and assessed using suitable tools and the outputs and findings are provided in the Transport Assessment Annex **[APP-243]**. It has been predicted that most of the junctions in the downstream of the Scheme will benefit from the Scheme, due to re-routing of traffic to a better capacity road. However, there are some potential congestion hotspots identified, which have been assessed and the nature of potential increase in congestion have been outlined. The Applicant will continue to monitor these hotspots post implementation of the Scheme and manage/mitigate the adverse impacts when they evolve in consultation with the local transport and highways authorities.
RR-049d	4) By encouraging more cars on the road it will negatively impact air pollution which kills both people and nature. It is not in line with the UKs national carbon budgets. I hope this extension of the road is not built for the above 4 reasons.

Reference Number	Comment from Relevant Representation/Applicant Response
Applicant Response	Air quality effects, as set out in Chapter 5, Air Quality **[APP-074]** of the Environmental Statement are not considered to be significant. Nitrogen dioxide (NO_2) pollution from roads disperses over short (200m) distances and therefore NO_2 concentrations at sensitive receptors are much more heavily influenced by the location of emissions, than the total emissions generated by the Scheme. Whilst some increases in pollutant concentrations are predicted at individual receptors, where these are greater than imperceptible (i.e. more than 1% of the objective), air quality is good (both with and without the Scheme) with concentrations under the air quality objective values, which are set for the protection of human health. Similarly, some decreases in pollutant concentrations are predicted at receptors, particularly those located along the existing A428. As concentrations of pollutants are predicted to remain under the relevant air quality objective value at these receptors these changes are not considered significant. Additionally, no significant air quality effects have been predicted at any designated habitats with the Scheme in place. In summary, the air quality assessment for the Scheme demonstrates the Scheme will not have the severely negative impacts suggested by the Interested Party. Chapter 14, Climate **[APP-083]** of the Environmental Statement presents an assessment of the Scheme against the UK Government's current carbon budgets, as required by Paragraph 5.17 of the NPSNN: *"for road project applicants should provide evidence of the carbon impact of the project and an assessment against the Government's carbon budgets"*. Paragraph 5.18 of the NPSNN clarifies *that "any increase in carbon emissions is not a reason to refuse development consent, unless the increase in carbon emissions resulting from the proposed scheme are so significant that it would have a material impact on the ability of Government to meet its carbon reduction targets".* The assessment within Chapter 14, Climate **[APP-083]** of the Environmental Statement has identified that the emissions arising as a result of the construction and operation of the Scheme represent less than 0.012% of the total emissions in any of the 3rd, 4th or 5th Carbon Budget periods. Accordingly, the assessment has concluded that the GHG emissions impact of the Scheme would not have a material impact on the UK Government meeting its legally binding carbon reduction targets. Although the 6th Carbon Budget was not legally binding when the Environmental Statement was written, an additional assessment of the 6th Carbon Budget, which became legally binding during June 2021, has been undertaken. This assessment concluded that the Scheme represents less than 0.024% of the total emissions in the 6th budget period and is also considered not have a material impact on the UK Government meeting its carbon reductions target." The proposed mitigation measures proposed for the Scheme are also detailed in Chapter 14, Climate **[APP-083]** of the Environmental Statement. During the development of the Scheme the Applicant will

Reference Number	Comment from Relevant Representation/Applicant Response
	continue to review these mitigations and seek further opportunities to minimise carbon emissions as required by Design Manual for Roads and Bridges (DMRB) and in line with the net zero target.

RR-050 Brown & Co on behalf of JAC Settlement Trust Corporation Limited

Reference Number	Comment from Relevant Representation/Applicant Response
RR-050a	1. Our clients are the owners and [Redacted] of Rectory Farm, Eynesbury an equipped arable unit of approximately 106.56 ha of which 19.3885 ha are affected by the current proposal. 1. The new road will sever our clients farm into parts and, as such, access is an important issue. 1. Our clients are the freeholder owners of plots 5/2f, 5/2k, 6/2k & 6/2c as identified in the Book of Reference to be acquired. 1. As frontage owners to both sides of the Potton Road, their ownership extends to the centre of the highway as recorded within the Book of Reference by reference to being part owners and it is noted that as a result of this road being stopped up the ownership of plot 6/3b will revert to our client.
Applicant Response	The Applicant can confirm that the ownership of plot 6/3b, as shown on Sheet 6 of the Land Plans **[APP-008]**, will revert back to the fronting landowners through the stopping up of the existing Potton Road. In this case, the landowners are Judith Anne Clements and JAC Settlement Trust Corporation Limited.
RR-050b	1. With regard to plot 6/6a, note that the ownership of this plot, as a result of the B1046 diversion will revert to our client. Our client is particularly concerned over ensuring sufficient access to the properties known as Nos. 1 & 2 Rectory Farm Cottages is provided with the entrance to No. 2 being of a particular concern and further details are requested.
Applicant Response	The Applicant can confirm that the ownership of plot 6/6a, as shown on Sheet 6 of the Land Plans **[APP-008]**, will revert back to the fronting landowners through the stopping up of the existing B1046 and Potton Road, in this case, the landowners Judith Anne Clements and JAC Settlement Trust Corporation Limited. The Applicant can confirm that unfettered access is to be provided to No.1 and 2 Rectory Farm Cottages. The Applicant proposes that access to these properties will be via the existing roads that are to be stopped up and turned into private means of access, as detailed on the Streets, Rights of Way and Access Plans **[APP-013]**. Discussions regarding these points have been held at multiple meetings with the Landowner since 2017.
RR-050c	2. In respect of plot 6/2l, we note that a single field entrance has been indicated on the General Arrangement plan and the access to this land must be suitable for farm machinery and equipment there should be adequate turning circles and visibility splays.
Applicant Response	Detailed requirements of accommodation works will be finalised at detailed design by the Principal Contractor and in consultation with the landowner. The detailed design of the access will seek to accommodate the anticipated farm machinery and equipment.

Reference Number	Comment from Relevant Representation/Applicant Response
RR-050d	3. We note that the existing field access to the rear of Nos. 1 & 2 Rectory Farm Cottages as currently exists, has not been provided for within the General Arrangements plan sheet 6, As this is an existing entrance, our client requests that this is reinstated as part of the overall scheme.
Applicant Response	The access to the field plot to the rear of Nos. 1 & 2 Rectory Farm Cottages is retained off the existing Potton Road which is to be stopped up and turned into a private means of access. There is no formal private means of access into this field from the B1046 for which to be replaced.
RR-050e	4. In respect of plot 6/3b, our client has a concern regarding the final road surface and wants to ensure that access to their farm is uninterrupted at all times throughout the scheme. Within plot 6/3b an access gate is to be installed to prevent unauthorised access.
Applicant Response	Detailed requirements of accommodation works will be finalised at detailed design by the Principal Contractor and in consultation with the landowner. The Applicant will seek to maintain access to all properties and roads throughout the construction of the works or provide alternative access arrangements. In some instances, it may be necessary to restrict access for limited periods, however, the Applicant would seek to minimise the number and duration of any such restrictions as far as reasonably practicable. The Principal Contractor will liaise with the affected landowner to ensure that such disruption is minimised.
RR-050f	5. With regard to plot 5/2f, it is noted on the General Arrangement plan that the newly aligned watercourse will be planted with trees on to the eastern boundary and it is currently proposed that a new hedge is planted along the western boundary. It is requested that the proposed hedge line is removed as maintenance will be restricted to this watercourse under the current proposal.
Applicant Response	The planting proposed as part of the landscape strategy is illustrated on the Environmental Masterplan **[APP-091]**, presented on Figure 2.4 of the Environmental Statement. In this location, essential mitigation in the form of functional woodland blocks and hedgerows are proposed to assist in integrating the Scheme into the wider landscape. This integration will be achieved by connecting and where needed reconnecting pieces of habitat severed by the Scheme or isolated within the landscape. As such, given the essential nature and intended purpose of this landscape mitigation within Plot 5/2f, the Applicant is unable to remove or relocate the proposed hedge line as requested in RR-050f. Specific watercourse maintenance access location points will be confirmed with the relevant responsible water authority.

Reference Number	Comment from Relevant Representation/Applicant Response
RR-050g	6. In respect of plot 5/2h identified on the General Arrangement plan [**APP-011**], the area for soil storage encompasses part of the Brook.
Applicant Response	The Applicant can confirm that an area defined for soil storage encompasses part of the Brook within plot 5/2h, as shown on Sheet 5 of the Land Plans **[APP-008]**. Control measures set out within the Soil Handling and Management Plan and the Water Management Plan presented as Annex E and Annex F within the First Iteration EMP **[APP-234]** will be implemented throughout the construction phase of the Scheme to manage possible interactions and construction related impacts on water features and the movement and storage of soils.
RR-050h	7. Our client is concerned to ensure that the new access proposed to serve plot 5/2k as shared with the adjoining landowner is of a sufficient specification to ensure both accesses are suitable for both the machinery and equipment associated with Eynesbury Plant Hire and farm machinery and equipment used by our client and that there should be adequate turning circles and visibility splays for both parties.
Applicant Response	The preliminary design of the access junction has been checked for the vehicle tracking for an articulated HGV entering and exiting the junction is deemed suitable. This will be further reviewed and checked at detailed design.
RR-050i	8. In respect of plot 5/2a, the green temporary possession area extends to the edge of plot 5/2f and this is incorrect. The General Arrangement plan sheet 5 only extends to the watercourse, and it is plot 5/2a needs to be updated to reflect the General Arrangement Plan.
Applicant Response	The hatched area shown on Sheet 5 of the General Arrangement Plans **[APP-011]** represents the proposed area required specifically for soil storage. The Applicant still proposes to take the land between the watercourse and the new dual carriageway in order to construct the Scheme. This includes other temporary storage, laydown areas, access and working space as defined in Schedule 7 of the draft DCO **[APP-025]**.
RR-050j	9. Our client notes that there is currently no future access provision to the flood storage area identified within plot 5/2f. Our client has concerns regarding the provisions of appropriate fencing alongside the highway boundaries and concerns over the effective maintenance of the draining schemes.
Applicant Response	The Applicant proposes that maintenance access to the flood compensation area will be from the new dual carriageway.

Reference Number	Comment from Relevant Representation/Applicant Response
	Detailed requirements of accommodation works will be finalised at detailed design by the Principal Contractor and in consultation with the landowner. The flood compensation area will be maintained in accordance with Highways England's maintenance practices.
RR-050k	10. Our client is concerned about ensuring suitable and adequate land drainage schemes are installed at early stage.
Applicant Response	During detailed design the Applicant will consider the individual needs of each land parcel and the impacts on the existing land drainage systems. Pre-earthworks ditches will be installed prior to the start of the major construction and the existing land drainage will be connected to these and any proposed new drainage ditches. As part of the Proposed Development, the Applicant has proposed drainage systems such as overland ditches to capture land drainage severed by the Scheme to ensure no worse than the existing land drainage.
RR-050l	11. Our clients overriding concern is the impact of the overall scheme on Rectory Farm and the 4 dwellings associated with the farm and seek to minimise the impact of the scheme on their property.
Applicant Response	The Applicant has undertaken a comprehensive environmental assessment to identify and where possible and necessary mitigate the construction and operational effects of the Scheme. The First Iteration EMP **[APP-234]** sets out the control measures to minimise the impacts of construction related activities on the surrounding environment and identified receptors. During the operational phase where significant effects arise, each topic assessment **[APP-074** to **APP-084]** presented within the Environmental Statement details out the mitigation and subsequent monitoring required reduce these effects.
RR-050m	12. Our clients have noted that the utility diversions and the proposals to divert existing water mains and our anxious to ensure that water supply and pressure are maintained at all times.
Applicant Response	The Applicant will seek to maintain all utility supplies to the affected properties throughout the construction of the works. In some instances, it may be necessary to restrict the supply for limited periods, however, the Applicant would seek to minimise the duration of any such restrictions as far as reasonably practicable. The Principal Contractor will liaise with the affected landowner to ensure that such disruption is minimised.

RR-051 Jack Pike

Reference Number	Comment from Relevant Representation/Applicant Response
RR-051	**Jack Pike**
RR-051a	The A428 will be on an intrusive embankment from visual an noise intrusion to [Redacted] and Chawston Lane
Applicant Response	The Applicant proposes a flyover of the new dual carriageway at Black Cat junction to provide a free flow continuous route towards St. Neots and Cambourne. The flyover is required to be on an embankment to span over the new Black Cat junction circulatory, the A1 (situated below existing ground level) and the River Great Ouse and its associated flood plains. The effects of the Scheme on views, including residents of Chawston Lane, have been assessed in Chapter 7, Landscape and Visual Effects **[APP-076]** of the Environmental Statement. This assessment has identified mitigation to minimise landscape and visual effects. Where possible, planting is proposed on embankments of this section of the Scheme within engineering and safety constraints. Landscape mitigation measures are presented on the Environmental Masterplan **[APP-091]**, Figure 2.4 of the Environmental Statement. Chapter 11, Noise and Vibration **[APP-080]** of the Environmental Statement comprises an assessment of the likely noise and vibration effects of the Scheme, which includes Chawston Lane. The assessment has identified that properties close to the A1 north of the new Black Cat junction, including those on Chawston Lane, are likely to experience a decrease in traffic noise as a result of the both a predicted reduction in traffic flow on the A1 and its realignment below existing ground level once the Scheme is open to traffic. Low noise surfacing materials are also proposed throughout the Scheme, as presented on the Environmental Masterplan **[APP-091]**, Figure 2.4 of the Environmental Statement.

RR-052 Jacqueline Wieczorek

Reference Number	Comment from Relevant Representation/Applicant Response
RR-052a	I am concerned that the remaining old A428 road, having become a local road from St Neots to Caxton Gibbet (and vice versa) decants drivers onto the redesigned new roundabout at Caxton Gibbet, and from there we have to join the dual carriageway with all the non-local fast traffic and juggernauts, before we can leave at the Cambourne junction. Mixing slower (and possibly more timid) vehicles is not in my opinion a sensible idea. On return from Cambridge, we would have to leave the local road at Cambourne and attempt to join the A428 dual carriageway as far as Caxton Gibbet, negotiating the roundabout with the lorries and faster cars, before getting back to the new local road. The sensible link to avoid all this is nearly in existence- however it's been designated for horses and bicycles only. Please see what can be done to avoid this design flaw, even though it's not quite in the 'project envelope'. Thank you.
Applicant Response	The existing A428 between St Neots and Caxton will be redesignated as a local road for local need. The provision of a local road parallel to the existing A428 between Caxton and Cambourne is outside of the scope of this Scheme. For those users who do not feel comfortable joining the new dual carriageway at Caxton Gibbet junction, the route to Cambridge via local roads would be through Cambourne before heading east on St. Neots Road. This route is similar to the existing situation.

RR-053 James Tebboth

Reference Number	Comment from Relevant Representation/Applicant Response
RR-053a	Opportunity to Deliver the A428 Improvement and East West Rail Cost-Effectively I would like Highways England to consider how the delivery of this road scheme can be integrated with the delivery of the new railway line between St Neots and Cambridge. This could take several forms: * Where the routes of the two schemes run close to parallel * Where one route cross the other route * Where works (eg, earth works, culvert construction, rearrangement of utilities, footpath diversion, access routes) are in close vicinity Then there may be opportunities to integrate or at least coordinate the works. This will have several benefits: * More cost-effective - saving the taxpayer money overall when considering the schemes jointly - only one set of earth movements, one set of utility adjustment, etc. * Less disruption - having one combined set of works will be less disruptive than two sets of works over two separate periods * Less wasted work / rework - for instance if not integrated, it may be that a bridge needs building over the new road at a later to date, or some re-routing/adjustment is required, then this would caused rework which could be avoided if the two projects were considered together up front. I recognise that the road scheme is currently more advanced in planning than the new railway. At the very least, passive provision for the railway to be built afterwards should be made when building the road - eg, where a bridge is required, or the alignment of one needs to take the other into account. But for the reasons stated above, I think that the benefits of more closely integrating the delivery of the two schemes together will be significant. It may even make sense for the final choice of the route of the railway to take into account the benefit of being delivered alongside the road improvement. I urge Highways England and East West rail to collaborate closely so that as much benefit as possible can be realised by delivering the schemes together.
Applicant Response	The East West Rail Company completed its non-statutory route options consultation for the East West Rail project in June 2021, and a Preferred Route Announcement is not anticipated until 2022. Therefore, since the East West Rail Company has not determined the route and locations of its proposed stations for its project, it is too early to understand the potential interactions between this and the A428 Black Cat to Caxton Gibbet improvements scheme. However, East West Rail and Highways England are collaborating on the preparation of a draft Statement of Common Ground for the A428 Scheme Examination.

RR-054 Janet Good

Reference Number	Comment from Relevant Representation/Applicant Response
RR-054a	I have 2 teenage granddaughters who need safe places to ride and this is sadly lacking in our area.They do not ride over the bridge crossing the 421 as I believe it to be unsafe for riders. They would cerainly use it if it was made condusive to equestrians. Any improvements showing care for riders would be appreciated as safety is of primary importance.
Applicant Response	In the delivery of the Scheme, the Applicant is required to re-provide NMU routes that are severed or disrupted as a result of the Scheme. The Roxton Road bridge has been provided to maintain connectivity across the Scheme and has an improved cross section compared to the existing bridge, as illustrated on Sheet 1 of the Engineering Sections (Part 3 – Structures General Arrangements) **[APP-019]**. This shows that the verge on the carriageway side of the bridge is 2.5m from the 1m high parapet railing. This is a standard (DMRB CD127 Cross sections and headrooms) minimum offset and parapet height (DMRB TD19/06 Requirements for road restraint systems) for bridges of this nature on roads for all users. On the footway/cycleway side, the carriageway is offset by 5m from the parapet railing. The parapet railing on this side will be a minimum of 1.4m high for safety reasons as cyclists may be immediately adjacent to the railing. Correspondence received during the consultation suggested that Roxton Road 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 that counts were undertaken no horse riders were observed using the existing bridge. It should also be noted that there are no existing bridleways in the vicinity of this part of the Scheme. The Applicant acknowledges the suggestion that there would be greater interest in using this route if it were considered safer. The Applicant considers that the improved cross section on the bridge provides a safe and adequate route for all users. Should Bedford Borough Council as the local highway authority wish to extend the bridleway network within the area and provide an off-carriageway route across the bridge, the proposed Scheme does not preclude any such extensions or alterations in the future. More information on the results of the walkers, cyclists and horse rider counts can be found within Chapter 12, Population and Human Health **[APP-081]** of the Environmental Statement which describes the assessment on Population and Health.

RR-055 Joanne Dagley Cleworth

Reference Number	Comment from Relevant Representation/Applicant Response
RR-055a	I have two horses, and currently don't use the bridge over the A421 out towards roxton, but i would like to, Please can consideration be given to making this horse safe in the new development
Applicant Response	In the delivery of the Scheme, the Applicant is required to re-provide NMU routes that are severed or disrupted as a result of the Scheme. Whilst wider interventions may sometimes be appropriate to address community severance resulting from the existing strategic road network, it is beyond the proper scope of the Scheme to address all existing issues faced by existing users of the highways network. The Roxton Road bridge has been provided to maintain connectivity across the Scheme and has an improved cross section compared to the existing bridge, as illustrated on Sheet 1 of the Engineering Sections (Part 3 – Structures General Arrangements) **[APP-019]**. This shows that the verge on the carriageway side of the bridge is 2.5m from the 1m high parapet railing. This is a standard (DMRB CD127 Cross sections and headrooms) minimum offset and parapet height (DMRB TD19/06 Requirements for road restraint systems) for bridges of this nature on roads for all users. On the footway/cycleway side, the carriageway is offset by 5m from the parapet railing. The parapet railing on this side will be a minimum of 1.4m high for safety reasons as cyclists may be immediately adjacent to the railing. Correspondence received during the consultation suggested that Roxton Road 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 that counts were undertaken no horse riders were observed using the existing bridge. It should also be noted that there are no existing bridleways in the vicinity of this part of the Scheme. The Applicant considers that the improved cross section on the bridge provides a safe and adequate route for all users. Should Bedford Borough Council as the local highway authority wish to extend the bridleway network within the area and provide an off-carriageway route across the bridge, the proposed Scheme does not preclude any such extensions or alterations in the future. More information on the results of the walkers, cyclists and horse rider counts can be found within Chapter 12, Population and Human Health **[APP-081]** of the Environmental Statement which describes the assessment on Population and Health.

RR-056 Bletsoes on behalf of John Lammie

Reference Number	Comment from Relevant Representation/Applicant Response
RR-056a	We represent the interests of John Lammie in his capacity as tenant under an Agricultural Holdings Act 1986 tenancy and partner of the farming partnership, J & J W Lammie. Mr Lammie occupies various parcels of land affected by the Scheme, some of which lie within the Order Limits for permanent and temporary land acquisition. We are instructed to make outline representations on behalf of our client. Representations are made without prejudice to making further objections/representations at a later stage for different reasons, or to amplify these representations. We have reviewed the plans included within the Developer's application insofar as they relate to our client and these representations are based upon the information contained therein. The aforementioned plans do not provide sufficient detail in order to ascertain the full impact on my client's leasehold interest. We would therefore like to formally record our principal concerns, based upon the information that is available. We do not wish to be put in a position whereby when it comes to the 'detailed design stage' we are told that design issues raised should have been dealt with earlier on in the scheme and it is too late. The Developer cannot say that they will deal with matters in dispute at a later stage. These issues should either be dealt with during the application process or determined by the Planning Inspectorate. We submitted representations to the supplementary consultation held in July 2020. To date, we have not received a formal response from the Developer. Our client wishes to make clear his principal concerns: Provision of Accesses: At present, the affected land benefits from numerous access points along the Barford Road. My client is prepared to stop-up some of those access points in return for the provision of 6 purpose-built accesses (3 on either side of the Barford Road) in order to make the Barford Road safer and generally mitigate the detrimentally effect of the Scheme on my client's leasehold interest. From the information available, it appears that provision for 4 purpose-built accesses will be provided; two either side of the Barford Road. In addition to those already provided, our client requires additional accesses located opposite each other to provide access into field parcels Parcel ID: TL1654 4959 & TL1654 6725. We are liaising directly with the Developer concerning the provision of accesses but wish to reserve our position within this representation.

Reference Number	Comment from Relevant Representation/Applicant Response
Applicant Response	The Applicant has provided responses to the representation at Supplementary Consultation through the Consultation Report submitted as part of the Application. The Applicant has actively engaged with Mr Lammie to understand the impacts of the Scheme proposals on his land holdings. The provision of the four proposed field accesses off the Barford Road side road diversion are required as replacements for existing accesses that are directly affected by the Scheme. The locations of these four accesses has been discussed and agreed with Mr Lammie. The Applicant is aware of two additional accesses that have been requested by Mr Lammie into field parcels that are located to the south of the Scheme off Barford Road. These fields and existing accesses are located outside of the Scheme extents and are considered to be unaffected by the proposed development. The Applicant is not willing to agree to providing the additional accesses beyond those four accesses that are affected by the Scheme.
RR-056b	Design of Accesses: During previous consultation with the Developer, we requested detailed design information concerning the proposed accesses to assess whether the new accesses are as equally commodious as the existing accesses. To date, this information has not been forthcoming. Consequently, we still have concerns regarding the design of the accesses, principally relating to widths and gradient. We require confirmation that the accesses will be at a similar level to the finished road surface to avoid steep gradients that are dangerous for slow moving agricultural traffic entering and exiting the field parcels; and require confirmation the accesses will be of a sufficient width to allow safe access for agricultural traffic with restricted maneuverability. For the avoidance of doubt, we wish to make clear that the new accesses should be at least 30ft wide and gated to provide secure commodious access.
Applicant Response	Detailed requirements of accommodation works will be finalised at detailed design by the Principal Contractor and in consultation with the landowner.
RR-056c	Safety: During previous consultation with the Developer, we raised concerns concerning the safety of the Barford Road after alterations have been made because of the Scheme. In summary, the principal concern relates to the proposed alterations to straighten the alignment of Barford Rad and flatten its contours, which we believe will allow motorists to travel faster thus increasing the risk of accidents, especially between road users and slow-moving agricultural equipment entering and exiting fields. We requested a reduction in the speed limit from 60mph, perhaps to 40 or 50 mph, and traffic calming measures, such as on-road markings and road signs highlighting the presence of agriculture traffic. Based on the information available, we note

Reference Number	Comment from Relevant Representation/Applicant Response
	that our request for a reduced speed limit has not been implemented. Furthermore, there is no information available concerning traffic calming measures.
Applicant Response	The design of the realigned Barford Road complies with the governing design standards, and is an improvement on the existing route. This preliminary design has been developed in consultation with Central Bedfordshire Council and incorporates the same carriageway width to discourage speeding. This can be viewed on the General Arrangement Plans **[APP-011]**. The proposals will be developed further at detailed design with a Stage 2 - Road Safety Audit undertaken; and will be agreed with the local highway authority (Central Bedfordshire Council) to ensure that adequate safety measures are put in place. The introduction of a lower speed limit will not be easily enforceable and current existing speeds are likely to be maintained through this section. The speed limit on the section of Barford Road which is altered by the Scheme will be 60mph as agreed by the local highway authority – please see the Speed Limit Plans **[APP-015]**.
RR-056d	Parking Provision: During previous consultation, we highlighted the potential need for off road parking for a local angling club, who enjoy short term rights to fish the River Great Ouse. Whilst this request has been acknowledged by the Developer, the information available does not make provision for such access. At present, the anglers park on the side of the Barford Road and walk to the river; this has little impact on my client's use of the land. If access and parking is provided for this purpose, we request that any such provision is accommodated on land that is already identified as being permanently required to reduce the impact on client.
Applicant Response	The Applicant is not aware of an existing access track or secure parking area close to the river that is affected by the Scheme. The Applicant does not preclude the anglers from accessing the river in a similar manner to their existing situation. The ability to park within the highway will be maintained as per the existing arrangement along Barford Road. The Applicant is in discussions with the angling society to understand the impact of the Proposed Development on their current rights. The Applicant believes that currently four rights of access exist to allow anglers to access the river from the Barford Road. The Scheme impacts one of these accesses.

Reference Number	Comment from Relevant Representation/Applicant Response
RR-056e	Accommodation Works: We have on numerous occasions reiterated the need for accommodation works. We require further details on the proposed accommodation works to ascertain the full impact on my client's leasehold interest. As a minimum, our client requires commodious access, post scheme land drainage, and fencing and hedge of boundaries to mitigate the detrimental effect of this scheme.
Applicant Response	The Applicant is committed to continuing engagement with this landowner on matters relating to accommodation works including drainage and boundary treatment during and post construction. The embedded mitigation proposed as part of the Scheme, including boundary treatments, is shown on the Environmental Masterplan **[APP-091],** Figure 2.4 of the Environmental Statement. Detailed requirements of accommodation works will be finalised at detailed design by the Principal Contractor and in consultation with the landowner.

RR-057 John Wood

Reference Number	Comment from Relevant Representation/Applicant Response
RR-057a	The proposed route is near my house and I would like to see what potential disruption there will be. I approve of the road though
Applicant Response	The Applicant requests further details of the location of the house.

RR-058 Jonathan Baker

Reference Number	Comment from Relevant Representation/Applicant Response
RR-058a	I fully support the proposed scheme, especially Black Cat Roundabout.. I was surprised with the A1 Black Cat junction the nearby Tempsford bends were not straightened out due to the close proximity of the 3 level junction. The situation on the A1 will be dangerous with motorists suddenly have to slow down to negotiate the the bend on the northbound carriageway. Generally the scheme has been designed well and will cut congestion.
Applicant Response	The Applicant welcomes the supportive comment in relation to the Scheme. It should be noted that the Tempsford Bends are outside the scope of the Scheme.

RR-059 Josh Welby

Reference Number	Comment from Relevant Representation/Applicant Response
RR-059a	Yes, I agree with the whole scheme When I was living in Wyboston, Bedford next to the Black Cat Roundabout, there were many accidents on that Roundabout at one time one lane was closed, the fast lane towards the Roundabout from St Neots because it was full of Fire Engines attending an accident there Anything to improve the Road is most welcome, it is a very fast Road that links St Neots with Bedford Town Centre My Previous address was [Redacted] Thank You
Applicant Response	The Applicant welcomes the supportive comment in relation to the Scheme.

RR-060 Brown & Co on behalf of Judith Anne Clements

Reference Number	Comment from Relevant Representation/Applicant Response
RR-060a	1. Our clients are the owners and [Redacted] of Rectory Farm, Eynesbury an equipped arable unit of approximately 106.56 ha of which 19.3885 ha are affected by the current proposal. 1. The new road will sever our clients farm into parts and, as such, access is an important issue. 1. Our clients are the freeholder owners of plots 5/2f, 5/2k, 6/2k & 6/2c as identified in the Book of Reference to be acquired. 1. As frontage owners to both sides of the Potton Road, their ownership extends to the centre of the highway as recorded within the Book of Reference by reference to being part owners and it is noted that as a result of this road being stopped up the ownership of plot 6/3b will revert to our client.
Applicant Response	The Applicant can confirm that the ownership of plot 6/3b, as shown on Sheet 6 of the Land Plans **[APP-008]**, will revert back to the fronting landowners through the stopping up of the existing Potton Road. In this case, the landowners are Judith Anne Clements and JAC Settlement Trust Corporation Limited.
RR-060b	1. With regard to plot 6/6a, note that the ownership of this plot, as a result of the B1046 diversion will revert to our client. Our client is particularly concerned over ensuring sufficient access to the properties known as Nos. 1 & 2 Rectory Farm Cottages is provided with the entrance to No. 2 being of a particular concern and further details are requested.
Applicant Response	The Applicant can confirm that the ownership of plot 6/6a, as shown on Sheet 6 of the Land Plans **[APP-008]**, will revert back to the fronting landowners through the stopping up of the existing B1046 and Potton Road, in this case, the landowners Judith Anne Clements and JAC Settlement Trust Corporation Limited. The Applicant can confirm that unfettered access is to be provided to No.1 and 2 Rectory Farm Cottages. The Applicant proposes that access to these properties will be via the existing roads that are to be stopped up and turned into private means of access, as detailed on the Streets, Rights of Way and Access Plans **[APP-013]**. Discussions regarding these points have been held at multiple meetings with the Landowner since 2017.
RR-060c	2. In respect of plot 6/2l, we note that a single field entrance has been indicated on the General Arrangement plan and the access to this land must be suitable for farm machinery and equipment there should be adequate turning circles and visibility splays.

Reference Number	Comment from Relevant Representation/Applicant Response
Applicant Response	Detailed requirements of accommodation works will be finalised at detailed design by the Principal Contractor and in consultation with the landowner. The detailed design of the access will seek to accommodate the anticipated farm machinery and equipment.
RR-060d	3. We note that the existing field access to the rear of Nos. 1 & 2 Rectory Farm Cottages as currently exists, has not been provided for within the General Arrangements plan sheet 6, As this is an existing entrance, our client requests that this is reinstated as part of the overall scheme.
Applicant Response	The access to the field plot to the rear of Nos. 1 & 2 Rectory Farm Cottages is retained off the existing Potton Road which is to be stopped up and turned into a private means of access. There is no formal private means of access into this field from the B1046 for which to be replaced.
RR-060e	4. In respect of plot 6/3b, our client has a concern regarding the final road surface and wants to ensure that access to their farm is uninterrupted at all times throughout the scheme. Within plot 6/3b an access gate is to be installed to prevent unauthorised access.
Applicant Response	Detailed requirements of accommodation works will be finalised at detailed design by the Principal Contractor and in consultation with the landowner. The Applicant will seek to maintain access to all properties and roads throughout the construction of the works or provide alternative access arrangements. In some instances, it may be necessary to restrict access for limited periods, however, the Applicant would seek to minimise the number and duration of any such restrictions as far as reasonably practicable. The Principal Contractor will liaise with the affected landowner to ensure that such disruption is minimised.
RR-060f	5. With regard to plot 5/2f, it is noted on the General Arrangement plan that the newly aligned watercourse will be planted with trees on to the eastern boundary and it is currently proposed that a new hedge is planted along the western boundary. It is requested that the proposed hedge line is removed as maintenance will be restricted to this watercourse under the current proposal.

Reference Number	Comment from Relevant Representation/Applicant Response
Applicant Response	The planting proposed as part of the landscape strategy is illustrated on the Environmental Masterplan **[APP-091]**, presented on Figure 2.4 of the Environmental Statement. In this location, essential mitigation in the form of functional woodland blocks and hedgerows are proposed to assist in integrating the Scheme into the wider landscape. This integration will be achieved by connecting and where needed reconnecting pieces of habitat severed by the Scheme or isolated within the landscape. As such, given the essential nature and intended purpose of this landscape mitigation within Plot 5/2f, the Applicant is unable to remove or relocate the proposed hedge line as requested in RR-060f. Specific watercourse maintenance access location points will be confirmed with the relevant responsible water authority.
RR-060g	6. In respect of plot 5/2h identified on the General Arrangement plan, the area for soil storage encompasses part of the Brook.
Applicant Response	The Applicant can confirm that an area defined for soil storage encompasses part of the Brook within plot 5/2h, as shown on Sheet 5 of the Land Plans **[APP-008]**. Control measures set out within the Soil Handling and Management Plan and the Water Management Plan presented as Annex E and Annex F within the First Iteration EMP **[APP-234]** will be implemented throughout the construction phase of the Scheme to manage possible interactions and construction related impacts on water features and the movement and storage of soils.
RR-060h	7. Our client is concerned to ensure that the new access proposed to serve plot 5/2k as shared with the adjoining landowner is of a sufficient specification to ensure both accesses are suitable for both the machinery and equipment associated with Eynesbury Plant Hire and farm machinery and equipment used by our client and that there should be adequate turning circles and visibility splays for both parties.
Applicant Response	The preliminary design of the access junction has been checked for the vehicle tracking for an articulated HGV entering and exiting the junction is deemed suitable. This will be further reviewed and checked at detailed design.
RR-060i	8. In respect of plot 5/2a, the green temporary possession area extends to the edge of plot 5/2f and this is incorrect. The General Arrangement plan sheet 5 only extends to the watercourse, and it is plot 5/2a needs to be updated to reflect the General Arrangement Plan.

Reference Number	Comment from Relevant Representation/Applicant Response
Applicant Response	The hatched area shown on Sheet 5 of the General Arrangement Plans **[APP-011]** represents the proposed area required specifically for soil storage. The Applicant still proposes to take the land between the watercourse and the new dual carriageway in order to construct the Scheme. This includes other temporary storage, laydown areas, access and working space as defined in Schedule 7 of the draft DCO **[APP-025]**.
RR-060j	9. Our client notes that there is currently no future access provision to the flood storage area identified within plot 5/2f. Our client has concerns regarding the provisions of appropriate fencing alongside the highway boundaries and concerns over the effective maintenance of the draining schemes.
Applicant Response	The Applicant proposes that maintenance access to the flood compensation area will be from the new dual carriageway. Detailed requirements of accommodation works, including boundary treatments, will be finalised at detailed design by the Principal Contractor and in consultation with the landowner. The flood compensation area will be maintained in accordance with Highways England's maintenance practices.
RR-060k	10. Our client is concerned about ensuring suitable and adequate land drainage schemes are installed at early stage.
Applicant Response	During detailed design the Applicant will consider the individual needs of each land parcel and the impacts on the existing land drainage systems. Pre-earthworks ditches will be installed prior to the start of the major construction and the existing land drainage will be connected to these and any proposed new drainage ditches. As part of the Proposed Development, the Applicant has proposed drainage systems such as overland ditches to capture land drainage severed by the Scheme to ensure no worse than existing land drainage.
RR-060l	11. Our clients overriding concern is the impact of the overall scheme on Rectory Farm and the 4 dwellings associated with the farm and seek to minimise the impact of the scheme on their property.
Applicant Response	The Applicant has undertaken a comprehensive environmental assessment to identify and where possible and necessary mitigate the construction and operational effects of the Scheme. The First Iteration EMP

Reference Number	Comment from Relevant Representation/Applicant Response
	[APP-234] sets out the control measures to minimise the impacts of construction related activities on the surrounding environment and identified receptors. During the operational phase where significant effects arise, each topic assessment **[APP-074** to **APP-084]** presented within the Environmental Statement details out the mitigation and subsequent monitoring required reduce these effects.
RR-060m	12. Our clients have noted that the utility diversions and the proposals to divert existing water mains and our anxious to ensure that water supply and pressure are maintained at all times.
Applicant Response	The Applicant will seek to maintain all utility supplies to the affected properties throughout the construction of the works. In some instances, it may be necessary to restrict the supply for limited periods, however, the Applicant would seek to minimise the duration of any such restrictions as far as reasonably practicable. The Principal Contractor will liaise with the affected landowner to ensure that such disruption is minimised.

RR-061 Brown & Co on behalf of Judith Penelope Glossop Bennett Gape Pearson

Reference Number	Comment from Relevant Representation/Applicant Response
RR-061a	This representation is made on behalf of Mrs JPGBG Tucker as owner and [Redacted] of the land identified as plots 14/8a, 14/8b, 14/8c, 14/8d, 14/8e and 14/8f. My client is concerned regarding the electrical diversion on their land as this is the supply for Pastures Farmhouse and the agricultural buildings. My client wants to ensure that an adequate supply is put in place for the dwellings and buildings following the scheme and diversion.
Applicant Response	The Applicant proposes to divert the existing overhead power line to the farm where it is impacted by the Scheme. There is no intention to change the existing power supply.
RR-061b	My client has also agreed with Highways England that they will be contacted during these works to ensure that appropriate services can also be connected to their retained farm buildings.
Applicant Response	The Applicant will seek to maintain the electricity power supply to the farm throughout the construction of the works. It may be necessary to restrict the supply for limited periods, however, the Applicant would seek to minimise the duration of any such restrictions as far as reasonably practicable. The Principal Contractor will establish a Community Relations Manager (as set out in the Project team roles and responsibilities of the First Iteration Environmental Management Plan (EMP) [**APP-234**] for the Scheme) for the duration of the construction phase to liaise with affected landowner(s) to minimise disruption. Smaller works such as these have not yet been discussed with the Statutory undertaker, however Highways England has committed to engaging with the landholder at the appropriate time. Typically, Highways England will reinstate connection on a like for like basis unless otherwise agreed.
RR-061c	My client understands from the plans submitted for the Development Consent order that a new roundabout access is to be included as the Caxton Gibbet West roundabout and my clients request further details on the width and type of access to be created here.
Applicant Response	The Applicant proposes a minimum 6m wide access off the Caxton Gibbet junction south-west roundabout. Detailed requirements of accommodation works will be finalised at detailed design by the Principal Contractor and in consultation with the landowner.

Reference Number	Comment from Relevant Representation/Applicant Response
RR-061d	It is also noted that the cycle lane included from Caxton Gibbet running south is not linking to any of the proposed paths included within the Cambourne development and my client would ask that the scheme revisit the proposed cycle path to ensure it links appropriately with local cycle networks.
Applicant Response	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. The Applicant has proposed provision of a shared footway/cycleway through Caxton Gibbet junction such that cyclist who are using the carriageway do not have to negotiate the roundabouts, but have a safer separate provision. Wider interventions to the Cambourne development are outside of the scope of the Scheme and are the responsibility of the local highway authority.
RR-061e	My client is concerned regarding land drainage on the fields affected by the scheme. My client seeks confirmation that drainage surveys will be undertaken prior to entry to ensure that land drainage can be put in place prior to any damage being caused.
Applicant Response	Land drainage and over land drainage has been is considered as part of the Scheme and will be refined further as part of the detailed design. During detailed design the Applicant will consider the individual needs of each land parcel including land drainage where this is appropriate. Pre-earthworks ditches will be installed prior to the start of the major construction. The Applicant will obtain copies of any land drain plans, to identify where connections to temporary and/or permanent drainage channels or watercourses will be made. In the absence of plans, the Principal Contractor will connect those land drains which become evident as new drainage or ditch is installed.
RR-061f	My client practices Regenerative Agriculture and has invested considerable time and money into creating high quality, biologically healthy, well structured soil. My client seeks confirmation that appropriate soil surveys and consideration will be given to this on the temporary land take to ensure they are returned to them in the same condition following completion of the scheme.
Applicant Response	Section 9.4 within Chapter 9, Geology and Soils **[APP-078]** of the Environmental Statement explains that soils sampling to inform the geology and soils assessment were planned to be carried out in 2020, however, due to the Covid-19 pandemic and associated local lockdown restrictions, these were unable to be undertaken. The Applicant has committed to undertake this sampling in 2021 subject to the lifting of

Reference Number	Comment from Relevant Representation/Applicant Response
	lockdowns. Following the completion of the fieldwork and the analysis of findings, a report will be prepared by the Applicant and submitted to the Examination on or before Deadline 6. The Applicant is unable to provide the assurances being sought by the Interested Party (IP) requesting that soils will be returned in the same condition following completion of the Scheme. The reinstatement of topsoils and subsoils on land temporarily acquired to construct the Scheme will be managed in accordance with the control measures outlined in Annex E Soil Handling and Management Plan located within the First Iteration EMP **[APP-234]**. These mitigation and control measures aim to reduce disturbance and movement of soils to a minimum; however, segregation of individual landowner soils to ensure condition is the same to that prior to the Scheme being commenced is not practicable on a Scheme of this nature and size. Notwithstanding this, the Principal Contractor will consult with the Interested Party to identify possible interventions to retain soil condition.
RR-061g	My client also seeks confirmation of the boundary treatments along the route to ensure the security of his property both during construction and following completion.
Applicant Response	The embedded mitigation proposed as part of the Scheme, including boundary treatments, is shown on the Environmental Masterplan **[APP-091]**, Figure 2.4 of the Environmental Statement. Detailed requirements of accommodation works will be finalised at detailed design by the Principal Contractor and in consultation with the landowner.
RR-061h	My client will require access to all land at all times during construction of the project and seeks confirmation that this will be available and details on the proposed method of works to ensure that access is not interrupted. Accordingly our client will represent that the DCO should be amended to reflect the matters set out above.
Applicant Response	The Applicant will seek to maintain access to all properties and roads throughout the construction of the works or provide alternative access arrangements. In some instances, it may be necessary to restrict access for limited periods, however, the Applicant would seek look to minimise the number and duration of any such restrictions as far as reasonably practicable. The Principal Contractor will liaise with the affected landowner to ensure that such disruption is minimised. The Applicant will seek to record all matters discussed with the Interested Party, including details of any agreements reached, within a Position Statement instead of inclusion in the Development Consent Order.

RR-062 Bletsoes on behalf of Lanesons Ltd

Reference Number	Comment from Relevant Representation/Applicant Response
RR-062a	We are instructed to act on behalf of Lanesons Limited of [redacted] who as tenant under an Agricultural Holdings Act 1986 tenancy of [redacted] are affected by the scheme with plots 9/6a-e. The representations are made without prejudice to making further objections/representations for different reasons, or in order to amplify these representations. We submitted representations to the supplementary consultation held in July 2020. Following the representations, we held an online meeting with Highways England and their consultants on 14th August 2020, during which Highways England undertook to provide various information and details and to respond back with comments in respect of the representations. Despite numerous requests for the information to be provided, Highways England has not provided any further feedback or detail.
Applicant Response	The Applicant emailed a response on 16 July 2021 to the queries raised referring to drawings and links to the Planning Inspectorate website for documents. The questions relating to lighting, access, utilities and accommodation works could not be answered at this time as they will form part of the detailed design by the Principal Contractor. The Applicant sent an email on 11 August 2021 to the agent seeking to arrange a meeting to discuss these outstanding issues.
RR-062b	The proposed scheme will have a significant impact upon [redacted], severing [redacted] from the rest of the farm. The boundary of the road runs adjacent to the cottages with increased noise and visual intrusion from the proposed road and junction. The cottages need protecting from the noise and visual intrusion from mitigation works such as double glazing, bunding, landscaping, etc. We have sought greater detail to understand the impact of the road of the cottages and proposals for mitigation but this has not been provided.
Applicant Response	Chapter 7, Landscape and Visual Effects **[APP-076]** of the Environmental Statement presents the assessment of the likely effects of the Scheme on landscape character and the visual environment. This assessment has informed the identification and development of landscape mitigation measures, which are proposed to avoid and minimise significant adverse effects, including those on the views of residents **[APP-091]**. This includes blocks of tree and shrub planting north and west of the properties to assist in screening

Reference Number	Comment from Relevant Representation/Applicant Response
	views of the Cambridge Road junction. Woodland is proposed to the east of the property, helping to screen views along the Scheme north of Wintringham. Chapter 11, Noise and Vibration **[APP-080]** of the Environmental Statement comprises an assessment of the likely noise and vibration effects of the Scheme, which includes the cottages. The assessment has identified that these cottages are likely to experience a decrease in traffic noise of approximately 14dB(A) $L_{10,18hr}$ to the front of their properties, as a result of the predicted reduction in traffic along Cambridge Road once the Scheme is open to traffic. However, the Scheme introduces a new source of noise to the rear of these properties. As a result, an increase of approximately 8dB(A) $L_{10,18hr}$ is predicted at the rear facades and therefore a likely significant adverse noise effect is identified. Although a barrier would provide some traffic noise reduction to the rear of these two cottages, the likely significant adverse effect is predicted to remain. The predicted day time traffic noise levels from the Scheme on the rear facades are around 62 dB(A) $L_{10,18hr}$ once the Scheme is opened, which is below the day-time Significant Observed Adverse Effect Level (SOAEL) of 68 dB(A) $L_{10, 18hr}$. However, the predicted reduction in traffic on Cambridge Road once the Scheme is open to traffic results in traffic noise levels at the front facades decreasing to below the day-time SOAEL. On the basis of the above, the installation of a noise barrier alongside the new dual carriageway at this small number of properties has not been taken forward as it is not considered to be a sustainable noise mitigation measure.
RR-062c	The access to [redacted] will be varied via the realigned A428. The access to the cottages is required to be available constantly throughout construction and subsequent to the road being built, for both private vehicles, delivery vehicles and for service vehicles. We have sought details of the design to ensure that the cottages can be serviced by the tanker emptying the private drainage, the dustcart, oil deliveries etc. Highways England has not provided this information.
Applicant Response	Wintringham cottages are located within an area where temporary traffic management measures will be implemented to facilitate the construction of the new junction at Cambridge Road. The access to the cottages will change to a new permanent arrangement as part of the new junction layout. During the construction of the new junction, access to the cottages will be maintained via either a temporary or permanent arrangement suitable for use by private, service and delivery vehicles.

