

## Comments on the Applicant's responses to Relevant Representations

Document TR010044-001002 [REP1-021]

This document sets out the comments on the Applicant's responses to Relevant Representations by Cambridgeshire County Council (**CCC**), Huntingdonshire District Council (**HDC**) and South Cambridgeshire District Council (**SCDC**) (together, the **Councils**).

Except where expressly stated otherwise below, the Councils reiterate and rely on their comments submitted to the ExA at Deadline 1 and Deadline 2.

The Councils have made comments below on the Applicant's responses to each of the following topics:

- Biodiversity
- Landscape
- Noise
- Air Quality
- Contaminated Land
- Cultural Heritage
- Minerals and Waste
- Flooding and Drainage
- Climate Change
- NMU and Rights of Way
- Traffic Modelling
- Cycling
- Highway Design
- Highway Network Impact
- Digital Connectivity

### Biodiversity

Reference number	Comment
RR-013b RR-048b RR-100b	<p>The Applicant advised that various surveys have been repeated, extended or will be undertaken in 2022 (in the case of key birds) and BNG will be re-assessed against Defra metric. The results in the form of a Technical Note are awaited (expected at Deadline 3). This outcome is welcomed.</p> <p>The Applicant has revised the BNG calculations using the DEFRA Metric 2.0. In a meeting 14 September 2021 with the District and County ecologists, the Applicant reported that a lower BNG of 16% is expected using the DEFRA Metric 2.0 against the original estimate of 20.5% using the bespoke metric.</p> <p>Notwithstanding the above, our concerns still stand until we have viewed this additional information.</p>
RR-013c RR-048c RR-100c	<p>The Applicant has reduced the proportion of silver birch to 5%, having accepted that the species is not appropriate in this area. This amendment is welcomed and this should be confirmed in the Application documents.</p>

	<p>The Councils are concerned about the seed mixes proposed for open and species-rich grassland; a lack of clarity on the commitment to use Elm; and planting details for the aquatic habitats.</p> <p>In a meeting on 14 September 2021 with the District and County ecologists, the Applicant advised that it would welcome input from the Landscape and Ecology teams as to appropriate seed mixes and tree species.</p> <p>The Councils welcome the opportunity to comment on the final species mixes during the preparation for the second interaction EMP, however were concerned inaccuracies within the 1st EMP may be transferred in to the 2nd EMP. The Councils are also unclear about the mechanism, if any, by which the Councils will be consulted and any comments adequately incorporated in the 2nd EMP if the principles have not been secured in the 1<sup>st</sup> EMP.</p>
<p>RR-013e RR-048e RR-100e</p>	<p>For clarification, there are on-going discussions occurring between the Councils and the Applicant for a number of topics, it is important that the ecological impact of any changes are considered as part of this process. For example, if the design of the scheme changes for 'highways' reasons, then the ecological impact of additional land-take / lighting, or potential for new wildlife corridors as of any additional NMU crossings will need to be considered.</p>
<p>RR-013f RR-048f RR-100f</p>	<p>The restoration of borrow-pits should accord with Policy 19 of the Cambridgeshire and Peterborough Minerals and Waste Local Plan 2021 which requires restoration and aftercare schemes to demonstrate net biodiversity gain [BNG].</p> <p>There should be opportunities for biodiversity enhancement within the borrow-pits, even if part / or the majority of the site is restored for agriculture, such as enhancement of boundary features / margins or similar to higher level agricultural environment stewardship scheme options. The borrow-pits also provide opportunities to mitigate impact to species that cannot be mitigated through the route of the A428 road itself. For example, songbirds nesting in hedgerows are likely to be excluded from habitat close to the road due to road noise or lighting. Therefore, borrow-pits can create or enhance hedgerow habitat sufficient distance from the road.</p> <p>It is clear from the 1st iteration EMP [APP-234], the BNG assessment which omits borrow-pits, [APP-206] and discussions with the Applicant that no enhancement of the borrow-pits will be delivered.</p> <p>The Councils seek confirmation that the Applicant will deliver BNG as part of borrow-pit restoration. The Councils do not consider leaving this fundamental principle of the restoration scheme design to the 2<sup>nd</sup> EMP to be appropriate.</p>
<p>RR-013g RR-048g RR-100g</p>	<p>The Applicant confirmed during a meeting on 14 September 2021 with the District and County ecologists, that three of the water courses were surveyed and the Water Framework Directive (WFD) information will be incorporated at a more detailed stage. This will comprise mostly geomorphology and vegetation.</p>

	Any changes to the watercourses may require updated ecological survey work, which should be used to inform the WFD assessment and works.
RR-013h RR-048h RR-100h	In a meeting on 14 September 2021 with the District and County ecologists, the Applicant advised that various surveys have been repeated, extended or will be undertaken in 2022 (in the case of key bird species). The results in the form of a Technical Note are awaited. This outcome is welcomed.

## Landscape

Reference number	Comment
RR-013i RR-048i RR-100i	<p>The question of timing of planting related to lessons learnt from the A14 where a very significant proportion of the landscape failed due to a lack of maintenance primarily and in part from planting too late in the planting season for adequate root development to establish prior to the stresses of hot summers and drought, particularly when watering is less achievable.</p> <p>The clarity the Councils would like is to ensure that planting occurs prior to the end of January rather than extending it as late as March (standard planting seasons is October to March).</p>
RR-013j RR-048j RR-100j	Adjustment to species mixes has been deferred by the Applicant to Iteration 2 of the EMP which does not provide the Councils with the confidence that any changes can or will be made as the DCO will be made at that point and fewer opportunities for changes exist the further the process progresses. The Councils would prefer any changes to be secured through the DCO consent.
RR-013k RR-048k RR-100k	<p>Statement of Environmental Opportunities listed within the NCA88 Bedfordshire and Cambridgeshire Claylands Character Area<sup>1</sup> Profiles provide opportunities which should be undertaken to improve the character areas.</p> <p>SEO number 1 states: Maintain and manage a sustainable and productive claylands arable landscape, while <b>managing, expanding and linking woodlands, hedgerows and other semi-natural habitats</b> to benefit biodiversity, improve soil and water quality, and ameliorate climate change by promoting good agricultural practice. The Councils consider that this opportunity has not been taken fully, particularly where the routes passes through the St. Neots/Toseland area and this has been limited further by the narrow redline boundary limits in this area.</p>
RR-013m RR-048m RR-100m	Please see the Councils' response to RR-013k, RR-048k, RR-100k specifically in relation to hedgerows.
RR-013n RR-048n RR-100n RR-013o RR-048o	Borrow pits are proposed to be restored for the use of landscape or agricultural uses and that the structure of soils is critical to the success of both of these uses is unarguable. The Councils require the clarity of understanding as to how reinstatement of the soils, drainage and

<sup>1</sup> [NCA Profile: 88 Bedfordshire and Cambridgeshire Claylands - NE555 \(naturalengland.org.uk\)](https://www.naturalengland.org.uk/NCA/Profile/88-Bedfordshire-and-Cambridgeshire-Claylands-NE555)

RR-100o	appropriate compactions will be achieved and secured to avoid overly compacted or 'engineered' reinstatements.
RR-111b	The Councils note and accept the Applicant's explanation regarding the retention of T311 (Veteran Elm) and its root protection area.

## Noise

Reference number	Comment
RR-013p RR-048p RR-100p	<p>The first part of dDCO Requirement 19: "Construction work for the authorised development must only take place between 0700 hours and 1800 hours Monday to Friday, and 0700 hours to 1300 hours on Saturdays, with no activity on Sundays or bank holidays, except as specified in paragraph."</p> <p>The Applicant has requested a start-up and shutdown period in addition to the core working hours. This period hasn't been defined, but assuming this will be 1 hour at either end of the shift, this would allow a start at 6am which may not be appropriate depending on the location and type of work being carried out. An agreeable compromise would be 8am Monday to Friday and then 8 till 1pm on Saturday and no working on Sundays and Bank Holidays. Exception "n" of Requirement 19 of the dDCO [REP1-003] allows earthworks to exceed normal construction hours during the summer (when it is dry and with more daylight hours) which is positive for the progression of construction work but does not take into account noise at residential receptors when people are more likely to be outside enjoying their gardens. Exception "n" is therefore unacceptable unless at a sufficient distance from dwellings.</p> <p>The exceptions should only relate to emergency works and those where there is a clear need due to Health and Safety reasons such as working on/or next to a live carriageway, where it is not possible to do this safely during normal daytime shifts and road closures or traffic management is required. In such cases, it will only be practical to do this during the night-time period (out of core hours) when traffic flows are lower.</p> <p>We understand construction noise monitoring will be undertaken to confirm requirements set out in the Noise Management Plan as presented in the First Iteration EMP.</p> <p>It is important that the effectiveness of installed mitigation for operational noise is tested. This involves real world monitoring in addition to predictive modelling. The Councils note the Applicant's position is not to carry out any monitoring once the road is open.</p>
RR-013q RR-048q RR-100q	The Councils understands Environmental Health Officers will be consulted on the Second Iteration EMP. This is welcome as there will be a greater level of detail will be provided to cover specific local issues. The Councils are seeking additional control over the 2 <sup>nd</sup> EMP and are discussing this with the Applicant.