Reference Number	Comment from Relevant Representation/Applicant Response
	There may be short periods where to enable the route to the cottages to be switched to a new configuration access will be restricted or curtailed while the switch is completed. During the construction phase the Principal Contractor will liaise with the affected parties including the landowner and tenants to ensure that these works are completed at times that minimise disruption and inconvenience and ensure essential services such as tankers, dustcarts and oil deliveries can be maintained.
RR-062d	[redacted] are connected to a private sewage system which includes a soakaway connected to a ditch on land being acquired. Provision needs to be made for the continuation of the sewage system and appropriate arrangements or rights granted for the future. It would seem to make sense to arrange an appropriate discharge of the drains to land to the east being acquired by Highways England under Plot 9/7g. There is insufficient ground within the area left unacquired around the cottages in order to adequately provide for the continuation of the private drainage system. Due account needs to be taken during construction to ensure that the private drainage system continues to operate successfully.
Applicant Response	The Applicant will make provision to maintain the private sewage system or an alternative with a similar capacity both during the construction phase and in the permanent case. During the detailed design Highways England will request records of the private sewage system including the soakaways and the ditch outfall and undertake any necessary surveys to confirm the details of the current arrangement. This information will be used to assess any changes required to the current system, any construction impacts on the system and where future rights or discharge licence is required as result of the works.
RR-062e	The proposed scheme will sever the existing services to [redacted], including the water supply which runs via [redacted] from the north west. It is important that throughout the construction phase and thereafter, the cottages maintain full services and that those are not interrupted. This will require bringing in a new water supply to replace the existing supply running from [redacted] which will be severed.
Applicant Response	The Applicant will work with the various Utility companies that provide services to these cottages to ensure that any changes to their assets as result of this project will not result in a reduction in the service to the cottages. Where a new supply is required to replace or alter an existing arrangement the Applicant will liaise with the Utility company and the affected parties to provide notice and detail of any interruptions or service suspensions necessary to undertake these works.

Reference Number	Comment from Relevant Representation/Applicant Response
RR-062f	[redacted] will be severely impacted during construction for noise, dust and vibration. Appropriate mitigation measures should be put in place. We have requested details of these but Highways England has not provided the information.
Applicant Response	Annex B Noise and Vibration Outline Management Plan of the First Iteration EMP **[APP-234],** sets out the generic measures which will be used by the contractor to control noise and vibration during the construction phase. These generic measures will be expanded upon to determine the specific mitigation measures to be applied to individual construction activities or receptors. It is not possible to determine specific mitigation measures at this stage before the details of the construction works are finalised. The First Iteration EMP **[APP-234]** includes a commitment to develop a Noise and Vibration Management Plan to be contained within the Second Iteration EMP which will detail the management and monitoring to be applied at all construction sites. This will build on the generic measures set out in the First Iteration EMP **[APP-234]** and will include adopting industry standard practice to: • Apply Best Practicable Means as defined in Section 72 of Control of Pollution Act. • Integrate noise control into preparation of all method statements for construction activities. This would include the selection of low noise plant, siting plant away from receptors where possible to minimise noise disturbance, using acoustic enclosures, using temporary site hoardings/barriers and using less intrusive reversing alarms. • Develop and implement noise monitoring protocols – locations, duration, methods to publish data • Develop procedures for installing noise insulation and temporary rehousing residents where it is not possible to mitigate construction noise below relevant trigger levels as defined by BS 5228. • Develop a process to ensure ongoing compliance with the Noise and Vibration Management Plan and for corrective actions required to address non-compliance. The proposed measures to mitigate dust effects during the construction phase are set out in the Dust Management Plan within the First Iteration EMP **[APP-234]**. These cover activities such as general dust management measures, earthworks, surfacing works, construction, demolition and trackout. Examples of these measures include:

Reference Number	Comment from Relevant Representation/Applicant Response
	• Remove materials that have the potential to produce dust from site as soon as possible, unless being re-used on site. If they are being re-used on-site, cover as appropriate. • Impose and signpost a maximum-speed-limit on surfaced and un-surfaced haul roads and work areas (if long haul routes are required these speeds may be increased with suitable specific control measures provided). • Ensure equipment is readily available on site to clean any dry spillages and clean up spillages as soon as reasonably practicable after the event using wet cleaning methods. • Avoid scabbling (roughening of concrete surfaces) if possible. • Use water-assisted dust sweeper(s) on access and local roads, to remove, as necessary, any material tracked out of the site. This may require the sweeper being continuously in use. With the implementation of these measures, significant effects due to construction related emissions from dust are not anticipated during the construction phase, and noise and vibration related temporary effects would be reduced as far as practicable.
RR-062g	The proposed road will also have a significant impact on the balance of [redacted] to the north including [redacted] being a residential property at the entrance track to [redacted]. Appropriate glazing, landscaping and bunding should be installed to reduce the visual and noise impact on these residential properties.
Applicant Response	Chapter 7, Landscape and Visual Effects **[APP-076]** of the Environmental Statement presents the assessment of the likely effects of the Scheme on landscape character and the visual environment. This assessment has informed the identification and development of landscape mitigation measures, which are proposed to avoid and minimise significant adverse effects, including those on the views of residents as illustrated on the Environmental Masterplan **[APP-091]**, presented on Figure 2.4 of the Environmental Statement. This includes blocks of tree and shrub planting north and west of the properties to assist in screening views of the Cambridge Road junction. Woodland is proposed to the east of the property, helping to screen views along the Scheme north of Wintringham. Chapter 11, Noise and Vibration **[APP-080]** of the Environmental Statement comprises an assessment of the likely noise and vibration effects of the Scheme, which includes the cottages. The assessment has identified that these cottages are likely to experience a decrease in traffic noise of approximately 14dB(A) L10,18hr to the front of their properties, as a result of the predicted reduction in traffic along Cambridge

Reference Number	Comment from Relevant Representation/Applicant Response
	Road once the Scheme is open to traffic. However, the Scheme introduces a new source of noise to the rear of these properties. As a result, an increase of approximately 8dB(A) L10,18hr is predicted at the rear facades and therefore a likely significant adverse noise effect is identified. Although a barrier would provide some traffic noise reduction to the rear of these two cottages, the likely significant adverse effect is predicted to remain. The predicted day time traffic noise levels from the Scheme on the rear facades are around 62 dB(A) L10,18hr once the Scheme is opened, which is below the day-time Significant Observed Adverse Effect Level (SOAEL) of 68 dB(A) L10, 18hr. However, the predicted reduction in traffic on Cambridge Road once the Scheme is open to traffic results in traffic noise levels at the front facades decreasing to below the day-time SOAEL. On the basis of the above, the installation of a noise barrier alongside the new dual carriageway at this small number of properties has not been taken forward as it is not considered to be a sustainable noise mitigation measure.
RR-062h	The land being acquired has underground land drainage schemes and appropriate arrangements should be put in place to provide for and deal with the continuation of the existing land drainage schemes so as to not impact the drainage to the remainder of [redacted].
Applicant Response	Land drainage and over land drainage has been is considered as part of the Scheme and will be refined further as part of the detailed design. During detailed design the Applicant will consider the individual needs of each land parcel including land drainage where this is appropriate. Pre-earthworks ditches will be installed prior to the start of the major construction. The Principal Contractor will seek copies of existing land drains, or clear indications of existing land drainage conditions. The Principal Contractor will install pre-construction ditches to protect the integrity of the existing drainage pattern during construction and in the operational state.
RR-062i	There is considerable concern regarding continued access arrangements both in and out of [redacted] and also to the wider area and that access is maintained at all times and suitable for agricultural vehicles to allow the business to continue to farm and operate.
Applicant Response	The Applicant can confirm that access for the landowner / tenant to their land will be maintained during construction. The Principal Contractor will be responsible for establishing and maintaining a safe means of

Reference Number	Comment from Relevant Representation/Applicant Response
	access to the land for agricultural vehicles and agreeing consulting with the landowner / tenant any required procedures and methods of work required to ensure that this is achieved.
RR-062j	We had been promised by Highways England that a draft Schedule of Accommodation Works would be provided, following the online meeting in August 2020. Nothing has been provided. We would seek that accommodation works are discussed and agreed prior to the granting of the DCO to avoid the issues being faced with the A14 where accommodation works were not agreed until after a number of years after commencement of the road scheme.
Applicant Response	Detailed requirements of accommodation works will be finalised at detailed design by the Principal Contractor and in consultation with the landowner. The Applicant emailed a response on 16 July 2021 to the queries raised referring to drawings and links to the Planning Inspectorate website for documents. The questions relating to lighting, access, utilities and accommodation works cannot be answered at this time as they will form part of the detailed design by the Principal Contractor. An email was sent on 11 August 2021 to the agent seeking to arrange a meeting to discuss these outstanding issues.

RR-063 Lorraine Jewell

Reference Number	Comment from Relevant Representation/Applicant Response
RR-063a	Consideration be made not only for pedestrians, cyclists but also horse riders. Being a rural area the increasing of any roadways results in the need for safer routes across or under roads. So please always make cycleways/footpaths into bridleway to allow for all vulnerable 'traffic' (this may need to consider vulnerable wildlife such as frogs and hedgehogs?) My understanding is that for riders special height bridges are required. Many thanks
Applicant Response	In the delivery of the Scheme, the Applicant is required to re-provide NMU routes that are severed or disrupted as a result of the Scheme. Whilst wider interventions may sometimes be appropriate to address community severance resulting from the existing strategic road network, it is beyond the proper scope of the Scheme to address all existing issues faced by existing users of the highways network. Unless a bridleway has been severed, there is no requirement to create a new bridleway. A bridleway bridge has been provided at BW1/18 to the east of the Cambridge Road junction. This will have parapets that are 1.8m high, as riders may be immediately adjacent to the parapets. To the north of Eltisley a new underpass is provided on BW74/6 to allow safe passage beneath the new dual carriageway. The Applicant considers that the cross section of other bridges along the route of the Scheme provide a safe and adequate route for all users. More information on the results of the walkers, cyclists and horse rider counts can be found within Chapter 12, Population and Human Health **[APP-081]** of the Environmental Statement which describes the assessment on Population and Health, and Chapter 8, Biodiversity **[APP-077]** of the Environmental Statement which describes the provision of crossing points to safeguard vulnerable wildlife.

RR-064 Lara Davenport-Ray on behalf of Love's Farm Community Association

Reference Number	Comment from Relevant Representation/Applicant Response
RR-064a	Love's Farm Community Association represents the interests of residents (and future residents) living on the eastern edge of St Neots, Cambridgeshire. These residents will be directly impacted by upgrades to the A428/A421, specifically between the Little Barford roundabout and Eltisley. Our future representations will relate to the safety and well-being of residents, as well as the impact of visual and noise pollution on residents.
Applicant Response	The Applicant notes the points raised on behalf of Love's Farm Community Association and awaits further information regarding their concerns. Chapter 12, Population and Human Health **[APP-081]** of the Environmental Statement includes an assessment on human health. In terms of accessibility, there is a neutral health outcome as although the severance and accessibility effects could have a negative outcome on health and well-being, the provision of mitigation measures such as diversions and traffic management would ensure that access remains possible. Chapter 7, Landscape and Visual Effects **[APP-076]** and Chapter 11, Noise and Vibration **[APP-080]** of the Environmental Statement comprise assessment of the likely landscape and visual effects and noise and vibration effects of the Scheme. These assessments have informed the noise and landscape mitigation proposed to avoid and minimise significant adverse effects on residents. Mitigation measures incorporated into the design of the Scheme are illustrated on the Environmental Masterplan **[APP-091]**, Figure 2.4 of the Environmental Statement. Views from Loves Farm have been assessed and are largely screened by existing vegetation within and on the eastern boundary of the development and in the intervening landscape. The Scheme incorporates additional planting around the existing Cambridge Road roundabout and along the northern boundary east of the Cambridge road junction to enhance landscape integration and provide visual screening. The proposed mitigation measures embedded in the Scheme design to minimise operational noise are shown on the Environmental Masterplan **[APP-091]**, Figure 2.4 of the Environmental Statement. These measures include the installation of low noise surfacing materials throughout the Scheme. The noise and vibration assessment has predicted minor increases in traffic noise at existing residential properties in Loves Farm located adjacent to the existing A428 at its junction with Stone Hill. These increases are predicted to result from an increase in traffic flow along Cambridge Road as traffic from Loves Farm and

Reference Number	Comment from Relevant Representation/Applicant Response
	Wintringham developments tend to make more use of the Cambridge Road junction with the Scheme in place. However, this is not predicted to result in significant adverse effects at these properties. The Applicant can confirm that the change in traffic noise environment in the proposed Loves Farm East development has been assessed. The assessment has recorded that a minor increase in traffic noise is predicted in the area of that development located closest to the Scheme. It also acknowledges that traffic noise will continue to dominate the acoustic environment in the development area, as it does currently. Effects on individual properties in the proposed Loves Farm East development have not been reported in the assessment as these are not predicted to be occupied prior to the start of construction. Accordingly, future residents of these properties will not experience a change in noise as a consequence of either construction or operation of the Scheme.

RR-065 Lucie Thring

Reference Number	Comment from Relevant Representation/Applicant Response
RR-065a	Will include a number of points all pertaining to A428 Black Cat to Caxton Gibbet Road Improvement scheme Planning Inspectorate Reference: TR010044: Firstly, that the proposed development would contribute significant Carbon emissions (these have been estimated at 3 Million Tons of CO2 from vehicle emissions alone. Additional CO2e emissions from soil disturbance and other sources need consideration which I will address in my detailed written representation. These CO2 and CO2e emissions need consideration against a range of relevant national policies including the UK's target for zero Carbgon by 2050.
Applicant Response	Chapter 14, Climate **[APP-083]** of the Environmental Statement presents an assessment of the Scheme against the UK Government's current carbon budgets, as required by Paragraph 5.17 of the NPSNN: "*for road project applicants should provide evidence of the carbon impact of the project and an assessment against the Government's carbon budgets*". Paragraph 5.18 of the NPSNN clarifies that "*any increase in carbon emissions is not a reason to refuse development consent, unless the increase in carbon emissions resulting from the proposed scheme are so significant that it would have a material impact on the ability of Government to meet its carbon reduction targets*". Greenhouse gas emissions have been calculated by comparing a Do-minimum scenario (baseline) where the Scheme does not go ahead, against a Do-something scenario where the Scheme is built. The variation in emissions between the two scenarios represents additional emissions as a result of the Scheme. Over the life of the Scheme emissions have been calculated at just over 3 million tCO2e. It should be noted however that the methodology to calculate road user emissions, which account for over 90% of total Scheme emissions, does not take into account the impact of recent Government policy on decarbonising transport (Transport Decarbonisation Plan (TDP)[8]) or Highways England' Net Zero Plan[9]'. The TDP presents Government commitments and initiatives to decarbonise transport in the UK to net zero by 2050 while Highways England's Net Zero Plan presents how they will support the implementation of the TDP. The emissions presented in Chapter 14, Climate **[APP-083]** of the Environmental Statement are therefore considered to be a conservative, worst case scenario. Road user emissions are anticipated to decrease to net zero by 2050 in line with the TDP.

[8] Decarbonising Transport: a better, greener Britain https://www.gov.uk/government/publications/transport-decarbonisation-plan
[9] Net zero highways: our 2030 / 2040 / 2050 plan https://highwaysengland.co.uk/netzerohighways/#plan

Reference Number	Comment from Relevant Representation/Applicant Response
	The GHG assessment also takes into consideration the impact of land use change in terms of a variation in sequestration value. Land use change has been calculated according to the methodology and factors set out in the EU Commission's guidelines for the calculation of land carbon stocks. This method considers both above and below ground carbon stocks. Chapter 14, Climate **[APP-083]** of the Environmental Statement has identified that the emissions arising as a result of the Scheme represent less than 0.012% of the total emissions in any of the 3rd, 4th or 5th Carbon Budget periods. Accordingly, the assessment has concluded that the GHG emissions impact of the Scheme would not have a material impact on the UK Government meeting its legally binding carbon reduction targets. Although the 6th Carbon Budget was not legally binding when the Environmental Statement was written, an additional assessment of the 6th Carbon Budget, which became legally binding during June 2021, has been undertaken. This assessment concluded that the Scheme represents less than 0.024% of the total emissions in the 6th budget period and is also considered not have a material impact on the UK Government meeting its carbon reductions target. The proposed mitigation measures proposed for the Scheme are also detailed in Chapter 14, Climate **[APP-083]** of the Environmental Statement. During the development of the Scheme the Applicant will continue to review these mitigations and seek further opportunities to minimise carbon emissions as required by Design Manual for Roads and Bridges (DMRB) and in line with the net zero target.
RR-065b	Secondly, there is also a risk of significant biodiversity impacts from the proposed development and these impacts must be considered against relevant national policies and local biodiversity priorities.
Applicant Response	A comprehensive biodiversity assessment of the construction and operational phases of the Scheme has been undertaken, as presented within Chapter 8, Biodiversity **[APP-077]** of the Environmental Statement. As part of this assessment, the Scheme has been considered against the relevant and applicable international, national, regional and local policy relating to biodiversity and it has been concluded that there are no significant effects on biodiversity.
RR-065c	Thirdly, the proposed development would add significant air pollution risks to those living near to the proposed development. There are a growing number of relevant policies which seek to address this, given the growing data on deaths from air pollution which, in the UK are approximately 40 000 premature deaths/year and the UK has recently had a landmark case linking air pollution with the death of a child.

Reference Number	Comment from Relevant Representation/Applicant Response
Applicant Response	Air Quality objectives are set out in the Clean Air Strategy published by Defra and are set to be protective of human health. For the pollutants considered in the assessment of effects on air quality for this Scheme the objectives are: • 40µg/m^3 for annual mean nitrogen dioxide (NO_2). • 40µg/m^3 for annual mean particulate matter (PM_{10}). • 25µg/m^3 for annual mean particulate matter ($PM_{2.5}$). Areas where annual mean concentrations are within these air quality thresholds are not considered to be areas where likely significant effects would occur, as set out in the DMRB LA 105 standard. There is a risk of significant effects at locations above these health-based objective values. Within the air quality study area for the scheme the vast majority of receptors are predicted to experience annual mean concentrations below these objective values and therefore no significant effects on air quality are predicted at these receptors. There is one area, seven properties located close to the A1 in the Sandy AQMA where receptors are predicted to be above the objective value. Air quality effects within the Sandy AQMA at these seven receptors, as set out in Chapter 5, Air Quality **[APP-074]** of the Environmental Statement, an imperceptible (less than 1% of the objective value) increase is predicted. These effects are not considered to be significant for air quality based on advice within the air quality guidance utilised for the assessment of the Scheme (DMRB LA 105). As such, no mitigation would be required to manage air quality effects associated with the Scheme.

RR-066 Lynda Warth

Reference Number	Comment from Relevant Representation/Applicant Response
RR-066a	The failure of the scheme to provide for safe equestrian access despite consultation with the British Horse Society since project inception. In particular, the removal of a safe equestrian crossing at Caxton Gibbet without any consultation or advice to the BHS. Inaccurate claims (no bridleway links) as to why equestrian access has been omitted. Missed opportunities to improve access for all non motorised users within this transport scheme. Use of out of date maps and information during the consultation period preventing proper consultation opportunities. This is a brief outline of my representation which I will be happy to expand on and provide more detail.
Applicant Response	In the delivery of the Scheme, the Applicant is required to re-provide NMU routes that are severed or disrupted as a result of the Scheme. The Applicant does not propose the removal of an equestrian crossing at the Caxton Gibbet junction. There are no designated bridleways surrounding Caxton Gibbet junction within the Scheme. More information on the results of the walkers, cyclists and horse rider counts can be found within Chapter 12, Population and Human Health **[APP-081]** of the Environmental Statement which describes the assessment on Population and Health. The Applicant requests further specific information pertaining to the 'use of out of date maps and information' that has led to the Interested Party believing proper consultation opportunities have been prevented.

RR-067 Rapleys on behalf of Mactaggart and Mickel

Reference Number	Comment from Relevant Representation/Applicant Response
RR-067a	Mactaggart and Mickel (M&M) controls circa 55ha of land to the east of [] South, located to the south of Papworth Everard and to the north of the proposed Caxton Gibbett junction improvements. M&M is promoting the land for residential/ mixed-use development via the emerging Greater Cambridge Local Plan. The proposed Caxton Gibbett junction improvements are located less than 300m from the boundary of land controlled by M&M. In principle, M&M supports the implementation of an appropriate A428 Black Cat to Caxton Gibbet Road Improvement Scheme. However, M&M has the following comments to make via representations: Further clarification is needed in relation to the design of the proposed shared use path connecting Papworth Everard to Cambourne West across the A428, notably the interaction between pedestrians, cyclists and vehicles at the proposed slip roads. These active travel routes will be crucial to ensure that residents living to the north of the A428 are not segregated from the amenities and services available within Cambourne
Applicant Response	The Applicant confirms that signalised crossings will be provided where the shared footway/cycleways cross all slip roads and on the A1198 on the north side of the Caxton Gibbet junction.
RR-067b	The application does not consider future growth scenarios associated with the emerging Greater Cambridge Local Plan (GCLP), which has a plan period of 2017 to 2040. The design of the junction should be future proofed to ensure that sufficient capacity exists to accommodate potential strategic growth options on the A428 corridor, which are being analysed through the preparation of the GCLP.
Applicant Response	For traffic forecasting purposes DfT guidance has been followed to ensure consistency of approach with other transport schemes. Using this approach requires proposed developments to have a degree of certainty, in terms of proceeding, for them to be included within the forecasting process. The Greater Cambridge Local Plan was not available at the time the Uncertainty Log was developed for this stage of the Scheme. Therefore, the development referred to above is not included in the traffic forecasts submitted for DCO. Using 2040 forecast traffic volumes in the analysis of the new Caxton Gibbet junction has indicated that there is sufficient capacity to accommodate additional traffic approaching from Papworth Everard.

Reference Number	Comment from Relevant Representation/Applicant Response
RR-067c	The assessment of the Cambourne junction to the east is not consistent with the assessment undertaken for the Caxton Gibbett junction. The latter has been subject to a strategic microsimulation model while the former has been subject to traditional capacity assessment. No explanation has been provided.
Applicant Response	The Applicant has used reasonable and proportionate analytical and modelling tools for assessing the impact of the scheme on local junctions. As set out in Table 3-89 of the Transport Assessment Annex **[APP-243]**, for the Cambourne Junction it was noted that while some increase in flows on this junction is predicted, the flows are expected to remain well within capacity with minimal queues and delays. Hence a merge/ diverge analysis of that junction was adequate for assessment. At the Caxton Gibbet roundabout, an entirely new grade separated interchange will be constructed which is likely to make significant impacts on turning flows and proportions at that interchange. Hence, a microsimulation VISSIM model was considered necessary to be developed for that junction for all assessments.
RR-067d	The application does not have regard to the emerging E-W rail proposals and potential new railway station at Cambourne. While the E-W scheme is at an early stage of development, the co-ordination of comprehensive strategic transport package in the locality is essential to safeguard strategic growth objectives associated with the Oxford-Cambridge Arc, the CPCA Strategic Economic Plan, and the Greater Cambridge Local Plan.
Applicant Response	In terms of the East West Rail Scheme, the Applicant is seeking to provide a joined up approach where there are opportunities to do so, and this is part of ongoing discussions between the two projects. However, it should be noted that East West Rail completed their non-statutory route options consultation in June 2021, and a Preferred Route Announcement is not anticipated until 2022. Therefore, since East West Rail has not determined the route and locations of the proposed stations it is too early to define opportunities for co-ordination.
RR-067e	As part of the application consideration should be given to the opportunity to deliver strategic development to the north of the A428 and the south of Papworth Everard. Land proposed to be used for ‘borrow pits’ should be appropriately remediated to avoid sterilisation of the land for development.

Reference Number	Comment from Relevant Representation/Applicant Response
Applicant Response	The Applicant notes the comment. It is proposed that the borrow pits will be reinstated to a condition to enable agricultural use.

RR-068 Brown & Co on behalf of Maureen Elizabeth Wright

Reference Number	Comment from Relevant Representation/Applicant Response
RR-068a	This representation is made on behalf of Maureen Elizabeth Wright who is the owner of plots 2/18a, 2/18b and 2/18c detailed within the Book of Reference. My client is concerned regarding the provision of appropriate fencing alongside the boundaries both during construction and following completion to ensure the security of the field. The land is let on a Farm Business Tenancy for the grazing of livestock and so the field must be secure at all times.
Applicant Response	Detailed requirements of accommodation works will be finalised at detailed design by the Principal Contractor and in consultation with the landowner.
RR-068b	My client currently enjoys access from a gate located onto Chawston Lane and this is being removed by the new link road. A new access has been provided however further details have not been provided as to width and size of apron, my client required clarity on this to ensure it is adequate.
Applicant Response	Detailed requirements of accommodation works will be finalised at detailed design by the Principal Contractor and in consultation with the landowner.

RR-069 Maxine Warner

Reference Number	Comment from Relevant Representation/Applicant Response
RR-069a	I have 3 horses at home in [Redacted], Wyboston. I currently do not ride them over the A421 bridge as it feels unsafe. The sides are not high enough. If the bridge had higher sides and the cycle way was also a bridle way, then I definitely would ride as it would enable suitable road exercise for my horses.
Applicant Response	In the delivery of the Scheme, the Applicant is required to re-provide NMU routes that are severed or disrupted as a result of the Scheme. The Roxton Road bridge has been provided to maintain connectivity across the Scheme and has an improved cross section compared to the existing bridge, as illustrated on Sheet 1 of the Engineering Sections (Part 3 – Structures General Arrangements) **[APP-019]**. This shows that the verge on the carriageway side of the bridge is 2.5m from the 1m high parapet railing. This is a standard (DMRB CD127 Cross sections and headrooms) minimum offset and parapet height (DMRB TD19/06 Requirements for road restraint systems) for bridges of this nature on roads for all users. On the footway/cycleway side, the carriageway is offset by 5m from the parapet railing. The parapet railing on this side will be a minimum of 1.4m high for safety reasons as cyclists may be immediately adjacent to the railing. Correspondence received during the consultation suggested that Roxton Road 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 that counts were undertaken no horse riders were observed using the existing bridge. It should also be noted that there are no existing bridleways in the vicinity of this part of the Scheme. The Applicant acknowledges the suggestion that there would be greater interest in using this route if it were considered safer. The Applicant considers that the improved cross section on the bridge provides a safe and adequate route for all users. Should Bedford Borough Council as the local highway authority wish to extend the bridleway network within the area and provide an off-carriageway route across the bridge, the proposed Scheme does not preclude any such extensions or alterations in the future. More information on the results of the walkers, cyclists and horse rider counts can be found within Chapter 12, Population and Human Health **[APP-081]** of the Environmental Statement which describes the assessment on Population and Human Health.

RR-070 ADL Traffic and Highways Engineering Ltd on behalf of McDonald

Reference Number	Comment from Relevant Representation/Applicant Response
RR-070a	Our Representation will relate to the existing McDonald's restaurant at the Caxton Gibbet Park Service Area and the highway works as shown on General Arrangement Plan Regulations 5(2) (O) Sheet 14. The restaurant is currently visible from the A428 and A1198 as customers approach the roundabout. The new grade separated arrangements require customers on the A428 to make an earlier decision if they wish to visit the services. Appropriate signage for the services must be provided so that drivers are able to make a safe and timely decision to access the slip roads. No signage plans have been provided with the submissions to demonstrate that this has been adequately addressed.
Applicant Response	The Scheme will provide advance directional signs prior to the Caxton Gibbet junction off-slip roads. The details of these signs will be developed during detailed design. It is anticipated that a 'Services' panel will be provided in accordance with the Traffic Signs Regulations and General Directions 2016.
RR-070b	The existing Service Area is accessed via a right turn lane on the A1198 which is shown as proposed to be removed with the new highway arrangement. The lack of right turn lane facility presents a risk to highway safety and is contrary to DMRB CD123 junction design guidance. The design of the highway at the Services Access is therefore unacceptable.
Applicant Response	The Applicant is aware of this issue and commits to maintaining the existing right turn lane into the Caxton Gibbet services as part of the permanent solution.
RR-070c	Our representations also relate to the existing McDonald's restaurant at Wyboston. The proposed link to the Black Cat junction is a less direct link to the A1 and appropriate signage will be necessary to direct customers to the A1. No signage plans have been submitted with the application to demonstrate this has been adequately addressed.
Applicant Response	The access arrangement to the existing McDonald's restaurant will not be impacted by the Scheme. The A1 Services Link from the service area to Black Cat junction is for those exiting the service area only.

RR-071 Mini Grey

Reference Number	Comment from Relevant Representation/Applicant Response
RR-071a	This road scheme would increase carbon emissions by over 3 million tonnes (the third worst scheme in the RIS2 roads programme for carbon). I am rgistering my objection on climate grounds.
Applicant Response	Chapter 14, Climate **[APP-083]** of the Environmental Statement presents an assessment of the Scheme against the UK Government's current carbon budgets, as required by Paragraph 5.17 of the NPSNN: "*for road project applicants should provide evidence of the carbon impact of the project and an assessment against the Government's carbon budgets*". Paragraph 5.18 of the NPSNN clarifies that "*any increase in carbon emissions is not a reason to refuse development consent, unless the increase in carbon emissions resulting from the proposed scheme are so significant that it would have a material impact on the ability of Government to meet its carbon reduction targets*". Greenhouse gas emissions have been calculated by comparing a Do-minimum scenario (baseline) where the Scheme does not go ahead, against a Do-something scenario where the Scheme is built. The variation in emissions between the two scenarios represents additional emissions as a result of the Scheme. Over the 60 year life of the Scheme emissions have been calculated at just over 3million tCO2e. It should be noted however that the methodology to calculate road user emissions, which account for over 90% of total Scheme emissions, does not take into account the impact of recent Government policy on decarbonising transport (Transport Decarbonisation Plan (TDP)[10]) or Highways England' Net Zero Plan[11]'. The TDP presents Government commitments and initiatives to decarbonise transport in the UK to net zero by 2050 while Highways England's Net Zero Plan presents how they will support the implementation of the TDP. The emissions presented in Chapter 14, Climate **[APP-083]** of the Environmental Statement are therefore considered to be a conservative, worst case scenario. The assessment within Chapter 14, Climate **[APP-083]** of the Environmental Statement has identified that the emissions arising as a result of the Scheme represent less than 0.012% of the total emissions in any of the 3rd, 4th or 5th Carbon Budget periods. Accordingly, the assessment has concluded that the GHG emissions impact of the Scheme would not have a material impact on the UK Government meeting its legally binding carbon reduction targets. Although the 6th Carbon Budget was not legally binding when the Environmental Statement was written, an additional assessment of the 6th Carbon Budget, which became

[10] Decarbonising Transport: a better, greener Britain https://www.gov.uk/government/publications/transport-decarbonisation-plan
[11] Net zero highways: our 2030 / 2040 / 2050 plan https://highwaysengland.co.uk/netzerohighways/#plan

Reference Number	Comment from Relevant Representation/Applicant Response
	legally binding during June 2021, has been undertaken. This assessment concluded that the Scheme represents less than 0.024% of the total emissions in the 6th budget period and is also considered not have a material impact on the UK Government meeting its carbon reductions target. The proposed mitigation measures proposed for the Scheme are also detailed in Chapter 14, Climate **[APP-083]** of the Environmental Statement. During the development of the Scheme the Applicant will continue to review these mitigations and seek further opportunities to minimise carbon emissions as required by Design Manual for Roads and Bridges (DMRB) and in line with the net zero target.

RR-072 Mrs Julie Cox

Reference Number	Comment from Relevant Representation/Applicant Response
RR-072a	Dust will be one of the most inevitable consequence of your roadworks. With the Gravel and crushed gravel and hard rock aggregates always contain a proportion of fines, and if the material is dry, a fairly heavy dust cloud can be raised when it is mobilized. The resulting dust can disturb both the population and the local environment. Excess dust production can be treated by a range of means such as watering so will you be actioning this? Or the use of alternative materials, and by using dust binders near houses. Will we be notified of dust levels; we are concerned for our parishioners who we know this could affect?
Applicant Response	Measures to mitigate dust emissions during construction of the Scheme will be presented in an Air Quality Management Plan (AQMP). The AQMP will be based upon the outline AQMP contained in Annex A of the First Iteration EMP **[APP-234]** and will include a range of industry standard good practice construction phase dust mitigation and monitoring measures, and general control measures. These measures include: • Ensure effective water suppression is used during demolition operations. Hand-held sprays are more effective than hoses attached to equipment as the water can be directed to where it is needed. In addition, high volume water suppression systems, manually controlled, can produce fine water droplets that effectively bring the dust particles to the ground. • Ensure an adequate water supply on the site for effective dust/particulate matter suppression/ mitigation, using non-potable water where possible and appropriate. • Cover, seed or fence stockpiles to prevent wind whipping. • Erect solid screens or barriers around particularly dusty activities or the site boundary that are at least as high as any stockpiles on site for higher risk sites. • Use water-assisted dust sweeper(s) on access and local roads, to remove, as necessary, any material tracked out of the site. This may require the sweeper being continuously in use. For the monitoring of dust levels and the availability of that information, the Annex A of the First Iteration EMP **[APP-234]** includes the following:

Reference Number	Comment from Relevant Representation/Applicant Response
	• Undertake regular inspections, as will be set out in the Second Iteration EMP, where receptors are nearby, to monitor dust, record inspection results, and make the log available to the relevant local authority upon request. For locations within 100 metres of dust generating activities, the First Iteration EMP **[APP-234]** includes community liaison measures that will be implemented during construction. This will involve establishing appropriate mechanisms to communicate with local residents to highlight potential periods of disruption. An information web-page shall be provided and kept up-to-date on the Applicant's website to reflect construction and community liaison requirements, and this shall provide up-to-date information on: • The progress of the construction works. • Areas affected by construction (including advanced notification of very dusty or noisy activities). • Mitigation in place to reduce adverse effects. • Planned construction works (including any proposed works outside normal hours). • Works recently completed. This communication strategy will be implemented to minimise the likelihood of complaints, and residents shall be provided with a point of contact for any queries or complaints.
RR-072b	traffic queues are likely to cause unsafe scenarios creating 'rat-runs'.
Applicant Response	The Scheme would provide significant relief to the corridor between Caxton Gibbet and the A1 and would remove queues and congestion at junctions at Cambridge Road, Eltisley, Abbotsley Road (Croxton), Caxton Gibbet and Black Cat. By reducing queues and congestion on this corridor the Scheme would reduce traffic diverting to other routes to avoid delays in the without Scheme scenario. This is illustrated in Figure 4-7 of the Combined Modelling and Appraisal Report **[APP-250]** that demonstrates that the scheme would reduce traffic volumes on a number of local roads. The Applicant would be able to provide further details for specific locations if required.
RR-072c	the fact we have a primary school located on the main road leaving the village with no speed restriction

Reference Number	Comment from Relevant Representation/Applicant Response
Applicant Response	The Applicant proposes to stop up School Lane from the Roxton village to the A1 as requested by Bedford Borough Council. Therefore, there will be no rat-running along this link and traffic will be subject to the 30mph through the village. Refer to the Streets, Rights of Way and Access Plans **[APP-013]** for details on stopping up of highways. request further details on the location of the primary school in question.
RR-072d	Suitable access for all including bikers, bridleways, walkers and disabled.
Applicant Response	In the delivery of the Scheme, the Applicant is required to re-provide NMU routes that are severed or disrupted as a result of the Scheme. Whilst wider interventions may sometimes be appropriate to address community severance resulting from the existing strategic road network, it is beyond the proper scope of the Scheme to address all existing issues faced by existing users of the highways network. The NMU provision made between School Lane at Roxton and The Lane at Wyboston is a direct replacement for the shared unsegregated footway/cycleway that is currently adjacent to the A1 northbound carriageway. The existing route is unsuitable and would require pedestrians or cyclists to negotiate the new Black Cat junction. The proposed route provides a safer and more attractive alternative, away from the strategic road network, and it also links to National Cycle Route 12. It should be noted that the route along School Lane and from the east end of School Lane, northwards to the start of the Kelpie Marina access road, is to be dedicated as bridleway, as requested by Bedford Borough Council. The Applicant considers that the cross sections on the other bridges provide a safe and adequate route for all users. The carriageway on the existing Bedford Road, Kelpie Marina access road, realigned Roxton Road and the new Roxton Road Link can be legally used by horses and carriages. More information on the results of the walkers, cyclists and horse rider counts can be found within Chapter 12, Population and Human Health **[APP-081]** of the Environmental Statement which describes the assessment on Population and Human Health
RR-072e	Under Part I of the Land Compensation Act 1973 ('the Act'), compensation can be claimed by people who own and also occupy property that has been reduced in value by more than £50 by physical factors caused by the use of a new or altered road. The physical factors are noise, vibration, smell, fumes, smoke and artificial lighting and the discharge on to the property of any solid or liquid substance. The cause of the

Reference Number	Comment from Relevant Representation/Applicant Response
	physical factors must be the new or altered road in use. For example, if a road is altered, the noise and other adverse effects must arise from the traffic using the altered stretch of road. The most damaging effects of road construction is noise. Noise is defined as a sound that is undesirable to the listener. The level of the disturbance caused by sound will depend on its extent and intensity, and on the sensitivity of the persons affected. The Bung you have suggested is not suitable it is not stretching far enough; it will not stop the traffic noise. We will require either a far greater height than 3 meters as sound travels as the sound of sight. As this will be a continuous noise 24/7. We would consider Acoustic fencing but would have to be suitable to stop the noise of all vehicles.
Applicant Response	The Applicant's approach to identifying noise mitigation measures has been informed by considering those measures which will result in the Scheme meeting the following policy aims set out in paragraph 5.195 of the National Policy Statement for National Networks, within the context of Government Policy on sustainable development. a) Avoid significant adverse impacts on health and quality of life from noise as a result of the new development. b) Mitigate and minimise other adverse impacts on health and quality of life from noise from the new development. c) Contribute to improvements to health and quality of life through the effective management and control of noise, where possible. Paragraph 11.3.69 of Chapter 11, Noise and Vibration **[APP-080]** of the Environmental Statement summarises the factors which have been considered by the Applicant when identifying sustainable noise mitigation measures to be included in the Scheme. Such factors include cost versus benefit, engineering practicality, generation of non-acoustic impacts and consultation and stakeholder engagement responses. The initial proposals for the design of 3m high noise bunding alongside the new dual carriageway were consulted upon during the supplementary consultation held in 2020. The noise bunding provides the same function as a noise barrier, in that it reduces noise levels by creating a barrier between a noise source (in this case, the new dual carriageway) and a receptor. This measure was developed in conjunction with other environmental disciplines to avoid secondary impacts (including, for example, landscape, visual impacts and water quality). Taking into account the analysis of the consultation responses and subsequent development of the Scheme design, this noise bunding has been included within the Scheme design and is illustrated on the Environmental Masterplan **[APP-091]**, Figure 2.4 of the Environmental Statement.

Reference Number	Comment from Relevant Representation/Applicant Response
	Paragraph 11.9.45 of Chapter 11, Noise and Vibration **[APP-080]** confirms that further modelling has been undertaken to assess the noise reduction benefit of increasing the effective height of the noise bund alongside the A421 westbound carriageway, through the addition of a 1m barrier along its length. However, these barriers have not been included in the Scheme as they were not identified to be sustainable noise mitigation measures when the factors described in paragraph 11.3.69 of Chapter 11, Noise and Vibration **[APP-080]** were considered.
RR-072f	public transport, how will this be affected?
Applicant Response	The Applicant proposes the re-location of two bus stops further north along the A1, north of Black Cat junction. This re-location is to ensure safe access and egress of buses when the A1 becomes a free-flowing continuous link through Black Cat junction. For details of the impacts on public transport, refer to Section 8 – Sustainable Transport of the Transport Assessment Report- Part 1 **[APP-241].**
RR-072g	Work taking place overnight will we be notified?
Applicant Response	The Principal Contractor's community engagement team will provide advance notification to residents and occupiers of any properties which might be affected by overnight or weekend work and other potentially disruptive activity, dates, timescales and the likely effects.
RR-072h	A1 the new access to Kelpie Boat yard. how this will be screened from the village.
Applicant Response	Chapter 7, Landscape and Visual Effects **[APP-076]** of the Environmental Statement comprises an assessment of the likely landscape and visual effects of the Scheme. This assessment has informed the landscape mitigation proposed to avoid and minimise significant adverse effects, including on views of residents. As illustrated on the Environmental Masterplan **[APP-091]**, Figure 2.4 of the Environmental Statement, belts of shrubs and trees are proposed on the embankments of the Kelpie Marina overbridge.
RR-072i	My biggest concerns is what will be built around us after the construction. Petrol station, hotels and fast food chains. What are the plans for infill lands?

Reference Number	Comment from Relevant Representation/Applicant Response
Applicant Response	The Applicant would need confirmation regarding what this Interested Party means by the term “infill lands”. The Applicant has no control over land outside the Order Limits.
RR-072j	When will we know off any land you plan to increase Roxton and local villages traffic visitation?
Applicant Response	The Applicant would like to engage on this issue if the Interested Party could confirm what is meant.
RR-072k	Light pollution, will be lit up over the night time, how is this going to dealt with.
Applicant Response	To minimise light spill during the construction phase of the Scheme, the Commitment ESS – LV5 in the Register of Environmental Actions and Commitment (REAC) within the First Iteration EMP **[APP-234]** states that the Principal Contractor will ‘*keep construction lighting to the minimum luminosity necessary for safe working within construction compounds and working areas and where possible, fitting it with motion sensors to minimise the duration of potential light spill in night time views’.* In addition, the Principal Contractor will also implement the scheme-wide lighting control measures as outlined within the First Iteration EMP **[APP-234]**. During the operational phase of the Scheme, the lighting of new and improved sections of highway within the Scheme has been confined to locations where road safety is a priority, in order to minimise the potential for light spill in night time views across the landscape. This lighting would be designed to be directional to minimise light spill beyond the carriageway and immediate highway and would be installed at the following locations across the Scheme: • Roxton Road roundabout. • Black Cat junction (including maintaining the existing lighting on the A1 carriageway through the junction). • BP Garage service road. • Cambridge Road junction. • Eltisley link • Caxton Gibbet junction.

Reference Number	Comment from Relevant Representation/Applicant Response
RR-072l	How are you repaying the Roxton village residents with disruptions for 4/5 years. What grants that's you have available to help compensate.
Applicant Response	The Applicant does not believe the respondent has an interest in land being acquired and therefore any right to make a claim for statutory compensation would be limited to Part 1 of the Land Compensation Act 1973.
RR-072m	Are you helping local groups, churches, sports and anyone effected by road closures when they occur.
Applicant Response	When construction begins, the Applicant will use many ways of keeping customers and the local community up to date with the effects of construction. As a principle, the Principal Contractor will be required to minimise disruptive works. For those that are unavoidable, the Principal Contractor will be required to plan such works, e.g. road or junction closures, well in advance. Notifications will be shown on the Applicant's website A428 Black Cat to Caxton Gibbet improvements - Highways England, via email updates if requested, via the local newsletter and the scheme's Facebook page A428 Black Cat to Caxton Gibbet - Home | Facebook, and via Twitter and other forms of social media. The Applicant will publicise these channels widely as the onset of construction work approaches. The Applicant's Community Relations Manager will open lines of communication with local groups and organisations in order to establish the best practicable means of keeping the community informed and up to date with the construction programme and any local impacts. The Community Relations team will be ready to help accommodate the needs of the community whenever possible.

RR-073 Natalie Whitbread

Reference Number	Comment from Relevant Representation/Applicant Response
RR-073a	I am highly concerned that not enough consideration is being given to the horse riders and carriage drivers locally, my stables are located in chawston I can ride one of my horses over the Roxton bridge but fear for my safety and well being of my other horses so can't use it as it stands with them due to the railings not being sufficient and not enough space and consideration being given by the current drivers on that road. I would like to ask that sufficient safety barriers on the new bridge be installed as many more of us would be able to safely use that route on a regular basis. We are very limited in the local area on safe spaces to ride and with the future increase in traffic load due to the proposed layout I think it is imperative for our safety and the safety of others.
Applicant Response	In the delivery of the Scheme, the Applicant is required to re-provide NMU routes that are severed or disrupted as a result of the Scheme. The carriageway on the existing Bedford Road, Kelpie Marina access road, realigned Roxton Road and the new Roxton Road Link can be legally used by horses and carriages. The Roxton Road bridge has been provided to maintain connectivity across the Scheme and has an improved cross section compared to the existing bridge, as illustrated on Sheet 1 of the Engineering Sections (Part 3 – Structures General Arrangements) **[APP-019]**. This shows that the verge on the carriageway side of the bridge is 2.5m from the 1m high parapet railing. This is a standard (DMRB CD127 Cross sections and headrooms) minimum offset and parapet height (DMRB TD19/06 Requirements for road restraint systems) for bridges of this nature on roads for all users. On the footway/cycleway side, the carriageway is offset by 5m from the parapet railing. The parapet railing on this side will be a minimum of 1.4m high for safety reasons as cyclists may be immediately adjacent to the railing. Correspondence received during the consultation suggested that Roxton Road 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 that counts were undertaken no horse riders were observed using the existing bridge. It should also be noted that there are no existing bridleways in the vicinity of this part of the Scheme.