<p>RR-013r RR-048r RR-100r</p>	<p>The Councils accept that the noise assessment does not consider the impacts of the Scheme on the future residents of Cambourne West, as they are not currently in-situ and so will not experience a “difference” between the current baseline modelled noise levels and those in the future once the road is open. This point is agreed.</p> <p>However, paragraph 11.8.4 of Chapter 11, Noise and Vibration [APP-080] of the Environmental Statement does not report on the Cambourne West noise climate, instead focusing on areas outside SCDC.</p> <p>Section 11.9.84 states “Increases in traffic noise are predicted in the area of the Cambourne West development, with moderate increases in noise predicted in the areas close to the Scheme. These increases result from the new dual carriageway carrying a greater volume of traffic at higher speed through the proposed grade separated junction. Traffic noise will continue to dominate the acoustic environment in these areas once the Scheme is operational, with both the new dual carriageway and Caxton Gibbet junction visible to those properties to be located on the north and west boundaries of the development.”</p> <p>With regard to Cambourne West, Section 11.9.80 states “Increases in traffic noise on the minor/moderate border are also predicted at Swansley Wood Farmhouse in Cambourne, located approximately 500m to the south east of the Scheme. However, the view of the Scheme from this property is likely to be limited, due to the development of Cambourne West providing screening of the Scheme at this property.”</p> <p>The Councils request the assessment is updated to include predictions of noise levels that are likely to be experienced by future receptors of Cambourne West, once the Scheme is in operation, and that mitigation is provided if required.</p>
<p>RR-013s RR-048s RR-100s</p>	<p>The Councils agree with the general structure proposed for the First, Second and Third Iteration Environmental Management Plans in principle. Greater detail and local authority involvement is expected in 2<sup>nd</sup> Iteration of the EMP and local circumstances will need to be considered at that point.</p>
<p>RR-013t RR-048t RR-100t</p>	<p>Insufficient reasons have been given for the decision to discount mitigation at the eastern end of the Scheme. The future Cambourne West development could potentially experience higher noise impacts that have not been reported the ES in sufficient detail. Consequently, the Councils request further information to clarify/justify discounting the mitigation in this area. This could be part of ongoing discussions on the draft joint Statement of Common Ground.</p>

### Air Quality

Reference number	Comment
<p>RR-013u RR-048u RR-100u</p>	<p>No further issues to raise in respect of this matter at this stage. The comments regarding recording, reviewing and provision of data are welcomed and it is noted the outline measures within the First Iteration</p>

RR-013v RR-048v RR-100v	Environmental Management Plan will be refined and updated as part of the Second Iteration Environmental Management Plan, and where necessary location or area specific control measures will be included. The Councils agree that prior to construction, it is important that the Councils have an opportunity to review and comment on the control measures contained within the Second Iteration Environmental Management Plan.
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### Contaminated Land

Reference number	Comment
RR-013w RR-048w RR-100w	The Councils continue to have concerns relating to the restoration of borrow pits. Reference is made to section 13 of the Councils' Written Representation [REP1-048] and to the Councils' comments on the responses to First Written Questions submitted at deadline 3 (pages 5, 22, 23 and 29).