Reference Number	Comment from Relevant Representation/Applicant Response
	The Applicant acknowledges the suggestion that there would be greater interest in using this route if it were considered safer. The Applicant considers that the improved cross section on the bridge provides a safe and adequate route for all users. Should Bedford Borough Council as the local highway authority wish to extend the bridleway network within the area and provide an off-carriageway route across the bridge, the proposed Scheme does not preclude any such extensions or alterations in the future. More information on the results of the walkers, cyclists and horse rider counts can be found within Chapter 12, Population and Human Health **[APP-081]** of the Environmental Statement which describes the assessment on Population and Human Health.
RR-073b	May I also suggest that the local authority upgrade a good number of the local footpaths to allow horses other safe routes to go, locally the amount of traffic during the proposed works is going to be horrendous and it's already risky at the current levels, it may be wise to upgrade these footpaths to bridleways as a matter of urgency, there have already been a few accidents involving vehicles and horses/riders and I fear that it's only a matter of time before it escalates to deaths in either animal or human form
Applicant Response	The Applicant notes this comment. Amendments to footpaths outside the scope of the Scheme will be a matter for Bedford Borough Council to address. For Public Rights of Way within the Order Limits, the Outline Construction Traffic Management Plan **[APP-244]** sets out that during the construction stage, those that are not permanently closed will be maintained where possible using permanent diversion routes of temporary diversion routes where necessary. Diversion routes will be developed during the detailed design stage in consultation with the relevant local highway authority.

RR-074 National Farmers Union (NFU)

Reference Number	Comment from Relevant Representation/Applicant Response
RR-074a	NFU OUTLINE REPRESENTATIONS 1. Introduction 1.1 These are the Outline Written Representations of the National Farmers Union ("NFU") on behalf of their members to the application for a Development Consent Order by Highways England for the identified scheme A428 Black Cat to Caxton Gibbet Improvements. 1.2 The objectives of the NFU are to champion farming in England and Wales and to provide professional representation and service to its members. 1.3 The matters raised in these Written Representations are matters not only of concern to the farming owners of agricultural land affected by this DCO, but also of concern to, and raise points of principle that will affect, members of the NFU having farm holdings that may be affected by similar infrastructure schemes. 2. Consultation and Engagement 2.1 One to one meetings have been held between landowners and Ardent the agents acting for Highways England (HE) and the NFU would like to see negotiations continuing with members who are directly affected. The NFU understands from agents that HE is not keeping landowners updated and it is taking HE too long to respond to queries raised by agents. Further the NFU would like to enter into a Statement of Common Ground to understand and agree outstanding issues, especially the wording that is being sought on practical issues and the NFU would like to see being included in the First Iteration Environmental Management Plan (FIEMP).
Applicant Response	The Applicant can confirm that negotiations with directly affected landowners will continue. The Applicant has prepared a draft Statement of Common Ground that has been shared with the NFU and submitted at Deadline 1.
RR-074b	3. Habitat Mitigation

Reference Number	Comment from Relevant Representation/Applicant Response
	3.1. Further to the response submitted to the consultation the NFU would still like to receive clarification as to why so much land is being taken for habitat mitigation and it is understood that (HE) have now identified a 20.5 % net gain. We understand that this might be being achieved through the enhancement of previous identified sites. . Further clarification is required as the NFU would not want to see more land being compulsorily purchased to achieve a net gain on a linear infrastructure scheme. The NFU would like confirmation on what management agreements are to be put in place to maintain the habitat mitigation sites.
Applicant Response	The Applicant wishes to clarify that no land is being sought through compulsory acquisition for the sole purpose of contributing towards delivery of the Scheme's biodiversity net gain (BNG) score of 20.5%. The BNG score has been derived from the measures incorporated into the Scheme that have been identified as being essential to mitigate its likely environmental effects. Land taken for embedded and essential mitigation is controlled by the Applicant to ensure the effectiveness of the mitigation is managed, maintained and monitored. Should land owners wish to negotiate the return of land which contains embedded and/or essential mitigation, any agreement would require the land owner to take over these management and maintenance functions as prescribed and monitored by the Applicant to ensure the continuing effectiveness of the mitigation in place.
RR-074c	4. Access Routes and Accommodation Works 4.1. The NFU raised concerns over (HE) addressing new access routes that will be required once the new road is operational to land and also temporary access routes during construction which will be severed by the works. Further concerns where in regard to agreeing accommodation works at an early stage. The response provided by HE in the response consultation document is brief with no detail. The NFU understand from agents acting for members that meetings have been taking place, but further confirmation is required.
Applicant Response	The Applicant is committed to continuing engagement with landowners on matters relating to both maintaining access to land, including temporary access routes and other accommodation works during and post construction.

Reference Number	Comment from Relevant Representation/Applicant Response
RR-074d	5. Construction Compound Sites 5.1 HE on plans submitted under the DCO has identified some large areas of land to be taken for construction compound sites. The NFU would like to see the detail of use for each compound site being detailed in the DCO particularly within Schedule 7, Article 40. At the present time it is stated that the areas will be used as a construction area 'required to provide temporary storage, laydown areas, access and working space to facilitate the construction of…' We require further detail on exactly what works may take place and what type of storage. This should be explicitly detailed for each compound.
Applicant Response	The level of detail in Schedule 7 of the draft DCO **[APP-025]** matches the level of detail included in other consented DCOs including the A303 (Amesbury to Berwick Down) Development Consent Order 2020; The A63 (Castle Street Improvement, Hull) Development Consent Order 2020 and the A1 Birtley to Coal House Development Consent Order 2021. It is important that the DCO allows an element of flexibility at this stage in the design process, so the Applicant is unable to provide any more detail about the construction compounds in Schedule 7 of the draft DCO **[APP-025]**.
RR-074e	6. Powers to Survey Land 6.1 It is noted that in the DCO under Paragraph 23: Authority to survey and investigate the land under 23.1 (b) ii it is stated that HE can discharge water from sampling operations. The NFU would like further detail on the types of sampling that is to be undertaken and the quantities water that could be discharged. The NFU is pleased to see that 23.3. does state that the nature of the survey must be stated in the notice. The NFU would further like to see that the ALO as part of its role is to: "Provide preconstruction survey information to landowners including company name, survey type and equipment to be used, an estimate of how long the surveys are expected to take and where surveys are to take place on land outside of the Order limits, an explanation of why such land is required".
Applicant Response	The Applicant is committed to continuing engagement with the land owners and where surveys are required outside of the Order Limits, general details of the survey type and purpose, the equipment to be used, expected duration and name of the company completing these works will be provided to the landowner prior to the start of these works.
RR-074f	7. Temporary use of land for carrying out the authorised development

Reference Number	Comment from Relevant Representation/Applicant Response
	7.1 It is noted that in the DCO at Paragraph 40 'Temporary use of land for carrying out the authorised development' it is stated that a 14 day notice has to be served before taking entry. At a minimum the NFU will want to see a 28 day notice being served before entry is taken on to land on a temporary basis. Experience form other schemes is showing that a 14 day notice is not adequate.
Applicant Response	The 14 day period was included in the Model Provisions and numerous other granted development consent orders including the recently granted The A303 (Amesbury to Berwick Down) Development Consent Order 2020;The A63 (Castle Street Improvement, Hull) Development Consent Order 2020; The A1 Birtley to Coal House Development Consent Order 2021; The A19 Downhill Lane Junction Development Consent Order 2020 and The A303 Sparkford to Ilchester Dualling Development Consent Order 2021. It is therefore considered adequate. Although the notice period of 14 days is less than that envisaged by the Neighbourhood Planning Act 2017 (NPA) (which is not yet in force in any event), the owners and occupiers of the land will have been consulted and notified of the Applicant's need to temporarily use the land to carry out the authorised development as a result of the DCO application process. The Applicant needs to ensure that the Scheme can be carried out efficiently and expeditiously following the making of the Order. Therefore, a longer notice period is considered to be unnecessary given that the relevant landowners will already have had prior notice via consultation. The relevant provisions (sections 18 to 23) of the NPA are not yet in force and it is unclear whether or when they will be brought into force, and whether further regulations will be introduced to provide more detail on the operation of the temporary possession regime. As the NPA is not yet in force, the Applicant is of the view that it is not currently possible to understand or reflect accurately the temporary possession provisions as intended by Parliament in respect of DCOs. It is not yet known whether the provisions will apply to DCOs or whether there will be any transitional arrangements. The Applicant has therefore applied the 'tried and tested' temporary possession regime that has been included in numerous DCOs to date, and is well understood by practitioners, agents and contractors.
RR-074g	8. Balance Ponds 8.1 The NFU would like information to be provided to explain why the size and location of balance ponds are required and where these are to be located. Further relocation next to field boundaries would help minimise the impact on the farmland in question. The NFU would like to see further negotiations with landowners on balance ponds and refinement as design is developed.

Reference Number	Comment from Relevant Representation/Applicant Response
Applicant Response	The size of ponds is defined by the volume of runoff from additional impermeable areas that needs to be stored during 1 in 100 year storm events with 40% climate change allowance, when discharge rates are restricted to Qbar, to mimic the existing flow and volume conditions. This pond design principle al has been agreed with the LLFAs (Lead Local Flood Authority's) and the EA (Environment Agency). Ponds have been located near to outfalls while remaining outside of floodplains and as close as possible to the carriageway. The proposed attenuation basins are essential elements of the Scheme for which permanent land acquisition is sought. The Applicant has engaged with the directly affected landowners on the design of the proposed attenuation ponds and this has influenced the current proposals and helped mitigate any associated impacts.
RR-074h	9.0 Waste and Spoil 9.1 The NFU would like information to be provided to explain how waste and spoil is to be treated. The response to the NFU after the first consultation does not clarify where waste and spoil is to be used within the construction. It just states that soils will be delivered back to the respective locations from the storage zones. It will not be possible to return soil back to respective soil locations without changing the surface level and agricultural classification
Applicant Response	It is not clear what is meant by the terms waste and spoil – details on how waste will be managed on the project are show in Chapter 10, Material Assets and Waste **[APP-079]** of the Environmental Statement. Topsoil and subsoil that is cut from plan area of the Scheme including the borrow pits will be stored and subsequently reused on new verges, embankments, cut slopes and in the reinstatement of the borrow pits. Material cut from the Scheme which is suitable for use as an engineering fill will be used in the embankment construction across the project. Material that is cut but is not found to be suitable for use as an engineering fill will be incorporated in the permanent mitigation bunds and landscaping areas or used in the reinstatement of the borrow pit areas from where the shortfall in engineering fill will be sourced. If material is required to be moved around the scheme an assessment will be conducted prior to the deposit to ensure that it is compatible with the deposit location.

Reference Number	Comment from Relevant Representation/Applicant Response
RR-074i	10. Private Water Supply 10.1 There is no information in the FIEMP as to how private water supplies will be treated if affected on a temporary or permanent basis. The main works contractors should have to provide an alternative supply if a private supply is contaminated, cut off or the supply is affected in anyway during the construction of the road. The NFU has specific wording that it would like to see agreed and included in the FIEMP to guarantee that farms will have a temporary and/or a permanent water supply.
Applicant Response	Records of private water supplies obtained as part of the assessment reported in Chapter 13, Road Drainage and the Water Environment **[APP-082]** of the Environmental Statement confirmed that no such supplies are present within 1 km of the Scheme. Accordingly, no temporary or permanent effects are predicted on private water supplies.
RR-074j	11.0 Field Drainage 11.1 Land drainage is always one of the main issues which landowners and agricultural tenants are concerned about when land is taken for construction purposes of a major road. Further to raising issues in a response to the consultations in regard to field drainage HE responded that the Drainage Strategy report covers operational drainage and that the FIEMP describes how construction drainage will be dealt with. The NFU is disappointed that HE has not addressed agricultural field drainage that will be severely affected by the construction works. This is particularly important where land will be returned to agricultural use. 11.2 The NFU has specific wording that it would like to see agreed and included in the FIEMP to guarantee that land drainage will be fully reinstated.
Applicant Response	Land drainage and over land drainage has been is considered as part of the Scheme and will be refined further as part of the detailed design. During detailed design Highways England will consider the individual needs of each land parcel. Any impacts on the existing land drainage systems will be dealt with as part of the detailed design and implemented by the Principal Contractor. Any land drainage severed by the Scheme will be captured by drainage systems such as overland ditches along the Scheme to ensure no worse than existing land drainage.

Reference Number	Comment from Relevant Representation/Applicant Response
RR-074k	12. Soils 12.1. The NFU is pleased to see that there is a detailed section on Soil Handling and Management at Appendix E of the FIEMP which covers soil preparation, sub and top soil stripping, controls during construction, soil storage and restoration. The NFU would like to see further detail included to cover a pre-construction soil survey which will form the basis of a soil statement to be included within a record of condition. 12.2. Further the NFU would like to see wording agreed to cover soil aftercare which will be linked back to the soil statement and condition of the soil before the construction works started.
Applicant Response	Section 9.4 of Chapter 9, Geology and Soils **[APP-078]** of the Environmental Statement explains that intrusive soils sampling surveys to inform the geology and soils assessment were planned for 2020. However due to the Covid-19 pandemic and associated local lockdown restrictions, these were unable to be undertaken. The Applicant has committed to undertake the surveys in 2021 (subject to the lifting of lockdowns) and following the completion of the fieldwork and the analysis of findings, a report will be prepared by the Applicant and submitted to the Examination on or before Deadline 6. The Applicant will also provide a copy of the report to the NFU at the time it is submitted to the Examination. The scope of soil survey will be based upon the following: • Information required to establish current soil grades and profiles within the Order limits will be obtained using 675 auger points, 13 soil pits and 13 lab samples. • The grades of soil will be identified within each of the 31 agricultural holdings and graded using the Agricultural Land Classification (ALC) system. The outcomes of the agricultural soil assessment will be used to inform the agricultural impact assessment in relation to determining the extent, distribution and value of ALC soils and assessing the impacts and effects of their loss and/or disturbance to function (for example through degradation, compaction and erosion). Specific regard will be given to the impacts and effects of soils graded as being best and most versatile.

Reference Number	Comment from Relevant Representation/Applicant Response
	The Applicant can confirm that wording drafted relating to soil aftercare will be shared with the NFU in a timely manner and prior to the completion of the Second Iteration EMP.
RR-074l	13. Dust 13.1 It is noted that within the FIEMP that dust will be controlled during construction, but clarification is needed on how dust will be controlled during construction to protect arable crops. The project will impact a vast area of arable crops that are grown in this area, quality of the crop is paramount. NFU would like to see details specific to dust control for agricultural crops.
Applicant Response	The proposed measures to control dust emissions during the construction phase are set out in Annex A Air Quality management plan within the First Iteration EMP **[APP-234]**. Examples of such control measures include but are not limited to: • *"Use water-assisted dust sweeper(s) on access and local roads, to remove, as necessary, any material tracked out of the site. This may require the sweeper being continuously in use.* • *Implement a wheel washing system (with rumble grids to dislodge accumulated dust and mud prior to leaving the site) where reasonably practicable.* • *Ensure sand and other aggregates are stored in bunded areas and are not allowed to dry out, unless this is required for a particular process, in which case ensure that appropriate specific control measures are in place; and* • *Where possible, only remove the cover in small areas during work and not all at once".*
RR-074m	14. Irrigation Systems 14.1. The NFU has not been able to find any information in the FIEMP as to how the effect of construction can be minimised on irrigation systems. The NFU has specific wording that it would like to see agreed and included in the FIEMP to guarantee that irrigation systems are maintained.
Applicant Response	The Applicant is content to review the NFU's suggested wording on minimising the effects of construction on irrigation systems and discuss its possible inclusion in the First iteration EMP **[APP-234]**.

Reference Number	Comment from Relevant Representation/Applicant Response
RR-074n	15. Agricultural Liaison officer 15.1 Liaison with landowners, tenants and agents is essential but there is only mention of a Community Relations Manager within the FIEMP. This is not adequate and the NFU would like to see that the main works contractors will have to employ an agricultural liaison officer to carry out liaison with landowners. The NFU has specific wording that it would like to see agreed and included in the FIEMP which covers the roles which need to be undertaken by the ALO.
Applicant Response	The Applicant is content to review the NFU's suggested wording on the roles of an agricultural liaison officer and discuss its possible inclusion in the First iteration EMP **[APP-234]**.
RR-074o	16. Agricultural Use of the A428 16.1 The NFU requested confirmation that the proposed A428 will remain for the use of all traffic including agricultural vehicles. HE has confirmed that the new dual carriageway will be designated an all-purpose trunk road. The NFU would like to see this stated in the DCO.
Applicant Response	The new dual carriageway will be an all purpose trunk road and there are no restrictions as to the use of that road by agricultural vehicles being sought within the draft DCO **[APP-025]**.
RR-074p	17.0 Request to Attend Hearings and make Representations 17.1 The NFU wishes to request to make oral representations at the issue specific, draft DCO and compulsory acquisition hearings which may be held if necessary. The NFU will be working closely with the agents that represent the NFU members affected. Louise Staples Senior Rural Surveyor
Applicant Response	The Applicant notes this comment.

RR-075 Bryan Cave Leighton Paisner LLP on behalf of National Grid (NGET plc and NGG plc

Reference Number	Comment from Relevant Representation/Applicant Response
RR-075a	Representation by National Grid Electricity Transmission Plc and National Grid Gas Plc (together, "National Grid") in respect of the Highways England A428 Black Cat to Caxton Gibbet Improvements Scheme DCO (the "Project") This relevant representation is submitted on behalf of National Grid Electricity Transmission Plc ("NGET") and National Grid Gas Plc ("NGG") (together, "National Grid") in respect of the Project, and in particular National Grid's infrastructure and land which is within or in close proximity to the proposed Order limits. National Grid will require appropriate protection for retained apparatus including compliance with relevant standards for works proposed within close proximity of its apparatus. National Grid's rights of access to inspect, maintain, renew and repair such apparatus must also be maintained at all times and access to inspect and maintain such apparatus must not be restricted. Further, where the Promoter intends to acquire land or rights, or interfere with any of National Grid's interests in land or National Grid's apparatus, National Grid will require appropriate protection and further discussion is required on the impact to its apparatus and rights. Further detail is set out below.
Applicant Response	Noted and the Applicant has responded to each of the detailed comments below.
RR-075b	National Grid infrastructure within/in close proximity to the proposed Order Limits National Grid owns or operates the following infrastructure within or in close proximity to the proposed Order limits for the Project: Electricity Transmission NGET has a high voltage electricity overhead transmission line within or in close proximity to the proposed Order limits. The overhead line forms an essential part of the electricity transmission network in England and Wales. The details of the electricity assets are as follows: - Overhead Lines: 4VK (400kV) overhead line Eaton Socon – Wymondley Main; Cottam – Eaton Socon – Wymondley 2 - Fibre Cable: Fibre cable alongside the existing A428 alignment Gas Transmission NGG has a high pressure gas transmission pipeline and above ground installation ("AGI") located within or in close proximity to the proposed Order limits. The transmission pipeline and AGI form an essential part of the gas transmission network in England, Wales and Scotland: - Feeder Main 18 Huntingdon to St Neots; St Neots to Little Barford Power Station; St

Reference Number	Comment from Relevant Representation/Applicant Response
	Neots to New Wimpole - AGI Little Barford Power Station NGG is working with the Promoter regarding a diversion of the gas main. Protection of National Grid Assets As a responsible statutory undertaker, National Grid's primary concern is to meet its statutory obligations and ensure that any development does not impact in any adverse way upon those statutory obligations. As such, National Grid has a duty to protect its position in relation to infrastructure and land which is within or in close proximity to the Order limits of the proposed Project. As noted, National Grid's rights to retain its apparatus in situ and rights of access to inspect, maintain, renew and repair such apparatus located within or in close proximity to the Order limits should be maintained at all times and access to inspect and maintain such apparatus must not be restricted. National Grid will require protective provisions to be included within the DCO for the Project to ensure that its interests are adequately protected and to ensure compliance with relevant safety standards. National Grid is liaising with the Promoter in relation to such protective provisions, along with any supplementary agreements which may be required. National Grid requests that the Promoter continues to engage with it to provide explanation and reassurances as to how the Promoter's works pursuant to the Order (if made) will ensure protection for those National Grid assets which will remain in situ, along with facilitating all future access and other rights as are necessary to allow National Grid to properly discharge its statutory obligations. National Grid will continue to liaise with the Promoter in this regard with a view to concluding matters as soon as possible during the DCO Examination and will keep the Examining Authority updated in relation to these discussions. Compulsory Acquisition Powers in respect of the Project As noted, where the Promoter intends to acquire land or rights, or interfere with any of National Grid's interests in land, National Grid will require further discussion with the Promoter.
Applicant Response	The Applicant is continuing to work with National Grid in relation to the protective provisions and any supplementary agreements which may be required with a view to agreeing the terms.
RR-075c	National Grid is particularly concerned that a number of plots are included in the Book of Reference for the Project where National Grid has fibre cables assets that do not appear to be referenced. National Grid has confirmed the existence of the fibre cable assets with the Promoter in its earlier consultation responses.

Reference Number	Comment from Relevant Representation/Applicant Response
	National Grid reserves the right to make further representations as part of the Examination process but in the meantime will continue to liaise with the applicant with a view to reaching a satisfactory agreement.
Applicant Response	The Applicant notes the comments raised regarding the Book of Reference **[APP-032]**, and will update the document for the next required submission. The Applicant was notified of the National Grid Fibre Cable assets, post DCO submission on 25 June 2021 during a meeting, so was unable to include these in the original application submission. On the 4 August 2021 there was further confirmation from National Grid that these Fibre Cables are owned by Vodafone, this has been reflected in the Book of Reference **[APP-032]**.

RR-076 Natural England

Reference Number	Comment from Relevant Representation/Applicant Response
RR-076a	Part I: Summary of Natural England's advice 1.1 Natural England's advice in these relevant representations is based on information submitted by Highways England in support of its application for a Development Consent Order ('DCO') in relation to the A428 Black Cat to Caxton Gibbet Improvement Scheme. 1.2 Natural England has been working closely with Highways England and its consultants, AECOM, to provide coordinated advice on the A428 Black Cat Roundabout to Caxton Gibbet Improvement Scheme since April 2017. Following the Planning Inspectorate's acceptance of the DCO application, Natural England will work with the applicant to develop a Statement of Common Ground (SoCG) as part of the examination process. We have recently received a copy of the draft SoCG and will start to review this in the coming weeks. 1.3 These relevant representations contain a summary of what Natural England considers to be the main nature conservation related issues in relation to the DCO application and indicate the principal submissions that it wishes to make at this point. Natural England will develop these points further as appropriate during the examination process. It may have additional or more detailed points to make, particularly if further information about the project becomes available, for example through ongoing ecological and soils survey work. 1.4 Part I of these representations provides an overview of the issues and a summary of Natural England's advice. Section 2 identifies the natural features relevant to this application. Section 3 summarises Natural England's overall view of the application and the main issues which it considers need to be addressed by the Secretary of State. 1.5 Part II of these representations sets out all the significant issues which remain outstanding, and which Natural England advises should be addressed by Highways England and the Examining Authority as part of the examination process in order to ensure that the project can properly be consented. These are primarily issues on which further information would be required in order to allow the Examining Authority properly to undertake its task or where further work is required to determine the effects of the project to provide a sufficient degree of confidence as to their efficacy. 1.6 Natural England will continue discussions with Highways England to seek to resolve these concerns and agree outstanding matters in a SoCG.

Reference Number	Comment from Relevant Representation/Applicant Response
	Failing satisfactory agreement, Natural England advises that the matters set out in sections 4 to 7 will require consideration by the Examining Authority as part of the examination process. 1.7 The Examining Authority may wish to ensure that the matters set out in these relevant representations are addressed as part of the Examining Authority's first set of questions to ensure the provision of information early in the examination process.
Applicant Response	Natural England's points are noted by the Applicant.
RR-076b	2 The natural features potentially affected by this application 2.1 Countryside is affected along the route of the Scheme between Black Cat Roundabout in Bedfordshire and Caxton Gibbet in Cambridgeshire. 2.2 The European / internationally designated sites relevant to this application are: • Portholme Special Area of Conservation (SAC); • Eversden and Wimpole Woods SAC; • Ouse Washes SAC, Special Protection Area (SPA) and Ramsar site. 2.3 The nationally designated sites relevant to this application are: • Portholme Site of Special Scientific Interest (SSSI); • Eversden and Wimpole Woods SSSI; • Ouse Washes SSSI; • Elsworth Wood SSSI; • Papworth Woods SSSI; • Little Paxton Common SSSI; • St. Neots Common SSSI. 2.4 The following European protected species may be affected by the proposed project: • Bats (various species);

Reference Number	Comment from Relevant Representation/Applicant Response
	• Great Crested Newts (GCN); • Otter. 2.5 The following nationally protected species may be affected by the proposed project: • Badger; • Wintering birds and breeding birds including barn owl, red kite and hobby; • Reptiles: common lizard. 2.6 The following areas of non-designated but valuable and sensitive habitat could be affected: • Great Ouse Valley County Wildlife Site (CWS); • Begwary Brook Pits CWS and Wildlife Trust Nature Reserve; • Birchfield Farm Meadows CWS; • Croxton Park CWS; • Elsworth (A428 to Common Farm) Protected Roadside Verge (CWS); • Eltisley Wood CWS; • Great Barford House Grassland CWS; • Latch Pool and Ditch CWS; • Little Barford CWS; • Palaceyard Wood CWS; • River Great Ouse CWS; • Rivers Ivel and Hiz CWS; • Sir John's Wood CWS; • Willow Pollards West of Sharp's Barn CWS; • Wyboston Pits CWS;

Reference Number	Comment from Relevant Representation/Applicant Response
	• Zwetlots Pits CWS. 2.7 UK Priority Habitats that will be affected by the proposal include broadleaved woodland, ancient and veteran trees and hedgerow. Other habitats affected include arable land, neutral grassland, ponds and other aquatic features. 2.8 There are no nationally designated landscapes that will be impacted upon by the proposed scheme. Embedded mitigation measures seek to avoid and minimise impacts on Local Landscape Character Areas (LLCAs) and visual receptors as far as possible, for example by integrating the scheme into the character of LLCAs and existing vegetation patterns. 2.9 The proposed scheme will impact on access for walkers, cyclists and horse riders, for example through loss or severance of Public Rights of Way (PRoW). Measures are incorporated into the design of the scheme to avoid or mitigate any adverse impacts as far as possible. 2.10 The project will result in physical damage, and or permanent loss of, Best and Most Versatile (BMV) land (Agricultural Land Classification (ALC) grades 1 – 3a) through temporary and permanent landtake; however, impacts have yet to be quantified through ALC and soil resource field survey work due to Covid restrictions. It is proposed to carry these out through 2021 subject to lifting of lockdown restrictions. 2.11 Biodiversity Net Gain: it is calculated that the project will deliver 20.5% biodiversity net gain but we note that the Highways England metric was used rather than the preferred Defra 2.0 metric.
Applicant Response	The Applicant wishes to clarify that the Scheme would not impact any ancient or veteran trees. As noted within Section 7.8 of the Chapter 7, Landscape and Visual Effects **[APP-076]** of the Environmental Statement, modifications were made to the Scheme design to avoid effects on the veteran Elm tree located to the north of Hen Brook and the Croxton Park Registered Park and Garden. Information relating to the veteran Elm tree and further trees identified within the extents for the Scheme are presented within Appendix 7.5 Arboricultural Impact Assessment (Part 1 to Part 5) **[APP-183** to **APP-187]** of the Environmental Statement. The Applicant can confirm that Natural England's summary of the sites and remaining features likely to be affected by, or relevant to, the Scheme is accurate. Further, Natural England is correct in stating that to calculate the Biodiversity Net Gain (BNG) of the preliminary design of the Scheme, the Applicant has used the Highways England (BNG) metric, published by Highways England in April 2018 within Chief Highway

Reference Number	Comment from Relevant Representation/Applicant Response
	Engineer Memorandum 422/18 to calculate the biodiversity net gain for the Scheme. In undertaking this exercise using the Highways England adopted method, a BNG score of 20.5% is being achieved. In response to Written Question Q 1.3.2.1 (Part a), within the Applicant's Response to the Examining Authorities First Round of Written Questions **[TR010044/EXAM/9.2]**, the Applicant can confirm that a BNG calculation using the Defra Metric 2.0 is currently in preparation and will be submitted into the examination for consideration.
RR-076c	2.12 The main issues raised by this application are: 2.12.1 Designated sites: Natural England has reviewed the Environmental Statement (ES), Habitats Regulations Assessment (HRA) and accompanying documents and is broadly satisfied that impacts to statutorily designated sites, including hydrological and air quality impacts, can be ruled out or proposed mitigation is sufficient to demonstrate no adverse effect. The exception to this is in relation to Eversden and Wimpole Woods SAC. Natural England's bat specialists have advised that further evidence is required, detailed in section 3.3 below, to support the no likely significant effect conclusion of the ES and HRA, for Eversden and Wimpole Woods SAC.
Applicant Response	The Applicant welcomes Natural England's confirmation of its satisfaction that, except for Eversden and Wimpole Woods SAC, adverse effects of the Scheme on statutorily designated sites can be ruled out or would be sufficiently mitigated. Regarding Natural England's assertion that further evidence is required to support the Applicant's conclusion that the Scheme would not give rise to likely significant effects on Eversden and Wimpole Woods SAC (as reported in the Habitats Regulations Assessment: No Significant Effects Report **[APP-233]**), the Applicant details its position against the specific issues and concerns raised in Natural England's Section 3.3 below.
RR-076d	2.12.2 European protected species: • We are awaiting advice from Natural England's bat specialists regarding the effects of the scheme on bats, including mitigation proposals and licensing requirements. We will update our position on this matter through the SoCG. • Minor adverse impact to otters, through temporary loss of habitat connectivity. Ecological mitigation and monitoring set out in the Schedule of Mitigation and BMP seeks to minimise impacts as far as possible.

Reference Number	Comment from Relevant Representation/Applicant Response
	Natural England is satisfied with this in principle, subject to agreement of the detail following completion of survey updates;
Applicant Response	The Applicant will continue its engagement with Natural England and is actively seeking to develop the content of its Statement of Common Ground with the organisation, particularly on the matters raised within Natural England's Relevant Representation. The Applicant welcomes Natural England's satisfaction with the findings of the Biodiversity assessment set out in Chapter 8, Biodiversity **[APP-077]** of the Environmental Statement in relation to the reported adverse effects on Otter, and the related mitigation and monitoring measures proposed in both the Schedule of Mitigation **[APP-235]** and the First Iteration EMP **[APP-234]**. A programme of surveys and review of any new biodiversity records will be carried out to keep the biodiversity baseline up to date. This includes records for Otter and a survey for riparian mammals incorporating Otter in 2022.
RR-076e	• Temporary loss of breeding ponds and terrestrial habitat will have minor adverse impact on GCN which will be offset through an overall increased provision of ponds and wetland areas. Natural England is satisfied with this noting that Highways England are in the process of joining District Level Licensing (DLL) schemes. Should DLL not be progressed for any reason Highways England will require a Natural England European Protected Species (EPS) Licence. In such case we recommend that a full draft GCN application is agreed with Natural England as soon as possible, in order to expedite the issue of a Letter of No Impediment (LONI) for the examination. The draft licence application will need to include details of impacts, mitigation and monitoring. We will update our position through the SoCG as this matter, including survey updates, is progressed.
Applicant Response	The Applicant can confirm that District Levelling Licensing (DLL) is being sought to mitigate the impacts of the Scheme on identified Great Crested Newt (GCN) breeding ponds and terrestrial habitat within the administrative boundary of Bedfordshire. Discussions are ongoing with both Natural England and the NatureSpace Partnership (the local organisation working with Natural England to oversee the licence in Bedfordshire) to progress the application process. For the impacts of the Scheme identified on Great Crested Newt (GCN) within the administrative boundary of Cambridgeshire, a Natural England European Protected Species Licence (EPS) is being sought. The

Reference Number	Comment from Relevant Representation/Applicant Response
	Applicant is currently compiling the draft application which will include details of impacts, mitigation and if required the monitoring to attain the Letter of No Impediment (LONI) for GCN from Natural England. The Applicant has undertaken additional GCN eDNA surveys between May and June 2021 and is producing a supplementary report presenting the findings of the surveys. This report will be submitted to Natural England, NatureSpace and the ExA during the examination period.
RR-076f	2.12.3 Nationally protected species: • Badger: Minor adverse impacts. Ecological mitigation measures detailed in the BMP including creation of new sett and provision of underpasses seek to minimise impacts as far as possible. Natural England is in the process of reviewing the draft badger licence application and should be in a position to issue a LONI shortly.
Applicant Response	The Applicant can confirm that a Letter of No Impediment (LONI) in relation to the draft badger licence application for the Scheme was issued by Natural England on 15 July 2021. This LONI forms part of the updated Consents and Agreements Position Statement **[TR010044/APP/3.3]**, which has been submitted at Deadline 1.
RR-076g	• Wintering and breeding birds, including barn owl, red kite and hobby: minor adverse impact will occur through temporary loss of habitat / nesting habitat and disturbance and direct loss of farmland bird habitat including arable land, hedgerows and scrub. Natural England is satisfied in principle with the mitigation measures set out in the BMP, subject to agreement of the detail.
Applicant Response	The Applicant welcomes Natural England's agreement on its assessment of effects on wintering and breeding birds, and the associated mitigation and enhancement measures,
RR-076h	• Common lizard: Natural England is satisfied that there will be negligible impact following implementation of best practice working methods and habitat creation and enhancement outlined in the BMP.
Applicant Response	The Applicant welcomes Natural England's agreement on its assessment of effects on Common Lizard, and the associated mitigation and enhancement measures.

Reference Number	Comment from Relevant Representation/Applicant Response
RR-076i	• Detailed species mitigation measures set out in the BMP will need to reflect the findings of ongoing ecological survey updates
Applicant Response	The Applicant can confirm that the mitigation measures set out within the Biodiversity Management Plan (BMP) of the First Iteration EMP **[APP-234]** will be reviewed and if necessary revised following the completion of the ongoing ecological surveys during 2021. The applicable updates or amendments required within the BMP would be presented within the Second Iteration Environmental Management Plan (EMP). This second iteration EMP would be based upon the First Iteration EMP **[APP-234]** and will refined and adopted prior to the commencement of the construction phase for the Scheme.
RR-076j	2.12.4 Non-designated habitat: minor adverse impact to Sir John's Wood and ancient woodland, due to temporary loss of hedgerow connectivity with two other woodlands, will be mitigated through incorporation of a mammal tunnel into the scheme design to maintain ecological connectivity postconstruction. Indirect impacts to the River Great Ouse CWS and Wyboston Pits CWS, through pollution and siltation, will be mitigated through implementation of best practice construction measures and measures to ensure no impact to groundwater flows to the River Great Ouse through dewatering of borrow pits and cuttings. Natural England is satisfied with this subject to agreement of the details through the EMP/BMP.
Applicant Response	The Applicant welcomes Natural England's agreement on its mitigation and enhancement measures in relation to restoring connectivity between Sir John's Wood (CWS and semi-natural ancient woodland) and two neighbouring woodlands, and of implementation of best practice construction measures and measures to ensure no impact to groundwater flows to the River Great Ouse through dewatering of borrow pits and cuttings.
RR-076k	2.12.5 UK Priority Habitats: Generally minor adverse impacts, through temporary loss of habitat, will be minimised as far as possible through ecological mitigation and enhancement measures outlined in the BMP. The BMP will need to be updated to reflect the findings of ongoing habitat survey work and detailed measures agreed with relevant stakeholders.
Applicant Response	Please see response to RR-076i.

Reference Number	Comment from Relevant Representation/Applicant Response
RR-076l	2.12.6 We are satisfied that embedded mitigation illustrated in the Environmental Masterplan, and essential mitigation measures set out in the First Iteration EMP seek to avoid and minimise impacts on Local Landscape Character Areas (LLCAs) and visual receptors as far as possible. Detailed measures should be agreed to ensure opportunities are maximised to benefit priority enhancement areas such as those described above.
Applicant Response	In addition to the enhancement of biodiversity, for example creation of priority habitats such as woodland and grassland over and above that required for mitigation, opportunities will be taken to maximise the benefits to priority enhancement areas. This will be considered as part of the detailed design process. With respect to biodiversity enhancement, the Applicant refers Natural England to the First Iteration EMP **[APP-234]** for the Scheme.
RR-076m	2.12.7 Impacts on the PRoW network and recreational users of the River Great Ouse, for example through loss of access and connectivity, will be minimised through embedded and essential mitigation measures set out in the Environmental Masterplan and the EMP.
Applicant Response	The Applicant confirms that control measures to minimise the impacts to the Public Rights of Way (PRoW) network and recreational users of the River Great Ouse during the construction phase of the Scheme are presented within the Register of Environmental Actions and Commitments (REAC) [**APP-234**]. Commitment ESS-PH2 states, "*The Principal Contractor will implement temporary public rights of way (PRoW) diversion routes and works crossings based on the principles described in the Outline Construction Traffic Management Plan. In locations where construction works are in proximity to PRoW, the Principal Contractor will fence off works areas using temporary fencing panels to segregate the site work areas from the public. Where these construction works areas sever PRoW, the Principal Contractor will consult and agree how to manage these routes with the appropriate local authority. Where practical and feasible, a local diversion route via an adjacent PRoW, or locally around the perimeter of the fenced work site, will be identified by the Principal Contractor and temporary signage erected to direct the public around these routes. If a short duration closure of a footpath is required and no local diversion can be provided, then appropriate signage will be erected by the Principal Contractor at the extent of the footpath closure, to ensure that the public are informed of the closure*." Commitment ESS-PH3 states, "*In relation to construction of the River Great Ouse viaduct, the Principal Contractor will review and implement traffic management and the phasing of the works in line with the*

Reference Number	Comment from Relevant Representation/Applicant Response
	principles contained in the Outline Construction Traffic Management Plan [TR010044/APP/7.4]. Works will not be carried out for more than 24 hours and the public will be notified in advance by the Principal Contractor. Works will not be continuous, although closures will largely be undertaken during weekdays in the daytime with measures put in place to ensure that the river can be reopened outside of working hours. There will be no closures of the River Great Ouse during the weekend(s) of the Bedford River Festival (typically held bi-annually in late July).” As embedded mitigation the new or realigned PRoW network as presented on the Environmental Masterplan **[APP-091]**, Figure 2.4 of the Environmental Statement, will form part of the Scheme and will therefore minimise the impacts to the PRoW network when the Scheme becomes operational.
RR-076n	2.12.8 Soils (including BMV land): It is proposed to carry out the delayed ALC and soil resource surveys through 2021 and these will be required to inform the ES and Soil Resource Strategy. Based on a worst-case assumption the ES estimates that the proposed development will result in the total permanent loss of 348.94ha of BMV soils as well as the total temporary disturbance of 511.881ha of BMV soils. Physical damage to soil will occur through excavation and temporary storage, soil compaction and the exacerbation of soil erosion through handling and storage of soils. Embedded and essential mitigation measures and monitoring have been incorporated into the scheme to minimise impacts on soils and BMV land as far as possible. Additional essential mitigation and monitoring measures will also be implemented.
Applicant Response	Section 9.4 within Chapter 9, Geology and Soils **[APP-078]** of the Environmental Statement explains that soils sampling to inform the geology and soils assessment were planned to be carried out in 2020, however, due to the Covid-19 pandemic and associated local lockdown restrictions, these were unable to be undertaken. The Applicant has committed to undertake this sampling in 2021 subject to the lifting of lockdowns. Following the completion of the fieldwork and the analysis of findings, a report will be prepared by the Applicant and submitted to the Examination on or before Deadline 6. Annex E Soil Handling and Management Plan located within the First Iteration EMP **[APP-234]** details the outline control measures to be implemented during the construction phase of the Scheme to manage the effects on Best and Most Versatile (BMV) land.

Reference Number	Comment from Relevant Representation/Applicant Response
RR-076o	2.12.9 Biodiversity net gain: we support the calculated delivery of 20.5% biodiversity net gain through the project although we note that the Highways England metric was used instead of the preferred Defra 2.0 metric which considers habitat condition and other key criteria. For this reason Natural England strongly recommends use of the Defra 2.0 metric to ensure accuracy of net gain calculations for this Scheme.
Applicant Response	As stated within paragraph 8.2.50 of Chapter 8, Biodiversity **[APP-077]** and presented within Appendix 8.19 **[APP-206]** Biodiversity Net Gain of the Environmental Statement, the Applicant has used the method published by Highways England in April 2018 within Chief Highway Engineer Memorandum 422/18 to calculate the biodiversity net gain for the Scheme. This method has been adopted throughout Highways England and is the method used to calculate the biodiversity net gain scores for the road schemes for which they are the proponents of. As noted in the Applicant's response to Written Question Q1.3.2.1 within the Applicant's Response to the Examining Authorities First Round of Written Questions **[TR010044/EXAM/9.2],** the Applicant is currently undertaking a revised Biodiversity Net Gain calculation using the Defra Metric 2.0 methodology and will report the outcomes of this calculation on or before Deadline 3.
RR-076p	2.12.10 Natural England advises that consideration should be given to incorporating biodiversity and green infrastructure enhancements into the borrow pit restoration schemes to deliver benefits for people and wildlife.
Applicant Response	As stated with paragraphs 2.6.285 to 2.6.292 of Chapter 2, The Scheme **[APP-071]** of the Environmental Statement, the final form of any restoration would be undertaken at detailed design stage with the reinstatement of the borrow pits following the completion of the main construction works phase of the Scheme. The Scheme proposes to return the borrow pits back to agricultural land and will offer the previous landowner the opportunity to purchase the land back. As shown on the Environmental Masterplan **[APP-091]**, Figure 2.4 of the Environmental Statement, the areas intended to be used for borrow pits are not required for embedded or essential environmental mitigation, nor would the tests for permanent compulsory acquisition of land be met if the land was to be solely acquired for 'enhancement' purposes. As such the Applicant has not sought to provide green infrastructure enhancements within the footprints of the borrow pits.