### Cultural Heritage

Reference number	Comment
RR-013x RR-048x RR-100x	Discussions regarding the areas for archaeological excavation of some of the sites have stalled recently and need to restart in order that a revised Archaeological Mitigation Strategy can be approved.
RR-013y RR-048y RR-100y	<p>Discussions have stalled regarding agreement on areas of excavation for some sites and need to recommence.</p> <p>The Councils consider that the areas selected for excavation require a) suitable buffering and b) inclusion of the unenclosed archaeological evidence that has been omitted from some sites (for example at Site 18). A research focus is laudable and a requisite of all development-led archaeological excavations, but should not seek to limit focus on enclosed settlement forms and omit other types of evidence from inclusion.</p> <p>Research objectives b, d, g to will not be met or be limited at Site 18 Appendix D of APP-238 if the excavation area fails to include known Iron Age and as yet undated evidence from the evaluation. Medieval remains continue from Site 17 into this area, but there are no research objectives for these in Site 18's mitigation approach. The Councils look forward to seeing these in the revised AMS, along with other areas of change that have been sent to the Applicant following the Councils' review of the AMS.</p> <p>In terms of the over-simplification of evidence, there can be blank gaps in archaeological settlement plans which define different land uses – separation or quiet zones between domestic areas and task sites or burial grounds, on empty zones beneath the boundary banks of enclosures and other territory divisions for example. When evaluation trenches locate blank areas, these require proper interpretation in settlement terms, not to be seen as a chance to limit excavation areas that are confined to settlement cores. Where multiple blank trenches occur together, it is safe to assume that the archaeological evidence has ended. If all of the evidence has been used to define areas for excavation as the Applicant</p>

	<p>suggests, it remains unclear why the extent of cover at Site 18 omits the archaeological evidence at the east end of the field (Field 74 – see AMS [APP-238] Table 5.1 entry for Site 18, “<i>northern end of the field will not be investigated</i>” - the latter direction referring to everything at the east end of the field. See also the discussion of Site 18 in Appendix C of the same document pdf pages 105-108).</p>
RR-013z RR-048z RR-100z	<p>The archaeological site areas that are to be fenced off are agreed. Our concern is that Site 17 should not be subjected to the treatment outlined in 11.3 of the AMS [APP-238]. It is presumed that this will be amended in the revised AMS as the Applicant has not further referred to this method.</p>
RR-013aa RR-048aa RR-100aa	<p>The Councils welcome the Applicant’s commitment to the advice and requirements of the reissued Joint Authorities’ Archaeology Brief (JAAB). CCC review comments on the AMS [APP-238] were sent to the Applicant in May and discussed with the Archaeology Team in August, since then the revised JAAB has been issued. Changes to the AMS are to be made in line with that document.</p>
RR-013ab RR-048ab RR-100ab	<p>The Councils’ comments were given to the Applicant in the review of the AMS in May 2021 for Site 17, Field 70 and discussed in August 2021. Site 17 was found on land adjacent to Wintringham Deserted Medieval Village remains: it is more accurate to say they are immediately adjacent (to the west) of an unscheduled area of the same village remains; the scheduled part lies 400m to the south east.</p> <p>The A428 evaluation found evidence of Saxo-Norman to Medieval remains in the scheme area for multi-purpose construction use (see Archaeological Evaluation Trenching Phase 2 ,5.1.8 [APP-175]. For clarity, the comments provided to the Applicant were: “<i>The proposed mitigation requirements are unworkable and are not approved for this dual period settlement area of Late Bronze Age to Early Iron Age and Saxo-Norman to Medieval dates. There is a palimpsest of archaeological evidence in this area. In the field it will probably be difficult to determine the dates of Saxo-Norman or Late Bronze Age settlement evidence until they have been subject to investigation. Saxon-Norman settlement evidence is rare outside village cores. As this is the western edge of a settlement categorised as a Deserted Medieval Village, the excavation level here should be of high intensity to allow detailed analysis of these remains to be undertaken – to fulfil the research objectives set out at 4.5. in the preceding section of the AMS. Removal of the word “solely” would make the strategy acceptable.</i>”</p>
RR-013ac RR-048ac RR-100ac	<p>Regarding work focused on Hen Brook and Wintringham Brook: The Joint Authorities’ Archaeology Brief required a geoarchaeological approach to the investigation of archaeological areas where they are situated close to watercourses. It will eventually be shown at Appendix B of a revised AMS which we look forward to reviewing but contains the following statement:</p> <p>“<i>4.3.1 A geoarchaeological approach to the fieldwork programme is required for the investigation of lived in and human/naturally modified landscapes. The combined study of archaeological and geomorphological records with appropriate environmental sampling will enable the definition and characterisation of landscape change to occur and to provide the</i></p>

	<p><i>context in which past activity represented at the site(s) or within the scheme is understood. The selection of relevant appropriate sampling techniques should, therefore, be shown in the WSI to gain evidence to from the geomorphological features in the development area (e.g. palaeochannels, creeks, ponds/oxbows; dry valleys/winterbournes) and from feature and deposit contexts for environmental mapping purposes and to examine past landscape character and transformation brought about by the settlement's inhabitants and due to natural events...."</i></p> <p>It is not a simple matter of geoarchaeological coring, but enabling the investigation of areas that were difficult to adequately investigate in the west evaluation period, which are going to be altered by the construction processes. Stripping around the Sandy-Godmanchester Roman Road crossing of the brook west of Wintringham Deserted Medieval Village of Site is an example of the need to strip and excavate remains relating to prehistoric to early Medieval evidence, and both here and at Site 19, the examination of palaeochannels that may be present is imperative.</p>
RR-013ad RR-048ad RR-100ad	<p>The General Arrangement Plans used on the A14 scheme by all parties require to be updated with information about constraint areas and protection areas where no construction work would take place. As the A428 maplets in the mitigation strategy [APP-238] are so limited in view, they are hard to geolocate for readers. The Councils require assurance that the revised AMS maps would be used by all contractors working on the A428 scheme to ensure their locations are understood and that no transgression into archaeological areas takes place before archaeological excavations had occurred. The maplets in the revised AMS would helpfully show the areas in relation to known archaeology – preferably using geophysical survey greyscale plots and cropmarked sites as a background to allow the context of the excavation areas to be understood by archaeologists working on the scheme.</p>
RR-013ae RR-048ae RR-100ae	<p>The Councils welcome the inclusion of CCC's Museum Liaison officer into the scheme.</p>
RR-013af RR-048af RR-100af	<p>Skills development and training is not specified in the list at AMS [APP-238] 6.1.2. The Councils would welcome its inclusion in the DCO AMS to ensure it can be secured, measured and monitored in the future programme.</p>

### Minerals and Waste

Reference number	Comment
RR-013ag RR-048ag RR-100ag	<p>The Applicant refers to the response to RR-013f, RR-048f, RR-100f which states: "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."</p> <p>In addition, the Applicant states: "the environmental assessment has considered, fully, the impacts of the proposed borrow pits as part of the</p>



	<p>Scheme and therefore these sites and operations do not need to be considered within a cumulative assessment.”</p> <p>The Councils wish to highlight that the borrow pit design and restoration is yet to be finalised. Consequently, assertions made by the Applicant in response to this question should not be accepted without an understanding of the uncertainties involved and how that may impact compliance with both national and local policy.</p> <p>Furthermore, the assertion that the environmental assessment “considered, fully,” the impacts of the proposed borrowpits would appear to conflict with the statement that the proposals are yet to be completed, particularly if the final use of the land has not yet been settled. It is also noted that whilst Chapter 15 Assessment of Cumulative Effects, section 15.4 makes references to the uncertainties identified in Chapters 5-14, no such uncertainties are identified in Chapter 10 Material Assets and Waste.</p> <p>In the context of the proposals being incomplete, the uncertainty in relation to the proposals should be considered, at the very least, if not a significant consideration. Without that information, it is difficult to see how a cumulative assessment could have been accurately undertaken. This, when combined with a lack of proper consideration of local policy, would appear, with regards to the borrow pits, to be currently resulting in a scheme that is unlikely to meet local policy, nor be the most sustainable outcome of the available options.</p>
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### Flooding and Drainage