Reference Number	Comment from Relevant Representation/Applicant Response
	Any consideration for incorporating biodiversity and green infrastructure enhancements into the restored borrow pits would be at the discretion of the new landowners.
RR-076q	Part II: Natural England's detailed advice 3 Planning Inspectorate Reference: TR010044 3.3 Natural England's advice is that in relation to the nature conservation, landscape and soil resource matters within its remit, there is no fundamental reason why the project should not be permitted but that insufficient evidence has been provided to date, to establish that all the derogation tests under Habitats Directive will be met with regard to impacts on Eversden and Wimpole Woods SAC. Further information is also required, through ALC and soil resource surveys, to fully inform the assessment of impacts and mitigation requirements in relation to BMV land and soils. 3.4 Natural England's headline points are that on the basis of the information submitted: 3.5 Designated sites: 3.5.1 European / International sites: Highways England has submitted a thorough ES incorporating a HRA: No Significant Effects Report which demonstrates beyond reasonable scientific doubt that the proposed scheme will not have an adverse effect on the integrity of the Ouse Washes SAC, SPA and Ramsar site and Portholme SAC. However, Natural England does not consider there is sufficient information available to rule out likely significant effect with regard to the Eversden and Wimpole Woods SAC bat population. Barbastelle bats have been recorded travelling up to 20km from their roost and the A428 scheme is located approximately 8km at its nearest point from Eversden and Wimpole Woods SAC. Whilst it is acknowledged that the Core Sustenance Zone (CSZ) of pregnant barbastelles is generally 6km (BCT (2020)), home ranges can vary, depending on the available resource. Natural England is also concerned by the comment 'bats would be tracked for 5km' as ideally bats should be tracked to their roosts. Our advice is that the following should be provided: • Alongside the maternity colony considerations, assessment is required of the winter foraging, hibernation and population exchange with other known barbastelle colonies in the area to inform the HRA as these are considered important supporting functions to the SAC; • Efforts should be made to identify whether the scheme impacts on winter foraging (hibernating) barbastelle; notably to inform the HRA for the SAC. Winter feeding grounds are important in maintaining bat energy reserves throughout the hibernation period, this information will be critical in determining No

Reference Number	Comment from Relevant Representation/Applicant Response
	Adverse Effect on the Eversden and Wimpole SfAC, for which barbastelle are the qualifying feature. Winter automated static acoustic bat detector work should be undertaken along key sections of the route in areas that represent optimal winter foraging habitat. We would advise HE to undertake static detector monitoring for at least 6 nights, preferably 10, for each of the winter months (i.e. November to March inclusive); • Limited geographical and temporal information has been collected from advanced licensed bat survey techniques (ALBST) with no pre-parturition surveys conducted and a small number of barbastelles trapped and tracked. Furthermore, the only bat trapping survey carried out were at the far western end of the route, away from the SAC. Natural England advises that further data should be collected by ALBST along the length of the scheme or through further surveys of Eversden and Wimpole Woods SAC population. The home range of the maternity colonies, main foraging area and flight lines as well as the seasonal changes in habitat use in the barbastelle population need to be identified in order to determine how they may be impacted by the scheme i.e. severance of key areas. • Cumulative (in combination) impacts with other known developments should be considered as part of the HRA.
Applicant Response	The Applicant welcomes Natural England's confirmation of its satisfaction that, except for Eversden and Wimpole Woods SAC, adverse effects of the Scheme on statutorily designated sites of international biodiversity importance can be ruled out. Regarding Natural England's assertion that further evidence is required to support the Applicant's conclusion that the Scheme would not give rise to likely significant effects on Eversden and Wimpole Woods SAC (as reported in the Habitats Regulations Assessment: No Significant Effects Report **[APP-233]**), the Applicant held a workshop with Natural England on 23 August 2021 to discuss the survey data collected and relied upon within its assessment, how the conclusion of no likely significant effects on the SAC has been arrived at, and the feasibility of undertaking further bat surveys between now and the end of the Examination. Following the workshop, the Applicant shared its proposed scope for further bat surveys with Natural England on 24 August 2021. This included a combination of habitat suitability inspections and crossing point surveys at locations along the Scheme, and advanced licence bat survey techniques (ALBST) to trap and tag Barbastelle bats within Eversden and Wimpole Woods SAC. The Applicant made Natural England aware of the fact that the proposed surveys would need to be constrained to a period between September – December 2021 as time was needed to secure the

Reference Number	Comment from Relevant Representation/Applicant Response
	necessary land access and licences, and to enable the Applicant to then collate the findings of the surveys and submit a report to the Examination at Deadline 7. The Applicant received feedback from Natural England on its proposed survey scope on 25 August 2021. Following a review of Natural England's further recommendations, the Applicant has discussed these with Natural England to agree the survey scope and identify the licence applications required to carry out ALBST surveys within the SAC. Further information regarding the Applicant's position on Habitats Regulations Assessment matters is detailed within the following documents submitted to the Examination at Deadline 1: • Eversden and Wimpole Woods SAC Technical Note **[TR010044/EXAM/9.13]**. • Joint Position Statement on Habitats Regulations Assessment and Mitigation **[TR010044/EXAM/9.14]**.
RR-076r	3.5.2 National sites: Based on the information provided through the ES and accompanying documents Natural England is satisfied that the scheme will not have any adverse effect.
Applicant Response	The Applicant welcomes Natural England's confirmation of its satisfaction that the Scheme will not have any adverse effects on statutorily designated sites of national biodiversity importance.
RR-076s	3.5.3 County Wildlife Sites: We are satisfied that potential impacts on the River Great Ouse and Sir John's Wood CWSs will be appropriately mitigated through the implementation of the measures detailed in the Schedule of Mitigation and BMP
Applicant Response	The Applicant welcomes Natural England's implication that, apart from the River Great Ouse and Sir John's Wood, the Scheme will not have any adverse effects on any County Wildlife Sites, and that with respect to the River Great Ouse and Sir John's Wood CWS, these two sites will be appropriately mitigated through the implementation of the measures detailed in the Schedule of Mitigation and the BMP, Annex D of the First Iteration EMP **[APP-243]**.
RR-076t	3.6 European protected species: 3.6.1 Natural England's bat specialists are reviewing the ES assessment of effects on bats, including mitigation measures and licensing requirements. We will update our position on this matter through the SoCG;

Reference Number	Comment from Relevant Representation/Applicant Response
Applicant Response	The Applicant looks forward to receiving the outcome of Natural England's review of the Applicant's environmental assessment of effects on bats, including mitigation measures and any licensing requirements through an update of its position on this matter through the Statement of Common Ground.
RR-076u	3.6.2 We are broadly satisfied with mitigation measures proposed to address minor adverse impacts on otters;
Applicant Response	The Applicant welcomes Natural England's confirmation that it is broadly satisfied with mitigation measures proposed to address minor adverse impacts on Otter.
RR-076v	3.6.3 Loss of GCN ponds will be mitigated through the use of District Level Licensing (DLL) or application of a Natural England EPS Licence, or a combination of the two. We understand that a submission has been made to DLL Natural England with respect to the part of the scheme located in Cambridgeshire and that a submission will be made to NatureSpace for the Bedfordshire part of the scheme. We welcome and encourage the use of DLL and wish to flag that there is currently a lack of ponds to progress DLL hence we would become any opportunities that Highways England can identify as suitable location for GCN ponds. Should application for an EPS licence be required we would encourage the submission of a full draft licence application as soon as possible to expedite the process of obtaining a LONI from Natural England.
Applicant Response	The Applicant recognises that Natural England encourages the use of District Levelling Licensing (DLL) and we acknowledge that there is currently a lack of ponds to progress DLL and hence that Natural England would welcome any opportunities that Highways England can identify as suitable locations for GCN ponds. As such, the Applicant can confirm for the impacts of the Scheme identified on Great Crested Newt (GCN) within the administrative boundary of Cambridgeshire, a Natural England European Protected Species Licence (EPS) is being sought. The Applicant is currently compiling the draft application which will include details of impacts, mitigation and, if required, the monitoring to attain the Letter of No Impediment (LONI) for GCN from Natural England.

Reference Number	Comment from Relevant Representation/Applicant Response
	To mitigate and compensate the impacts of the Scheme on identified Great Crested Newt (GCN) breeding ponds and terrestrial habitat within the administrative boundary of Bedfordshire, a submission has been made to the NatureSpace Partnership (the local organisation working with Natural England to oversee the licence in Bedfordshire) to join the District Level Licensing Scheme.
RR-076w	3.7 Nationally protected species: 3.7.1 Natural England is engaging in discussions with Highways England around agreeing a LONI for badgers; 3.7.2 We are aware that further surveys are being carried out to fully determine the impacts of the scheme and mitigation requirements in relation to badger and birds. Opportunities should be taken to fully mitigate impacts and provide enhancements for breeding and wintering birds as far as possible, taking advice from local experts. We will update our position on this through the SoCG.
Applicant Response	The Applicant can confirm that a Letter of No Impediment (LONI) in relation to the draft badger licence application for the Scheme was issued by Natural England on 15 July 2021, as confirmed within the updated Consents and Agreements Position Statement **[TR010044/EXAM/3.3]** submitted at Deadline 1. The Applicant confirms that to comply with the requirements of the LONI, confirmation badger surveys will be completed in advance of construction. The impacts of the Scheme and mitigation requirements in relation to birds have been reported within Chapter 8, Biodiversity **[APP-077]** of the Environmental Statement. Further surveys including for badger and birds will be carried out to ensure that the biodiversity baseline is kept up to date. In the case of badger, the survey is to check for any changes in badger activity with respect to appropriate mitigation and informing a licence application. The bird survey has focussed on Barn Owl with surveys to check on the behaviour of this species in relation to the Scheme. The Applicant notes that Natural England will update its position on this through the Statement of Common Ground.
RR-076x	3.8 UK Priority Habitats and Local Landscape: The EMP will need to be updated to reflect the findings of ongoing habitat survey work. Input from local experts should be sought on detailed mitigation and enhancement measures for priority and other habitats including woodland, hedgerow, grasslands and arable field margins. This will help

Reference Number	Comment from Relevant Representation/Applicant Response
	maximise benefits for priority areas such as Ouse Valleys and West Cambridgeshire Hundreds and local flora and fauna.
Applicant Response	The Applicant can confirm that the First Iteration EMP **[APP-234]** will, where necessary, be updated to reflect the results from the ongoing habitat survey(s).
RR-076y	3.9 Soil and Agricultural Land Quality: The key issue is that at present Highways England haven't been able to carry out a detailed ALC survey because of Covid 19. We welcome the commitment to a full detailed survey being carried out when lockdown restrictions allow; Natural England strongly encourages this since it will also be part of the soil resource survey to identify soil resources and to inform the soils management plan. There appears to have been good consideration of soil and ALC matters in the submitted documents using key reference and guidance documents. The full Soil Resource Plan (SRP) is required to review the current iteration of proposed soil handling and management in the Soil Management Plan (SMP) (Annex E of the First Iteration Environmental Management Plan) at the detailed design stage.
Applicant Response	Section 9.4 of Chapter 9, Geology and Soils **[APP-078]** of the Environmental Statement explains that intrusive soils sampling surveys to inform the geology and soils assessment were planned for 2020. However due to the Covid-19 pandemic and associated local lockdown restrictions, these were unable to be undertaken. The Applicant has committed to undertake the surveys in 2021 (subject to the lifting of lockdowns) and following the completion of the fieldwork and the analysis of findings, a report will be prepared by the Applicant and submitted to the Examination on or before Deadline 6. The findings of the soil surveys will be reviewed against the control measures set out within Annex E outline Soil Management Plan included with the First Iteration EMP **[APP-234]**, and if necessary these measures will be revised and updated in the Second Iteration Environmental Management Plan during detailed design.
RR-076z	PART II: OUTSTANDING MATTERS REQUIRING ATTENTION 4 Further evidence or assessment work required

Reference Number	Comment from Relevant Representation/Applicant Response
	4.1 Further information requested in section 3.3 should be provided to rule out likely significant effect in regard to the Eversden and Wimpole Woods SAC bat population.
Applicant Response	Regarding Natural England's assertion that further evidence is required to support the Applicant's conclusion that the Scheme would not give rise to likely significant effects on Eversden and Wimpole Woods SAC (as reported in the Habitats Regulations Assessment: No Significant Effects Report **[APP-233]**), the Applicant's position regarding the further information and surveys requested by Natural England is set out within its response to RR-076q.
RR-076aa	4.2 If required, a full EPS licence application for GCN should be submitted and agreed with Natural England as soon as possible to facilitate obtaining a LONI examination.
Applicant Response	The Applicant can confirm for the impacts of the Scheme identified on Great Crested Newt (GCN) within the administrative boundary of Cambridgeshire, a Natural England European Protected Species Licence (EPS) is being sought. The Applicant is currently compiling the draft application which will include details of impacts, mitigation and, if required, the monitoring to attain the Letter of No Impediment (LONI) for GCN from Natural England.
RR-076ab	4.3 ALC and soil resource surveys will need to be completed to inform the SRP and SMP. This should follow the methodology described in Natural England's *Technical Note 049 Agricultural Land Classification: protecting the best and most versatile agricultural land*. The ES and other relevant documents will need to be updated accordingly. Following the submission of this information, Natural England will provide its updated position through the draft SoCG;
Applicant Response	The Applicant has committed to undertake soil surveys in 2021 (subject to the lifting of Covid-19 pandemic related lockdowns) and following the completion of the fieldwork and the analysis of findings, a report will be prepared by the Applicant and submitted to the Examination on or before Deadline 6.
RR-076ac	4.4 The ES, HRA and other relevant documents will need to be updated pending the outcome of ongoing habitat and species survey updates.

Reference Number	Comment from Relevant Representation/Applicant Response
Applicant Response	The Applicant can confirm that the applicable documents in the Application will be reviewed (and where necessary revised) taking cognizance of the findings and conclusions of the ongoing habitat and species surveys.
RR-076ad	**5 Comments on the draft DCO.** 5.1 Natural England is satisfied that the draft DCO includes appropriate requirements, including requirements 3,6,10,17 and 20, to secure delivery of environmental mitigation and enhancement measures agreed in the relevant plans including the Environmental Management Plan (and embedded Biodiversity Management Plan, Soil Handling and Management Plan and Landscape and Ecology Management Plan) and the Biodiversity Pre-commencement Plan.
Applicant Response	The Applicant thanks Natural England for this confirmation.

RR-077 Brown & Co on behalf of Neal Gerard Doherty

Reference Number	Comment from Relevant Representation/Applicant Response
RR-077a	This representation is made on behalf of Mr Neal Gerard Doherty who is the owner of the plots 1/36a, 1/36b, 1/36c, 2/38a, 2/38b, 2/38c, 3/2a, 3/2b and 3/9a detailed within the book of reference and who has an interest in plots 1/37a, 1/37b, 3/1a, 3/1b, 3/1c and 3/1d as Director of D.H.T. Limited, a separate registration will be submitted for D.H.T. Limited. My client strongly objects to the proposed A428 works and feel that they will detrimentally impact upon the surrounding area and offer minimal benefit to the local community. My clients live within close proximity to the proposed route and this will have a detrimental impact upon their enjoyment of their property. My client retains his residential property to the north of the proposed A428 and my client is concerned that access is maintained at all times during construction.
Applicant Response	The Applicant will seek to maintain access to all properties and roads throughout the construction of the works or provide alternative access arrangements. In some instances, it may be necessary to restrict access for limited periods, however, the Applicant would seek to minimise the number and duration of any such restrictions as far as reasonably practicable. The Principal Contractor will liaise with the affected landowner to ensure that such disruption is minimised.
RR-077b	My client also owns a number of commercial units which enjoy access directly from the A1. This access is being replaced by a new link road. This will primarily be for traffic to exit the services and so my client will be required to cross passing traffic in order to access their property. My client is concerned with the safety of passing oncoming traffic and seeks clarity on the speed restriction enforcement following completion of the scheme. The current occupiers of the commercial units have expressed concerns to my clients that they will lose passing trade. My client wants to ensure that access can be taken at all times during the scheme to his property and also the commercial units.
Applicant Response	The Applicant proposes a 40mph speed limit along the A1 Services Link as detailed in the Permanent Speed Limit Plans **[APP-015]**. The design of the A1 Services Link is intended to maintain access for local residents and businesses, and for the users of the service area off the A1 southbound carriageway. The link is intended to promote a low-traffic, low-speed environment and it has been designed to accommodate vehicles turning into and out of accesses serving private land. Once the Scheme opens, these vehicles will benefit from not having to turn directly on and off the A1 main carriageway reducing the risk of a road traffic collision and improving safety. It will be the responsibility of the Bedfordshire constabulary to enforce the speed restrictions along the A1 Services Link.

Reference Number	Comment from Relevant Representation/Applicant Response
	As regards passing trade, there are overall benefits in the proposed changes to the access arrangements in this section and although it is expected that there will be a change in traffic flows, access will be maintained to the commercial premises to enable trade to continue. Furthermore, as set out in response to RR-077a, the Applicant will seek to maintain access to all properties and roads throughout the construction of the works or provide alternative access arrangements. In some instances, it may be necessary to restrict access for limited periods, however, the Applicant would seek to minimise the number and duration of any such restrictions as far as reasonably practicable. The Principal Contractor will liaise with the affected landowner to ensure that such disruption is minimised.
RR-077c	It is unclear when the new link road will be constructed. My clients existing access is suitable for HGV's and as such seeks clarification on the design and width of the new access point. Due to the commercial businesses on site it is crucial that HGV access is maintained throughout the scheme.
Applicant Response	The Principal Contractor will keep the landowner informed of the construction programme associated with the A1 Service Link as this is developed. The modified access will be designed to accommodate heavy goods vehicles into and out of the property.
RR-077d	My clients land is identified as being used as a Borrow Pit. This land has previously been used for gravel extraction and as such is identified as filled land. Survey work undertaken by the Highways England team was taken outside of the borrow pit area and as such my clients feels that a borrow pit in this area is unnecessary. My client feels that increasing the size of other borrow pits in the area would be better and more effective. My clients request that this area is removed from the Development Consent Order. If the borrow pit is to be located on my clients land then my clients seek details of the bund to be put in place to protect his existing properties together with details of security fencing to ensure that his property is protected during the works.

Reference Number	Comment from Relevant Representation/Applicant Response
	My client also seeks clarification on the measures to be put in place to control noise and dust during construction and also what equipment will be used to monitor vibration and the impact on their residential property. Accordingly our client will represent that the DCO should be amended to reflect the points set out above.
Applicant Response	The selection process for the preferred borrow pit sites is detailed in the Borrow Pit Optioneering Report **[APP-246]**. The Applicant has undertaken appropriate investigation and has concluded that the quantity and quality of material for the construction of the works is adequate. The borrow pit was selected due to the relative proximity to the embankment of new dual carriageway for which is material is required for, and the relative impact on the environment compared to the other sites considered. The existing bunding which provides protection to the landowner's property will be maintained. Additional bunding will be provided using topsoil and subsoil material stripped from the proposed borrow pit site. Further details of this bunding and fencing will be provided by the Principal Contractor when it is developed. The proposed measures to mitigate noise and vibration effects during the construction phase are set out in the outline Noise and Vibration Management Plan within Annex B of the First Iteration EMP **[APP-234].** Examples of such measures include: • All ancillary plant such as generators, compressors and pumps will be positioned so as to cause minimum noise disturbance. If necessary, acoustic barriers or enclosures will be provided, where appropriate. • Working methods will be developed specific to the area and will consider use of equipment and methods of operations to minimise noise. • Whenever possible, fabrication of materials will be undertaken off-site. • All plant and machinery in intermittent use will be shut down in intervening periods between work or throttled down to a minimum. • Proper use of plant with respect to minimising noise emissions with regular maintenance will be undertaken. All vehicles and mechanical plant used for the purpose of the works will be fitted with exhaust silencers and be maintained in good working order. • Minimising the drop height of materials into hoppers, lorries or other plant.

Reference Number	Comment from Relevant Representation/Applicant Response
	• Use of less intrusive alarms on vehicles, for example broadband vehicle reversing warnings. • Consideration of low vibration working methods, including non-vibratory compaction plant where possible. • Haul routes within the site boundary will be kept in good condition • The removal of obstructions that can cause, or add, resonance e.g. concrete bases. • No start-up or shut down of large vibratory rollers (approximately 13 tonnes) within 50m of receptors and medium vibratory rollers (approximately 3.5 tonnes) within 15m of receptors. • The use of cut-off trenches to disrupt direct vibration movement through the ground. • The use of pre-bores for piles. Exact details of the locations and equipment to be used to monitor vibration have not been defined at this early stage. However, the First Iteration EMP **[APP-234]** commits the contractor to evaluate the potential for significant vibration to result from construction activities and carry out vibration monitoring at the associated location. The First Iteration EMP **[APP-234]** also commits to informing nearby residents of such works and the vibration control measures which will be implemented. Only piling and works using vibratory rollers have been identified as a potentially significant source of vibration during the works. The proposed measures to mitigate dust effects during the construction phase are set out in the Dust Management Plan within Annex A Air Quality Management Plan of the First Iteration EMP **[APP-234]**. These cover activities such as general dust management measures, earthworks, surfacing works, construction, demolition and trackout. Examples of these measures include: • Remove materials that have the potential to produce dust from site as soon as possible, unless being re-used on site. If they are being re-used on-site, cover as appropriate. • Impose and signpost a maximum-speed-limit on surfaced and un-surfaced haul roads and work areas (if long haul routes are required these speeds may be increased with suitable specific control measures provided). • Ensure equipment is readily available on site to clean any dry spillages and clean up spillages as soon as reasonably practicable after the event using wet cleaning methods. • Avoid scabbling (roughening of concrete surfaces) if possible.

Reference Number	Comment from Relevant Representation/Applicant Response
	• Use water-assisted dust sweeper(s) on access and local roads, to remove, as necessary, any material tracked out of the site. This may require the sweeper being continuously in use. The Applicant will assess the suitability of conducting noise and vibration monitoring, using appropriate equipment, following discussions with the local authority. The location and duration of this monitoring is designed to record noise and/or vibration from construction activities experienced by a representative sample of the local population.

RR-078 Network Rail Infrastructure Limited

Reference Number	Comment from Relevant Representation/Applicant Response
RR-078a	I refer to the A428 Black Cat to Caxton Gibbet Improvements Development Consent Order and I write to formerly object to the Order on behalf of Network Rail Infrastructure Limited of 1 Eversholt Street, London, NW1 2DN, on the grounds that operational railway land is adversely affected. Whilst Network Rail does not object to the principle of the proposed Order, it does object to the compulsory acquisition of operational railway land and the compulsory acquisition of permanent and temporary rights over operational railway land where that would compromise Network Rail's ability to perform its statutory undertaking. Network Rail has interests in several of the Plots identified in the Book of Reference which affect sections of the East Coast Mainline railway as well as providing access to the operational railway. Network Rail objects to the seeking of powers to carry out works on/over/under the operational railway without first securing appropriate protections for Network Rail's statutory undertaking. The safe and efficient operation of the railway has not been adequately addressed within the application documents and there is insufficient explanation or justification for the extent and nature of the land and rights being sought. It should be noted that prior to the release of any land and rights as detailed within the Book of Reference, such land and rights will require submission for approval through Network Rail's Land Clearance process and if such approval is not granted then this may give rise to further grounds of objection to the proposed Order. Network Rail is unable to release any land and rights for disposal without Clearance approval having first been obtained. Before Network Rail can consider withdrawing its objection it requires: a) Detailed information as to the precise nature of all works proposed on/over/under the operational railway.
Applicant Response	The Applicant confirms that it has engaged with and will continue to engage with Network Rail on the proposed East Coast Mainline (ECML) bridge crossing. The applicant has developed the preliminary design of the proposed bridge crossing in consultation with NR. The Applicant has agreed and signed a Two Party Overbridge Agreement between Network Rail and Highways England. This agreement will be formally completed prior to construction of the Scheme. Network Rail has issued a letter of no objection in respect of the construction of the proposed Bridge carrying the new dual carriageway over the East Coast Mainline. The Applicant has also engaged with and will continue to engage with Network Rail on the required Agreement for Easement that is required for the proposed ECML bridge crossing. The Agreement for

Reference Number	Comment from Relevant Representation/Applicant Response
	Easement is currently being reviewed by the respective legal teams and Network Rail has confirmed that they would wish to complete the agreement as soon as possible.
RR-078b	b) Clarity on the land and various rights being acquired on/over/under the operational railway.
Applicant Response	No permanent acquisition of any land currently owned by Network Rail is proposed. The only permanent rights that are being sought by the Applicant are in connection with the rights to over-sail the existing mainline railway with the new road bridge. Temporary possession of a number of other plots as detailed on the Land Plans **[APP-008]** which have been identified required to facilitate the construction of the proposed works. Details of the specific need of each plot detailed on the land plans is provided in the Statement of Reasons **[APP-030]**. In summary the need for the plots within Network Rail ownership are summarized below: Plots 4/2h & 4/2i: Comprises land required temporarily for the temporary access and working space for the new overbridge construction, this temporary access and working space requirement will only be taken in accordance with the Two Party Overbridge Agreement and with the approval and supervision of Network Rail's Asset Protection Team. Plot 4/2c: Comprises land required for the construction and maintenance of the new overbridge with permanent rights being sought to over-sail the railway. Plots 4/2a & 4/2b, 4/2d & 4/2e & 4/2g: Comprises land required temporarily for access and working space to install the new higher palisade fencing that has been identified required by Network Rail. Plot 4/2f: Comprises land required temporarily for access and working space to undertake improvements/modifications to the existing Network Rail access located at this location.
RR-078c	c) Agreement from the applicant that the acquisition of operational land is on terms to be agreed with Network Rail for the protection of its statutory undertaking and an undertaking that compulsory powers will not be exercised in relation to such land and rights.
Applicant Response	The Applicant confirms their agreement to the acquisition of operational land is on terms to be agreed with Network Rail for the protection of its statutory undertaking and is willing to provide an undertaking that compulsory powers will not be exercised in relation to such land and rights.

Reference Number	Comment from Relevant Representation/Applicant Response
RR-078d	d) That sufficient protections for Network Rail's statutory undertaking are put in place for the carrying out of works on/over/under the operational railway. Without further details being provided and adequate protections put in place, Network Rail considers the proposed Order would cause serious detriment to Network Rail's statutory undertaking and therefore the proposed Order should not be made. Until such time as Network Rail is given the adequate protection and assurances requested as detailed in this objection, Network Rail's objection to the proposed Order will not be withdrawn. Network Rail reserves the right to raise further issues in evidence and intends to take a full part in the examination process, including attending and making oral representations at relevant hearings.
Applicant Response	The Applicant confirms that it has engaged with and will continue to engage with Network Rail on the proposed ECML bridge crossing. The applicant has developed the preliminary design of the proposed bridge crossing in consultation with Network Rail. The Applicant has agreed and signed a Two Party Overbridge Agreement between Network Rail and Highways England. This agreement will be formally completed prior to construction of the Scheme. Network Rail has issued a letter of no objection in respect of the construction of the proposed Bridge carrying the new dual carriageway over the East Coast Mainline. The Applicant confirms that the design and construction of the proposed new ECML bridge crossing will be completed in accordance with the Bridge Agreement and not before the Easement Agreement is completed.

RR-079 Brown & Co on behalf of Nicholas Wolstenholme

Reference Number	Comment from Relevant Representation/Applicant Response
RR-079a	1. Our client and his family are the occupiers of [redacted]. Of the 98.32 ha included within their Agricultural Holdings Act Tenancy, 14.22 ha are identified for acquisition as part of the proposed A428 scheme, which sees our clients farm severed by the new road. The Agricultural Holdings Act Tenancy is held by Mr Nicholas Wolstenholme. 2. Our client notes the proposals on sheet 3 of the rights of way and access plans which impacts severely on the existing farm access arrangements.
Applicant Response	Since 2017, the Applicant has met with Mr and Mrs Wolstenholme on five occasions to discuss the impact of the project on their landholding. As part of these discussions, access provisions have been taken into account with the application, including the provision of access to the west of the railway line to provide access for agricultural vehicles to the severed land on the north side of the new highway.
RR-079b	3. Our client seeks confirmation that the current access drive including all existing planting and signage are to be reinstated to the same finish as is currently in place and that the drive is constructed of a sufficient standard, size and construction to ensure it is suitable for all machinery and deliveries associated with the farm.
Applicant Response	Detailed requirements of accommodation works will be consulted on agreed with the landowner as part of the detailed design by the Principal Contractor. The access off Barford Road has been designed to accommodate the maximum legal length articulated vehicles and the Applicant has confirmed via direct correspondence that such a vehicle can also negotiate the bend close to the tie-in between the new access track and existing access track. In relation to the planting referred to, the Applicant will replace the planting where reasonably possible with and understands from recent discussions with the Land Agent that this relates to Daffodils and Tulips.
RR-079c	4. Our client notes that in respect of plots 3/10j and 4/1g that new rights are to be provided and it is understood that these rights will extend to Network Rail and Highways England only for the purpose of undertaking inspections of the bridge and that this route will not be used for construction purposes. Our client is concerned over frequency of visits and future maintenance.

Reference Number	Comment from Relevant Representation/Applicant Response
Applicant Response	The Applicant has confirmed that access along the drive will not be utilised during the construction phase of the project and the rights of access sought relate to the future maintenance and inspection of the bridge. Typically, inspections occur once every two years, unless there are specific concerns that require closer monitoring.
RR-079d	5. Our client is concerned that the proposed field entrance identified within private access no. 24 is of a sufficient standard to allow farm machinery to enter this field and provide adequate turning circles.
Applicant Response	Detailed requirements of accommodation works will be consulted on with the landowner as part of the detailed design by the Principal Contractor. The detailed design of the access will seek to accommodate farm machinery and equipment currently in use.
RR-079e	6. Our client is concerned about ensuring access to their retained land throughout the scheme.
Applicant Response	The Applicant will seek to maintain access to all properties throughout the construction of the works or provide alternative access arrangements. In some instances, it may be necessary to restrict access for limited periods, however, the Applicant would look to minimise the number and duration of any such restrictions as far as reasonably practicable. The Principal Contractor will liaise with the affected landowner to ensure that such disruption is minimised.
RR-079f	7. Our client has concerns regarding the provision of appropriate fencing along highway boundaries and concerns there is effective maintenance of existing drainage schemes.
Applicant Response	Detailed requirements of accommodation works will be consulted upon with the landowner as part of the detailed design by the Principal Contractor. The individual needs of each land parcel will be considered by the Applicant during the detailed design stage.

Reference Number	Comment from Relevant Representation/Applicant Response
RR-079g	8. Our client is also concerned over land drainage provision and requests that these are installed at an early opportunity.
Applicant Response	Land drainage and over land drainage has been is considered as part of the Scheme and will be refined further as part of the detailed design. During detailed design the Applicant will consider the individual needs of each land parcel. The Principal Contractor will install pre-construction ditches to protect the integrity of the existing drainage pattern during construction and in the operational state.
RR-079h	9. Our client is extremely concerned over the provision of utility diversions to ensure that their electricity and mains water supplies remain uninterrupted throughout the scheme.
Applicant Response	The Applicant will seek to maintain all utility supplies to the affected properties throughout the construction of the works. In some instances, it may be necessary to restrict the supply for limited periods, however, the Applicant would look to minimise the duration of any such restrictions as far as reasonably practicable. The Principal Contractor will liaise with the affected landowner to ensure that such disruption is minimised.
RR-079i	10. Our client is concerned to ensure that the proposed underpass within plot 4/1e and served by plots 4.1g and 4/1d is of an adequate size and width to ensure that all modern farm machinery can pass uninterrupted through this underpass and that the surface within this area should be concrete.
Applicant Response	The underpass at the new railway bridge has a clear width of 6m and headroom of approximately 5.9m. Refer to Sheet 9 of the Engineering Sections (Part 3 – Structures General Arrangements) **[APP-019]** for details on the underpass. Detailed requirements of accommodation works, including track surface materials, will be finalized at detailed design by the Principal Contractor and in consultation with the landowner.
RR-079j	11. Our client remains concerned over the proximity of the proposed type A laybys and the security of their holding. Whilst the bunding and planting is welcomed in the context of providing privacy, it is requested that these laybys are also close board fenced to ensure that no unauthorised access is taken from the laybys onto our clients holding.

Reference Number	Comment from Relevant Representation/Applicant Response
Applicant Response	Detailed requirements of accommodation works, specifically type of fencing for security, will be finalised at detailed design by the Principal Contractor and in consultation with the landowner.

RR-080 Nick Gellatly

Reference Number	Comment from Relevant Representation/Applicant Response
RR-080	I support the proposed upgrading to the A428. The recent expansion in housing developments in this part of England, and to the west, means that improved infrastructure is required to ensure the safe passage of vehicles and their occupants to the East including Cambridge. I do think, however, that the opportunity to improve connectivity between St Neots and the towns and villages between there and Cambridge should also be improved, not least to provide improved opportunity for cycling – particularly in view of the growth and potential growth in e-cycling.
Applicant Response	In the delivery of the Scheme, the Applicant is required to re-provide public rights of way and walkers, cyclists and horse-rider routes that are severed or disrupted as a result of the Scheme. Off-carriageway provision has been made for walkers and cyclists at Black Cat junction, Cambridge Road junction and Caxton Gibbet junction. Whilst wider interventions may sometimes be appropriate to address community severance resulting from the existing strategic road network, it is beyond the proper scope of the Scheme to address all existing issues faced by existing users of the highways network.

RR-081 Nilam Moorcroft

Reference Number	Comment from Relevant Representation/Applicant Response
RR-081a	I object to this scheme on environmental grounds as it will increase carbon emissions to catastrophic and unacceptable levels. This is not where we should be heading in the year when the U.K. is meant to be giving a lead at COP27, or indeed at any other time given the need to address climate change and environmental issues.
Applicant Response	Chapter 14, Climate **[APP-083]** of the Environmental Statement presents an assessment of the Scheme against the UK Government's current carbon budgets, as required by Paragraph 5.17 of the NPSNN: "*for road project applicants should provide evidence of the carbon impact of the project and an assessment against the Government's carbon budgets*". Paragraph 5.18 of the NPSNN clarifies that "*any increase in carbon emissions is not a reason to refuse development consent, unless the increase in carbon emissions resulting from the proposed scheme are so significant that it would have a material impact on the ability of Government to meet its carbon reduction targets*". The assessment within Chapter 14, Climate **[APP-083]** of the Environmental Statement has identified that the emissions arising as a result of the Scheme represent less than 0.012% of the total emissions in any of the 3rd, 4th or 5th Carbon Budget periods. Accordingly, the assessment has concluded that the GHG emissions impact of the Scheme would not have a material impact on the UK Government meeting its legally binding carbon reduction targets. Although the 6th Carbon Budget was not legally binding when the Environmental Statement was written, an additional assessment of the 6th Carbon Budget, which became legally binding during June 2021, has been undertaken. This assessment concluded that the Scheme represents less than 0.024% of the total emissions in the 6th budget period and is also considered not have a material impact on the UK Government meeting its carbon reductions target. The mitigation measures proposed for the Scheme are detailed in Chapter 14, Climate **[APP-083]** of the Environmental Statement. During the development of the Scheme the Applicant will continue to review these mitigations and seek further opportunities to minimise carbon emissions as required by Design Manual for Roads and Bridges (DMRB) and in line with the net zero target.

RR-082 Brown & Co on behalf of Patricia Martha Mary Eayrs

Reference Number	Comment from Relevant Representation/Applicant Response
RR-082a	This representation is made on behalf of Patricia Martha Mary Eayrs as owner of plots 2/25a, 2/25b and 2/39a together with part of plot 2/32a as frontager to one side of the highway. My client also holds other interest in plots 2/24a, 2/24b,2/24c, 2/24d, 2/24e, 2/24f, 2/26a and 2/26b. My client holds this land as an investment with the intention of commercial development being obtained. It is proposed that the entirety of the land is to be acquired as part of the scheme to mainly provide a flood alleviation area. A small section of the land is required for the new link road. My client believes that the flood alleviation area would be better suited closer to and alongside the existing river rather than creating additional area further away from the river on high value land. My clients therefore suggest that the land taken in this area is altered to reflect the areas at greater risk of flooding. The land alongside the river is detailed as lying within Flood Zones 2 and 3 and so would be better suited as flood compensation areas. Accordingly our client will represent that the DCO should be amended to reflect the matter set out above.
Applicant Response	The proposed flood compensation in this location is required to mitigate the impacts of the Scheme on the existing floodplains associated with South Brook. Paragraph 13.6.86 of Chapter 13, Road Drainage and the Water Environment **[APP-082]** of the Environmental Statement notes that the Great North Road acts as a barrier to flow, with floodwater pooling on the floodplain upstream of the road embankment. Some floodwater overtops the road on the southern side, with depths up to 0.15 metres. Data collected and presented within Table 6.1 Appendix 13.4 Flood Risk Assessment **[APP-220]** highlights that six known historical flood events have occurred due to South Brook exceeding channel capacity. As such, as part of the environmental assessment for the Scheme, flood compensation has been identified for South Brook in the form of two floodplain compensation areas to compensate for the floodplain storage volume lost as a result of the proposed embankment for the new Roxton Road Link and the A1. These compensation areas would be located to the west of the A1 prior to the culverted South Brook and are to the east and west of the new Roxton Road Link. See the Environmental Masterplan **[APP-091]**, Figure 2.4 of the Environmental Statement. Given the interdependencies of needing to mitigate in the vicinity of the impacted floodplain and the suitability of land to form flood compensation, the flood compensation in this area cannot be amended as per the request of the Interested Party.

Reference Number	Comment from Relevant Representation/Applicant Response
	Further information on the flood risk assessment for the Scheme is presented within Chapter 13, Road Drainage and the Water Environment **[APP-082]** and the supporting appendices: • Appendix 13.4 Flood Risk Assessment **[APP-220]**. • Appendix 13.4 Flood Risk Assessment – Annex B Ordinary Watercourse Modelling Report **[APP-221]**. • Appendix 13.4 Flood Risk Assessment – Annex B Ordinary Watercourse Hydrology Report **[APP-222]**.

RR-083 Brown & Co on behalf of Pearson Gape Farming Partnership

Reference Number	Comment from Relevant Representation/Applicant Response
RR-083a	This representation is made on behalf of The Pearson Gape Farming Partnership as [Redacted] of the land identified as plots 14/8a, 14/8b, 14/8c, 14/8d, 14/8e and 14/8f. My client is concerned regarding the electrical diversion on their land as this is the supply for Pastures Farmhouse and the agricultural buildings. My client wants to ensure that an adequate supply is put in place for the dwellings and buildings following the scheme and diversion.
Applicant Response	The Applicant proposes to divert the existing overhead power line to the farm where it is impacted by the scheme. There is no intention to change the existing power supply.
RR-083b	My client has also agreed with Highways England that they will be contacted during these works to ensure that appropriate services can also be connected to their retained farm buildings.
Applicant Response	The Applicant will seek to maintain the electricity power supply to the farm throughout the construction of the works. It may be necessary to restrict the supply for limited periods, however, the Applicant would look to minimise the duration of any such restrictions as far as reasonably practicable. The Principal Contractor will liaise with the affected landowner to ensure that such disruption is minimised. Smaller works such as these have not yet been discussed with the Statutory undertaker, however Highways England has committed to engaging with the landholder at the appropriate time. Typically, Highways England will reinstate connection on a like for like basis unless otherwise agreed.
RR-083c	My client understands from the plans submitted for the Development Consent order that a new roundabout access is to be included as the Caxton Gibbet West roundabout and my clients request further details on the width and type of access to be created here.
Applicant Response	The Applicant proposes a minimum 6m wide access off the Caxton Gibbet junction south-west roundabout. Detailed requirements of accommodation works will be finalised at detailed design by the Principal Contractor and in consultation with the landowner.

Reference Number	Comment from Relevant Representation/Applicant Response
RR-083d	It is also noted that the cycle lane included from Caxton Gibbet running south is not linking to any of the proposed paths included within the Cambourne development and my client would ask that the scheme revisit the proposed cycle path to ensure it links appropriately with local cycle networks.
Applicant Response	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 to the Cambourne Development outside of the Scheme area are outside of the scope of the Scheme and are the responsibility of the local highway authority.
RR-083e	My client is concerned regarding land drainage on the fields affected by the scheme. My client seeks confirmation that drainage surveys will be undertaken prior to entry to ensure that land drainage can be put in place prior to any damage being caused.
Applicant Response	Land drainage and over land drainage has been is considered as part of the Scheme and will be refined further as part of the detailed design. During detailed design the Applicant will consider the individual needs of each land parcel. The Principal Contractor will seek copies of existing land drains, or clear indications of existing land drainage conditions. The Principal Contractor will install pre-construction ditches to protect the integrity of the existing drainage pattern during construction and in the operational state.
RR-083f	My client practices Regenerative Agriculture and has invested considerable time and money into creating high quality, biologically healthy, well-structured soil. My client seeks confirmation that appropriate soil surveys and consideration will be given to this on the temporary land take to ensure they are returned to them in the same condition following completion of the scheme.
Applicant Response	All land to be possessed temporarily will be re-instated to a condition to enable agricultural use post-construction.
RR-083g	My client also seeks confirmation of the boundary treatments along the route to ensure the security of his property both during construction and following completion.
Applicant Response	The embedded mitigation proposed as part of the Scheme, including boundary treatments, are shown on Figure 2.4 of the Environmental Statement (the Environmental Masterplan) **[APP-091]**.

Reference Number	Comment from Relevant Representation/Applicant Response
	Detailed requirements of accommodation works will be finalised at detailed design by the Principal Contractor and in consultation with the landowner.
RR-083h	My client will require access to all land at all times during construction of the project and seeks confirmation that this will be available and details on the proposed method of works to ensure that access is not interrupted. Accordingly our client will represent that the DCO should be amended to reflect the matters set out above.
Applicant Response	The Applicant will seek to maintain access to all properties and roads throughout the construction of the works or provide alternative access arrangements. In some instances, it may be necessary to restrict access for limited periods, however, the Applicant will seek to minimise the number and duration of any such restrictions as far as reasonably practicable. The Principal Contractor will liaise with the affected landowner to ensure that such disruption is minimised.

RR-084 Peter Scott

Reference Number	Comment from Relevant Representation/Applicant Response
RR-084a	A428 Black Cat to Caxton Gibbet Road Improvement scheme Planning Inspectorate Reference: TR010044 My representation is as follows and contains the following points: Firstly, that the proposed development would contribute significant Carbon emissions (these have been estimated at 3 Million Tons of CO2 from vehicle emissions alone. Additional CO2e emissions from soil disturbance and other sources need consideration. These CO2 and CO2e emissions need consideration against a range of relevant national policies including the UK's target for Net Zero Carbon Emissions by 2050. This development is entirely inconsistent with such legislation.
Applicant Response	Chapter 14, Climate **[APP-083]** of the Environmental Statement presents an assessment of the Scheme against the UK Government's current carbon budgets, as required by Paragraph 5.17 of the NPSNN: "*for road project applicants should provide evidence of the carbon impact of the project and an assessment against the Government's carbon budgets*". Paragraph 5.18 of the NPSNN clarifies that "*any increase in carbon emissions is not a reason to refuse development consent, unless the increase in carbon emissions resulting from the proposed scheme are so significant that it would have a material impact on the ability of Government to meet its carbon reduction targets*". Greenhouse gas emissions presented in Chapter 14, Climate **[APP-083]** of the Environmental Statement have been calculated by comparing a Do-minimum scenario (baseline) where the Scheme does not go ahead, against a Do-something scenario where the Scheme is built. The variation in emissions between the two scenarios represents additional emissions as a result of the Scheme. Over the 60 life of the Scheme emissions have been calculated at just over 3 million tCO2e. It should be noted however that the methodology to calculate road user emissions, which account for over 90% of total Scheme emissions, does not take into account the impact of recent Government policy on decarbonising transport (Transport Decarbonisation Plan (TDP)[12]) or Highways England' Net Zero Plan[13]'. The TDP presents Government commitments and initiatives to decarbonise transport in the UK to net zero by 2050 while Highways England's Net Zero Plan presents how they will support the implementation of the TDP. The emissions presented in Chapter 14, Climate **[APP-083]** of the Environmental Statement are therefore considered to be a conservative, worst case scenario.

[12] Decarbonising Transport: a better, greener Britain https://www.gov.uk/government/publications/transport-decarbonisation-plan
[13] Net zero highways: our 2030 / 2040 / 2050 plan https://highwaysengland.co.uk/netzerohighways/#plan

Reference Number	Comment from Relevant Representation/Applicant Response
	Greenhouse gas emissions associated with land use change have been calculated in line with guidelines for the calculation of land carbon stocks for the purpose of Annex V to Directive 2009/28/EC, Official Journal of the European Union, L 151/19. This calculation considers the impact of carbon stock before and after the Scheme is construction to understand the variation in carbon emissions above and below ground. As presented in Chapter 14, Climate **[APP-083]** of the Environmental Statement there will be a net positive gain of 5,849tCO2e as a result of planting of new woodland. Soil disturbance is accounted for in these calculations. The assessment within Chapter 14, Climate **[APP-083]** of the Environmental Statement has identified that the emissions arising as a result of the Scheme represent less than 0.012% of the total emissions in any of the 3rd, 4th or 5th Carbon Budget periods. Accordingly, the assessment has concluded that the GHG emissions impact of the Scheme would not have a material impact on the UK Government meeting its legally binding carbon reduction targets. Although the 6th Carbon Budget was not legally binding when the Environmental Statement was written, an additional assessment of the 6th Carbon Budget, which became legally binding during June 2021, has been undertaken. This assessment concluded that the Scheme represents less than 0.024% of the total emissions in the 6th budget period and is also considered not have a material impact on the UK Government meeting its carbon reductions target. The mitigation measures proposed for the Scheme are also detailed in Chapter 14, Climate **[APP-083]** of the Environmental Statement. During the development of the Scheme the Applicant will continue to review these mitigations and seek further opportunities to minimise carbon emissions as required by Design Manual for Roads and Bridges (DMRB) and in line with the net zero target.
RR-084b	Secondly, there is also a risk of significant biodiversity impacts from the proposed development and these impacts must be considered against relevant national policies and local biodiversity priorities.
Applicant Response	As presented within Section 8.9 of Chapter 8, Biodiversity **[APP-077]** of the Environmental Statement, the biodiversity assessment for the Scheme concluded that with the implementation of mitigation measures and best practice guidance during the construction and operational phases of the Scheme, significant adverse biodiversity effects are not predicted. As part of this biodiversity assessment, the identified impacts and effects have been considered against the relevant and applicable international, national, regional and local policy and biodiversity priorities relating to biodiversity.

Reference Number	Comment from Relevant Representation/Applicant Response
RR-084c	Thirdly, the proposed development would add significant air pollution risks to those living near to the proposed development. There are a growing number of relevant policies which seek to address this, given the growing data on deaths from air pollution which, in the UK are approximately 40 000 premature deaths/year and the UK has recently had a landmark case linking air pollution with the death of a child.
Applicant Response	Air Quality objectives are set out in the Clean Air Strategy published by Defra and are set to be protective of human health. For the pollutants considered in the assessment of effects on air quality for this Scheme the objectives are: • 40µg/m^3 for annual mean nitrogen dioxide (NO_2). • 40µg/m^3 for annual mean particulate matter (PM_{10}). • 25µg/m^3 for annual mean particulate matter ($PM_{2.5}$). Areas where annual mean concentrations are within these air quality thresholds are not considered to be areas where likely significant effects would occur, as set out in DMRB LA 105 guidance. There is a risk of significant effects at locations above these health-based objective values. Within the air quality study area for the Scheme the vast majority of receptors are predicted to experience annual mean concentrations below these objective values and therefore no significant effects on air quality are predicted at these receptors. There is one area, 7 properties located close to the A1 in the Sandy AQMA where receptors are predicted to be above the objective value. Air quality effects within the Sandy AQMA at these 7 receptors, as set out in the Chapter 5, Air Quality **[APP-074]** of the Environmental Statement an imperceptible (less than 1% of the objective value) increase is predicted. These effects are not considered to be significant for air quality based on advice within the air quality guidance utilised for the assessment of the Scheme (Design Manual for Roads and Bridges (DMRB) LA 105). As such, no mitigation would be required to manage air quality effects associated with the Scheme.