Reference number	Comment
RR-013ah RR-048ah RR-100ah	As the Applicant has mentioned, agreements are still required and discussions are ongoing.
RR-013ai RR-048ai RR-100ai	As the Applicant has mentioned, agreements are still required and discussions are ongoing.
RR-013aj RR-048aj RR-100aj	It is acknowledged that some of the ponds and outfalls will be adopted by CCC Highways Team. These features must be designed in accordance with CCC Highways adoption standards.
RR-013ak RR-048ak RR-100ak	It was raised by the LLFA in the written representations [REP1-048] that the LLFA is less supportive of proprietary treatment systems, which are proposed in areas at higher risk of pollution such as roundabouts, due to increased maintenance and chances of failure if not maintained suitably. This could be better treated through the use of reed planting or other natural solutions to provide treatment, while increasing biodiversity of the scheme. The use of proprietary treatment, albeit meeting the pollution mitigation requirements should be seen as a last resort.
RR-013al RR-048al RR-100al	As the Applicant has mentioned, agreements are still required and discussions are ongoing

## Climate Change

Reference number	Comment
RR-013ap RR-048ap RR-100ap	Noting that the Applicant requests further information in order to be able to respond fully. Further clarification has now been provided in our Written Representations, notably in relation to assessment of the significance of effects against the Sixth Carbon Budget and specific measures to mitigate the additional carbon emissions associated with the Scheme (see section 15, paragraphs 15.1 - 18.3) <b>[REP1-048]</b> .
RR-013aq RR-048aq RR-100aq	With regards to the impact of the scheme on national carbon budgets, we have noted in our Written Representation and Local Impact Report that while the emissions appear small when set against a national budget, they still represent an increase in emissions. As raised in our submissions to the examination, we would welcome further clarification as to the precise mitigation measures that will be put in place to reduce emissions as well as detail on how remaining emissions will be dealt with, for example via carbon offsetting. The response from the Applicant does not change this.
RR-013ar RR-048ar RR-100ar	No further comment beyond that raised in our Written Representation (see section 15, Climate change paragraph 18.4.1) <b>[REP1-048]</b> .
RR-013as RR-048as RR-100as	The Councils are now satisfied that consideration has been given to potential impacts on communities adjacent to the Scheme from a climate resilience perspective.
RR-013at RR-048at RR-100at	We have noted in our Written Representation <b>[REP1-048]</b> and Local Impact Report <b>[REP2-003]</b> that while the emissions appear small when set against a national budget, they still represent an increase in emissions. As raised in our submissions to the examination, we would welcome further clarification as to the precise mitigation measures that will be put in place to reduce emissions to the extent envisioned in the ES as well as detail on how remaining emissions will be dealt with, for example via carbon offsetting.
RR-013au RR-048au RR-100au	With regards to the inclusion of the EWR project in the cumulative assessment of the Scheme, we acknowledge that given the stage EWR is at, its identification as a Tier 3 development is appropriate. We welcome the confirmation from the Applicant that progress will be kept under review, with the status of the project updated within the cumulative effects assessment in the event of a scoping report or similar being published during the DCO examination.

## NMU and Rights of Way

Reference number	Comment
RR-013av RR-048av RR-100av	<p>The Council welcomes the commitment to continued engagement on the detailed design of the proposed WCH routes and RoW.</p> <p>It is not clear to which procedural issues the Applicant refers, as the County Council has raised issues with a number of different ones. These have been set out in detail in our Written Representations at 3.4-3.6, 3.15-3.27 and 6.4-6.4.10 <b>[REP-048]</b>.</p>