RR-085 Public Health England

Reference Number	Comment from Relevant Representation/Applicant Response
RR-085a	Thank you for your consultation regarding the above development. Public Health England (PHE) welcomes the opportunity to comment on your proposals at this stage of the project and can confirm that: Air Quality Impacts It is unclear how the applicant has evaluated the long and short-term impacts on air quality in relation to human health during the construction phase. The Environment Statement (ES) should clearly set out the long and short-term impacts on air quality in relation to human health (specifically particulate matter PM_{10} and $PM_{2.5}$) from the construction phase of the development, or provide suitable justification as to why no further assessment is required.
Applicant Response	The effects of the Scheme as a whole on human health are considered in Chapter 12, Population and Human Health **[APP-081]**. The assessment of the construction phase of the Scheme was undertaken in line with industry guidance (DMRB LA 105) and presented within Chapter 5, Air Quality **[APP-074]** of the Environmental Statement. In summary, the study area for the local air quality assessment for road traffic effects during the construction phase of the Scheme focuses on the key risk areas for potential exceedances of the annual mean objectives identified by the process described in Paragraphs 5.3.57 to 5.3.64 of Chapter 5, Air Quality **[APP-074]** of the Environmental Statement. These key risk areas were assessed and the air quality effects were considered not significant at these locations as air quality was predicted to be under the air quality objective values. $PM_{2.5}$ and PM_{10} concentrations were predicted at sensitive receptors in the base year and were predicted to be under the relevant air quality objective values. The maximum predicted concentration of PM_{10} is 26.6 $\mu g/m^3$ which is under the AQO of 40$\mu g/m^3$. The maximum predicted concentration of $PM_{2.5}$ is 21.3 $\mu g/m^3$ which is under the AQO of 25$\mu g/m^3$. Therefore, these pollutants have not been considered for the construction phase or the operational phase as there will be no impact on the achievement of these objectives as a result of the Scheme. For fugitive emissions of particulate matter during the construction phase the proposed mitigation measures are set out in the Annex A Air Quality Management Plan within the First Iteration EMP **[APP-234]**. These measures are protective of all sensitive receptors to emissions of particulates and therefore

Reference Number	Comment from Relevant Representation/Applicant Response
	detailed modelling of these emissions is not required. With these measures in place, significant adverse effects during the construction phase are not anticipated.
RR-085b	Human Health and Wellbeing This section of PHE's response, identifies the wider determinants of health and wellbeing we expect the ES to address, to demonstrate whether they are likely to give rise to significant effects. PHE has focused its approach on scoping determinants of health and wellbeing under four themes, which have been derived from an analysis of the wider determinants of health mentioned in the National Policy Statements. The four themes are: • Access • Traffic and Transport •Socioeconomic • Land Use Having considered the submitted ES PHE wish to make the following specific comments and recommendations: Eltisley Manor An approach to the identification of vulnerable populations was provided within the ES but does not appear to adequately reflect the findings within the Equality Impact Assessment (EqIA). The impacts on health and wellbeing and health inequalities of the scheme may have particular effect on vulnerable or disadvantaged populations, including those that fall within the list of protected characteristics. The assessments and findings of the ES and any EqIA should be cross referenced between the two documents, particularly to ensure the comprehensive assessment of potential impacts/effects for health and inequalities and where resulting mitigation measures are mutually supportive. Chapter 12 considers access to Eltisley Manor nursing home, which is a 37-bed psychiatric nursing home offering specialist mental health care services for the over 50s, separate care for over 18s with complex mental health issues and patients coming to the end of their rehabilitation process. The nursing home can only be accessed by using the existing A428.

Reference Number	Comment from Relevant Representation/Applicant Response
	Chapter 12 assesses the impact from overnight road closures and offers mitigation to maintain access for staff movement and emergency access. It does not provide an estimate for the potential delay in journey time, particularly in case of emergency access or egress. It does not provide any details on the frequency of any emergency access or egress for the facility.
Applicant Response	The Population and Human Health assessment presented within Chapter 12, Population and Health **[APP-081]** of the Environmental Statement, considers the direct impacts on accessibility to community land and assets as per prescribed guidance set out in DMRB 'LA 112 - Population and human health'. In line with the guidance, the magnitude of impact in respect of impacts on Eltisley Manor is based on two factors: change in access; and severance. In respect of access, provision of access is maintained by the mitigation offered and whilst limited severance is introduced there is adequate accessibility provision. As this aligns with a minor (adverse) impact as indicated in the guidance, this conclusion has been reached based on full consideration of the relevant requirements. Other considerations such as potential delay in journey time have not been considered given the conclusion reached and the guidance it is based on, although none would be expected given the provision of access and mitigation identified. These mitigation measures are presented within the: a) Register of Environmental Actions and Commitments (REAC) within the First Iteration Environmental Management Plan (EMP) [APP-234] as Commitment ESS – PH1, which states, "*The Principal Contractor will implement the traffic management measures, carriageway restrictions, carriageway closures and diversions described in the Outline Construction Traffic Management Plan. In relation to accessibility: To ensure access is retained for employees of Eltisley Manor care home (Nouvita Healthcare) working night shifts, or new patients who may require admission during night hours, the Principal Contractor will implement an appropriate system for local traffic to access the facility*." Whereby the Applicant considers the term 'local traffic' within Commitment ESS-PH1 to include both private and publicly funded emergency services; and Paragraph 3.15.3 of the Outline Construction Traffic Management Plan **[APP-244]** commits the Principal Contractor to establishing clear lines of communication at an early stage. This will allow the care home to be adequately informed of any operations or traffic management measures that may affect the routes they use for transporting residents or that staff use, and alternative plans made as necessary.
RR-085c	It should also be noted that this sensitive location was not identified within the PEIR and contact with the Care Home Manager in January 2021 appears very late in the process.

Reference Number	Comment from Relevant Representation/Applicant Response
Applicant Response	The Preliminary Environmental Information Report (PEI Report) was based on preliminary environmental assessment work undertaken during 2019. Following consultation on the PEI Report further potentially sensitive receptors were identified and included as a resource in both the Population and Health chapter of the Environmental Statement **[APP-081]** and the Equality Impact Assessment **[APP-245]**. Two separate meetings were held with Eltisley Manor Care Home in January 2021 to identify potential issues. The manager of the care home was satisfied that there had been adequate engagement with the Applicant and stated that clear communication was needed in advance of any closures or diversions to minimise the impact of the Scheme on staff, patients and visitors. Following this engagement, Eltisley Manor Care Home has been specifically mentioned within the Outline Construction Traffic Management Plan **[APP-244]** which commits the Principal Contractor to establishing clear lines of communication at an early stage. This will allow the care home to be adequately informed of any operations or traffic management measures that may affect the routes they use for transporting residents or that staff use, and alternative plans made as necessary.
RR-085d	Chapter 12 does not however, consider the potential for delays in journeys during daytime movement of staff or residents, but is identified within the EqIA. The EqIA does consider this aspect and the potential effect on residents who will be highly sensitive to increased journey time length or changes in routine and journey routes. There will also be impacts on staff and visitors.
Applicant Response	Chapter 12, Population and Human Health of the Environmental Statement **[APP-081]** considers the direct impacts on accessibility to community land and assets as per prescribed guidance set out in DMRB 'LA 112 - Population and human health'. In line with the guidance, the magnitude of impact is based on two factors only: change in access; and severance. The Equality Impact Assessment **[APP-245]** assesses the potential effects of the Scheme on protected characteristic groups and not just assets, receptors or resources. The Equality Impact Assessment **[APP-245]** draws upon other assessment work undertaken for the Scheme including the Population and Human Health chapter of the Environmental Statement **[APP-081]**. Through this assessment Eltisley Manor was identified for inclusion in the Equality Impact Assessment **[APP-245]** with the patients of the care home covered by the protected characteristic of disability. It was understood through engagement with the manager of Eltisley Care Home that patients could experience adverse impacts if they were unaware of closures and delays which could affect journey times or routes and as such this was identified as a potential impact if adequate communication was not undertaken in advance with the care home. Therefore,

Reference Number	Comment from Relevant Representation/Applicant Response
	the scope of the two assessments differ and the findings of each do not interface or warrant cross-reference in respect of the consideration of journey-time delay.
RR-085e	There is also insufficient justification that the residents of Eltisley Manor are to be considered a medium sensitivity. The vulnerability of this population group should be highly sensitive to both temporary and permanent change and impacts.
Applicant Response	The assignment of sensitivity of land use receptors, including in respect of community land and assets such as the residents of Eltisley Manor, is based on the relevant DMRB guidance. Four factors are considered in assigning sensitivity using this guidance: severance, availability of alternative facilities, level of use, and the proportion of the community using the facility. On the basis that there are limited alternative facilities and the facility is used frequently, but by a minority of the community and severance is limited, the balance of considerations supports a value of medium sensitivity being assigned.
RR-085f	It should also be noted that the PHE response to the PEIR also contained a specific recommendation to the inclusion of mental health impacts within the scope of population and human health. Recommendations The ES should contain greater detail in relation to the identification, assessment of impacts / effects and agreed mitigation measures with regards to Eltisley Manor and this should include consideration of emergency service access.
Applicant Response	The assessment of health impacts in Chapter 12, Population and Human Health of the Environmental Statement **[APP-081]** was undertaken based on the methodology set out in DMRB 'LA 112 - Population and human health'. It comprises an assessment of impacts during construction and operation on the parameters identified in this guidance, namely accessibility, physical activity, air quality, noise and vibration, and road safety. Consideration is given to the potential for impacts on mental health albeit indirectly through assessing an outcome in respect of each parameter. The assessment reflects the scope set out within the Scoping Report with no comments provided in the Scoping Opinion on the approach in respect of mental health from Public Health England. However, the Applicant acknowledges the comments received on the PEI Report. An assessment of impacts and effects on Eltisley Manor was undertaken and is included within the chapter, with mitigation measures included.

Reference Number	Comment from Relevant Representation/Applicant Response
	These mitigation measures are presented within the: a) Register of Environmental Actions and Commitments (REAC) within the First Iteration Environmental Management Plan (EMP) [APP-234] as Commitment ESS – PH1, which states, "*The Principal Contractor will implement the traffic management measures, carriageway restrictions, carriageway closures and diversions described in the Outline Construction Traffic Management Plan. In relation to accessibility: To ensure access is retained for employees of Eltisley Manor care home (Nouvita Healthcare) working night shifts, or new patients who may require admission during night hours, the Principal Contractor will implement an appropriate system for local traffic to access the facility*." Whereby the Applicant considers the term 'local traffic' within Commitment ESS-PH1 to include both private and publicly funded emergency services; and b) Paragraph 3.15.3 of the Outline Construction Traffic Management Plan **[APP-244]** commits the Principal Contractor to establishing clear lines of communication at an early stage. This will allow the care home to be adequately informed of any operations or traffic management measures that may affect the routes they use for transporting residents or that staff use, and alternative plans made as necessary.

RR-086 Brown & Co on behalf of R. H. Topham & Sons Limited

Reference Number	Comment from Relevant Representation/Applicant Response
RR-086a	This representation is made on behalf of R H Topham & Sons as owners of the land north of the existing A428 and who hold an interest in other land affected by the proposed route. My client occupies the land identified as plots 9/9a, 9/10a, 10/4a, 10/4b, 10/4c, 10/4d, 10/5a, 10/5b, 10/5c, 10/5d, 11/4a, 11/4b, 11/4c, 11/4d, 11/4e, 11/4f, 11/4g, 11/5a, 12/3a, 12/3b, 12/3c, 12/4a, 12/4b, 13/5a and 13/5b. My client also has an interest in the following plots, 6/8a, 6/8b, 6/8c, 6/8d, 6/8e, 6/8f, 6/8g, 6/8h, 8/4a, 14/19a and 14/19b. The Book of Reference shows the following plots 9/11a and 9/11b as unregistered and they are owned by my clients R H Topham Ltd. The Book of Reference also shows 9/12a and 9/12b as being owned by Abbotsley Farms Ltd, this is a registration error and these are owned by R H Topham & Sons. My client also owns 10/7a and 10/7b which is identified as unregistered. I would be grateful if the Book of Reference could be amended to reflect these changes.
Applicant Response	The Applicant notes the comments raised regarding the Book of Reference **[APP-032]**, and will update the document for the next required submission.
RR-086b	My client strongly objects to this proposal and feels that an alignment closer to the existing A428 will have a reduced impact on the surrounding area together with their farming operations with a reduced area being severed as a result of the scheme. The proposed A428 project will have a significant impact on my clients farming operations with a significant amount of land being acquired as part of the scheme. In addition to this the main farming site of my client is to be split in half. My client currently prides themselves on maximising efficiency with farming operations in order to reduce costs and farm in an environmentally friendly way. The scheme will make this very difficult to continue due to the creation of a number of small fields and difficult field shapes.

Reference Number	Comment from Relevant Representation/Applicant Response
Applicant Response	The Applicant has undertaken a thorough and comprehensive process over many years in the development and assessment of the Scheme. This has included extensive consultation with those directly affected by the Scheme proposals, statutory bodies and the local community. Public exhibitions and consultations have been undertaken at key stages in the scheme development. This included a Non-Statutory Consultation prior to the Preferred Route Announcement being made plus a Statutory Consultation held in 2019 and a Supplementary Consultation held in 2020 where the developing scheme proposals were presented. The Applicant has engaged thoroughly with this landowner over the impacts of the Scheme proposals and the development (and agreement) of required mitigation measures. This has included maintaining access to all areas of land, provision of a suitable accommodation access track and bridge crossing of the new dual carriageway and maximising field sizes to maintain ongoing farming efficiency and viability. The Applicant is disappointed and concerned that the landowner has not raised such fundamental objection to the Scheme proposals before. For details on the identification, assessment and selection of route options consider refer to Chapter 3, Assessment of Alternatives **[APP-072]** of the Environmental Statement.
RR-086c	My clients currently enjoy uninterrupted access over all of their land north of the existing A428 over a series of farm tracks. During construction my clients will require access over bridleway 1/18 at plot 10/7b.
Applicant Response	The Applicant can confirm that access for the landowner across the works during construction will be maintained. The Principal Contractor will be responsible for establishing and implementing an agreed process with the landowner to manage the safe passage of farm vehicles across the scheme until such time that the permanent accommodation access bridge crossing can be used.
RR-086d	My clients are also concerned regarding the on and off ramps of the new bridleway bridge at this location and whether they will be suitable for modern farm machinery. It has been brought to Highways Englands attention that the spur from the bridleway to the existing A428 is coloured pink however this should be temporary possession land (green) so that possession and control reverts back to my client at the completion of the scheme.
Applicant Response	Details of the proposed horizontal and vertical alignment of the accommodation access track/bridleway 1/18 crossing are shown on Sheet 42 of Engineering Sections (Part 6 – Plan and Profile) **[APP-022]**. The

Reference Number	Comment from Relevant Representation/Applicant Response
	preliminary design of the access ramps leading to the bridge crossing have been designed to accommodate the swept path of an articulated Heavy Goods Vehicle. This will be verified at detailed design by the Principal Contractor. The Applicant has and is committed to continuing engagement with the landowner with respect to the extent of permanent land acquisition and temporary land possession.
RR-086e	In addition to this during our most recent meeting with Highways England it was discussed that a permanent access track will be required from this point along the southern border of plot 10/4b and along the rear of the other properties at this point in order to access my client retained land which is severed as a result of the scheme. It was agreed that this is to be included as green land within the DCO.
Applicant Response	The Applicant has not committed to this proposal but confirmed that this change will need to be considered further through ongoing engagement with the landowner.
RR-086f	My client also requires access to the fields located to the south of the proposed A428 during construction and note that no access is being provided. During our most recent meeting the Highways England it was suggested that a new access track is temporarily installed running south of the proposed multi-purpose construction area and into the fields at this location. My clients are concerned regarding provision of adequate post scheme drainage at this proposed multi-purpose construction area following completion of the scheme when this temporary possession land is handed back to them.
Applicant Response	The Applicant can confirm that access for the landowner to the fields east of the multi-purpose construction area (plot 10/4b) will be provided during construction. The Principal Contractor will be responsible for establishing and maintaining a safe means of access to this area for farm vehicles. The Principal Contractor will also be responsible for ensuring that on completion of the scheme the multi-purpose construction area is restored and returned to the landowner with adequate land drainage commensurate to its condition prior to possession of the land being taken.
RR-086g	My client seeks confirmation that soil surveys will be undertaken prior to commencement to ensure the land is returned in the same condition, mainly in relation to compaction and drainage.
Applicant Response	The Applicant has committed to undertake soil surveys in 2021 (subject to the lifting of Covid-19 pandemic related lockdowns) and following the completion of the fieldwork and the analysis of findings, a report will

Reference Number	Comment from Relevant Representation/Applicant Response
	be prepared by the Applicant and submitted to the Examination on or before Deadline 6. The purpose of the soil surveys is to establish the quality of the soil being impacted by the Scheme. It is not possible for the Applicant to commit to returning land back to the landowner in the same condition as that prior to commencement of the works. The reinstatement of topsoils and subsoils on land temporarily acquired to construct the Scheme will be managed in accordance with the measures outlined in Annex E Soil Handling and Management Plan located within the First Iteration EMP **[APP-234]**.
RR-086h	In relation to the new Toseland road flyover area my client notes significant areas of land are being used for multi-purpose construction areas. These are spread over two locations and my client suggests that these are amalgamated in order to minimize the impact on farming operations. My client also seeks details on what these areas will specifically be used for. It is also noted that there are areas of soil storage at this location which my client feels can be amalgamated with the other temporary land take areas and in line with field boundaries in order to minimize the impact on farming operations during the scheme.
Applicant Response	The multi-purpose construction and soil storage areas shown near to Toseland Road Flyover are required to facilitate the construction works. The general methodology for the works in this location is included in Chapter 2, The Scheme **[APP- 071]** of the Environment Statement. The multi-purpose construction area to the west of Toseland Road will be used by the team constructing the new bridge and side road to locate temporary office and welfare units, laydown areas for materials such as steel reinforcement and formwork and for the storage of piling and construction plant. The multi-purpose construction area to the east of Toseland Road is required as a bulk material storage area for the offline section of mainline construction works between Cambridge Road and Eltisley Junction. Materials and plant required for the drainage, road works, fencing and landscaping works will be delivered to and stored in this area prior to use. Soil storage areas are distributed along the length of the scheme to provide locations where topsoil and subsoil, that is stripped from the works, can be stored in bunds for reuse. Storage areas have been shown to the east and west of Toseland Road such that this material can be stored locally without a requirement to cross the side road.

Reference Number	Comment from Relevant Representation/Applicant Response
RR-086i	In relation to all temporary areas my client requests that soil surveys are undertaken prior to entry to ensure that the land is returned to them in the same condition as when it is taken.
Applicant Response	The Applicant has committed to undertake soil surveys in 2021 (subject to the lifting of Covid-19 pandemic related lockdowns) and following the completion of the fieldwork and the analysis of findings, a report will be prepared by the Applicant and submitted to the Examination on or before Deadline 6. The purpose of the soil surveys is to establish the quality of the soil being impacted by the Proposed Development. It is not possible for the Applicant to commit to returning land back to the landowner in the same condition as that prior to commencement of the works. The reinstatement of topsoils and subsoils on land temporarily acquired to construct the Scheme will be managed in accordance with the measures outlined in Annex E Soil Handling and Management Plan located within the First Iteration EMP **[APP-234]**.
RR-086j	My client is concerned regarding the diversion of Footpath 278/7. My client is concerned that the public will make use of their farm tracks as footpaths rather than using the proposed diversion. This increases the risk of accidents with farm machinery. We understand that signage will be put in place to direct people along the footpath however my client requests further action is taken to ensure that footpath users remain on the proposed route.
Applicant Response	The Applicant confirms that footpath signing will be provided. Detailed requirements of any additional accommodation works will be finalized at detailed design by the Principal Contractor and in consultation with the landowner.
RR-086k	My client enjoys good access from Toseland Road which is suitable for HGV access and requires further detail on the proposed accesses to ensure they are suitable for HGV access following completion of the scheme.
Applicant Response	Detailed requirements of accommodation works, including suitability of HGV access, will be finalised at detailed design by the Principal Contractor and in consultation with the landowner.

Reference Number	Comment from Relevant Representation/Applicant Response
RR-086l	My client is concerned regarding land drainage on the fields affected by the scheme. My client seeks confirmation that drainage surveys will be undertaken prior to entry to ensure that land drainage can be put in place prior to any damage being caused.
Applicant Response	Land drainage and over land drainage has been is considered as part of the Scheme and will be refined further as part of the detailed design. During detailed design Highways England will consider the individual needs of each land parcel. The Principal Contractor will seek copies of existing land drains, or clear indications of existing land drainage conditions. The Principal Contractor will install pre-construction ditches to protect the integrity of the existing drainage pattern during construction and in the operational state.
RR-086m	My client also seeks confirmation of the boundary treatments along the route to ensure the security of his property both during construction and following completion.
Applicant Response	The embedded mitigation proposed as part of the Scheme, including boundary treatments, are shown on the Environmental Masterplan **[APP-091]**, Figure 2-. of the Environmental Statement. Detailed requirements of accommodation works, including boundary treatments, will be finalised at detailed design by the Principal Contractor and in consultation with the landowner.
RR-086n	My client will require access to all land at all times during construction of the project and seeks confirmation that this will be available and details on the proposed method of works to ensure that access is not interrupted. Accordingly our client will represent that the DCO should be amended to reflect the matters set out above.
Applicant Response	The Applicant will seek to maintain access to all properties and roads throughout the construction of the works or provide alternative access arrangements. In some instances, it may be necessary to restrict access for limited periods, however, the Applicant would seek to minimise the number and duration of any such restrictions as far as reasonably practicable. The Principal Contractor will liaise with the affected landowner to ensure that such disruption is minimised. The Applicant will seek to record all matters discussed with the Interested Party, including details of any agreements reached, within a Position Statement instead of inclusion in the Development Consent Order.

RR-087 Richard Hawker

Reference Number	Comment from Relevant Representation/Applicant Response
RR-087a	I am very concerned that this project is in direct contravention of the government's stated policy aim of encouraging modal shift to public transport, and away from a car-based transport system. The building of this road, which I use on occasion (before lockdown) to visit my relations in Birmingham and Reading seems unnecessary anyway, as it is of an adequate standard for the traffic. I am also concerned that the building and operation of the road will inevitably increase carbon emissions, again in contravention of the government's stated aim of carbon reduction. Alternatives of improving rail (passenger and freight) and bus services could be looked at in greater detail.
Applicant Response	The Scheme is intended to solve the specific problems identified on the A428 in terms of reducing delays and congestion, improving journey times and journey time reliability. Public transport would not provide a viable solution to solving current problems as it would not provide the level of traffic relief as the Scheme. As such the scheme is not in contravention of the Government policy of encouraging mode shift to public transport. Traffic monitoring on the A428 has demonstrated that although traffic levels declined during the restrictions imposed as a result of COVID-19, traffic volumes have recovered and are near to pre COVID levels. Chapter 14, Climate **[APP-083]** of the Environmental Statement presents an assessment of the Scheme against the UK Government's current carbon budgets, as required by Paragraph 5.17 of the NPSNN: "*for road project applicants should provide evidence of the carbon impact of the project and an assessment against the Government's carbon budgets*". Paragraph 5.18 of the NPSNN clarifies that "*any increase in carbon emissions is not a reason to refuse development consent, unless the increase in carbon emissions resulting from the proposed scheme are so significant that it would have a material impact on the ability of Government to meet its carbon reduction targets*". The assessment within Chapter 14, Climate **[APP-083]** of the Environmental Statement has identified that the emissions arising as a result of the Scheme represent less than 0.012% of the total emissions in any of the 3rd, 4th or 5th Carbon Budget periods. Accordingly, the assessment has concluded that the GHG emissions impact of the Scheme would not have a material impact on the UK Government meeting its legally binding carbon reduction targets. Although the 6th Carbon Budget was not legally binding when the Environmental Statement was written, an additional assessment of the 6th Carbon Budget, which became legally binding during June 2021, has been undertaken. This assessment concluded that the Scheme

Reference Number	Comment from Relevant Representation/Applicant Response
	represents less than 0.024% of the total emissions in the 6th budget period and is also considered not have a material impact on the UK Government meeting its carbon reductions target. The proposed mitigation measures proposed for the Scheme are also detailed in Chapter 14, Climate **[APP-083]** of the Environmental Statement. During the development of the Scheme the Applicant will continue to review these mitigations and seek further opportunities to minimise carbon emissions as required by Design Manual for Roads and Bridges (DMRB) and in line with the net zero target. The GHG assessment within Chapter 14, Climate **[APP-083]** presents a worst case scenario as it does not take into account the impact of the commitments made by DfT within the transport decarbonisation plan. It is anticipated that road user emissions will decrease in line with the forecast emissions presented within the plan, for example, due to the increased use of electric and low-emission vehicles.

RR-088 Bletsoes on behalf of Richard Infield

Reference Number	Comment from Relevant Representation/Applicant Response
RR-088a	We represent the interests of Richard Infield in his capacity as tenant under an Agricultural Holdings Act 1986 Tenancy and partner of the farming partnership, W A Infield & Sons. Mr Infield occupies land that is directly affected by the Scheme, some of which lie within the proposed Order Limits. On behalf of Mr Infield, we are instructed to make outline representations. Representations are made without prejudice to making further objections/representations for different reasons, or to amplify these representations. We have reviewed the plans included within the Developer's application insofar as they relate to our clients' and these representations are based upon the information contained therein. The aforementioned plans do not provide sufficient detail to ascertain the full impact on my client's requisite interest. We would therefore like to formally record our principal concerns, based upon the information that is available. Our client does not wish to be put in a position whereby when it comes to the 'detailed design stage', he is told that design issues raised should have been dealt with earlier on in the Scheme and it is too late. The Developer cannot say that they will deal with matters in dispute at a later stage. These issues should either be dealt with during the application process or determined by the Planning Inspectorate. We submitted representations to the supplementary consultation held in July 2020. To date, we have not received a formal response. Our client wishes to make clear his principle concerns: Post Scheme Access: At present, an isolated parcel of land off the Barford Road benefits from two access points from the Barford Road. During previous consultation with the Developer, we requested detailed design information concerning the proposed accesses to assess whether access will be equally commodious. From the information available, it would appear that the northern-most access will be stopped up; it is not clear how the southern-most access will be affected. In recent discussions with the Developer, our client has had verbal assurance from the Developer and their representatives that the southern-most access will not be affected, and my client has relied upon that assurance. In terms of the northern-most access, we note that new access is being provided to serve land owned by my client's landlord and occupied by a third party, [Redacted]. It would be pragmatic for this access to be shared providing access to my client and [Redacted] in their capacity as tenants. My client, [Redacted] and the Landlord's Agent have agreed the principle of a shared access. The Developer has confirmed they are willing to adjusting their proposals to include a shared access, and my client has relied upon that statement.

Reference Number	Comment from Relevant Representation/Applicant Response
Applicant Response	The responses to any submitted representation made at Supplementary Consultation are included in Appendix V of the Consultation Report **[APP-068]** submitted as part of the DCO Application. The Applicant confirms that the southern-most access will not be affected. With regards to the northern access, the Applicant can also confirm that, subject to adequate confirmation from the landowner, the principle of providing the shared northern access as proposed is accepted. Detailed requirements of accommodation works will be finalised at detailed design by the Principal Contractor and in consultation with the landowner.
RR-088b	Access during Construction: As well as at Ouse Farm, Tempsford, my client farms land located near to surrounding villages. He relies heavily on the A1, Blackcat Roundabout and connecting local roads; this use is intensified at certain times of year, such as silaging and harvesting. The construction of the Scheme will disrupt the A1, Blackcat Roundabout and connecting local roads. The Developer has confirmed that where possible the Scheme will be constructed 'offline' to avoid road closures but accept that closures are inevitable. Our client requires the Developer to avoid road closures where possible in order to help lessen the impact of the Scheme. In addition, our client requires the Developer to communicate any planned road closures well in advance of the closure date to allow alternative arrangements to be made.
Applicant Response	The Applicant confirms that the design and construction of the Scheme will aim to minimise disruption to the travelling public as far as reasonably possible. This will include ensuring that any road closures are kept to a minimum. The Applicant is committed to ensuring that the travelling public and directly affected landowners are kept informed of progress and any construction activities that may affect them. This includes ensuring that adequate notice of any planned road closures is provided.
RR-088c	Safety: During previous consultation, our client raised concerns relating to the safety of the Barford Road after alterations have been made as part of the Scheme. In summary, his principle concern relate to the proposal to straighten the alignment of Barford Rad and flatten its contours, which our client believes will allow motorists to travel faster thus increasing the risk of accidents, especially between road users and slow-moving agricultural equipment entering and exiting fields. Our client has requested a reduction in the

Reference Number	Comment from Relevant Representation/Applicant Response
	speed limit from 60mph, perhaps to 40 or 50 mph, and traffic calming measures, such as on-road markings, road signs highlighting the presence of agriculture traffic, and crash barriers on the bend near to the gas and water works. Based on the information available, we note that our client's request for a reduced speed limit has not been implemented. Furthermore, there is no information available concerning traffic calming measures.
Applicant Response	The design of the realigned Barford Road complies with the governing design standards, and is an improvement on the existing route. This preliminary design has been developed in consultation with Central Bedfordshire Council and incorporates the same carriageway width to discourage speeding. This can be viewed on the General Arrangement Plans **[APP-011]**. The proposals will be developed further at detailed design with a Stage 2 - Road Safety Audit undertaken; and will be agreed with the local highway authority (Central Bedfordshire Council) to ensure that adequate safety measures, including any identified required traffic calming, are put in place. The introduction of a lower speed limit will not be easily enforceable and current existing speeds are likely to be maintained through this section. The speed limit on the section of Barford Road which is altered by the Scheme will be 60mph as agreed by the local highway authority – please see the Speed Limit Plans **[APP-015]**.
RR-088d	Accommodation Works: Accommodation Works: Our client has on numerous occasions reiterated the need for accommodation works. Our client requires further details concerning the proposed accommodation works to ascertain the full impact on his interest. As a minimum, our client requires commodious access, post scheme land drainage, and fencing & hedging of boundaries to help mitigate the detrimental affect of this Scheme.
Applicant Response	Detailed requirements of accommodation works will be finalised at detailed design by the Principal Contractor and in consultation with the landowner.

RR-089 Richard Watson

Reference Number	Comment from Relevant Representation/Applicant Response
RR-089a	As my home borders the existing A428, we are one of the closest houses to the new development. I am concerned that noise from the new road is properly managed by sufficient banking, cuts and screening for some distance either side of Croxton.
Applicant Response	The Applicant has undertaken an assessment of the likely noise impacts associated with the operation of the Scheme, including those in the vicinity of Croxton. The findings of this assessment, as reported in Chapter 11, Noise and Vibration **[APP-080]** of the Environmental Statement identify that the Scheme is likely to result in traffic noise decreases at properties in Croxton. These decreases would result from the moving of traffic from the existing A428 to the new carriageway which is situated further away from the village. The Scheme is also in cutting as it passes to the north of Croxton which, combined with the use of low noise surfacing on the new dual carriageway, also contributes to the traffic noise reductions predicted in the village.

RR-090 Brown & Co on behalf of Robert John Millard

Reference Number	Comment from Relevant Representation/Applicant Response
RR-090a	This representation is made on behalf of Mr Robert Millard who is the owner and occupier of [Redacted] and who own and [Redacted] the plot identified as 13/7a within the book of reference. Plot 13/7a is identified on the General Arrangement Plan as being temporary use for the new Eltisley link road. The land forms part of my clients residential garden and comprises a very thin strip which is not necessary for the construction of the link road. The link road follows the existing road at this point which already has a wide verge. My client is concerned regarding the provision of appropriate fencing alongside the boundaries both during construction and following completion to ensure the security of his residential property is not compromised. Accordingly our client will represent that the DCO should be amended to reflect the matters set out above.
Applicant Response	The Applicant will install fencing to demarcate and separate the construction site from neighboring land plots. The installed demarcation fencing will be maintained throughout the duration of the construction activities. Permanent fencing along the route will be installed in accordance with the Scheme design.

RR-091 Brown & Co on behalf of Roger Graham

Reference Number	Comment from Relevant Representation/Applicant Response
RR-091a	This representation is made on behalf of Mr Roger Graham who is the owner and occupier of [Redacted] and who is the owner of the plots identified as 1/42a and 1/42c within the Book of Reference. Mr Graham also benefits from rights of access over plots 1/8t, 1/8u, 1/43a, 1/43b and 1/43d. My client strongly objects to the proposals and feels that they will have a detrimental impact on the surrounding area and do not deliver the benefits they set out to achieve. Widening of the existing road network would achieve the same result.
Applicant Response	The Applicant has undertaken a thorough and comprehensive process over many years in the development and assessment of the Scheme, including consideration of widening the existing road network. This has included extensive consultation with those directly affected by the Scheme proposals, statutory bodies and the local community. Public exhibitions and consultations have been undertaken at key stages in the scheme development. This included a Non-Statutory Consultation prior to the Preferred Route Announcement being made plus a Statutory Consultation held in 2019 and a Supplementary Consultation held in 2020 where the developing scheme proposals were presented. For details on the identification, assessment and selection of route options, including widening, refer to Chapter 3, Assessment of Alternatives **[APP-072]** of the Environmental Statement. The Applicant has engaged thoroughly with this landowner over the impacts of the Scheme proposals and the development (and agreement) of required mitigation measures. This has included agreeing the proposed land take and boundary treatment adjacent to the realigned A1 and maintaining access to the landowner's property both during and post construction.
RR-091b	My client retains his residential dwelling to the East of the current A1. My client is concerned that access is maintained at all times during construction to his dwelling onto the main road network. The current access route lies over plots 1/8u, 1/8t, 1/8q and 1/8p. The new access track is proposed under Works No. 15 however it is unclear when this new access track will become operational.

Reference Number	Comment from Relevant Representation/Applicant Response
Applicant Response	The Applicant will seek to maintain access to all properties and roads throughout the construction of the works or provide alternative access arrangements. In some instances, it may be necessary to restrict access for limited periods, however, the Applicant would seek to minimise the number and duration of any such restrictions as far as reasonably practicable. The Principal Contractor will liaise with the affected landowner to ensure that such disruption is minimised.
RR-091c	My client is also concerned that services such as electricity and telephone remain connected throughout the scheme.
Applicant Response	The Applicant will seek to maintain all utility supplies to the affected properties throughout the construction of the works. In some instances, it may be necessary to restrict the supply for limited periods, however, the Applicant would seek to minimise the duration of any such restrictions as far as reasonably practicable. The Principal Contractor will liaise with the affected landowner to ensure that such disruption is minimised.
RR-091d	Plot 1/8q is identified as being a site compound area. My client is concerned regarding what mitigation measures will be put in place to reduce this impact of this area on his property.
Applicant Response	Outline details of the Western Compound are provided in Chapter 2, The Scheme **[APP-071]** and Figure 2.5 - Construction Compound Location and Indicative Layout **[APP-089]** of the Environmental Statement. Temporary construction related impacts associated with the compounds will be managed in accordance with the control measures set out within Annex K Construction Compound Management Plan in addition to the wider construction phase measures as set out within the First Iteration EMP **[APP-234]** for the Scheme. Full layout and construction details for the proposed compound have yet to be confirmed and will be developed by the Principal Contractor in the detailed design. The Applicant is, however, able to confirm that it is proposed to provide an earth bund on the perimeter of the of the compound site which will provide protection to this landowner's property during construction.
RR-091e	My client also seeks confirmation of the working hours, lighting, noise and pollution impacts on his property.

Applicant Response	Details of the Construction Working hours are provided in Chapter 2, The Scheme **[APP-071]** of the Environmental Statement and are secured by Requirement 9 of the draft Development Consent Order (dDCO). Core construction working hours would be from 07:00 to 18:00 on weekdays and from 07:00 to 13:00 on Saturdays with exceptions. Chapter 11, Noise and Vibration **[APP-080]** of the Environmental Statement comprises an assessment of the likely noise and vibration impacts associated with the construction of the Scheme, including at the landowner's property. The assessment identified adverse noise and vibration impacts are likely to occur at the property, which are predicted to result from a number of construction activities to be undertaken in close proximity to it. These activities include the demolition of Roxton Road bridge, construction of structures associated with Black Cat junction, activities at the site compound to the north of the property and earthworks and road construction associated with the realigned A1 and slip roads to the west of the property. These noise and vibration impacts resulting from the construction activities will be managed in accordance with the measures outlined in Annex B Noise and vibration outline management plan located within the First Iteration EMP **[APP-234]**. Examples of such measures include: • All ancillary plant such as generators, compressors and pumps will be positioned so as to cause minimum noise disturbance. If necessary, acoustic barriers or enclosures will be provided, where appropriate. • Working methods will be developed specific to the area and will consider use of equipment and methods of operations to minimise noise. • Whenever possible, fabrication of materials will be undertaken off-site. • All plant and machinery in intermittent use will be shut down in intervening periods between work or throttled down to a minimum. • Proper use of plant with respect to minimising noise emissions with regular maintenance will be undertaken. All vehicles and mechanical plant used for the purpose of the works will be fitted with exhaust silencers and be maintained in good working order. • Minimising the drop height of materials into hoppers, lorries or other plant. • Use of less intrusive alarms on vehicles, for example broadband vehicle reversing warnings.

Reference Number	Comment from Relevant Representation/Applicant Response
	• Consideration of low vibration working methods, including non-vibratory compaction plant where possible. • Haul routes within the site boundary will be kept in good condition • The removal of obstructions that can cause, or add, resonance e.g. concrete bases. • No start-up or shut down of large vibratory rollers (approximately 13 tonnes) within 50m of receptors and medium vibratory rollers (approximately 3.5 tonnes) within 15m of receptors. • The use of cut-off trenches to disrupt direct vibration movement through the ground. • The use of pre-bores for piles. In the context of air quality effects arising from the Scheme, these are not considered significant, as set out in Chapter 5, Air Quality **[APP-074]** of the Environmental Statement. NO_2 pollution from roads disperses over short (200m) distances and therefore NO_2 concentrations at sensitive receptors are much more heavily influenced by the location of emissions, than the total emissions generated by the Scheme. The local air quality assessment for the operation of the Scheme has predicted imperceptible changes in NO_2 pollution at the majority of modelled sensitive receptors, including the property referred to by the IP. Whilst some increases in pollutant concentrations are predicted at individual receptors, where these are greater than imperceptible (i.e. more than 1% of the objective), air quality is good (both with and without the Scheme) with concentrations under the air quality objective values, which are set for the protection of human health. Similarly, some decreases in pollutant concentrations are predicted at receptors, particularly those located along the existing A428. As concentrations of pollutants are predicted to remain under the relevant air quality objective value at these receptors these changes are not considered significant.Lighting related control measures are outlined within Section 1.4 Annex K Construction compound management plan of the First Iteration Environmental Management Plan **[APP-234]**. These measures seek to reduce light spill from the compounds onto surrounding receptors.
RR-091f	During the consultation my client was provided with an extensive reinstatement program for his residential garden land which is being acquired temporarily, we note that this has not formed part of the DCO application and seeks to clarify that this will be discussed further with Highways England at the detailed design stages.

Reference Number	Comment from Relevant Representation/Applicant Response
Applicant Response	Noted. The Applicant is committed to continuing engagement with the landowner during detailed design on matters relating to the extensive reinstatement program for his residential garden land.
RR-091g	My client is concerned regarding the provision of appropriate fencing alongside the boundaries both during construction and following completion to ensure the security of his residential property is not compromised.
Applicant Response	Detailed requirements of accommodation works will be finalised at detailed design by the Principal Contractor and in consultation with the landowner.
RR-091h	My client also seeks clarification of the planting to be undertaken alongside his new access track so as to reduce the noise and visual impact of the proposals.
Applicant Response	Planting proposed to avoid or minimise landscape and visual effects is illustrated on the Environmental Masterplan **[APP-091]**, Figure 2.4 of the Environmental Statement. The Environmental Masterplan **[APP-091]**, Figure 2.4 of the Environmental Statement, shows that woodland planting is proposed to the west of the access track, south of the Black Cat junction. Details of the proposed species mix and specification are provided in Annex L Landscape and Ecology Management Plan within the First Iteration EMP **[APP-234]**. Upon this planting becoming established over a duration of approximately 15 years from opening of the Scheme, the screening properties of woodland planting throughout this period of time would start to take effect and integrate the Scheme into the wider landscape. With regards to planting to reduce noise impacts, the benefits of vegetation in providing an effective sound 'barrier' are limited and are generally more in terms of a perceived benefit, due to either reducing/ removing the view of the road and/ or a masking effect due to leaves rustling in the wind, rather than an actual reduction in traffic noise. A substantial depth, density and consistency of vegetation is required to achieve any reduction in levels. It is not possible to guarantee any reductions in traffic noise levels from planting would be achieved or could be maintained throughout the seasons and over the longer term. Therefore, to ensure a conservative approach the standard UK traffic noise prediction methodology (Calculation of Road Traffic Noise) and the standard traffic noise assessment methodology set out in the 'Design Manual for Roads and Bridges' (DMRB), as adopted in the operational traffic noise assessment as presented within Chapter 11, Noise and Vibration **[APP-080]** of the Environmental Statement, does not include any barrier effect for vegetation.

Reference Number	Comment from Relevant Representation/Applicant Response
RR-091i	My client is concerned regarding the height of the flyovers and slip road to the North and South of Green Acres including the height of the Kelpie Marina access and their visual impact on his property. My client seeks confirmation of the mitigation measures which will be put in place to protect his property. My client is also concerned with the height of these flyovers and the privacy of his property. My client seeks confirmation of what measures will be put in place to reduce this impact. My client asks that the above concerns are considered as part of the planning process.
Applicant Response	The heights of the new dual carriageway flyover of the proposed Black Cat junction to the north of Green Acres would be approximately 9.2m above existing ground level and the height of the Kelpie Marina access would be approximately 8m above existing ground level. Chapter 7, Landscape and Visual Effect **[APP-076]** of the Environmental Statement presents the assessment of the likely landscape and visual effects of the Scheme. This assessment has informed the landscape mitigation proposed to avoid and minimise significant adverse effects, on views from residential properties. This would also include mitigating any impacts on privacy. Mitigation measures to avoid or minimise the landscape and visual effect of the Interested Party from the construction of the flyover would be in the form of woodland planting. This planting is proposed to the north and south of the property which is illustrated on the Environmental Masterplan **[APP-091]**, Figure 2.4 of the Environmental Statement. The details of the proposed species mix and specification are provided in Annex L Landscape and Ecology Management Plan of the First Iteration EMP **[APP-234]**.

RR-092 Rosemary Neale

Reference Number	Comment from Relevant Representation/Applicant Response
RR-092a	I live in close proximity to the current bridge over the A428. I own 4 horses, three of which I drive (ie in a carriage) and one is ridden by my [Redacted] year old granddaughter. We never use the current bridge as it is too dangerous with traffic travelling too fast but would use it to get to the bridleway network around Roxton if it were to be made safer by having a horse height parapet and ideally making the proposed cycleway into a bridleway. Currently we have little or no off road riding and often fear for our lives with the traffic travelling far too fast on our country roads - if this is to include HGV traffic using the road bridge to get to the A! then we are effectively marooned in our property. There are many horse riders and owners (mainly women) in this area and national statistics show that many more cyclists are men so you are effectively discriminating against the female population who wish to take part in their preferred form of exercise.
Applicant Response	In the delivery of the Scheme, the Applicant is required to re-provide NMU routes that are severed or disrupted as a result of the Scheme. Whilst wider interventions may sometimes be appropriate to address community severance resulting from the existing strategic road network, it is beyond the proper scope of the Scheme to address all existing issues faced by existing users of the highways network. The NMU provision made between School Lane at Roxton and The Lane at Wyboston is a direct replacement for the shared unsegregated footway/cycleway that is currently adjacent to the A1 northbound carriageway. The existing route is unsuitable and would require pedestrians or cyclists to negotiate the new Black Cat junction. The proposed route provides a safer and more attractive alternative, away from the strategic road network, and it also links to National Cycle Route 12. It should be noted that the route along School Lane and from the east end of School Lane, northwards to the start of the Kelpie Marina access road, is to be dedicated as bridleway, as requested by Bedford Borough Council. The carriageway on the existing Bedford Road, Kelpie Marina access road, realigned Roxton Road and the new Roxton Road Link can be legally used by horses and carriages. The Roxton Road bridge has been provided to maintain connectivity across the Scheme and has an improved cross section compared to the existing bridge, as illustrated on Sheet 1 of the Engineering Sections (Part 3 – Structures General Arrangements) **[APP-019]**. This shows that the verge on the

Reference Number	Comment from Relevant Representation/Applicant Response
	carriageway side of the bridge is 2.5m from the 1m high parapet railing. This is a standard (DMRB CD127 Cross sections and headrooms) minimum offset and parapet height (DMRB TD19/06 Requirements for road restraint systems) for bridges of this nature on roads for all users. On the footway/cycleway side, the carriageway is offset by 5m from the parapet railing. The parapet railing on this side will be a minimum of 1.4m high for safety reasons as cyclists may be immediately adjacent to the railing. Correspondence received during the consultation suggested that Roxton Road 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 that counts were undertaken no horse riders were observed using the existing bridge. It should also be noted that there are no existing bridleways in the vicinity of this part of the Scheme. The Applicant acknowledges the suggestion that there would be greater interest in using this route if it were considered safer. The Applicant considers that the improved cross section on the bridge provides a safe and adequate route for all users. Should Bedford Borough Council as the local highway authority wish to extend the bridleway network within the area and provide an off-carriageway route across the bridge, the proposed Scheme does not preclude any such extensions or alterations in the future. More information on the results of the walkers, cyclists and horse rider counts can be found within Chapter 12, Population and Health of the Environmental Statement **[APP-081]** which describes the assessment on Population and Health

RR-093 Roxton Parish Council

Reference Number	Comment from Relevant Representation/Applicant Response
RR-093a	The Black Cat roundabout development is a significant infrastructure project that will have short term and long term impacts upon the village of Roxton and upon the health and wellbeing of its residents. To this end, Roxton Parish Council (RPC) have spent a considerable amount of time reviewing and considering the development plans and looking at ways that the villagers can benefit from the new road infrastructure and from general improvements to the surrounding area. To this end, Roxton Parish Council wish to make representations on the following points: 1.0 Noise and Air Pollution during construction and post construction; regarding post construction RPC believe there is insufficient acoustic screening provided. Significantly more soft landscape screening can address both noise and air pollution as well as minimising the negative visual impact of the works. The land between the new Kelpie Marina access road and the A1 have created an opportunity to provide a new patch of native woodland that would in small part reduce the noise and air pollution experienced in Roxton. RPC challenge the extent of the DCO red line; there is an opportunity to fulfil promises made to parishioners during the consultation process of the Gt Barford bypass circa 2000-2005 to protect Roxton from road noise. RPC insist the red line is extended towards the High Barns bridge to extend the acoustic bund & planting along the A421.
Applicant Response	The Applicant does not agree that there is insufficient acoustic screening provided as part of the Scheme. A comprehensive noise and vibration assessment (presented in Chapter 11, Noise and Vibration **[APP-080]** of the Environmental Statement) has been undertaken as part of the environmental impact assessment for the Scheme. This assessment has identified the construction and operational impacts and the subsequent mitigation and monitoring to minimise the significant effect(s). During the construction phase, noise related impacts will be controlled with the implementation of a Noise and Vibration Management Plan, an outline of which is provided in Annex B Noise and Vibration Management Plan of the First Iteration EMP **[APP-234]**. The Applicant's approach to identifying noise mitigation measures has been informed by considering those measures which will result in the Scheme meeting the following policy aims set out in paragraph 5.195 of

Reference Number	Comment from Relevant Representation/Applicant Response
	the National Policy Statement for National Networks, within the context of Government Policy on sustainable development. a) Avoid significant adverse impacts on health and quality of life from noise as a result of the new development. b) Mitigate and minimise other adverse impacts on health and quality of life from noise from the new development. c) Contribute to improvements to health and quality of life through the effective management and control of noise, where possible. Paragraph 11.3.69 of Chapter 11, Noise and Vibration **[APP-080]** of the Environmental Statement summarises the factors which have been considered by the Applicant when identifying sustainable noise mitigation measures to be included in the Scheme. Such factors include cost versus benefit, engineering practicality, generation of non-acoustic impacts and consultation and stakeholder engagement responses. The initial proposals for the design of 3m high noise bunding alongside the new dual carriageway were consulted upon during the supplementary consultation held in 2020. The noise bunding provides the same function as a noise barrier, in that it reduces noise levels by creating a barrier between a noise source (in this case, the new dual carriageway) and a receptor. The design of this measure was developed in conjunction with other environmental disciplines to avoid secondary impacts (including, for example, landscape, visual impacts and water quality). Native tree and shrub planting is proposed on these bunds. Taking into account the analysis of the consultation responses and subsequent development of the Scheme design and noise models, this noise bunding has been included within the Scheme design and is illustrated on the Environmental Masterplan **[APP-091]**, Figure 2.4 of the Environmental Statement. Paragraph 11.9.45 of Chapter 11, Noise and Vibration **[APP-080]** confirms that further modelling has been undertaken to assess the noise reduction benefit of increasing the effective height of the noise bunding alongside the A421 westbound carriageway, through the addition of a 1m barrier along its length. However, these barriers have not been included in the Scheme as they were not identified to be sustainable noise mitigation measures when the factors described in paragraph 11.3.69 of Chapter 11 Noise and Vibration **[APP-080]** were considered.Air quality effects within Roxton, as set out in Chapter 5, Air Quality **[APP-074]** of the Environmental Statement are predicted to be not significant. Nitrogen dioxide (NO_2) concentrations at receptors in Roxton are predicted to be well under the 40 µg/m^3 objective value with the highest concentration predicted with the Scheme of 14.8µg/m^3. Although most modelled sensitive receptors were predicted to experience imperceptible effects (change of less than 1% of the objective), two receptors

Reference Number	Comment from Relevant Representation/Applicant Response
	(R211 on Bedford Road and the R212 at Tempsford Bridge) were predicted to experience perceptible increases in NO_2 pollution (more than 1% of the objective). These effects are not considered to be significant for air quality as the predicted concentration remains well under the relevant objective value. Therefore, mitigation measures are not required for operational air quality. Soft landscape screening is not considered effective mitigation for air quality effects under the Design Manual for Roads and Bridges (DMRB) LA 105 Air Quality guidance[14] as the pollutant screening ability is highly variable depending on season, planting density, height of tree line, etc. In addition, pollutant concentrations are predicted to be well under the relevant objective values and therefore mitigation is not required. With regards to planting to reduce noise impacts, the benefits of vegetation in providing an effective sound 'barrier' are limited and are generally more in terms of a perceived benefit, due to either reducing/ removing the view of the road and/ or a masking effect due to leaves rustling in the wind, rather than an actual reduction in traffic noise. A substantial depth, density and consistency of vegetation is required to achieve any reduction in levels. It is not possible to guarantee any reductions in traffic noise levels from planting would be achieved or could be maintained throughout the seasons and over the longer term. Therefore, to ensure a conservative approach the standard UK traffic noise prediction methodology (Calculation of Road Traffic Noise) and the standard traffic noise assessment methodology set out in the 'Design Manual for Roads and Bridges' (DMRB), as adopted in the operational traffic noise assessment as presented within Chapter 11, Noise and Vibration **[APP-080]** of the Environmental Statement, does not include any barrier effect for vegetation. The Applicant does not consider the need to update or amend the Order limits in the area High Barns Bridge area. The Order Limits as presented on the General Arrangement Plans **[APP-011]** accurately reflect the temporary and permanent land take requirements to facilitate the Scheme. Historical commitments made to the parish council from projects not related to this application cannot be included within the Scheme, unless those commitments(s) overlap with embedded or essential mitigation identified following the completion of the environmental impact assessment for the Scheme.

[14] https://www.standardsforhighways.co.uk/dmrb/search/10191621-07df-44a3-892e-c1d5c7a28d90

Reference Number	Comment from Relevant Representation/Applicant Response
RR-093b	RPC insist that solid barriers are provided along all elevated sections of road/bridge to minimise light pollution from headlights. RPC insist that all lighting poles be fitted with directional lamp heads to deflect light spill away from Roxton.
Applicant Response	For details on lighting impact, refer to Chapter 7, Landscape and Visual Effects of the Environmental Statement **[APP-076]**. The Applicant disagrees that there will be significant impacts associated with headlight glare and lighting columns. Provision of solid barriers on elevated sections is not proposed as part of the Scheme. The design of operational lighting has considered the potential for lighting impacts and the use of full cut-off lanterns (directional lamp heads) are proposed; as described in Chapter 2, The Scheme **[APP-071]** of the Environmental Statement.
RR-093c	3.0 Safety in and around the T-junction of new Roxton Road Bridge and C44; RPC insist that this junction be in the form of a roundabout not a T-junction. This junction has experienced many accidents and at least one fatality over recent years. As all existing traffic currently accessing & exiting the Wyboston area onto the A1 will now use the new Roxton Road Bridge this significantly increases the volume of HGV & personised vehicles using this junction those increasing the danger. For the same reason the parapets on the new bridge should be increased to prevent all vulnerable road users from falling over onto the A421. RPC insist that the new 40mph speed limit along the C44 be implemented from day one of the works.
Applicant Response	Details of the design and traffic assessment of the proposed Bedford Road/Roxton Road priority junction is provided in the Transport Assessment Report - Part 1 **[APP-241]**. The traffic assessment has determined that the junction will operate well within capacity with minimal queuing on any approach. The design of the proposed priority junction complies with the Design Manual for Roads and Bridges (DMRB) standards and no issues have been identified from the Stage 1 Road Safety Audit with respect to the design and operation of this junction. The Applicant notes comments raised about road traffic collisions and clarifies that since completion of the Bedford bypass (2008) and the new Roxton Road junction, there has been three recorded collisions associated with the junction, of which one was serious and two were slight. The Applicant does not consider there to be a systemic problem with the layout of the junction and therefore there is no justification for upgrading this junction to a roundabout, which would require additional land to accommodate.

Reference Number	Comment from Relevant Representation/Applicant Response
	Furthermore, the introduction of the 40mph speed limit and kerb islands along Bedford Road will improve the safety of the junction. The Scheme proposals include for the extension of the existing 40mph speed limit on Roxton Road up to the junction with Bedford Road. It is also proposed to provide a 40mph speed limit on Bedford Road on the approaches to and through the junction with Roxton Road. The proposed speed limits have been agreed with Bedford Brough Council. With reference to the Outline Construction Traffic Management Plan **[APP-244]** it is proposed to provide temporary 40 mph speed limits on both the Roxton Road and Bedford Road on the approaches to the proposed works during construction. It is expected that these speed limits will be implemented at the commencement of the main works. The Roxton Road bridge has been provided to maintain connectivity across the Scheme and has an improved cross section compared to the existing bridge, as illustrated on Sheet 1 of the Engineering Sections (Part 3 – Structures General Arrangements) **[APP-019]**. This shows that the verge on the carriageway side of the bridge is 2.5m from the 1m high parapet railing. This is a standard (DMRB CD127 Cross sections and headrooms) minimum offset and parapet height (DMRB TD19/06 Requirements for road restraint systems) for bridges of this nature on roads for all users. On the footway/cycleway side, the carriageway is offset by 5m from the parapet railing. The parapet railing on this side will be a minimum of 1.4m high for safety reasons as cyclists are immediately adjacent to the railing.
RR-093d	4.0 Highways England should demonstrate how the works will facilitate future means of road, cycle & footpath access from Roxton to the future train station planned at St Neots South/Tempsford North on the East West Rail line. In conclusion by increasing the soft landscape screening to at least 20m from the A421 and A1, Highways England could provide meaningful protection to the long suffering parishioners of Roxton from the air and noise pollution that will inevitably result from this project. RPC look forward to the opportunity to expand on these issues during the DCO examinations.
Applicant Response	In the delivery of the Scheme, the Applicant is required to re-provide NMU routes that are severed or disrupted as a result of the Scheme. Whilst wider interventions may sometimes be appropriate to address community severance resulting from the existing strategic road network, it is beyond the proper scope of the Scheme to address all existing issues faced by existing users of the highways network. The NMU provision made between School Lane at Roxton and The Lane at Wyboston is a direct replacement for the shared unsegregated footway/cycleway that is currently adjacent to the A1 northbound carriageway. The existing route is unsuitable and would require pedestrians or cyclists to negotiate the new

Reference Number	Comment from Relevant Representation/Applicant Response
	Black Cat junction. The proposed route provides a safer and more attractive alternative, away from the strategic road network, and it also links to National Cycle Route 12. This will form an important link to the East West Rail station in the future. The scope of this scheme does not extend to works which may serve East West Rail facilities. East West Rail have committed to a statutory consultation in 2022 where communities will be asked to give their comments on detailed proposals. More information on the results of the walkers, cyclists and horse rider counts can be found within Chapter 12, Population and Health of the Environmental Statement **[APP-081]** which describes the assessment on Population and Health The Environmental Masterplan **[APP-091]**, Figure 2.4 of the Environmental Statement illustrates the planting which is proposed to provide functions including assisting in integrating the Scheme into the landscape and as visual mitigation. Within the context of Roxton, this includes planting on bunds west of the village between 18 and 27m wide, extending south to meet existing vegetation to the rear of numbers 1 to 11 Bedford Road. East of Roxton, planting is proposed on the embankments of the proposed Kelpie Marina bridge and between the access track and the A1. This planting has been designed within the constraints of the Scheme, including services and drainage. The benefits of vegetation in providing an effective sound 'barrier' are limited and are generally more in terms of a perceived benefit, due to either reducing/removing the view of the road and/or a masking effect due to leaves rustling in the wind, rather than an actual reduction in traffic noise. A substantial depth, density and consistency of vegetation is required to achieve any reduction in levels. It is not possible to guarantee any reductions in traffic noise levels from planting would be achieved or could be maintained throughout the seasons and over the longer term.

RR-094 BNP Paribas Real Estate on behalf of Royal Mail Group

Reference Number	Comment from Relevant Representation/Applicant Response
RR-094a	Royal Mail does not have an in principle objection to this proposed road scheme but is seeking to secure mitigations to protect its road based operations during the construction phase. Under section 35 of the Postal Services Act 2011 (the "Act"), Royal Mail has been designated by Ofcom as a provider of the Universal Postal Service. Royal Mail is the only such provider in the United Kingdom. The Act provides that Ofcom's primary regulatory duty is to secure the provision of the Universal Postal Service. Ofcom discharges this duty by imposing regulatory conditions on Royal Mail, requiring it to provide the Universal Postal Service. The Act includes a set of minimum standards for Universal Service Providers, which Ofcom must secure. The conditions imposed by Ofcom reflect those standards. Royal Mail is under some of the highest specification performance obligations for quality of service in Europe. Its performance of the Universal Service Provider obligations is in the public interest and should not be affected detrimentally by any statutorily authorised project. Royal Mail's postal sorting and delivery operations rely heavily on road communications. Royal Mail's ability to provide efficient mail collection, sorting and delivery to the public is sensitive to changes in the capacity of the highway network. Royal Mail is a major road user nationally. Disruption to the highway network and traffic delays can have direct consequences on Royal Mail's operations, its ability to meet the Universal Service Obligation and comply with the regulatory regime for postal services thereby presenting a significant risk to Royal Mail's business. Royal Mail has four Delivery Offices within 10 miles of this road scheme at Sandy, St Neots, St Ives and Huntingdon. The scheme has potential to present risk of construction phase impact / delays to Royal Mail's road based operations on the surrounding road network. Every day, in exercising its statutory duties Royal Mail vehicles use all the main roads that may be impacted by any additional traffic arising / delays during construction of this scheme. Any periods of road disruption / closure, night or day, have the potential to impact operations. Royal Mail does not wish to stop or delay this scheme from being constructed. However, Royal Mail does wish to ensure the protection of its future ability to provide an efficient mail sorting and delivering service. In order to do this, Royal Mail requests that: 1. the DCO includes specific requirements that during the construction phase Royal Mail is consulted by Highways England or its contractors at least one month in advance on any proposed road closures / diversions / alternative access arrangements, hours of working, and on the content of the final CTMP, and

Reference Number	Comment from Relevant Representation/Applicant Response
Applicant Response	The Outline Construction Traffic Management Plan **[APP-244]** includes details of the communications plan that will be used to inform of closures and diversion routes and the Applicant will continue to engage with affected parties on this matter. The Principal Contractor's Customer Liaison Officer will open lines of communication with Royal Mail and establish points of contact to provide Royal Mail with accurate advance information to minimise disruption to Royal Mail's operations and services.
RR-094b	2. the final CTMP includes a mechanism to inform major road users (including Royal Mail) about works affecting the local highways network (with particular regard to Royal Mail's distribution facilities near the DCO application boundary as identified above). Royal Mail reserves its position to object to the DCO application if the above requests are not adequately addressed.
Applicant Response	Appendix A of the Outline Construction Traffic Management Plan **[APP-244]** sets out a Customer Impact Assessment Tool which identifies the Royal Mail as a group that will be affected by the project during the construction stage. The tool also sets out how the traffic management plan has taken customer requirements into account and what mitigations are proposed. Sufficient notification of closures and those affected being notified via the Principal Contractor Customer Liaison Officer are examples of measures that will be used to minimise impacts on customers, including the Royal Mail. The Applicant notes the request for at least one month's notice of road closures and will endeavour to achieve this

RR-095 Sarah Wynn

Reference Number	Comment from Relevant Representation/Applicant Response
RR-095a	As a rider I have kept horses in the village of toseland that neighbours this route. I am disappointed to see that the latest application does not take full advantage of the opportunities to provide safe off road access for horses as well as other users. I would be keen to see greater consideration given to how this scheme can be used to promote active travel of all types. There a a number of bridlepaths that cross the route and opportunities to provide greater connectivity that have been missed.
Applicant Response	In the delivery of the Scheme, the Applicant is required to re-provide NMU routes that are severed or disrupted as a result of the Scheme. Whilst wider interventions may sometimes be appropriate to address community severance resulting from the existing strategic road network, it is beyond the proper scope of the Scheme to address all existing issues faced by existing users of the highways network. Unless a bridleway has been severed, there is no requirement to create a new bridleway. A bridleway bridge has been provided at BW1/18 to the east of the Cambridge Road junction. To the north of Eltisley a new underpass is provided on BW74/6 to allow safe passage beneath the new dual carriageway. The Applicant considers that the cross section of other bridges along the route of the Scheme provide a safe and adequate route for all users.

RR-096 Shelford and District Bridleways Group

Reference Number	Comment from Relevant Representation/Applicant Response
RR-096a	I represent the interests of all Bridleways users in my area: walkers, cyclists and horse-riders. We are concerned that early-stage agreements regarding safe equestrian access within this development do not seem to have been followed through into the scheme as has now been presented. There is a terrible lack of joined-up, safe off-road access for Bridleways users throughout our County, which is so often a result of poor design of previous road schemes: where Rights of Way have been severed without thought for the continuity of the RoW network. New road schemes *should* be an opportunity for ensuring that these past errors are now corrected, and that the network is improved, in line with the commitments in the county's RoWIP. My group wishes to have the chance to make a representation regarding these issues of safe off-road access for all Bridleways users.
Applicant Response	In the delivery of the Scheme, the Applicant is required to re-provide NMU routes that are severed or disrupted as a result of the Scheme. Where appropriate the Applicant seeks to deal with existing severance issues. Whilst wider interventions may sometimes be appropriate to address community severance resulting from the existing strategic road network, it is beyond the proper scope of the project to address all existing issues faced by existing users of the highways network. Unless a bridleway has been severed, there is no requirement to create a new bridleway. A bridleway bridge has been provided at BW1/18 to the east of the Cambridge Road junction. To the north of Eltisley a new underpass is provided on BW74/6 to allow safe passage beneath the new dual carriageway. The Applicant considers that the cross section of other bridges along the route of the Scheme provide a safe and adequate route for all users. The Applicant is not aware of the specific early-stage agreements that are being referred to here and therefore requests that the Interested Party provides more details of these. The Applicant is not aware of any early-stage agreements other than the consideration of where enhancements could be made within the scope of the Scheme.

RR-097 Simon Barber

Reference Number	Comment from Relevant Representation/Applicant Response
RR-097a	This dual-carriageway replacement for the A428 will bring no benefit at all to the local communities. The new road will affect green belt areas and will bring more traffic travelling between Cambridge and Milton Keynes. Traffic is already increasing with new housing developments along that corridor. The increased road traffic will in turn increase CO2 emissions by 3.5million tonnes and also air pollution (a serious health emergency),both of which the Government is pitifully complacent.
Applicant Response	Air quality effects, as set out in Chapter 5, Air Quality **[APP-074]** of the Environmental Statement, are not considered to be significant. NO_2 pollution from roads disperses over short (200m) distances and therefore NO_2 concentrations at sensitive receptors are much more heavily influenced by the location of emissions, than the total emissions generated by the Scheme. The local air quality assessment for the operation of the Scheme has predicted imperceptible changes in NO_2 pollution (less than 1% of the objective value) at the majority of modelled sensitive receptors. Whilst some increases in pollutant concentrations are predicted at individual receptors, where these are greater than imperceptible, air quality is good (both with and without the Scheme) with concentrations under the air quality objective values. Similarly, some decreases in pollutant concentrations are predicted at receptors, particularly those located along the existing A428. As concentrations of pollutants are predicted to remain under the relevant air quality objective value at these receptors these changes are not considered significant. In summary, the air quality assessment for the Scheme demonstrates the Scheme will not have the severely negative impacts suggested by the Interested Party. Greenhouse gas emissions have been calculated by comparing a Do-minimum scenario (baseline) where the Scheme does not go ahead, against a Do-something scenario where the Scheme is built. The variation in emissions between the two scenarios represents additional emissions as a result of the Scheme. Over the 60 life of the Scheme emissions have been calculated at just over 3 million tCO2e. It should be noted however that the methodology to calculate road user emissions, which account for over 90% of total Scheme emissions, does not take into account the impact of recent Government policy on decarbonising transport (Transport Decarbonisation Plan (TDP)[15]) or Highways England' Net Zero Plan[16]'. The TDP presents Government commitments and initiatives to decarbonise transport in the UK to net zero by 2050 while Highways England's Net Zero Plan presents how they will support the implementation of the TDP.

[15] Decarbonising Transport: a better, greener Britain https://www.gov.uk/government/publications/transport-decarbonisation-plan
[16] Net zero highways: our 2030 / 2040 / 2050 plan https://highwaysengland.co.uk/netzerohighways/#plan

Reference Number	Comment from Relevant Representation/Applicant Response
	The emissions presented in the Chapter 14 Climate **[APP-083]** of the Environmental Statement are therefore considered to be a conservative, worst case scenario. Road user emissions are anticipated to decrease to net zero by 2050 in line with the TDP. The Climate Assessment has identified that the emissions arising as a result of the Scheme represent less than 0.012% of the total emissions in any of the 3rd, 4th or 5th Carbon Budget periods. Accordingly, the assessment has concluded that the GHG emissions impact of the Scheme would not have a material impact on the UK Government meeting its legally binding carbon reduction targets. Although the 6th Carbon Budget was not legally binding when the Environmental Statement was written, an additional assessment of the 6th Carbon Budget, which became legally binding during June 2021, has been undertaken. This assessment concluded that the Scheme represents less than 0.024% of the total emissions in the 6th budget period and is also considered not have a material impact on the UK Government meeting its carbon reductions target.
RR-097b	Meanwhile the following measures should also be taken: Upgrade crossings on existing A428 to improve safety for pedestrians,cyclists and horse riders,and create more convenient off-road routes.
Applicant Response	In the delivery of the Scheme, the Applicant is required to re-provide NMU routes that are severed or disrupted as a result of the Scheme. Whilst wider interventions may sometimes be appropriate to address community severance resulting from the existing strategic road network, it is beyond the proper scope of the Scheme to address all existing issues faced by existing users of the highways network. A bridleway bridge has been provided at BW1/18 to the east of the Cambridge Road junction. To the north of Eltisley a new underpass is provided on BW74/6 to allow safe passage beneath the new dual carriageway. In addition the BW1/18 crossing of the existing A428 near Wintringham Farm is being improved. Safe crossings will be provided at Cambridge Road and Caxton Gibbet junctions, Eltisley, Bedford Road, Roxton Road and the Roxton Road Link.
RR-097c	Improve landscaping by planting locally-sourced trees and shrubs.
Applicant Response	As set out in Annex L Landscape and Biodiversity Management Plan within the First Iteration EMP **[APP-234]**, the Applicant can confirm that native plant species will make up the larger proportion of a planting mix within the soft estate for the Scheme. The selection of native plant species will also be guided by The Ecological Site Classification Decision Support System (ESC-DSS) in selecting species which are well-

Reference Number	Comment from Relevant Representation/Applicant Response
	suited to the environment of the planting site and the Current Forest Research guidance which stresses the need for species resilience and adaptability for an unpredictable future climate.
RR-097d	Changes to current local access roads to help improve driver access.
Applicant Response	In the delivery of the Scheme, the Applicant is required to re-provide any local roads that are severed by the scheme. Wider interventions beyond the scheme area (such as improvements to local access roads and junctions) are outside the scope of the Scheme.

RR-098 Simon Curtis

Reference Number	Comment from Relevant Representation/Applicant Response
RR-098a	It is my request that the position of the Black Cat interchange be relocated 250 Metres to the East from the planned location. The road should deviate from it's current line 570 Metres North of the Black Cat travelling due South in a straight line rejoining the current carriageway at a point 1638 Metres South of the current roundabout. The vast majority of the new interchange can be constructed with minimum disruption to the flow of traffic on the current A1/A428 roads By doing this one dangerous section of road being the Old Great North Road Wagon/Coach bridge which has been in that position since the 1660's will be removed plus several other road deviations. It will not be necessary to build the new separate access road to Kelpie Marina. Furthermore it moves the interchange further away from the Villages of Roxton and Chawston and will allow for much easier sound attenuating landscaping to be undertaken.
Applicant Response	A version of the option proposed by this interested party was considered as part of the Stage 1, Options Identification assessment undertaken by the Applicant. This proposal was discounted primarily for the following reasons: • The junction would be located within the flood plain of the River Great Ouse resulting in greater and unacceptable impacts on flood risk. • The proposal had a greater and unacceptable impact on existing residential properties and businesses. • Additional bridge crossings of the River Great Ouse would be required further impacting on the flooding.

RR-099 Carter Jonas LLP on behalf of SIR Trustee 17 & SIR Trustee 18 Limited

Reference Number	Comment from Relevant Representation/Applicant Response
RR-099a	INTRODUCTION 1. We write on behalf of SIR Trustee 17 & SIR Trustee 18 Limited (the 'Freeholder') making Relevant Representations to the A428 Black Cat to Caxton Gibbet Improvements Development Consent Order (the Scheme) being promoted by Highways England Ltd (the 'Applicant'). 2. The Freeholder own a hotel (the 'Hotel') leased to Travelodge on the existing Black Cat roundabout. The Hotel is a 40 bed budget hotel, located to the immediate north of the existing Black Cat roundabout. 3. The Hotel is well established and has been trading for approximately 19 years, from August 2000 in a well-connected location on the strategic road network. COMULSORY PURCHASE AND EXTINGUISHMENT 4. The Hotel will compulsorily acquire (Plots 1/29a 1/30a) and be demolished as part of the Scheme. The Applicant has said in their view it will be reasonably necessary to extinguish the Hotel.
Applicant Response	Based on discussions with the landowner regarding the potential for relocation, the Applicant has been of the opinion since late 2019 that the specialist nature of the property/business means it is unlikely that suitable alternative premises will become available before the DCO is consented. It's therefore accepted, in line with many other compulsory acquisitions of roadside services that a claim for compensation will need to be made on the basis of extinguishment rather than relocation. The relevant interest is the freehold held as an investment. The landowner will therefore be able to reinvest any compensation monies in an alternative investment of their choice. The Applicant has undertaken a thorough and comprehensive process over many years in the development and assessment of Black Cat junction which has ultimately resulted in the need to demolish the existing hotel. For details on the Black Cat junction design development, refer to Black Cat Junction Design Options **[APP-247]**.

Reference Number	Comment from Relevant Representation/Applicant Response
RR-099b	ROADSIDE SERVICES AND ROAD SAFETY 5. As well as a commercial enterprise the Hotel serves an important function in supporting the strategic road network. The Department for Transport policy on roadside services states: "The primary function of roadside facilities… is to support the safety and welfare of the road user." 6. The provision of comprehensive services on this key junction serving two major routes (A1 and A428) provides a higher quality of roadside facilities, and more sustainable land use than a number of smaller services scattered along both routes. 7. Government policy and industry guidance emphasises the risks of driver fatigue in road accidents, and the benefits of regular breaks, consumption of caffeinated drinks and over-night stops in preventing accidents. 8. Government policy in DfT Circular 02/2013 'The strategic road network and the delivery of sustainable development' (10th September 2013) states: "Motorway service areas and other roadside facilities perform an important road safety function by providing opportunities for the travelling public to stop and take a break in the course of their journey. Government advice is that motorists should stop and take a break of at least 15 minutes every two hours. Drivers of many commercial and public service vehicles are subject to a regime of statutory breaks and other working time restrictions and these facilities assist in compliance with such requirements."
Applicant Response	The Applicant notes the points that have been made. Highways England standards (DMRB) suggest that services or fuel filling stations should ideally be no more than 28 miles (45km) apart or 30-minute drive. On the A1 there are services at Sandy and Buckden, which are approximately 12 miles (19km) apart. There are services at Caxton Gibbet and at the A421/A6 junction south of Bedford, which are approximately 20 miles (32km) apart. The removal of the Black Cat junction service area does not contravene this guidance. It is for the private sector to promote and operate service areas that meet the needs of the travelling public and are subject to the provisions of relevant planning legislation and regulation.

Reference Number	Comment from Relevant Representation/Applicant Response
RR-099c	IMPACT OF THE SCHEME 9. The Scheme would result in significantly increased traffic volumes on the east / west route. Following extinguishment of the Hotel there will be an 18 mile gap between services and over-night stays on this route. The intensification of traffic on the east/west route due to the Scheme would therefore be associated with a reduction in roadside services in a key location, which would be potentially detrimental to the welfare of drivers. 10. There are other services and a hotel on the A1 in this area for north and south bound travellers, however these do not offer such comprehensive provision of hotel, fuel and hot food options, and in some cases are only accessible from one side of the carriageway. Planned upgrades of the A1 are likely to extinguish more roadside services. 11. This risk underlines the importance of retaining a comprehensive hotel service offering at the Black Cat roundabout. This is a strategic location that will provide services to both the A1 and improved A428/A421 route more efficiently and sustainably, maximising the benefit to road users and with less impact on land use than smaller roadside provisions scattered along both routes. 12. A key objective of the Scheme (Environment Statement [ES] Chapter 2, 2.2.2) “Safety: Improve safety at junctions, side roads and private accesses by reducing traffic flows on the existing A428. Improve safety on the A1 by removing existing substandard side road junctions and private accesses onto the carriageway” 13. ES ‘Chapter 12: Population and Human Health’ concludes that the Scheme would have a beneficial impact upon road safety and is therefore assessed to have a positive health outcome. 14. We note however that the ES (specifically the Transport Assessment) appears to have no regard to the following when arriving at its conclusions on the Scheme’s impact on safety: - DfT policy on roadside facilities and road user safety - The provision of roadside facilities - The impact of the loss of services at Black Cat Roundabout (including the Hotel)

Reference Number	Comment from Relevant Representation/Applicant Response
Applicant Response	In relation to point 14, the facilities that are lost from the demolition of the Black Cat junction services are a fuel filling station including refreshments and accommodation. The existing facilities do not include an HGV rest area. Guidance from both DfT and Highways England suggest that service areas should be spaced no more than 45km or a 30-minute drive; the removal of the Black Cat junction service area, does not contravene this guidance with the following distances: • BP garage at the A421 interchange with the A6 to Shell garage at the Caxton Gibbet junction is approximately 31.2km taking 20 minutes for both the eastbound and westbound direction of travel. • Esso garage to the Brampton Hut services is approximately 22.1km taking 16 minutes for the A1 northbound direction of travel. • Welcome Break to the service area at Sandy Roundabout is approximately 7.6km taking 6 minutes for the A1 southbound direction of travel. In addition, new lay-by facilities have been provided along the new dual carriageway for road users to rest before continuing their journey. It is for the private sector to promote and operate service areas that meet the needs of the travelling public and are subject to the provisions of relevant planning legislation and regulation. The Applicant suggests that other private accommodation facilities are sought at the nearby towns of Bedford, St. Neots, Sandy and Cambourne for those that are lost at Black Cat roundabout.
RR-099d	CONCLUSION 15. The Freeholder object to the compulsory purchase of the Hotel and extinguishment of the business and loss of jobs. They consider that the Applicant should provide for the provision of roadside services in this sustainable location as an integral part of the Scheme, in order to safeguard road safety in accordance with government policy. 16. The omission of consideration of this important policy factor (roadside facilities and road user safety) in the ES mean that the true adverse impacts of the Scheme have not been properly assessed. In the context of the increase in traffic associated with the Scheme and loss of roadside facilities such as the Hotel, the Scheme design is potentially inadequate.

Reference Number	Comment from Relevant Representation/Applicant Response
	17. In the absence of any tangible support to the Freeholder to assist a re-location they consider the Applicant has not taken reasonable steps to avoid compulsory purchase and that there is therefore no compelling case in the public interest to justify the use of such powers.
Applicant Response	Based on discussions with the landowner regarding the potential for relocation, the Applicant has been of the opinion since late 2019 that given the specialist nature of this property that relocation was unlikely to be a viable solution. However, as the relevant interest is held as an investment the landowner is free to reinvest any monies from the acquisition in an investment of their choice. Negotiations have been ongoing since late 2020 to acquire the site by agreement, but an agreement is yet to be reached.

RR-100 South Cambridgeshire District Council

Reference Number	Comment from Relevant Representation/Applicant Response
Applicant Response	(See RR-013: Cambridgeshire County Council)

RR-101 Shakespeare Martineau on behalf of South Staffordshire Water plc

Reference Number	Comment from Relevant Representation/Applicant Response
RR-101a	This registration is submitted on behalf of South Staffs Water plc (“SSW”), a water undertaker appointed under the Water Act 1989, with statutory duties to carry out water supply functions throughout its appointed area, including the area where the works are proposed to be carried out under the development consent order, if confirmed. SSW operates assets that are located in close proximity to the proposed works. Whilst SSW does not object in principle to the Scheme it reserves its ability to object if there is a risk to its assets or operations. The scheme affects major trunk mains serving thousands of people in the local populations in the West of Cambridge. All of the apparatus is strategic with no alternative means of serving the local areas if there is a loss of supply due to the scheme. It is essential that these assets remain in continuous operation in order to ensure the provision of water supplies to household and non-household customers. Initial discussions have been held with the applicant and initial designs provided but if the Scheme changes, further changes to the proposed diversions may be required. In addition any works required to be carried out to SSW’s assets must be planned and implemented to avoid the risk of supply interruption or damage to the integrity of the water network. Further, the current drafting of the protective provisions of the draft Development Consent Order ("DCO") are not satisfactory to SSW and amongst other points of concern they impose a requirement on SSW to remove redundant apparatus which SSW would normally cap and abandon. To remove such apparatus would impose significant costs on SSW. Removal of the redundant apparatus is only one of several issues that SSW have with the protective provisions. SSW therefore objects to the draft DCO unless and until such time as an approved programme and methodology of works can be agreed. In addition, SSW’s objection will remain unless SSW’s concerns with the protective provisions are addressed to their satisfaction, whether by amends to them or a supplemental agreement is reached.
Applicant Response	The Applicant is continuing to work with South Staffordshire Water PLC in relation to the protective provisions and any supplementary agreements which may be required with a view to agreeing the terms. The Applicant will update on the progress of these discussions throughout the Examination.

RR-102 Staploe Parish Council

Reference Number	Comment from Relevant Representation/Applicant Response
RR-102a	Staploe Parish Council support the proposals for the new Black Cat roundabout and the A428. We believe it will lead to improved traffic flow, less congestion and less use of local roads as “rat runs”. We have two concerns which are: 1. That there appears to be very little space for some of the proposed more northerly East West rail routes to run directly adjacent to the new roundabout at Black Cat
Applicant Response	The Applicant notes the comments about East West Rail. It should be noted that the East West Rail scheme has not announced a route alignment for the Bedford to Cambridge section yet. The East West Rail scheme completed their non-statutory route options consultation in June 2021, and a Preferred Route Announcement is not anticipated until 2022. Therefore, since East West Rail has not determined the route the Applicant is not able to comment on routes in relation to the new Black Cat junction.
RR-102b	2. How will you prevent people using local back roads to avoid congestion during construction?
Applicant Response	The Outline Construction Traffic Management Plan **[APP-244]** outlines initial proposals for traffic movements during construction, this considers the suitability of diversion routes, strategic signing and updates to satellite navigation system mapping to minimise rat-running. This will be further developed through consultation and design development, prior to construction. The Outline Construction Traffic Management Plan **[APP-244]** also includes details of the communications plan that will be used to inform of closures and diversion routes and Highways England will continue to engage with parish councils on this matter. A customer liaison officer will be appointed to act as point of contact for residents and businesses during construction. With these measures in place and through communicating road closures in advance it is hoped that the amount of traffic choosing to take an alternative route will be limited.

RR-103 Steve Eldridge

Reference Number	Comment from Relevant Representation/Applicant Response
RR-103a	We approve of the scheme generally as it should finally reduce the congestion at the Black Cat. However, we do have concerns about noise from the A421 as it rises when it passes near Roxton. We were assured at the consultation that this section could use a low noise surface and have suitable bunding but we do not remember there being any woodland proposed at that section. That would be beneficial both for noise and visual reasons. We also spoke about the lack of noise reduction on the stretch of the current A421 passing Roxton at ground level where no noise reduction was provided when it was built a few years ago. We were told that there would be a chance to rectify this as part of the new scheme since it is precisely where the re-working of the A421 would start. Roxton residents feel they were let down by the lack of noise reduction measures when the bypass was built and hope that this can be rectified with the planned works.
Applicant Response	As part of the Environmental Impact Assessment for the Scheme, a noise assessment has been undertaken and presented as Chapter 11, Noise and Vibration **[APP-080]** of the Environmental Statement. Through the iterative design process and noise assessment process, measures to minimise the traffic noise impacts of the Scheme on Roxton were developed in conjunction with other environmental disciplines to avoid secondary impacts (including, for example, landscape, visual and water quality impacts). The initial proposals included for the design of a 3m high noise bunding alongside the new dual carriageway as it passes Roxton which was consulted upon during the supplementary consultation held in 2020. Taking into account the analysis of the consultation responses and subsequent development of the Scheme design and noise models, this noise bunding has been included within the Scheme design in addition to low noise surfacing materials along the length of the Scheme. These measures are illustrated on the Environmental Masterplan **[APP-091]**, Figure 2.4 of the Environmental Statement. The illustrative linear belts of shrubs and trees as shown on the Environmental Masterplan **[APP-091]**, Figure 2.4 of the Environmental Statement, have been included within the Scheme for landscape mitigation and ecological purposes. Whilst these features cannot provide significant noise abatement, the intended function is to integrate the Scheme into the wider landscape and provide screening of the Scheme to

Reference Number	Comment from Relevant Representation/Applicant Response
	identified receptors as presented within Chapter 7, Landscape and Visual Effects **[APP-076]** of the Environmental Statement.

RR-104 Swayesey & District Bridleways Association

Reference Number	Comment from Relevant Representation/Applicant Response
RR-104a	This highways develoment presents a unique opportunity (in terms of funding and access to land) to work in partnersehip with the consultants, developers, local highway authority and Local Access Forum to ensure that existing Public Rights of Way are both protected and enhanced (by changing from Footpath (walkers) to Bridleway (walkers, cyclists, horseriders) or Restricted Byways (all non-motorised users). Also we wish to see that all possible new opportunities are taken to increase the PROW network in an inclusive way by the provision of new routes, both to provide circular routes, to provide links in broken networks, and to link villages and communities together, with safe crossing points. The standard has already been set with the A14 work from which much can be seen as good example and also much can be learnt in terms of mistakes made. We are pleased to see the same Highways England lead person is employed on the A428 as was on the A14.
Applicant Response	In the delivery of the Scheme, the Applicant is required to re-provide NMU routes that are severed or disrupted as a result of the Scheme. Whilst wider interventions may sometimes be appropriate to address community severance resulting from the existing strategic road network, it is beyond the proper scope of the Scheme to address all existing issues faced by existing users of the highways network. Where existing bridleways are affected by the Scheme, suitable and safe alternatives are provided, such as the bridge carrying BW1/18 over the new road to the east of the Cambridge Road junction and the underpass to the north of Eltisley, taking BW74/6 beneath the new road. The BW1/18 crossing of the existing A428 near Wintringham Farm is being improved. School Lane at Roxton is being converted to bridleway. This forms part of the wider Scheme proposal for the NMU link between existing footway/cycleway on the A1 northbound carriageway to Wyboston.

RR-105 Strutt & Parker on behalf of Tempsford Estate

Reference Number	Comment from Relevant Representation/Applicant Response
RR-105a	We reiterate our previous representations to Highways England for the widening of the proposed A428 bridge over the East Coast Main Railway, providing a private farm bridge and internal estate and farm access road thereby reducing the need to take large tractors and other agricultural machinery through Tempsford village via Station Road (with potential safety implications), a generally narrow road made worse and frequently impassable with parked vehicles either side.
Applicant Response	Noted. The Scheme does not affect any principal access arrangements to this landowner's land.

RR-106 Brown & Co on behalf of Terence John Wright

Reference Number	Comment from Relevant Representation/Applicant Response
RR106a	This representation is made on behalf of Terence John Wright who is the owner of plots 2/18a, 2/18b and 2/18c detailed within the Book of Reference. My client is concerned regarding the provision of appropriate fencing alongside the boundaries both during construction and following completion to ensure the security of the field. The land is let on a Farm Business Tenancy for the grazing of livestock and so the field must be secure at all times.
Applicant Response	Detailed requirements of accommodation works will be finalised at detailed design by the Principal Contractor and in consultation with the landowner.
RR106b	My client currently enjoys access from a gate located onto Chawston Lane and this is being removed by the new link road. A new access has been provided however further details have not been provided as to width and size of apron, my client required clarity on this to ensure it is adequate.
Applicant Response	Detailed requirements of accommodation works will be finalised at detailed design by the Principal Contractor and in consultation with the landowner.

RR-107 Henry Bletsoe & Son LLP on behalf of The Bates and Must Family

Reference Number	Comment from Relevant Representation/Applicant Response
RR-107a	This representation is made on behalf of Richard Bates of [redacted] and Janet Must of [redacted] as landowners of land affected by the A428 scheme. These representations are made without prejudice to making further objections/representations at a later stage for different reasons, or to amplify these representations. We have reviewed the plans included within the Developer's application insofar as they relate to our client and these representations are based upon the information contained therein. The proposed scheme affects land owned by Richard Bates and Janet Must located to the west of Roxton Road on the north and south side of the A421, and land to the north of School Lane. Based on the information available this land has been identified as permanent acquisition. This land is located within close proximity to Chawston, where we believe there to be potential for residential development. The landowners are seeking to promote the site for development and are currently in discussions with a major PLC housebuilder. In addition we consider that there are minerals present which will ultimately need paying for and cannot simply be taken and not compensated for. As such, we believe that the land has increased value over and above agricultural value. Based on the information available the majority of this land is only required for the construction phase, therefore there cannot be a compelling case in the public interest for this land to be acquired permanently, especially when you consider the increased land values highlighted above. Instead, the land should be acquired temporarily and reinstated to it's former condition and level, and returned to the landowners.
Applicant Response	The Applicant is willing to discuss temporary occupation of the land required for the borrow pit and is exploring the possibility of reaching an agreement to use this land under a short term private lease arrangement. The Applicant however maintains the position that the borrow pit land should remain in the Order as Permanent Acquisition, due to the nature of the works proposed on the land and the extent to which it will be materially altered. In the event of permanent acquisition, the value of any mineral present within the land reflecting the prospect of planning consent for extraction would be accounted for in any negotiations with the landowner in relation to a claim for compensation. However, further matters of compensation are not for assessment or consideration by the Secretary of State in relation to this Application.

Reference Number	Comment from Relevant Representation/Applicant Response
RR-107b	School Lane has also been identified as permanent acquisition. The Bates & Must family own land to the north of School Lane which is being promoted for development. A development standard access needs to be incorporated in the scheme (a plan of the land and a design of the access has been sent to Ardent), and further details have been requested from Ardent regarding the proposed highway works to School Lane. Uninterrupted agricultural access is also required, at all times, along parts of School Lane to access land farmed by the Bates & Must family, the access points must be suitable for heavy agricultural machinery, with a minimum width of 4m and allow for safe and efficient operation when entering and exiting the agricultural fields with heavy loads and restricted maneuverability such as tractors, sprayers and combines. The plans available do not provide sufficient detail in order to ascertain the full impact on my client's interest. In respect of the 'Land Plans Regulation 5(2)(i) Sheet 1' we would like further details on the size of reference point '1/16e' and '1/16f' as my client requires access through these points into the field to the north. A plan of School Lane has been emailed to Ardent which also identifies two further access points which are required for agricultural machinery as mentioned above.
Applicant Response	The Applicant proposes maintaining the existing access arrangements off School Lane into the adjacent agricultural field with rights of access along School Lane provided to the landowner. The adjacent landowner will retain access along School Lane, similar to that of the existing highway. The request for a 'development standard access' is predicated on the assumption that the landowner will be granted planning permission to a development site and an access point onto School Lane. It is therefore on this basis that the Applicant does not consider it is reasonable to provide additional provision over and above what is existing. The Applicant will seek to maintain access to all properties throughout the construction of the works or provide alternative access arrangements. In some instances, it may be necessary to restrict access for limited periods, however, the Applicant would seek to minimise the number and duration of any such restrictions as far as reasonably practicable. The Principal Contractor will liaise with the affected landowner to ensure that such disruption is minimised. As requested, the size of individual plots of land can be seen in the Book of Reference **[APP-032]**, however the plots of interest are: 1/16e - approximately 316sqm, 1/16f - approximately 110sqm.

Reference Number	Comment from Relevant Representation/Applicant Response
	The Applicant met Bletsoe's on 10 August 2021 to discuss School Lane and it was made clear the further two access points referenced will not be permanently affected.
RR-107c	Accommodation works will also be necessary due to the closure of School Lane. An irrigation pipe which currently goes under the road at the south side of School Lane will need to be replaced so that the land on the north side can be irrigated. The irrigation abstraction point will also need to be maintained. We require further details on the proposed accommodation works to ascertain the full impact on my client's interest. As a minimum, our client requires, post scheme land drainage, and fencing and hedge of boundaries to mitigate the detrimental affect of this scheme. Any Basic Payment Scheme Entitlements in respect of the land must also be kept by our client if relevant at the time of acquisition. This representation has been made by Verity Garlick BSc(Hons) MRICS FAAV and Peter Moore BSc(Hons) MRICS FAAV of Bletsoes, as Agents on behalf of the Bates & Must family.
Applicant Response	The Applicant is committed to continuing engagement with this landowner on these matters. Detailed requirements of accommodation works will be finalised at detailed design by the Principal Contractor and in consultation with the landowner. During detailed design the Applicant will consider the individual needs of each land parcel, including land drainage where this is appropriate. Pre-earthworks ditches will be installed prior to the start of the major construction. The Applicant will seek for copies of any land drain plans, to identify where connections to temporary and/or permanent drainage channels or watercourses will be made. In the absence of plans, the contractor will connect those land drains which become evident as new drainage or ditch is installed. The embedded mitigation proposed as part of the Scheme, including boundary treatments, are shown on the Environmental Masterplan **[APP-091]**, Figure 2.4 of the Environmental Statement. Financial compensation details including any payment scheme entitlements are addressed outside of the DCO Examination process.