	<p>Noting that some of the issues e.g. around limits of deviation, were discussed at the ISH2 on 23 September 2021, CCC would be pleased to discuss all of these/provide further information on anything that is not clear to the Applicant.</p>
<p>RR-013aw RR-048aw RR-100aw</p>	<p>For routes to be safe and encouraging as the Applicant states in their response, there needs to be continuous NMU provision between communities. The roadside NMU provision with the A428 scheme is limited to crossings of the new road, resulting in a fragmented network. It should be noted that across the whole scheme including neighbouring authorities, the total additional length of NMUs is 4km; 2km of this is actually a replacement roadside footway for an existing country footpath; only 1.15km of the 2km new PROW is bridleway status. In the Council's opinion this is insufficient when considered against national and local policies requiring a sea-change in modal shift and the carbon budget agenda, as well as enabling greater leisure activities for mental and physical health and well-being. The relevant paragraphs within the joint CCC, HDC and SDC Written Representations (document reference CLA.D1.WR) are paras 6.1-6.3.3 [REP1-048].</p> <p>The scheme does provide new sections of footpath, cycleway and bridleway as noted but these are not continuous and do not connect communities and so do not provide the benefits to the local population set out in the response. The new 3m footpath/cycleway from Eltisley to Caxton Gibbet, given as an example, includes a 600m gap in provision where users have to walk or cycle on the carriageway and cross the road without any crossing facility. This is a route to and from Cambourne Village College which could provide greater access for school children to after-school clubs and other journeys to school which are outside the restricted times of the school bus. The Applicant's proposals will not provide a safe route to school.</p> <p>At the ISH2 hearing on 23 September 2021, NH said that the additional NMU length was 4km and was proportionate and reasonable. Setting aside the disagreement over additional length, CCC responded that it was not proportionate, because it did not address public benefit needs around St Neots-Cambourne being a growth corridor; health and well-being needs/need for circular leisure routes that linear links would enable; the fact that one was starting from a low base-level, and the fact that in this area cyclists will commute long distances. The scheme should deliver NMU improvements within the redline boundary of the scheme. It should deliver improvements linking the A14 NMU improvements made nearby from Caxton Gibbet onwards to A14 LAR NMU and byway/bridleway network around Knapwell. It would be unreasonable for CCC to shoulder the burden of LTN1/20 requirements upon handover. It will not be cost-effective for the Applicant to have to undertake remedial works should it later be determined during delivery that the NMU improvements should after all be made.</p> <p>CCC responded to the WCHAR report in October 2020 advising that the lack of evidence did not mean that the need was not there. As authorities responsible for strategic development, the Applicant should be working with CCC to ensure that the opportunity presented by the scheme is taken to deliver the future infrastructure needed in accordance with all relevant</p>

	national and local policies set out in section 6 of the Joint Written Representations and at 8.7.17-8.7.18 of the LIR <b>[REP1-048]</b> .
RR-013ax RR-048ax RR-100ax	The changes CCC requires are set out clearly in the Joint Written Representations at sections 6.4, 6.5 and 6.6, <b>[REP1-048]</b> and in the LIR at 8.7.17 - 28 Missed Opportunities <b>[REP2-003]</b> . CCC notes that it provided further clarity at the ISH2 hearing on 23 September 2021 on the sites listed under agenda item 6. CCC is happy to provide any further details needed and to discuss them with the Applicant.
RR-013ay RR-048ay RR-100ay	<p>The provision across the Toseland Rd bridge has been downgraded from a 3m shared cycling and walking provision (as shown in plan HE551495-ACM-GEN-A428_SW_Z_Z-SK-CH-0482 P03 dated 19/2/20) <b>[APP-013]</b> to a footpath only. At the ISH2 hearing the Applicant advised that the previous representation of the route as a cycleway was 'a mistake'. This is clearly disappointing. At the hearing the Council explained its reasoning for why this should be an all-inclusive NMU provision: the scheme should provide safe access for cyclists to encourage commuters from surrounding villages in accordance with relevant national and local policies on modal shift, active travel and health &amp; well-being, particularly if a linear NMU route is provided along the A428; no additional work is needed for it to be inclusive for equestrians except a change of status. In addition, whilst CCC recognises that FP 59/1-278/7 needs to be diverted, it is a disproportionately long diversion warranting betterment in compensation.</p> <p>There has also been removal of cycle provision to connect into the Caxton Gibbet services. The relevant paragraphs within the joint CCC, HDC and SCDC Written Representations (document reference CLA.D1.WR) are paras 6.5.7 (e) and 6.6.6 <b>[REP1-048]</b>.</p>
RR-013az RR-048az RR-100az	<p>CCC's detailed responses have been set out in our Consultation Response of 2019, our Response to the Supplementary Consultation in 2020, and in the Joint Written Representation at 6.6.6-7 <b>[REP1-048]</b> relating to the Caxton Gibbet services junction and in the LIR at 8.7.27-28 <b>[REP2-003]</b> and refers to the change to the proposed NMU path south of the Caxton Gibbet roundabout which is now on the west side but was on the east side where it should be in order to link to West Cambourne, as well as other points.</p> <p>CCC is happy to discuss further detail with the Applicant at their earliest convenience.</p>
RR-013ba RR-048ba RR-100ba	<p>The crossings provided are replacements for existing crossings, reducing down the number of crossings possible because the old routes will be stopped up, diverted to road crossings, or merged with other PROWs. Whilst the replacement of at-grade crossings with bridges is an improvement resolving the danger and severance caused by the existing A428 traffic, there are no new, additional crossings.</p> <p>For routes to be safe and encouraging, as the Applicant states in their response, there needs to be continuous NMU provision between communities. The Applicant has provided short sections of NMU facilities at new road junctions, but these do not represent routes so connections to</p>