RR-108 The British Horse Society

Reference Number	Comment from Relevant Representation/Applicant Response
RR-108a	The BHS wishes to record its OBJECTION to the Development Consent Order as submitted because of the failure to include opportunities for equestrians which we believe has occurred due to the lack of consultation with equestrians unlike the consultation with cyclists. We would like to have the opportunity to explain our views to the Inspector due to the failure to accommodate the needs of equestrians contrary to National and Local Policies. For example : • The failure to provide for equestrian usage of the new bridge over the A421 at Roxton compounds an omission made when the A421 was built. The Society accepts that this current bridge is rarely used by horses because local riders consider it to be too dangerous. But there is a demand for it to be equestrian safe in order to create some riding circuits in an area has a shortage of bridleways. Further, the bridge will be used by a significantly higher number of HGVs than is currently the case making the need to segregate horses from the carriageway even greater. The Society considers it wholly unacceptable, and contrary to policy, that the proposed cycleway is not a bridleway in order to protect the safety of horse riders.
Applicant Response	The Applicant has also made efforts to ensure the British Horse Society were made aware of the Scheme. Prior to submission of the application for development consent, the Applicant set up a number of working groups, one of which covered Walkers, Cyclists and Horse Riders. Appendix M (Part 1.1) of the Consultation Report **[APP-046]** sets out that the British Horse Society and the Byways and Bridleways Trust were invitees to the Technical Working Group, which met on four occasions (October 2019, December 2019, March 2020 and June 2020). Furthermore, the British Horse Society were invited to the launch of the supplementary consultation, held in June and July 2020. Since submission of the DCO application, the Applicant met with the British Horse Society in April 2021 to discuss their concerns in greater detail. In terms of future consultation, the British Horse Society will be invited to engage with the Scheme during the detailed design phase. In the delivery of the Scheme, the Applicant is required to re-provide NMU routes that are severed or disrupted as a result of the Scheme. The NMU provision made between School Lane at Roxton and The Lane at Wyboston is a direct replacement for the shared unsegregated footway/cycleway that is currently adjacent to the A1 northbound carriageway. The existing route is unsuitable and would require pedestrians or cyclists to negotiate the new Black Cat junction. The proposed route provides a safer and more attractive alternative, away from the strategic road network, and it also links to National Cycle Route 12. It should be

Reference Number	Comment from Relevant Representation/Applicant Response
	noted that the route along School Lane and from the east end of School Lane, northwards to the start of the Kelpie Marina access road, is to be dedicated as bridleway, as requested by Bedford Borough Council. The carriageway on the existing Bedford Road, Kelpie Marina access road, realigned Roxton Road and the new Roxton Road Link can be legally used by horses and carriages. The Roxton Road bridge has been provided to maintain connectivity across the Scheme and has an improved cross section compared to the existing bridge, as illustrated on Sheet 1 of the Engineering Sections (Part 3 – Structures General Arrangements) **[APP-019]**. This shows that the verge on the carriageway side of the bridge is 2.5m from the 1m high parapet railing. This is a standard (DMRB CD127 Cross sections and headrooms) minimum offset and parapet height (DMRB TD19/06 Requirements for road restraint systems) for bridges of this nature on roads for all users. On the footway/cycleway side, the carriageway is offset by 5m from the parapet railing. The parapet railing on this side will be a minimum of 1.4m high for safety reasons as cyclists may be immediately adjacent to the railing. Correspondence received during the consultation suggested that Roxton Road 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 that counts were undertaken no horse riders were observed using the existing bridge. It should also be noted that there are no existing bridleways in the vicinity of this part of the Scheme. The Applicant acknowledges the suggestion that there would be greater interest in using this route if it were considered safer. The Applicant considers that the improved cross section on the bridge provides a safe and adequate route for all users. Should Bedford Borough Council wish to extend the bridleway network within the area and provide an off-carriageway route across the bridge, the proposed Scheme does not preclude any such extensions or alterations in the future.
RR-108b	• Caxton Gibbet roundabout. Needs safe and segregated NMU access for all users including equestrians. Failure to provide this facility will be disadvantage equestrians in perpetuity from accessing any A428 NMU provision. Opportunities to link to the new peripheral bridleway at Cambourne West have been ignored. • Bridleway 74/6 - could be provided no must be included in the project • New foot cycleway Cambourne to St. Ives – needs to be NMU

Reference Number	Comment from Relevant Representation/Applicant Response
	• Minutes of NMU Meetings with CCC. Need for new NMU path alongside de trunked A428 was recorded as was path alongside new A428 4.4 NMU data survey – no equestrian activity bears no reflection on suppressed demand where facilities are inadequate. Huge changes since 2017
Applicant Response	The route through the Caxton Gibbet junction is for walkers and cyclists. A new route to replace the existing route between Caxton Gibbet roundabout and Brockley Road will be created as part of the Scheme – this will be designated as a bridleway. The Cambourne West development is separate from this Scheme and is subject to local planning. There is no provision within this development for walkers, cyclist and horse-riders on its western side adjacent to the A1198, therefore there is no opportunity to provide a link from the Caxton Gibbet junction. The Applicant proposes an underpass crossing of the new dual carriageway to maintain Bridleway 74/6. The Applicant request further clarification on the reference to a new footway/cycleway between Cambourne and St Ives. It is envisaged that this route is not part of the proposed Scheme and therefore any upgrade is beyond the scope of this Scheme. The existing A428 will be detrunked as part of the Scheme, and will become part of the local highway network. Volumes of traffic on the route will decrease as a result of this Scheme. It will be for the local highway authority to determine future use and incorporation of dedicated routes for NMUs. The Applicant notes the comments made about survey data, however the provision of new facilities, where there is no evidence of need, is outside the scope of the Scheme. Whilst national and local planning policy requires schemes to consider opportunities to enhance access for walkers, cyclists and horse-riders, there is no policy requirement to provide facilities where it is considered there is suppressed demand.
RR-108c	• 2.21.2 Data from Jacobs survey in no way captures the suppressed demand from all three users arising from the lack of facilities. How was this information captured? Massive changes in demand since lockdown. Building for the future not the past.
Applicant Response	The Applicant notes the comments made about survey data, however the provision of new facilities, where there is no evidence of need, is outside the scope of the Scheme. Whilst national and local planning policy requires schemes to consider opportunities to enhance access for walkers, cyclists and horse-riders, there is no policy requirement to provide facilities where it is considered there is suppressed demand.

Reference Number	Comment from Relevant Representation/Applicant Response
	It will be for the local highway authority to determine future use and incorporation of dedicated routes for horse riders.
RR-108d	• 2.15.1 Equality Act – females not mentioned.
Applicant Response	The impacts of the Scheme in relation to the Equality Act 2010 have been assessed by the Applicant as part of the Equality Impact Assessment **[APP-245]**. This has identified where the impacts of the Scheme could have a potential disproportionate or differential effect on protected characteristic groups. This includes any effects on women which are included under the protected characteristic of sex.
RR-108e	Wintringham. The proposals made in the WCHAR only provide for cycling and walking whereas the existing footpaths are all to be upgraded to bridleways. This information was provided by the BHS but clearly has been ignored.
Applicant Response	The Public Rights of Way that the Scheme is affecting in this area are public footpaths. Three of these are to be stopped up in between the existing A428 and the new dual carriageway as it is known that the continuation of those routes on the west side of the existing A428 will be stopped up as part of the Wintringham development. The Applicant cannot advocate the upgrade of the remaining footpaths to public bridleways as part of the Scheme as there is no justification for acquiring the additional land that would be required to do this.
RR-108f	Constant reference throughout the document for the need to provide shared cycling and pedestrian access which is contrary to the Cambridgeshire and Peterborough Local Transport Plan requirement for Active Travel provision i.e. pedestrians, cyclists and equestrians.
Applicant Response	The 'Walking, Cycling and Horse-riding Assessment Report' (WCHAR), set out in the Transport Assessment **[APP-242]** has considered the existing walking, cycling and horse-riding policies and strategies. The level of WCH provision proposed for the Scheme is considered to be measured and appropriate to this assessment and the impact of the Scheme.
RR-108g	The provision of NMU access is not a 'nicety' 'if money allows' but of high importance in terms of health and wellbeing. Any route should be designed to be safe, enjoyable and welcoming to use for all NMU's and

Reference Number	Comment from Relevant Representation/Applicant Response
	not simply something squeezed on to the edge of the carriageway. Identification of funds and their source should be part of the Planning Inspectorate approval.
Applicant Response	The National Policy Statement for National Networks (NPSNN), requires applicants to mitigate impacts upon accessibility for non-motorised users. 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 new shared footway/cycleway provision adjacent to the Roxton Road link and Kelpie Marina access tracks, Cambridge Road junction, Eltisley link and Caxton Gibbet junction. In addition, a footway is proposes along Toseland Road as part of the footpath 278/7 diversion. The Scheme will also introduce a new bridleway along School Lane connecting to the Kelpie Marina access track. Further information on 'Public rights of way and other routes' can be found in Chapter 2, The Scheme of the Environmental Statement **[APP-071]**. The Planning Act 2008 (PA 2008) does not give the Panel or the Secretary of State any powers to require applicants to identify funds and their sources for improvements to the PRoW network. While PA 2008 provides opportunities for applicants of Nationally Significant Infrastructure Projects (NSIPs) to acquire land and rights over land through compulsory acquisition; Section 122 of PA 2008 explains that in order to do so, the land has to be required for development to which the development consent relates; is required to facilitate or is incidental to that development; or is replacement land which is to be given in exchange for the order land under Section 131 or 132. There also has to be a compelling case in the public interest for the order land to be acquired compulsorily. Provision of improved NMU access beyond the Order limits would not meet these compulsory acquisition tests and so could not be delivered as part of this DCO application.

RR-109 Bidwells on behalf of The Executors of N A Alington

Reference Number	Comment from Relevant Representation/Applicant Response
RR-109a	EXECUTORS N ALINGTON DECEASED – LITTLE BARFORD ESTATE Plot no.s 43a, 43b, 43c, 43d, 51a, 51b, 51c, 51d, 51e, 51f The Executors own and occupy the Little Barford Estate located to the south east of St Neots. The Estate extends to 451 hectares and comprises farmland and woodland, farm buildings, cottages, and houses. The principal activity is arable farming, on 332 ha at Top Farm where agricultural operations are centred. The alignment of the A428 severs the main block of farm land, separating the farm buildings from farm land, the means of access to the public highway and to the remainder of the Estate; the under pass on the East Coast main line being too small for modern agricultural equipment. The Executors' objections to the scheme and matters on which consultation is required are:- 1. General The route selected severs the Estate disrupting the main estate business. The Executors are aware of other representations by Central Bedfordshire and Bedford Borough Councils which seek to ensure sustainable modes of travel are incorporated in the design of the scheme so as not to prejudice due process in the consideration of housing and employment growth options for those authorities. The Executors support CBC/BBC representations in respect of seeking a segregated cycle lane on the Barford Road including on the overbridge, north-south pedestrian and cycle paths adjacent to the East Coast main line under the A428 improvement, and confirmation that the status of the A428 does not prohibit new junctions on to the new road in the future. Disregarding these creates the probability of future disruption to the Estate.
Applicant Response	The Applicant is aware of the impact the new road alignment has on the Little Barford Estate and has sought to mitigate this by replicating existing farm access through the provision of the private accommodation bridge. The bridge will be constructed on the alignment of the existing farm access track and will therefore ensure the estate remains joined up and access is provided to replicate that currently enjoyed on the estate. For matters relating to the NMU provision on Barford Road and adjacent to the East Coast Main Line please refer to RR-008ai. Subject to suitable details of any proposed junctions onto the new dual carriageway, the status of the new road will not preclude a provision of a junction in the future.
RR-109b	2. Permanent/Temporary Land Take The permanent land takes extends to 21.8ha and includes land to be planted to woodland or other environmental mitigation. This creates significant intrusion to the Estate, severed access to arable land, and third party access rights.

Reference Number	Comment from Relevant Representation/Applicant Response
	The Executors require that woodland and environmental mitigation areas are rearranged and taken on a temporary basis being returned when woodland works are completed. The Estate has owned and managed woodland and other habitat for many years.
Applicant Response	The applicant is willing to engage further with the Executors to discuss opportunities but must be satisfied that environmental mitigation will remain in place and will do so by the most robust legal instrument available. Consideration will also be given to returning the land via sale to the Executors.
RR-109c	3. Access Bridge The proposals provide for a bridge over the A428 at Top Farm. This is a single carriageway bridge with a width between parapets of 4.7m. Currently the Estate has access over a farm track unrestricted in width or weight. This width is sufficient to accommodate road traffic but is insufficient for the working width of modern farm equipment - from 3m to 8m+. The Executors need a wider equivalent to two carriageways to allow uninterrupted access for working farm equipment (eg ref CD127 fig. 2.1.1N1E 7.3m running surface plus 1x1m hard verge and 1x3.5m hard verge would allow for this). Detail of provisions for access to Top Farm during works is required.
Applicant Response	The Applicant has engaged further with the landowner's representative on this matter and a request has been made for full justification on the need for widening the proposed accommodation access bridge. No justification has been provided to date and the Applicant is committed to continuing engagement on this matter.
RR-109d	4. Land Drainage The general layout plans indicate provision for new drainage alongside the road but provide no detail to ensure that: i. The alignment is sufficient to drain the landscape ii. It can accommodate reinstated underdrainage schemes iii. Is of sufficient capacity to take both land water and road water
Applicant Response	Land drainage and over land drainage has been is considered as part of the Scheme and will be refined further as part of the detailed design. During detailed design the Applicant will consider the individual needs of each land parcel including land drainage where this is appropriate. Pre-earthworks ditches will be installed prior to the start of the major construction. The Applicant will seek for copies of any land drain plans, to identify where connections to temporary and/or permanent drainage channels or watercourses will be made. In the absence of plans, the contractor will connect those land drains which become evident as new drainage or ditch is installed.

Reference Number	Comment from Relevant Representation/Applicant Response
RR-109e	5. Environmental Mitigation The Executors object to the location of significant areas of the additional woodland habitat as supplements to existing wood elsewhere on the Estate would be preferable. (Please also refer to point 2 above re interest taken).
Applicant Response	Woodland is proposed to assist in integrating the Scheme into the landscape, reflecting the character of the landscape as it changes along the route. Larger blocks of woodland are characteristic of the landscape east of the East Coast Mainline, across Alington Hill. These have been designed to provide connectivity between different habitats, linked with proposed grassland and new and existing hedgerows and woodland.

RR-110 Brown & Co on behalf of The Huntingdon Freemen

Reference Number	Comment from Relevant Representation/Applicant Response
RR-110a	Our clients are the Huntingdon Freemen's Trust, a registered charity with land holdings around the Black Cat area. In total our clients land, identified within the Development Consent Order extends to approximately 9.4912 ha due and is made up as follows: • Land to rear of Travelodge (Plots 1/23a & 1/23d) – 6.5936 Ha • Land opposite Roxton Garden Centre (Plots 1/23e & 1/23f) – 0.8526 Ha • Land adjoining Roxton Garden Centre (Plot 1/23j) – 1.5505 Ha • Land south of Black Cat (Plots 1/23k & 1/23l) – 0.4945 Ha Our clients note the proposed access shown on the General Arrangements Plan sheet 1 and identified as new and approved private means of access no. 2 and the access at this point must be suitable for farm machinery and equipment and should be of a suitable width and construction and ensure there is adequate visibility splays and turning circles. Our clients are also concerned about the camber and height of field access and installation of gates at this point.
Applicant Response	Detailed requirements of accommodation works will be consulted upon with the landowner as part of the detailed design by the Principal Contractor.
RR-110b	Our clients note the location of footpaths 7 & 8 as they cross their land and are concerned what access arrangements are to be installed along the boundary and how this shall ingrate with the highway fencing.
Applicant Response	Detailed requirements of fencing works along the boundary will be consulted upon with the landowner as part of the detailed design by the Principal Contractor.
RR-110c	In respect of our clients land identified under plot 1/23g, which is being taken for temporary possession, we note that within plot 1/23e provision is made on the rights of way and access plans sheet 1B for access to the attenuation basin, however, no field access is provided at this location and such provision needs to be added to the Development Consent Order to ensure our clients can access their retained land. The access to be provided needs to be suitable for farm machinery and equipment and in particular there should be adequate turning circles and visibility splays.

Reference Number	Comment from Relevant Representation/Applicant Response
Applicant Response	The Applicant proposes that the landowner will have rights of access over part of the private means of access (11) on Sheet 1 of the Streets, Rights of Way and Access Plans **[APP-013]** to access the field the Interested Party believes is not provided. The detailed design of the field access off the private means of access (11) will seek to accommodate the anticipated farm machinery and equipment. The field access off Bedford Road is unchanged and therefore will accommodate farm machinery and equipment that currently use it.
RR-110d	Our client, as owners of plot 1/23j note the provision for a field access from the proposed service road as shown on the General Arrangement plan and wish to ensure that the field access road shown on the plan extends beyond the permanent acquisition land, to our clients retained land identified within Land Registry Title BD296658 and wish to ensure that any access does not fall short of their boundary.
Applicant Response	The Applicant proposes that the access to the field to land plot title BD296658 is via the new private means of access (14) on Sheet 1 of the Streets, Rights of Way and Access Plans **[APP-013]**.
RR-110e	During the scheme provision for accessing land outside the scheme adjoining plot 1/23h needs to be provided.
Applicant Response	The Applicant will seek to maintain access to all properties throughout the construction of the works or provide alternative access arrangements. In some instances, it may be necessary to restrict access for limited periods, however, the Applicant would look to minimise the number and duration of any such restrictions as far as reasonably practicable. The Principal Contractor will liaise with the affected landowner to ensure that such disruption is minimised.
RR-110f	Our client has concerns regarding the provision of appropriate fencing alongside highway boundary and effective maintenance of all existing drainage schemes.
Applicant Response	Detailed requirements of accommodation works will be consulted upon with the landowner as part of the detailed design by the Principal Contractor.
RR-110g	Our clients seek clarification over the specification of the culvert and gate to be constructed at plot 1/23n and to ensure all existing water flows are not interrupted.

Reference Number	Comment from Relevant Representation/Applicant Response
Applicant Response	Detailed requirements, including specification, of accommodation works will be finalised at detailed design by the Principal Contractor and in consultation with the landowner. Culvert will be sized to meet expected water flows.

RR-111 The Woodland Trust

Reference Number	Comment from Relevant Representation/Applicant Response
RR-111a	The Woodland Trust welcomes the opportunity to register a representation to the following project. We hold concerns with regards to the removal of G61, a group of Cherry Plum trees recognised as veteran specimens within the applicant's Arboricultural Impact Assessment (AIA) Report **[APP-183]**. The Trust asks that all veteran trees are retained, and adequately protected during construction in line with Natural England's Standing Advice which states: "A buffer zone around an ancient or veteran tree should be at least 15 times larger than the diameter of the tree. The buffer zone should be 5m from the edge of the tree's canopy if that area is larger than 15 times the tree's diameter."
Applicant Response	The Applicant wishes to highlight that this is a typographical error in the survey schedule. The trees in group G61 are not veteran and this group should be listed as semi mature to early mature (SM-EM) having a stem diameter of 80mm with no veteran features noted in the condition comments. The re-categorisation of the group from veteran cherry trees to semi mature to early mature cherry trees does not change the findings or conclusions of the landscape and visual effects assessment as presented within Chapter 7, Landscape and Visual Effects of the Environmental Statement **[APP-076]**.
RR-111b	Furthermore, we would appreciate clarity on the Root Protection Area (RPA) afforded to T311, a veteran elm adjacent to the proposed scheme that is also recorded on the Ancient Tree Inventory (ATI no: 189122). We note within the Arboricultural Impact Assessment that "T311 has been provided an increased RPA of 15 times the trunk diameter, as set out in Veteran Trees: A guide to good management (Ref 1-12)." However, Sheet 35 of the Tree Protection Plan **[APP-186]** denotes T311 with an RPA in line with the BS:5837:2012, which is usually calculated at 12 times the stem diameter. Can the applicants please confirm that T311 will be afforded an increased buffer zone as per the AIA? In summary, the Woodland Trust objects to the proposed development on the grounds of direct loss of veteran trees. We hope our comments are of use to you.
Applicant Response	The Applicant has reviewed the RPA buffer zone for T311 on the Tree Protection Plan and can confirm that it is correctly shown as a radius of 22.46m (15 x the stem diameter of the tree).

RR-112 Theo Cassell

Reference Number	Comment from Relevant Representation/Applicant Response
RR-112a	I sadly am unable to use the bridge due to the height of the sides - if they were to be higher I would ride my horse over the bridge regularly. With development of the area I feel it is important to provide safety for all road users cyclists and horse riders alike.
Applicant Response	In the delivery of the Scheme, the Applicant is required to re-provide NMU routes that are severed or disrupted as a result of the Scheme. Whilst wider interventions may sometimes be appropriate to address community severance resulting from the existing strategic road network, it is beyond the proper scope of the Scheme to address all existing issues faced by existing users of the highways network. The carriageway on the existing Bedford Road, Kelpie Marina access road, realigned Roxton Road and the new Roxton Road Link can be legally used by horses and carriages. The Roxton Road bridge has been provided to maintain connectivity across the Scheme and has an improved cross section compared to the existing bridge, as illustrated on Sheet 1 of the Engineering Sections (Part 3 – Structures General Arrangements) **[APP-019]**. This shows that the verge on the carriageway side of the bridge is 2.5m from the 1m high parapet railing. This is a standard (DMRB CD127 Cross sections and headrooms) minimum offset and parapet height (DMRB TD19/06 Requirements for road restraint systems) for bridges of this nature on roads for all users. On the footway/cycleway side, the carriageway is offset by 5m from the parapet railing. The parapet railing on this side will be a minimum of 1.4m high for safety reasons as cyclists may be immediately adjacent to the railing. Correspondence received during the consultation suggested that Roxton Road 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 that counts were undertaken no horse riders were observed using the existing bridge. It should also be noted that there are no existing bridleways in the vicinity of this part of the Scheme. The Applicant acknowledges the suggestion that there would be greater interest in using this route if it were considered safer. The Applicant considers that the improved cross section on the bridge provides a safe and adequate route for all users. Should Bedford Borough Council as the local highway authority wish to extend the bridleway network within the area and provide an off-carriageway route across the bridge, the proposed Scheme does not preclude any such extensions or alterations in the future.

RR-113 Brown & Co on behalf of Thomas Pearson

Reference Number	Comment from Relevant Representation/Applicant Response
RR-113a	This representation is made on behalf of Mr Thomas Pearson as [Redacted] of the land identified as plots 14/8a, 14/8b, 14/8c, 14/8d, 14/8e and 14/8f and who also has an interest in plot 14/20a. My client is concerned regarding the electrical diversion on their land as this is the supply for Pastures Farmhouse and the agricultural buildings. My client wants to ensure that an adequate supply is put in place for the dwellings and buildings following the scheme and diversion.
Applicant Response	The Applicant proposes to divert the existing overhead power line to the farm where it is impacted by the scheme. There is no intention to change the existing power supply.
RR-113b	My client has also agreed with Highways England that they will be contacted during these works to ensure that appropriate services can also be connected to their retained farm buildings.
Applicant Response	The Applicant will seek to maintain the electricity power supply to the farm throughout the construction of the works. It may be necessary to restrict the supply for limited periods, however, the Applicant would seek to minimise the duration of any such restrictions as far as reasonably practicable. The Principal Contractor will establish a Community Relations Manager (as set out in the Project team roles and responsibilities of the First Iteration Environmental Management Plan (EMP) [**APP-234**] for the Scheme) for the duration of the construction phase to liaise with affected landowner(s) to minimise disruption. Smaller works such as these have not yet been discussed with the Statutory undertaker, however Highways England has committed to engaging with the landholder at the appropriate time. Typically, Highways England will reinstate connection on a like for like basis unless otherwise agreed.
RR-113c	My client understands from the plans submitted for the Development Consent order that a new roundabout access is to be included as the Caxton Gibbet West roundabout and my clients request further details on the width and type of access to be created here.
Applicant Response	The Applicant proposes a minimum 6m wide access off the Caxton Gibbet junction south-west roundabout. Detailed requirements of accommodation works will be finalised at detailed design by the Principal Contractor and in consultation with the landowner.

Reference Number	Comment from Relevant Representation/Applicant Response
RR-113d	It is also noted that the cycle lane included from Caxton Gibbet running south is not linking to any of the proposed paths included within the Cambourne development and my client would ask that the scheme revisit the proposed cycle path to ensure it links appropriately with local cycle networks.
Applicant Response	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. The Applicant has proposed provision of a shared footway/cycleway through Caxton Gibbet junction such that cyclists who are using the carriageway do not have to negotiate the roundabouts, but have a safer separate provision. Wider interventions to the Cambourne development are outside of the scope of the Scheme and are the responsibility of the local highway authority.
RR-113e	My client is concerned regarding land drainage on the fields affected by the scheme. My client seeks confirmation that drainage surveys will be undertaken prior to entry to ensure that land drainage can be put in place prior to any damage being caused.
Applicant Response	Land drainage and over land drainage has been is considered as part of the Scheme and will be refined further as part of the detailed design. During detailed design the Applicant will consider the individual needs of each land parcel including land drainage where this is appropriate. Pre-earthworks ditches will be installed prior to the start of the major construction. The Applicant will obtain copies of any land drain plans, to identify where connections to temporary and/or permanent drainage channels or watercourses will be made. In the absence of plans, the Principal Contractor will connect those land drains which become evident as new drainage or ditch is installed.
RR-113f	My client practices Regenerative Agriculture and has invested considerable time and money into creating high quality, biologically healthy, well structured soil. My client seeks confirmation that appropriate soil surveys and consideration will be given to this on the temporary land take to ensure they are returned to them in the same condition following completion of the scheme.
Applicant Response	Section 9.4 within Chapter 9, Geology and Soils **[APP-078]** of the Environmental Statement explains that soils sampling to inform the geology and soils assessment were planned to be carried out in 2020, however, due to the Covid-19 pandemic and associated local lockdown restrictions, these were unable to

Reference Number	Comment from Relevant Representation/Applicant Response
	be undertaken. The Applicant has committed to undertake this sampling in 2021 subject to the lifting of lockdowns. Following the completion of the fieldwork and the analysis of findings, a report will be prepared by the Applicant and submitted to the Examination on or before Deadline 6. The Applicant is unable to provide the assurances being sought by the Interested Party (IP) requesting that soils will be returned in the same condition following completion of the Scheme. The reinstatement of topsoils and subsoils on land temporarily acquired to construct the Scheme will be managed in accordance with the control measures outlined in Annex E Soil Handling and Management Plan located within the First Iteration EMP **[APP-234]**. These mitigation and control measures aim to reduce disturbance and movement of soils to a minimum; however, segregation of individual landowner soils to ensure condition is the same to that prior to the Scheme being commenced is not practicable on a Scheme of this nature and size. Notwithstanding this, the Principal Contractor will consult with the Interested Party to identify possible interventions to retain soil condition.
RR-113g	My client also seeks confirmation of the boundary treatments along the route to ensure the security of his property both during construction and following completion.
Applicant Response	The embedded mitigation proposed as part of the Scheme, including boundary treatments, is shown on the Environmental Masterplan **[APP-091]**, Figure 2.4 of the Environmental Statement. Detailed requirements of accommodation works will be finalised at detailed design by the Principal Contractor and in consultation with the landowner.
RR-113h	My client will require access to all land at all times during construction of the project and seeks confirmation that this will be available and details on the proposed method of works to ensure that access is not interrupted. Accordingly our client will represent that the DCO should be amended to reflect the matters set out above.
Applicant Response	The Applicant will seek to maintain access to all properties and roads throughout the construction of the works or provide alternative access arrangements. In some instances, it may be necessary to restrict access for limited periods, however, the Applicant would seek to minimise the number and duration of any such restrictions as far as reasonably practicable. The Principal Contractor will liaise with the affected landowner to ensure that such disruption is minimised.

Reference Number	Comment from Relevant Representation/Applicant Response
	The Applicant will seek to record all matters discussed with the Interested Party, including details of any agreements reached, within a Position Statement instead of inclusion in the Development Consent Order.

RR-114 Tina Yates

Reference Number	Comment from Relevant Representation/Applicant Response
RR-114a	It is vital that all routes for non-motorised users (NMUs) include provision for horse riders. This is a great opportunity to enhance the NMU connectivity as has been done alongside the A1307 with the creation of the new A14. As development continues in Cambridgeshire, safe routes for horse riders have come under pressure and further dualling of the A428 adds to that pressure. The A428 presents a major block for horse riders and other NMU groups trying to go from one side to the other, and prevents connectivity between villages. This opportunity should be used to enhance connectivity so that all NMU groups are encouraged to get outside for exercise and for going between villages. This ability to connect has proved vital for health during the pandemic, and should be enhanced and encouraged. The A14 development demonstrates some good examples of best practice, and this best practice should be followed with the A428. On no account should horse riders have routes truncated by the development, or be placed in danger by the development.
Applicant Response	In the delivery of the Scheme, the Applicant is required to re-provide NMU routes that are severed or disrupted as a result of the Scheme. Each Scheme considers what provision needs to be made on an individual basis and cannot provide additional facilities on the basis of what another scheme in a different location has provided Unless a bridleway has been severed, there is no requirement to create a new bridleway. A bridleway bridge has been provided at BW1/18 to the east of the Cambridge Road junction. To the north of Eltisley a new underpass is provided on BW74/6 to allow safe passage beneath the new dual carriageway. In addition the BW1/18 crossing of the existing A428 near Wintringham Farm is being improved. More information on the results of the walkers, cyclists and horse rider counts can be found within Chapter 12, Population and Human Health **[APP-081]** of the Environmental Statement which describes the assessment on Population and Health. The Applicant notes the reference made to the A14 best practices and confirms that lessons learnt are been taken from the A14 scheme to improve the A428 Scheme.

RR-115 Toseland Parish Council

Reference Number	Comment from Relevant Representation/Applicant Response
RR-115a	Toseland is a very small hamlet, which, however, has deep historical roots, dating back not only to a Saxon/Danish barley farm mentioned in the Domesday Book as belonging to Countess Judith, but to the mesolithic era, according to archaeolgical finds in the village, which are logged on the Cambridgeshire Archaeology website. It is a quiet, tranquil rural community with no street lights and no light pollution produced within the village. Toseland Parish Council represents the interests and concerns of the residents and landowners within the Parish of Toseland, which have been exascerbated by the recent announcement of the favoured routes for the proposed East-West rail link as running alongside the proposed route of the renovated A428 (to be redesignated as the A421).
Applicant Response	The Applicant notes the comments made by the Interested Party in relation to East West Rail. The East West Rail company only recently completed their non-statutory route options consultation in June 2021. The consultation showed emerging preferred routes in close proximity to the Scheme which could result in interfaces between the A428 Scheme and the East West Rail scheme. However, the Applicant does not have any specific detail about the location of these interfaces or how the interfaces would be managed. It should also be noted that the route and location of stations has not yet been determined and a Preferred Route Announcement confirming this is not anticipated until 2022.
RR-115b	The principal concerns relate to: 1. Loss of viable Grade 2 farmland, and of access to elements of this;

Reference Number	Comment from Relevant Representation/Applicant Response
Applicant Response	The Applicant notes the Council's concerns on the loss of Grade 2 farmland. Chapter 9, Geology and Soils **[APP-078]** of the Environmental Statement concluded that approximately 285.4 ha of Grade 2 agricultural land would be permanently lost as a result of the construction and operation of the Scheme. Measures are contained within the First Iteration EMP **[APP-234]** that would be implemented during construction of the Scheme to mitigate impacts associated with the construction of the Scheme on agricultural soils. Further measures would be taken to avoid and / or minimise adverse impacts soils based upon the Defra Construction Code of Practice for the Sustainable Use of Soil on Development Sites[17].
RR-115c	2. Permanent disruption of local ecology;
Applicant Response	The Applicant has undertaken a comprehensive biodiversity assessment of the construction and operational phases of the Scheme, as presented within Chapter 8, Biodiversity **[APP-077]** of the Environmental Statement. This assessment has considered the ecological impacts and effects of the Scheme and details the mitigation measures to reduce (where required) the associated environmental effect(s). The hamlet of Toseland and the immediate surrounding area did not form part of the biodiversity assessment given the distance of the Scheme to Toseland. The study areas defined for the assessment on flora and fauna and designated ecological sites are presented within Appendices 8.2 to 8.18 **[APP-189** to **APP-205]** and 8.20 **[APP-207]** of the Environmental Statement.
RR-115d	3. Destruction of potential archaeological features;
Applicant Response	The hamlet of Toseland and the immediate surrounding area is outside the defined archaeological study area for Scheme. As no physical works would be undertaken in the area, no assessment on the disturbance of known or unknown archaeological features has been considered necessary. Notwithstanding this, Chapter 6, Cultural Heritage **[APP-075]** of the Environmental Statement identifies the impacts of the construction and operational phases of the Scheme on the historic environment, including archaeology and built heritage.

[17] https://www.gov.uk/government/publications/agricultural-land-assess-proposals-for-development/guide-to-assessing-development-proposals-on-agricultural-land

Reference Number	Comment from Relevant Representation/Applicant Response
	An Archaeological Mitigation Strategy **[APP-238]** has been developed to ensure the mitigation of the scheme impacts on the archaeological resource are implemented correctly, and if required presents the control measures to be adhered to in the event of chance finds during the construction phase.
RR-115e	4. Increased CO2 pollution in the area;
Applicant Response	The Applicant notes the Council's concerns on CO2 pollution in the area. Chapter 14, Climate of the Environmental Statement **[APP-083]** reports the effects on climate associated with greenhouse gas (GHG) emissions and the vulnerability of the Scheme to climate change. The First Iteration EMP **[APP-234]** includes a range of control measures to manage and where possible reduce CO_2 emissions throughout the construction phase.
RR-115f	5. Increased noise pollution in the area;
Applicant Response	The Applicant notes the Council's concerns on noise pollution in the area. Chapter 11, Noise and Vibration **[APP-080]** of the Environmental Statement assesses the potential noise and vibration impacts associated with the construction of the Scheme and the traffic noise impacts associated with the operation of the Scheme. During the construction phase of the Scheme, the assessment has predicted minor traffic noise increases at properties adjacent to the High Street in Toseland during the construction phase. However, no significant adverse effects are predicted to occur as a result of plant required to construct the Scheme, due to the village being over 1km away from the nearest construction works. The proposed measures to mitigate noise and vibration effects during the construction phase are set out in the outline Noise and Vibration Management Plan within the First Iteration EMP **[APP-234]**. Examples of such measures include: • All ancillary plant such as generators, compressors and pumps will be positioned so as to cause minimum noise disturbance. If necessary, acoustic barriers or enclosures will be provided, where appropriate. • Working methods will be developed specific to the area and will consider use of equipment and methods of operations to minimise noise.

Reference Number	Comment from Relevant Representation/Applicant Response
	• Whenever possible, fabrication of materials will be undertaken off-site. • All plant and machinery in intermittent use will be shut down in intervening periods between work or throttled down to a minimum. • Proper use of plant with respect to minimising noise emissions with regular maintenance will be undertaken. All vehicles and mechanical plant used for the purpose of the works will be fitted with exhaust silencers and be maintained in good working order. • Minimising the drop height of materials into hoppers, lorries or other plant. • Use of less intrusive alarms on vehicles, for example broadband vehicle reversing warnings. • Consideration of low vibration working methods, including non-vibratory compaction plant where possible. • Haul routes within the site boundary will be kept in good condition • The removal of obstructions that can cause, or add, resonance e.g. concrete bases. • No start-up or shut down of large vibratory rollers (approximately 13 tonnes) within 50m of receptors and medium vibratory rollers (approximately 3.5 tonnes) within 15m of receptors. • The use of cut-off trenches to disrupt direct vibration movement through the ground. • The use of pre-bores for piles. Once the Scheme is operational, the assessment has identified decreases in traffic noise are likely at properties along the High Street in Toseland due to the transfer of traffic from this road to the Scheme.
RR-115g	6. Increased light pollution in the area;
Applicant Response	The Applicant notes the Council's concerns on light pollution in the area. To minimise light spill during the construction phase of the Scheme, the Commitment ESS – LV5 in the Register of Environmental Actions and Commitment (REAC) within the First Iteration EMP **[APP-234]** states that the Principal Contractor will '*keep construction lighting to the minimum luminosity necessary for safe working within construction compounds and working areas and where possible, fitting it with motion sensors to minimise the duration of potential light spill in night time views'*.

Reference Number	Comment from Relevant Representation/Applicant Response
	In addition, the Principal Contractor will also implement the scheme-wide lighting control measures as outlined within the First Iteration EMP **[APP-234]**. During the operational phase of the Scheme, the lighting of new and improved sections of highway within the Scheme has been confined to locations where road safety is a priority, in order to minimise the potential for light spill in night time views across the landscape. This lighting would be designed to be directional to minimise light spill beyond the carriageway and immediate highway and would be installed at the following locations across the Scheme: • Roxton Road roundabout. • Black Cat junction (including maintaining the existing lighting on the A1 carriageway through the junction). • BP Garage service road. • Cambridge Road junction. • Eltisley link. • Caxton Gibbet junction. The nearest of these features in relation to Toseland would be approximately 4 km to the south east and south west respectively. These new features would be screened by established field boundaries and blocks of woodlands, in addition to the mitigation planting proposed by the Scheme, as presented on the Environmental Masterplan **[APP-091]**, Figure 2.4 of the Environmental Statement, which seeks to integrate the Eltisley Link and Cambridge Road junction into the wider landscape.
RR-115h	7. Potential problems with access to/use of local footpaths and bridleways if the Est-West rail route goes ahead in the same area. Our substantiated representation would centre on these concerns, paying critical attention to the assertions of the developers and other relevant documents.
Applicant Response	The Applicant notes the Council's point. It should also be noted that the scope of this scheme does not extend to works which may serve East West Rail facilities. East West Rail provided an indication in their non-statutory consultation brochure that a

Reference Number	Comment from Relevant Representation/Applicant Response
	statutory consultation would be held in 2022 where communities will be asked to give their comments on detailed proposals.

RR-116 Transport Action Network

Reference Number	Comment from Relevant Representation/Applicant Response
RR-116a	Transport Action Network (TAN) Transport Action network would like to formally object to the A428 Black Cat to Caxton Gibbet road scheme on the following grounds 1) The proposed scheme would have a significant impact on climate change as the scheme would lead to an increase in emissions of over 3.5 million tonnes of carbon dioxide. This makes the A428 the third largest emitting scheme out of the 50 schemes in the second Roads Investment Strategy and at a time of climate emergency this will make meeting the UK's target of a 78% reduction in emissions by 2035 even more challenging than it already is. We are also concerned that not all carbon emissions have been included in this calculation.
Applicant Response	Chapter 14, Climate **[APP-083]** of the Environmental Statement presents an assessment of the Scheme against the UK Government's current carbon budgets, as required by Paragraph 5.17 of the NPSNN: "*for road project applicants should provide evidence of the carbon impact of the project and an assessment against the Government's carbon budgets*". Paragraph 5.18 of the NPSNN clarifies that "*any increase in carbon emissions is not a reason to refuse development consent, unless the increase in carbon emissions resulting from the proposed scheme are so significant that it would have a material impact on the ability of Government to meet its carbon reduction targets*". Over the Schemes 60-year lifecycle GHG emissions are estimated to be approximately 3.1M tonnes of CO_2e. Approximately 2.9M tCO_2e of this total is from road user emissions however this is considered a conservative estimate as it does not fully consider the GHG reduction impact of the Government's policy on the ban of sales of new petrol and diesel cars by 2030 and the ban of sales of new diesel HGVs by 2040. Chapter 14, Climate **[APP-083]** of the Environmental Statement has been undertaken in line with the Design Manual for Roads and Bridges (DMRB) LA114 Climate. DMRB LA114 which requires that greenhouse gas (GHG) emissions are calculated for each relevant lifecycle stage including construction (embodied carbon in materials, transportation of materials, waste and workers to site, energy use for construction activities, emissions mobilised from vegetation or soil during construction) and during operation (emissions from road users, maintenance and repair). The greenhouse gas assessment was undertaken during the preliminary design stage of the Scheme. The assessment was therefore appropriate

Reference Number	Comment from Relevant Representation/Applicant Response
	based on the level of detail available at this stage. No material emissions sources have been omitted from the calculation. The assessment within Chapter 14, Climate **[APP-083]** of the Environmental Statement has identified that the emissions arising as a result of the Scheme represent less than 0.012% of the total emissions in any of the 3rd, 4th or 5th carbon budget periods. Accordingly, the assessment has concluded that the GHG emissions impact of the Scheme would not have a material impact on the UK Government meeting its legally binding carbon reduction targets. Although the 6th carbon budget was not legally binding when the Environmental Statement was written, an additional assessment of the 6th Carbon Budget, which became legally binding during June 2021, has been undertaken. This assessment concluded that the Scheme represents less than 0.024% of the total emissions in the 6th budget period and is also considered not have a material impact on the UK Government meeting its carbon reductions target.
RR-116b	2) The significance of the purported economic benefits when assessed at a national level.
Applicant Response	The economic appraisal of the Scheme is reported in Chapter 5 of the Combined Modelling and Appraisal Report **[APP-250]**. Table 5-18 shows that the adjusted Net Present Value of the Scheme (benefits minus costs), amounts to £420M. This gives an adjusted Benefit to Cost Ratio of 1.9. This places the Scheme in the Medium Value for Money (VfM) category using the Value for Money Framework, published by the Department for Transport in 2017.
RR-116c	3) The impact on the landscape and biodiversity due to the substantial footprint of the road.
Applicant Response	In line with the requirements of the National Policy Statement for National Networks (NPSNN), the design of the Scheme has been informed by the requirement to "*reduce, where practicable, the likely significant effects of the Scheme*". A description of the decisions made to reduce where practicable the likely significant effects of the Scheme is provided in Chapter 3, Assessment of Alternatives **[APP-072]** of the Environmental Statement. In the context of landscape, with regard to the footprint of the Scheme, Chapter 7, Landscape and Visual Effect **[APP-076]** of the Environmental Statement presents an assessment of the likely landscape and visual effects of the Scheme. This assessment has identified significant effects on landscape character during the construction and operational phases. This assessment has informed the landscape mitigation

Reference Number	Comment from Relevant Representation/Applicant Response
	proposed to avoid and minimise significant adverse effects, including on the landscape within the study area **[APP-091]**. In the context of biodiversity, with regard to the footprint of the Scheme, Chapter 8, Biodiversity **[APP-077]** of the Environmental Statement presents an assessment of the likely significant effects of the Scheme. This assessment concluded there were no significant effects to biodiversity as a result of the construction, operation or maintenance of the Scheme.
RR-116d	4) The air and noise pollution it will create along the route and in the wider area due to the extra traffic it will generate
Applicant Response	In the context of air quality effects arising from the Scheme, these are not considered significant, as set out in Chapter 5, Air Quality **[APP-074]** of the Environmental Statement. NO_2 pollution from roads disperses over short (200m) distances and therefore NO_2 concentrations at sensitive receptors are much more heavily influenced by the location of emissions, than the total emissions generated by the Scheme. The local air quality assessment for the operation of the Scheme has predicted imperceptible changes in NO_2 pollution at the majority of modelled sensitive receptors. Whilst some increases in pollutant concentrations are predicted at individual receptors, where these are greater than imperceptible (i.e. more than 1% of the objective), air quality is good (both with and without the Scheme) with concentrations under the air quality objective values, which are set for the protection of human health. Similarly, some decreases in pollutant concentrations are predicted at receptors, particularly those located along the existing A428. As concentrations of pollutants are predicted to remain under the relevant air quality objective value at these receptors these changes are not considered significant. Chapter 11, Noise and Vibration **[APP-080]** of the Environmental Statement comprises an assessment of the likely noise and vibration effects of the Scheme. This assessment has identified a number of significant adverse effects on noise sensitive receptors which are in close proximity to the Scheme. However, a number of significant beneficial effects in villages bypassed by the Scheme, including Croxton and Eltisley, and have also been identified. This assessment has informed the noise mitigation proposed to avoid and minimise significant adverse effects, which includes low noise surfacing along the length of the Scheme and noise bunding at Roxton and Potton Road. This mitigation is illustrated on the Environmental Masterplan **[APP-091]**, Figure 2.4 of the Environmental Statement. With regard to the extra traffic the Scheme will generate, the traffic forecasts take into account the effects of changes in travel cost as a result of the Scheme upon demand for travel using a Variable Demand Model

Reference Number	Comment from Relevant Representation/Applicant Response
	(VDM). The VDM process is described in Chapter 5.4 of Appendix C of the Combined Modelling and Appraisal Report; Transport Forecasting Report **[APP-253]**. Whilst the Scheme does not generate (induce) trips, the VDM forecasts a very small transfer of trips from rail to road. The main impact of the Scheme results from drivers changing their destination as the Scheme reduces travel times between the A1 and Caxton Gibbet and also due to drivers using different routes to make their journey, such as using the Scheme rather than travelling through Toseland. This results in additional kilometres travelled. A comparison of the total vehicle distance with and without the Scheme for each modelled time period is presented in Tables 6-4 and 6-5 of Appendix C Transport Forecasting Report of the Combined Modelling and Appraisal Report **[APP-253]** for 2025 and 2040 respectively. This shows that the increase in vehicle kilometres as a result of the Scheme is very small, ranging between 0.4% to 0.5%. The increase in vehicle kilometres travelled will, in the with Scheme scenario, result in additional greenhouse gas emissions compared to the without Scheme scenario.
RR-116e	5) The quality of the active travel infrastructure and the failure to improve the facilities on the existing A428, particularly the roundabout to the south of St Neots.
Applicant Response	In the delivery of the Scheme, the Applicant is required to re-provide public rights of way and walkers, cyclists and horse-rider routes that are severed or disrupted as a result of the Scheme. Whilst wider interventions may sometimes be appropriate to address community severance resulting from the existing strategic road network, it is beyond the proper scope of the Scheme to address all existing issues faced by existing users of the highways network.
RR-116f	6) The failure to make the existing A428 safer by lowering the speed limit so that it could be used, either on carriageway or adjacent to it, to create a long distance cycle route connecting St Neots to Cambourne and Cambridge. Given the flattish landscape in this area and prevalence of cycling, especially at the Cambridge end, this seems a serious omission as it could have been an opportunity to reduce road traffic and carbon emissions, particularly with the growing community at Cambourne.
Applicant Response	The existing A428 will provide a continuous local route between St Neots and Caxton Gibbet. Traffic on the existing A428 between Caxton Gibbet and east of St Neots is forecast to reduce by over 90% with the Scheme. This will therefore be more attractive to cyclists. It is beyond the scope of the Scheme to provide improvements to routes that are not severed or disrupted by the Scheme. The existing A428 will be de-

Reference Number	Comment from Relevant Representation/Applicant Response
	trunked and will become the responsibility of the relevant local highway authority, it will be for them to determine if further measures are appropriate.

RR-117 Carter Jonas LLP on behalf of Travelodge Hotels Ltd

Reference Number	Comment from Relevant Representation/Applicant Response
RR-117a	INTRODUCTION 1. We write on behalf of Travelodge Hotels Ltd ('Travelodge') making Relevant Representations to the A428 Black Cat to Caxton Gibbet Improvements Development Consent Order (the Scheme) being promoted by Highways England Ltd (the 'Applicant'). 2. Travelodge are leaseholder of a hotel (the 'Hotel') on the existing Black Cat roundabout. The Hotel is a 40 bed budget hotel, located to the immediate north of the existing Black Cat roundabout. 3. The Hotel is well established and has been trading for approximately 19 years, from August 2000 in a well-connected location on the strategic road network. COMULSORY PURCHASE AND EXTINGUISHMENT 4. The Hotel will compulsorily acquire (Plots 1/29a 1/30a) and be demolished as part of the Scheme. The Applicant has said in their view it will be reasonably necessary to extinguish the Hotel.
Applicant Response	Based on discussions with the landowner regarding the potential for relocation, the Applicant has been of the opinion since late 2019 that that the specialist nature of the property/business means that it is unlikely that suitable alternative premises will become available before the DCO is consented. It's therefore accepted, in line with many other compulsory acquisitions of roadside services that a claim for compensation will need to be made on the basis of extinguishment rather than relocation.
RR-117b	ROADSIDE SERVICES AND ROAD SAFETY 5. As well as a commercial enterprise the Hotel serves an important function in supporting the strategic road network. The Department for Transport policy on roadside services states: "The primary function of roadside facilities… is to support the safety and welfare of the road user." 6. The provision of comprehensive services on this key junction serving two major routes (A1 and A428) provides a higher quality of roadside facilities, and more sustainable land use than a number of smaller services scattered along both routes.

Reference Number	Comment from Relevant Representation/Applicant Response
	7. Government policy and industry guidance emphasises the risks of driver fatigue in road accidents, and the benefits of regular breaks, consumption of caffeinated drinks and over-night stops in preventing accidents. 8. Government policy in DfT Circular 02/2013 'The strategic road network and the delivery of sustainable development' (10th September 2013) states: "Motorway service areas and other roadside facilities perform an important road safety function by providing opportunities for the travelling public to stop and take a break in the course of their journey. Government advice is that motorists should stop and take a break of at least 15 minutes every two hours. Drivers of many commercial and public service vehicles are subject to a regime of statutory breaks and other working time restrictions and these facilities assist in compliance with such requirements."
Applicant Response	The Applicant notes the points that have been made. Highways England standards (DMRB) suggest that services or fuel filling stations should ideally be no more than 28 miles (45km) apart or 30-minute drive. On the A1 there are services at Sandy and Buckden, which are approximately 12 miles (19km) apart. There are services at Caxton Gibbet and at the A421/A6 junction south of Bedford, which are approximately 20 miles (32km) apart. The removal of the Black Cat junction service area does not contravene this guidance. It is for the private sector to promote and operate service areas that meet the needs of the travelling public and are subject to the provisions of relevant planning legislation and regulation.
RR-117c	IMPACT OF THE SCHEME 9. The Scheme would result in significantly increased traffic volumes on the east / west route. Following extinguishment of the Hotel there will be an 18 mile gap between services and over-night stays on this route. The intensification of traffic on the east/west route due to the Scheme would therefore be associated with a reduction in roadside services in a key location, which would be potentially detrimental to the welfare of drivers. 10. There are other services and a hotel on the A1 in this area for north and south bound travellers, however these do not offer such comprehensive provision of hotel, fuel and hot food options, and in some cases are only accessible from one side of the carriageway. Planned upgrades of the A1 are likely to extinguish more roadside services. 11. This risk underlines the importance of retaining a comprehensive hotel service offering at the Black Cat roundabout. This is a strategic location that will provide services to both the A1 and improved A428/A421

Reference Number	Comment from Relevant Representation/Applicant Response
	route more efficiently and sustainably, maximising the benefit to road users and with less impact on land use than smaller roadside provisions scattered along both routes. 12. A key objective of the Scheme (Environment Statement [ES] Chapter 2, 2.2.2) “Safety: Improve safety at junctions, side roads and private accesses by reducing traffic flows on the existing A428. Improve safety on the A1 by removing existing substandard side road junctions and private accesses onto the carriageway” 13. ES ‘Chapter 12: Population and Human Health’ concludes that the Scheme would have a beneficial impact upon road safety and is therefore assessed to have a positive health outcome. 14. We note however that the ES (specifically the Transport Assessment) appears to have no regard to the following when arriving at its conclusions on the Scheme’s impact on safety: - DfT policy on roadside facilities and road user safety - The provision of roadside facilities - The impact of the loss of services at Black Cat Roundabout (including the Hotel)
Applicant Response	In relation to point 14, the facilities that are lost from the demolition of the Black Cat junction services are a fuel filling station including refreshments and accommodation. The existing facilities do not include an HGV rest area. Guidance from both DfT and Highways England suggest that service areas should be spaced no more than 45km or a 30-minute drive; the removal of the Black Cat junction service area, does not contravene this guidance with the following distances: • BP garage at the A421 interchange with the A6 to Shell garage at the Caxton Gibbet junction is approximately 31.2km taking 20 minutes for both the eastbound and westbound direction of travel. • Esso garage to the Brampton Hut services is approximately 22.1km taking 16 minutes for the A1 northbound direction of travel. • Welcome Break to the service area at Sandy Roundabout is approximately 7.6km taking 6 minutes for the A1 southbound direction of travel. In addition, new lay-by facilities have been provided along the new dual carriageway for road users to rest before continuing their journey. It is for the private sector to promote and operate service areas that meet the needs of the travelling public and are subject to the provisions of relevant planning legislation and regulation. The Applicant suggests

Reference Number	Comment from Relevant Representation/Applicant Response
	that other private accommodation facilities are sought at the nearby towns of Bedford, St. Neots, Sandy and Cambourne for those that are lost at Black Cat roundabout.
RR-117d	CONCLUSION 15. Travelodge object to the compulsory purchase of the Hotel and extinguishment of the business and loss of jobs. They consider that the Applicant should provide for the provision of roadside services in this sustainable location as an integral part of the Scheme, in order to safeguard road safety in accordance with government policy. 16. The omission of consideration of this important policy factor (roadside facilities and road user safety) in the ES mean that the true adverse impacts of the Scheme have not been properly assessed. In the context of the increase in traffic associated with the Scheme and loss of roadside facilities such as the Hotel, the Scheme design is potentially inadequate. 17. In the absence of any tangible support to Travelodge to assist a re-location they consider the Applicant has not taken reasonable steps to avoid compulsory purchase and that there is therefore no compelling case in the public interest to justify the use of such powers.
Applicant Response	Based on discussions with the landowner regarding the potential for relocation, the Applicant has been of the opinion since late 2019 that given the specialist nature of this property that relocation was unlikely to be a viable solution. Negotiations have been ongoing since late 2020 to acquire the site by agreement, but an agreement is yet to be reached.

RR-118 Foot Anstey on behalf of Welcome Break Services Limited

Reference Number	Comment from Relevant Representation/Applicant Response
RR-118a	1. Welcome Break Services Limited has responded to several of Highways England's consultations relating to the proposed Development Consent Order including in 2019 and 2020 and it has had several meetings with Highways England to discuss the impact of the proposed highways scheme on its Wyboston Service Area (WSA). 2. Highways England is aware of the potential impact of the proposed Scheme on the WSA business as its proposal involves closing the existing slip road leading from the WSA to the A-road and its replacement with a 1km egress via a 30mph service road. This will have a significant detrimental effect on the WSA business and will make the WSA significantly less commodious for travellers, undermining the very benefits that such facilities and services provide to road users. 3. Welcome Break Services Limited has made several proposals to Highways England in terms of an alternative slip road design, layout and access point onto the A-road. These alternatives are technically viable and would be more commodious for travellers. Highways England has not adopted these proposals and this will be to the detriment of those using the highway network and will detract from and not be offset by the other benefits which Highways England claims the Scheme will deliver.
Applicant Response	2. The proposed speed limit along the service road (approximately 857m in length) access is 40mph. 3. The Applicant has considered the proposals requested by the Interested Party and principally they involved traffic merges directly onto the A1 creating a high risk of conflict between merging traffic and A1 southbound users wishing to exit for Black Cat junction. The proposals did not present a safe alternative to that which is included within the application and would require a Departure from Standards. It is noted that the proposals include improvements to the existing diverge off the A1 into the existing services which will deliver operational safety benefits to road users and those accessing the service station.
RR-118b	4. Highways England does not appear to have followed DMRB guidance in its own designs yet it objects to Welcome Break Services Limited's proposals to retain and adapt the existing slip road along similar principles.

Reference Number	Comment from Relevant Representation/Applicant Response
Applicant Response	The A1 Services Link has been provided to avoid current and future safety concerns with the egress from the Welcome Break service area onto the A1. The A1 Services Link is subject to Departures from Standards that related to a reduced carriageway width that have been approved in principle by Highways England Safety, Engineering and Standards. The reduction in carriageway width is to minimize impact on residential properties and does not have a significant impact on the safety of the road. A merge access directly onto the A1 creates a high risk of conflict between merging traffic and A1 southbound users wishing to exit for Black Cat junction. The Applicant deems this an unsafe proposal.
RR-118c	5. The new service road will not have traffic lights at its junction with the new roundabout. Phasing arrangements will make entry on to the roundabout difficult further undermining the claimed benefits of the Scheme. Highways England does not appear to addressed this in the Development Consent Order application.
Applicant Response	The entire new junction has been modelled including the service road approach, the outputs of which are set out in section 6.7 of the Transport Assessment **[APP-240]**. The results for the A1 Service Link show that there is an average speed of 30 mph – 40 mph on this section of road, with traffic briefly slowing to access the roundabout. There is therefore no significant queueing or delay modelled here. Hence, no signalisation of that approach arm is considered to be necessary.
RR-118d	6. The "Introduction to the Application" document states at paragraph 2.2.1 (g) "Customer satisfaction" that Highways England "listen to what is important to our customers to deliver a better road for everyone and improve customer satisfaction". There is no evidence that Highways England has sought to canvas customers of the WSA. The provision of WSAs is an important aspect of the highway network. If customers of the WSA have not been canvassed there is no clear evidence that Highways England has factored in to the design of the Scheme or its understanding of the impacts of the design of the Scheme on customer satisfaction or dissatisfaction. This goes to the heart of claims by Highways England that the Scheme will improve the highway network and the experience of road users.

Reference Number	Comment from Relevant Representation/Applicant Response
Applicant Response	The Applicant has promoted the Scheme widely through various media channels, holding 15 public events during the statutory consultation period and 4 remote events during the supplementary consultation period. During the statutory consultation, a total of 925 responses were received and analysed, Appendix U of the Consultation Report **[APP-067]** sets out how the Applicant had regard to these responses. A total of 389 responses were also received and analysed as part of the Supplementary Consultation, Appendix V of the Consultation Report **[APP-068]** sets out how the Applicant had regard to these responses. A specific consultation event was also held for nearby local residents affected by the changes, at the launch of the statutory consultation. Design changes including those resulting from consultation and engagement are documented within the supplementary consultation brochure, page 14 available on the Scheme webpages. The local authority who will be adopting the road have also been consulted and have approved the proposal.
RR-118e	7. Reducing the slip road to a 1km 30 mph service road undermines the Government policy requirements relating to the services to be provided at service areas.
Applicant Response	The Applicant does not propose a 1km 30mph speed limit on the A1 Service Link. As stated in the draft DCO **[APP-025]** and as shown on the Permanent Speed Limit Plans **[APP-015]**, the Applicant proposes a 857m 40mph speed limit on the A1 Service Link.
RR-118f	8. Highways England does not appear to have assessed either the impact of the changes to the slip road on the WSA business or its convenience of use for road users. Its proposal in so far as it affects WSA is inconsistent with Nation Policy Statement for National Networks which sets both the Government's vision and strategy to include improvement to journey quality.
Applicant Response	The Applicant has a fundamental responsibility to deliver a safe and serviceable network. The Scheme does this whilst creating a new and safe egress from the service area to Black Cat junction for users to continue their journey.

Reference Number	Comment from Relevant Representation/Applicant Response
	In relation to point 8, the facilities that are lost from the demolition of the Black Cat junction services are a fuel filling station including refreshments and accommodation. The existing facilities do not include an HGV rest area. Guidance from both DfT and Highways England suggest that service areas should be spaced no more than 45km or a 30-minute drive; the removal of the Black Cat junction service area, does not contravene this guidance with the following distances: • BP garage at the A421 interchange with the A6 to Shell garage at the Caxton Gibbet junction is approximately 31.2km taking 20 minutes for both the eastbound and westbound direction of travel. • Esso garage to the Brampton Hut services is approximately 22.1km taking 16 minutes for the A1 northbound direction of travel. • Welcome Break to the service area at Sandy Roundabout is approximately 7.6km taking 6 minutes for the A1 southbound direction of travel. In addition, new lay-by facilities have been provided along the new dual carriageway for road users to rest before continuing their journey. It is for the private sector to promote and operate service areas that meet the needs of the travelling public and are subject to the provisions of relevant planning legislation and regulation. The Applicant suggests that other private accommodation facilities are sought at the nearby towns of Bedford, St. Neots, Sandy and Cambourne for those that are lost at Black Cat roundabout.
RR-118g	9. Highway England has not given due consideration to alternative solutions in terms of the egress from the WSA to the A-road contrary to Government guidance on the pursuit and use of compulsory purchase powers.
Applicant Response	The Interested Party is not subject to any land acquisition. The majority of land required for the service road is within the existing highway boundary, with the except of the southern tie-in to Black Cat junction. The selected arrangement for the Black Cat roundabout and surrounding area is one which requires the least amount of land. Agreement for land acquisition by consent has been sought with all affected landowners. The Applicant did consider a number of alternative options for the egress from the existing service station, however, due to the proximity of the services to the proposed Black Cat junction it was determined that the only option that did not compromise the safety of both vehicles on the A1 and customers leaving the

Reference Number	Comment from Relevant Representation/Applicant Response
	service station was the segregated service road being proposed which would run adjacent to the A1 and directly links to the Black Cat junction.

RR-119 Catherine Florence Armstrong on behalf of West Cambridgeshire Bridleways Group

Reference Number	Comment from Relevant Representation/Applicant Response
RR-119a	We believe strongly in access for all and this project appears to have missed the opportunity for improving and enhancing safe off-road shared routes with equestrians. It is critical that such rights of access and rights of ways are a connected network of safe off-road use, especially now there is such a significant increase in traffic on our county's roads. There are increasing motor incidents with both cyclists and horse riders on the roads and it is imperative that this project includes safe access for equestrians on connected networks of rights of way. We have 39 active riders in our group and we are just one of many bridleway groups in this area, so there really is a definite need for equestrians to be considered along with cyclists and pedestrians.
Applicant Response	Where existing bridleways are affected by the Scheme, suitable and safe alternatives are provided, such as the bridge carrying BW1/18 over the new road to the east of the Cambridge Road junction and the underpass to the north of Eltisley, taking BW74/6 beneath the new road. The BW1/18 crossing of the existing A428 near Wintringham Farm is being improved. School Lane at Roxton is being converted to bridleway. This forms part of the wider Scheme proposal for the NMU link between existing footway/cycleway on the A1 northbound carriageway to Wyboston. More information on the results of the walkers, cyclists and horse rider counts can be found within Chapter 12, Population and Health of the Environmental Statement **[APP-081]** which describes the assessment on Population and Health

RR-120 Brown & Co on behalf of William Eayrs

Reference Number	Comment from Relevant Representation/Applicant Response
RR-120a	1. This representation is made on behalf of Mr William Eayrs of [Redacted] and is the owner of plots 2/25a, 2/25b and 2/39a together with part of plot 2/32a as frontager to one side of the highway. My client also holds other interest in plots 2/24a, 2/24b,2/24c, 2/24d, 2/24e, 2/24f, 2/26a and 2/26b. 2. My client holds this land as an investment with the intention of commercial development being obtained. It is proposed that the entirety of the land is to be acquired as part of the scheme to mainly provide a flood alleviation area. A small section of the land is required for the new link road. 3. My client believes that the flood alleviation area would be better suited closer to and alongside the existing river rather than creating additional area further away from the river on high value land. My clients therefore suggest that the land taken in this area is altered to reflect the areas at greater risk of flooding. The land alongside the river is detailed as lying within Flood Zones 2 and 3 and so would be better suited as flood compensation areas. 4. Accordingly our client will represent that the DCO should be amended to reflect the matter set out above.
Applicant Response	The proposed flood compensation in this location is required to mitigate the impacts of the Scheme on the existing floodplains associated with South Brook. Paragraph 13.6.86 of Chapter 13, Road Drainage and the Water Environment **[APP-082]** of the Environmental Statement notes that the Great North Road acts as a barrier to flow, with floodwater pooling on the floodplain upstream of the road embankment. Some floodwater overtops the road on the southern side, with depths up to 0.15 metres. Data collected and presented within Table 6.1 Appendix 13.4 Flood Risk Assessment **[APP-220]** highlights that six known historical flood events have occurred due to South Brook exceeding channel capacity. As such, as part of the environmental assessment for the Scheme, flood compensation has been identified for South Brook in the form of two floodplain compensation areas to compensate for the floodplain storage volume lost as a result of the proposed embankment for the new Roxton Road Link and the A1. These compensation areas would be located to the west of the A1 prior to the culverted South Brook and are to the east and west of the new Roxton Road Link. See the Environmental Masterplan **[APP-091]**, Figure 2.4 of the Environmental Statement.

Reference Number	Comment from Relevant Representation/Applicant Response
	Given the interdependencies of needing to mitigate in the vicinity of the impacted floodplain and the suitability of land to form flood compensation, the flood compensation in this area cannot be amended as per the request of the Interested Party. Further information on the flood risk assessment for the Scheme is presented within Chapter 13, Road Drainage and the Water Environment **[APP-082]** and the supporting Appendices: • Appendix 13.4 Flood Risk Assessment **[APP-220]**. • Appendix 13.4 Flood Risk Assessment – Annex B Ordinary Watercourse Modelling Report **[APP-221]**. • Appendix 13.4 Flood Risk Assessment – Annex B Ordinary Watercourse Hydrology Report **[APP-222]**.

RR-121 Savills (UK) Limited (Savills (UK) Limited) on behalf of Woodthorpe Hall Garden Centres Limited

Reference Number	Comment from Relevant Representation/Applicant Response
RR-121a	Savills (UK) Ltd are instructed by Woodthorpe Hall Garden Centres Limited, who own and operate Roxton Garden Centre, to act on their behalf in relation to the A428 Black Cat to Caxton Gibbet Improvements scheme ("the Scheme"). In accordance with the DCO application "Land Plans Regulation 5(2)(i) Improvements Sheet 1", the above mentioned parties own plots 1//40a, 1/40b and 1/40c, which are affected by either temporary or permanent acquisition, or acquisition of new rights. Roxton Garden Centre comprises a 12.25 acre (approx.) site which includes a garden centre, and restaurant, car parking, and fields either side, used for recreational uses (a maze) and overflow car parking. The site is also occupied by four concessions: Gap Home Improvements Limited, Merit Garden Products, Happy Brewer and the Black Cat Farm Shop. The garden centre is open seven days a week and has a customer base from a wide geographical area. Peak visitor times are during the weekends with customers being more family based, however during the week there is a consistent trade of more senior customers who use the restaurant facility also. The four concessions also attract a range of customers on a regular basis. The land parcels affected by the scheme are situated on the north-eastern side of Roxton Garden Centre, and comprise a grass field which is regularly used by the garden centre as overflow car parking when required, the main car park proving to be inadequate at peak times. This therefore means that the garden centre is at risk of losing a significant amount of car parking for the duration of the scheme. The entrance to the garden centre, off Bedford Road, is also included within the affected land parcels. This presents some logistical and operational concerns for the garden centre which will need to be addressed. It is for these reasons that we have been instructed to submit the following representation to the Highways England scheme. The majority of the field used for car parking is included within plot 1/40a. This plot is required for temporary possession purposes only. The south eastern corner of this field falls within plot 1/40b, which is to be permanently acquired, and through which the proposed new 'Kelpie Marina Access Track' will be constructed. The south-western corner of the field is due to have rights acquired, as well as temporary possession taken. The largest plot, plot 1/40a includes not only the entrance to the garden centre, but also the track leading to the back of the garden centre, and to a separate concession, Gap Home Improvements Ltd, who use this track daily for the operation of their business.

Reference Number	Comment from Relevant Representation/Applicant Response
	The loss of this field will result in a significant reduction in car parking available for customers as well as potential restrictions or loss of access to the garden centre depending on how the land will be used and the duration of such use. Further, any works to, or closure of Bedford Road, even on a temporary basis may result in a reduction in customer traffic which would have an adverse impact on the profitability of the garden centre. Equally a full car park is likely to deter customers, and may also lead to customers who cannot park within the site, parking on the verge of the public highway of Bedford Road. Therefore it is important that the garden centre are consulted early on in this scheme so that sufficient measures can be put in place to ensure these impacts are mitigated/managed.
Applicant Response	The Applicant has engaged with the Garden Centre operator on land required for the Scheme through meetings held on 12 June 2018 and 11 January 2019, conference calls on 1 April 2019 and 9 August 2019 and a Teams meeting with their representatives Savills on 27 May 2021. The Applicant is open to continuing discussions to mitigate impacts during construction, before they commence. The Principal Contractor's Community Engagement team will make contact with the Garden Centre to open lines of communication prior to the start of construction. Continuing engagement will identify the best ways of keeping each other informed of matters of concern. The Applicant will seek to maintain access to the Roxton Garden Centre and Gap Home Improvement throughout the construction of the works or provide alternative access arrangements. In some instances, it may be necessary to restrict access for limited periods, however, the Applicant would seek to minimise the number and duration of any such restrictions as far as reasonably practicable. The Principal Contractor will liaise with the affected landowner to ensure that such disruption is minimised. The Applicant has engaged further and is committed to continuing discussions with the landowner and their representative on the extent of temporary land possession and the provision for overflow car parking.

RR-122 Wyboston & Roxton Bridleways Group

Reference Number	Comment from Relevant Representation/Applicant Response
RR-122a	Safe access must be available to all vulnerable road users, cyclists, pedestrians and horse riders. There is a significant number of horse riders in this area who are members of the group, more than 117 people with at least two horses each. In relation to the 'improvements' at Black Cat and the proposal to lead all HGV 1. The bridge over the A428, Roxton Road, should be designed to equestrian standards, with horses separated from the increased levels of HGVs. The bridge will need to be designed to equestrian standards, in particular that it will need appropriate height parapets alongside the bridleway. The current bridge is considered unsafe by riders due to its lack of parapets and the lack of separation from the traffic. In particular, it cannot be used by young/inexperienced horses or children, of which there are a number in Wyboston. There is an incorrect perceived lack of need to provide equestrian height parapets, as horse usage of the current bridge is not regarded as significant. There are many riders, who would use the bridge if they considered it safe for themselves and their horses. Due to the closure of other HGV routes into Wyboston from the A1 Northbound, all HGV traffic with be diverted along a new route of a single road, bridge and roundabout. This will significantly increase risk of accidents and death amongst all road users. However riders are particularly vulnerable road users and Rule 55 of the Highway Code states riders should avoid roundabouts wherever possible. Appropriate bridge parapets and an alternative roundabout route are vital to mitigate risk.
Applicant Response	The carriageway on the existing Bedford Road, Kelpie Marina access road, realigned Roxton Road and the new Roxton Road Link can be legally used by horses and carriages. The Roxton Road bridge has been provided to maintain connectivity across the Scheme and has an improved cross section compared to the existing bridge, as illustrated on Sheet 1 of the Engineering Sections (Part 3 – Structures General Arrangements) **[APP-019]**. This shows that the verge on the carriageway side of the bridge is 2.5m from the 1m high parapet railing. This is a standard (DMRB CD127 Cross sections and headrooms) minimum offset and parapet height (DMRB TD19/06 Requirements for road restraint systems) for bridges of this nature on roads for all users. On the footway/cycleway side, the carriageway is offset by 5m from the parapet railing. The parapet railing on this side will be a minimum of 1.4m high for safety reasons as cyclists may be immediately adjacent to the railing. Correspondence received during the consultation suggested that Roxton Road 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 that counts were

Reference Number	Comment from Relevant Representation/Applicant Response
	undertaken no horse riders were observed using the existing bridge. It should also be noted that there are no existing bridleways in the vicinity of this part of the Scheme. More information on the results of the walkers, cyclists and horse riders can be found within Chapter 12, Population and Human Health of the Environmental Statement **[APP-081]** which describes the assessment on Population and Health.
RR-122b	2. The 'shared footway/cyclepaths' shown in red on maps 1 and 2 of the Updated General Arrangement Plans in your consultation should be upgraded to bridleway status
Applicant Response	The NMU provision made between School Lane at Roxton and The Lane at Wyboston is a direct replacement for the shared unsegregated footway/cycleway that is currently adjacent to the A1 northbound carriageway. The existing route is unsuitable and would require pedestrians or cyclists to negotiate the new Black Cat junction. The proposed route provides a safer and more attractive alternative, away from the strategic road network, and it also links to National Cycle Route 12. It should be noted that the route along School Lane and from the east end of School Lane, northwards to the start of the Kelpie Marina access road, is to be dedicated as bridleway, as requested by Bedford Borough Council. The carriageway on the existing Bedford Road, Kelpie Marina access road, realigned Roxton Road and the new Roxton Road Link can be legally used by horses and carriages. Should Bedford Borough Council as the local highway authority wish to extend the bridleway network within the area and provide an off-carriageway route, the proposed Scheme does not preclude any such extensions or alterations in the future.
RR-122c	3. The provision of a parallel public bridleway running the length of the new A428 should include an underpass of the A1 so that this new bridleway is accessible by horse riders from the Bedfordshire villages.

Reference Number	Comment from Relevant Representation/Applicant Response
Applicant Response	In the delivery of the Scheme, the Applicant is required to re-provide NMU routes that are severed or disrupted as a result of the Scheme. Whilst wider interventions may sometimes be appropriate to address community severance resulting from the existing strategic road network, it is beyond the proper scope of the Scheme to address all existing issues faced by existing users of the highways network. The need for a route running the entire length of the new dual carriageway would result in greater land take and there is no proven need for such a route. Furthermore, the Applicant would suggest that this would not be an attractive leisure route.
RR-122d	4. A bridleway link is made from Wyboston to the current underpass under the A1 and through to Alpha Drive, St Neots. This could either be by creating a route further north from the route on Map 2 (although it would appear that this may be difficult to achieve) or by getting Footpath 37/A9 upgraded from the end of Northfield Road, Wyboston, through to Alpha Drive.
Applicant Response	In the delivery of the Scheme, the Applicant is required to re-provide NMU routes that are severed or disrupted as a result of the Scheme. Whilst wider interventions may sometimes be appropriate to address community severance resulting from the existing strategic road network, it is beyond the proper scope of the Scheme to address all existing issues faced by existing users of the highways network. The need for a new route as described should be discussed with Bedford Borough Council as the local highway authority. It could not be provided as part of the Scheme as it would not be as essential mitigation of impacts arising from the Scheme and the Applicant would be extending its powers beyond those allowed by legislation.
RR-122e	5. The gantry to be built by Bridleway 6 to the west of Black Cat is designed in such a way as to not impede or endanger use of that bridleway (plan 16E)..
Applicant Response	The proposed gantry will not impact on the use of the shared accommodation track and bridleway.
RR-122f	6. Speed limits should be imposed on the country lanes that may be used by diverted traffic during construction.
Applicant Response	The Applicant has proposed that a temporary speed restriction will be implemented to facilitate the safe delivery of the works, these include restrictions on a number of side roads where works are required. The

Reference Number	Comment from Relevant Representation/Applicant Response
	location of these restrictions are shown in Appendix B of the Outline Construction Traffic Management Plan **[APP-244]**.

RR-123 Yelling Parish Council

Reference Number	Comment from Relevant Representation/Applicant Response
RR-123a	I was disappointed that the proposed EWR is given no mention in the application for the A428 when it is proposed to run alongside it.
Applicant Response	The Applicant has not been able to take account of East West Rail due to the stage the East West Rail scheme is currently at. Due to the lack of information it has not been possible to undertake a cumulative effects assessment and since the scheme has no planning status, it has also not been taken into account in the transport model. Further detail regarding the cumulative effects assessment is set out below. The assessment of cumulative effects reported in Chapter 15, Assessment of Cumulative Effects of the Environmental Statement in **[APP-084]** has been undertaken in accordance with the four-stage assessment approach contained in the Planning Inspectorate's Advice note seventeen: Cumulative effects assessment relevant to nationally significant infrastructure projects (version 2) (2019). This required the Applicant to first establish a long list of 'other existing development and/or approved development'. The long list of developments identified in Stage 1 of the assessment included, amongst others, the "East West Railway" proposals, which are referenced as ID002 in Appendix 15.1 of the Environmental Statement **[APP-228]** (hereafter the "East West Rail project"). All identified development plans and projects were first allocated into different tiers based on their status, their geographical relationship to the Scheme, the availability of information regarding their likely environmental effects, and their anticipated delivery timescales. In accordance with Advice note seventeen, the Applicant categorised the East West Rail project as a Tier 3 development at Stage 1 on the basis that a scoping report had not yet been prepared, and because project information within the public domain was very limited at that time. As the Stage 1 assessment recorded potential for the East West Rail project to interact environmentally with the Scheme due to its possible geographical and temporal relationships, this development was progressed to Stage 2 of the assessment. Stage 2 of the assessment acknowledged that whilst the scale and nature of the East West Rail project would, itself, likely result in significant environmental effects, it was not possible to shortlist this development for inclusion in the cumulative effects assessment at Stages 3 and 4 because very limited

Reference Number	Comment from Relevant Representation/Applicant Response
	information was available regarding: a) its likely environment effects; b) the coverage and extent of its effects; and c) when its effects might occur. Accordingly, the East West Rail project was discounted from further consideration as it was concluded that the absence of this information prevented a meaningful cumulative effects assessment being undertaken. Notwithstanding this conclusion, the Applicant continues to review the status of the East West Rail project and its progression through statutory procedures. In the event of a scoping report or similar environmental information being published for the East West Rail project prior to, or during, the DCO Examination, the Applicant will update its status within the cumulative effects assessment, Chapter 15 Assessment of Cumulative Effects of the Environmental Statement **[APP-084]**. Finally, it should be noted that the Applicant is seeking to provide a joined up approach with East West Rail where there are opportunities to do so, and this is part of ongoing discussions between the two projects. However, it should be noted that East West Rail completed their non-statutory route options consultation in June 2021, and a Preferred Route Announcement is not anticipated until 2022. Therefore, since East West Rail has not determined the route and locations of the proposed stations it is too early to define integration opportunities.
RR-123b	As a Parish Council we are keen that our tiny village is not disturbed with construction or diverted traffic during the work undertaken for the A428. It was a concern to learn that projected traffic volume through our village from West to East is only estimated at -20%. Pre Covid we had around 800 vehicles per hour at rush hour through the village so 20% reduction isn't at all impressive. Also an increase in traffic at the Toseland Crossroads from north to south is extremely worrying when this already carries a high accident rate as there are no STOP signs.
Applicant Response	The reduction of 20% appears to refer to Tables 3-7 and 3-8 of the Transport Assessment Annex **[APP-241]**. However, this is the predicted reduction in the total flow through the Toseland crossroads (north-south and east-west). Figure 4-8 of he Combined Modelling and Assessment Report **[APP-250]** shows a reduction of 64% in traffic on the route through Yelling in 2040 with the Scheme compared to without the Scheme. The impact of the Scheme is also expected to significantly reduce the amount of rat-running through Yelling during the peak hours due to less congestion along the A428 route and in particular at the Caxton Gibbet junction. This will more than offset the predicted increase in north-south movements. Further details of anticipated traffic flow changes are given in the Transport Assessment Annex **[APP-241]** at Tables 3-7 and

Reference Number	Comment from Relevant Representation/Applicant Response
	3-8. These Tables indicate a decrease of between 45% and 63% in peak period flows east-west through Yelling as a result of the Scheme. Junction capacity assessments have been carried out for each of the construction phases. This demonstrated that the Toseland Crossroads junction is predicted to operate well within capacity during each of the construction phases. During the new carriageway construction period, an increase in vehicle trips through the junction could occur, however once the Scheme is open traffic flows along this route are anticipated to reduce as noted above, providing long term benefits. Whilst in the short term there may be a risk that collisions occurring at the junction could increase during the construction of the Scheme, over a longer term the 'risk of collisions' is expected to reduce due to the reduction in flows. The Applicant will continue to work with the Principal Contractor to identify best routes and timings for construction vehicles to mitigate impacts on local road networks and junctions during construction.

3 Additional Submissions accepted at the discretion of the Examining Authority

AS-001 Shell U.K Limited (in respect of Shell Fortune Service Station)

Reference Number	Comment from Additional Submission/ Applicant Response
AS-001a	Shell U.K. Limited – Shell Fortune Service Station – Great North Road, Roxton MK44 3BE - A428 Black Cat to Caxton Gibbet Improvement Scheme DCO Application ("the Scheme") I confirm that I am instructed by Shell U.K. Limited which owns the freehold interest in Shell Fortune Service Station, ("the Service Station"), located immediately to the north of and adjoining the Black Cat Roundabout on the A1 trunk road, near Roxton. My client operates the Service Station which provides roadside facilities to motorists using the A1 trunk road as well as the east-west route involving the A428. The Service Station is a key facility occupying a nodal location serving the needs of motorists using these routes and it will be totally extinguished by these proposals. Together with restaurant facilities and the adjoining motorists' lodge, which will also be destroyed by the Scheme, the service area provides comprehensive facilities for the motorist on this stretch of the strategic road network. No proper consideration has been given to the loss of the facility and no provision has been made for the creation of access arrangements to support an alternative site or the acquisition of land for this purpose. Please accept this letter as a representation against the Scheme proposals as currently formulated. For present purposes, my client's position including the right to submit representations in relation to the Scheme is fully reserved. I should be grateful if you would kindly acknowledge receipt of this letter.
Applicant Response	The acquisition of the relevant land is required for permanent works which form a fundamental requirement of the Scheme. The landowner will have a resultant claim for compensation for the acquisition of the land based on the value of the interest and it is for the claimant/landowner to reinvest those monies as they see fit. The Applicant would like to reach agreement for the voluntary acquisition of the land where possible. The Applicant notes the points that have been made concerning the loss of the facility. Highways England standards (DMRB) suggest that services or fuel filling stations should ideally be no more than 28 miles (45km) apart or 30-minute drive. On the A1 there are services at Sandy and Buckden, which are

Reference Number	Comment from Additional Submission/ Applicant Response
	approximately 12 miles (19km) apart. There are services at Caxton Gibbet and at the A421/A6 junction south of Bedford, which are approximately 20 miles (32km) apart. The removal of the Black Cat junction service area does not contravene this guidance. It is for the private sector to promote and operate service areas that meet the needs of the travelling public and are subject to the provisions of relevant planning legislation and regulation.

AS-002 Shell U.K Limited (in respect of Shell Gibbet Service Station)

Reference Number	Comment from Additional Submission/ Applicant Response
AS-002a	Shell U.K. Limited – Shell Gibbet Service Station, St Neots Road, Cambridge CB3 8PD – A428 Black Cat to Caxton Gibbet Improvement Scheme DCO Application (“the Scheme”) I confirm that I am instructed by Shell U.K. Limited which owns the freehold interest in Shell Gibbet, Service Station, (“the Service Station”), located immediately to the south-west of and adjoining Caxton Gibbet roundabout near Cambourne. My client operates the Service Station which provides roadside facilities to motorists using the A428 and A1198 strategic roads including refuelling facilities for HGVs. Although my client has reviewed the emerging proposals to upgrade the A428 onto a new alignment to the north of the existing junction, until now there has been no suggestion of any direct effect on the Service Station due to the proposed Scheme. Having now reviewed the recently produced plans on which there has been no direct consultation, it is evident that the proposed Scheme will involve some frontage freehold land acquisition from this facility and temporary occupation of part of it during the construction of the works. The Service Station plays an important role in serving passing motorists on the strategic road network and the proposals are likely to have an adverse effect on its operation including interference with its access arrangements. Please accept this letter as a representation against the Scheme proposals as currently formulated. Without prejudice to this position, my client is willing to enter into discussions to establish whether the Scheme can be executed in a manner which will allow continued effective operation of the Service Station following completion of the works, including the provision of advance warning signs and also consider arrangements for mitigating the adverse effects that the Scheme will undoubtedly have on the trading performance of the Service Station during the works themselves. For present purposes, my client’s position including the right to submit representations in relation to the Scheme is fully reserved. I should be grateful if you would kindly acknowledge receipt of this letter.
Applicant Response	The relevant plot was designated as permanent acquisition at formal statutory consultation and notice was issued to the landowner informing of its inclusion. .

Reference Number	Comment from Additional Submission/ Applicant Response
	Although it was included at formal consultation, the land was not included in earlier proposals therefore detailed discussions have not yet taken place with the landowner regarding the potential for early acquisition of the plot. The Applicant will make contact in due course to open these negotiations. The Applicant is committed to continuing engagement with the Shell U.K.Limited on matters relating to the impacts on the service area at Caxton Gibbet roundabout.

AS-003 Woolfson Trago

Reference Number	Comment from Additional Submission/ Applicant Response
AS-003a	Euro Garages Limited – Black Cat Restaurant - Great North Road, Chawston, Bedford MK44 3BE - A428 Black Cat to Caxton Gibbet Improvement Scheme DCO Application (“the Scheme”) I confirm that I am instructed by Euro Garages Limited and its group company Woolfson Trago, which hold a controlling leasehold interest in the Black Cat Restaurant, (“the Restaurant”), located immediately to the north of and adjoining the Black Cat Roundabout on the A1 trunk road, near Chawston and Roxton. My client acquired the Restaurant with the firm intention to modernise and redevelop this facility to reflect the high quality of the trading location. Plans were prepared and works scheduled. With the announcement of the Scheme however the Restaurant was effectively blighted and my client was forced to cancel its plans and trade under short term and holding arrangements that have not reflected the full trading potential of the location since the Scheme’s announcement. I made representations on behalf of my client by letter dated 26th July 2019 confirming the importance of the location and confirming that my client’s property has been blighted by the Scheme. Black Cat service area, including the Restaurant together with the adjoining service station and motorist’s hotel occupy a strategic location serving the needs of motorists using the A1 and A428 routes. The latest plans confirm that these facilities will be totally extinguished by the Scheme after which the needs of the motorist in this vicinity will not be satisfied. No proper consideration has been given to the loss of the service area and this facility and no provision has been made for the creation of access arrangements to support an alternative site or the acquisition of land for this purpose. Please accept this letter as a representation against the Scheme proposals, as currently formulated. For present purposes, my client’s position including the right to submit representations in relation to the Scheme is fully reserved. I should be grateful if you would kindly acknowledge receipt of this letter.
Applicant Response	Compensation is based on the value of the interest acquired (or where no land is acquired but its value is reduced if the necessary tests are met under the compensation code) reflecting all factors, both positive

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	and negative. As such, the development/refurbishment potential of a property will be reflected where appropriate. The Applicant notes the points that have been made concerning the loss of the facility. Highways England standards (DMRB) suggest that services or fuel filling stations should ideally be no more than 28 miles (45km) apart or 30-minute drive. On the A1 there are services at Sandy and Buckden, which are approximately 12 miles (19km) apart. There are services at Caxton Gibbet and at the A421/A6 junction south of Bedford, which are approximately 20 miles (32km) apart. The removal of the Black Cat junction service area does not contravene this guidance. It is for the private sector to promote and operate service areas that meet the needs of the travelling public and are subject to the provisions of relevant planning legislation and regulation.

AS-004 East West Railway Company Limited

Reference Number	Comment from Additional Submission/ Applicant Response
AS-004a	Proposed A428 Black Cat to Caxton Gibbet Road Improvement scheme East West Railway Company Limited: request to become an interested party in the Examination We refer to the above application (the Application) for the Highways England A428 Black Cat to Caxton Gibbet Road Improvement Scheme (the "Application" for the "Scheme"). We write to request that the Examining Authority exercises its discretion to allow East West Railway Company Limited (EWR Co) to take part in the Examination of the Application. EWR Co has been tasked by the Government with the delivery of the East West Rail project ("Project"). The Project will connect Oxford and Cambridge by rail, linking them with Bicester, Bletchley, Milton Keynes, Bedford and many communities in between. As well as connecting places within the Oxford to Cambridge Arc, it will enable quicker journeys to places further afield, including places east of Cambridge, and join up with existing north-south rail lines. It supports economic growth by unlocking opportunities for jobs, new homes and tourism. The section of the Project between Bedford and Cambridge was designated as being of national significance by the Secretary of State on 29 August 2019. Accordingly, EWR Co intends to make an application for a Development Consent Order to authorise the construction, operation and maintenance of the Project in due course. The Project is registered on the Planning Inspectorate's website. On 9 June 2021, EWR Co closed its second round of non-statutory consultation which included five potential alignment options for a new section of railway between Bedford and Cambridge. EWR Co identified two emerging preferences for EWR's proposed alignment, both of which would run alongside the proposed Scheme. Other potential alignments would be located close to the Scheme. Given that the Scheme and the Project would be in close proximity to each other, there are likely to be significant engineering interfaces between them. EWR Co wishes to take part in the examination of the Scheme in order to seek appropriate protection for the Project. As currently proposed, if the Scheme is authorised EWR Co's DCO application may need to seek powers to modify the way in which HE can exercise the functions conferred by the Scheme DCO. It is highly desirable for any such issues to be raised during the examination of the Scheme in order that they can be appropriately addressed. While EWR Co is not an interested party in the Application within the meaning of section 102(1) of the Planning Act 2008, as a promoter of a registered NSIP its position is analogous to that of a statutory

Reference Number	Comment from Additional Submission/ Applicant Response
	undertaker. EWR Co submits that it should treated during the examination as if it were an interested party. EWR Co therefore requests that the Examining Authority exercise its discretion to: • invite EWR Co to attend and take part in the forthcoming preliminary meeting; • permit EWR Co to attend and take part in any hearings conducted as part of the examination; and • accept written submissions from EWR Co during the course of the examination. We would of course be happy to provide any further information that the Examining Authority requires in order to consider our request
Applicant Response	The East West Rail project and the A428 Scheme are independent of each other, and the A428 Scheme is subject to a separate consent (under the Development Consent Order (DCO) process). Given the East West Rail Scheme is at an early stage of development, it is not appropriate for this Scheme to make specific provision for any new infrastructure which may be required as part of the East West Rail scheme. The Applicant will continue to work with East West Rail and local stakeholders to enable planning and delivery of these transformative projects to be co-ordinated where appropriate or possible. The Applicant notes the response from East West Rail and can confirm that a Statement of Common Ground has been submitted at Deadline 1 to address the points and aid discussions about the points raised in this relevant representation.

AS-008 Ted Baxter

Reference Number	Comment from Additional Submission/ Applicant Response
AS-008a	The scheme will encourage more long-distance commuting and generate additional local trips in the area. This will have cause more congestion and bottlenecks on feeder roads and other roads in the area.
Applicant Response	The assessment undertaken by the Applicant shows that the Scheme will deliver significant benefits to the local community in terms of relieving existing traffic congestion on the local road network in addition to delivering economic benefits to both the local and wider areas.
AS-008b	The Highways England webpage on the scheme does not include a cost estimate, but it is sure to be in the hundreds of millions. The country cannot afford a scheme that will ultimately create more problems.
Applicant Response	The cost of the Scheme is set out in the Funding Statement **[APP-031]** which has been submitted as part of the DCO application.