	<p>communities remains poor. The scheme proposals do provide some of the route between St. Neots and Cambourne but does not provide the whole route as was expected in the TIP. It should be noted that across the whole scheme including neighbouring authorities, the total additional length of NMU footways and cycle tracks provided is 2km, which in the Council's opinion is insufficient support when policies regarding health and well-being are considered. The relevant paragraph within the joint CCC, HDC and SCDC Written Representations (document reference CLA.D1.WR) are paras 6.1-6.3.3.</p> <p>Please see also our response to RR-013aw, RR-043aw and RR-100aw above.</p> <p>In addition, at the Hearing the Council explained the health and well-being needs/need for circular leisure routes, particularly in relation to FP1/17 upgrade to bridleway request. The Wintringham Park developer already has new BR and CTs in its strategy so this is a key link to facilitate necessary NMU improvements for this significant housing increase. (Bridleway status enables use by both equestrians and cyclists as well as pedestrians, and is therefore most inclusive.) Experience shows that it is far more expeditious in terms of cost and effort to future-proof for growth in user demand and put the necessary infrastructure in whilst the scheme is delivered rather than to try and retrofit later. If necessary, CCC can follow up necessary legal change of status at a later point for the extent of the path outside the redline boundary.</p>
<p>RR-013bb RR-048bb RR-100bb</p>	<p>Gaps in provision are set out in the Joint written reps at 6.5.7(g) p38 and (k) <b>[REP1-048]</b>. An example is the route between Eltisley to Cambourne where there is a gap of 600m where users would somehow have to continue along the carriageway. Users would also have to cross the re-aligned old A428 with no provision and the link to Eltisley ends before it is safe to be on road.</p>

### Traffic Modelling

Reference number	Comment
<p>RR-013bc RR-048bc RR-100bc</p>	<p>The issues of the routing within the cordon Model that was unrealistic and required further investigation has been set out in the WR and LIR..</p> <p>Reference is made to CCC's comments on 9.8 Traffic Routeing Impacts at Coton Technical Note - Rev 1 <b>[REP1-028]</b>, submitted at deadline 3.</p> <p>Whilst CCC continue to have concerns about the trip making in the base model it is acknowledged that the scheme is shown to have a positive impact on Eltisley. This will need to be monitored to ensure that the projected benefit is realised.</p> <p>Reference was made by HE to work done to examine the origin of this traffic on the A1198, HE suggests that this is local traffic heading to Cambourne and Caxton with very little continuing south of the A603. If this is the case it would be useful to understand where this traffic is rerouting from. It is important that the Council as Local Highway Authority understands the impact of the scheme on its network.</p>

	<p>CCC requested the information that informed this assessment as it is not possible to confirm this from the cordon model to date (080921), the information about the origins and destinations of traffic outside the cordon has not been provided to CCC and it would be beneficial to understand this to see if there are wider re-routing effects.</p>
<p>RR-013bd RR-048bd RR-100bd</p>	<p>It is agreed that the strategic model validates well against the TAG guidance, but this does not require the model to be validated to individual turning movements as this would not be possible in a model of this size.</p> <p>CCC are not questioning the validity of the Saturn model for use in the testing the strategic impact of the scheme, rather CCC are questioning the appropriateness of taking the flows directly from the Saturn model for use in the operational junction models as it was not clear how the turning proportions in the Saturn model corresponded to this in the observed count data.</p> <p>This is covered in CCC's response to TN73 - 9.10 Junction Modelling Technical Note - Rev 1 (TR010044/EXAM/9.10) [REP1-030].</p> <p>The review of this information shows that the turn proportions in the Base Model do not represent those indicated by the observed count data and therefore, it is not possible for CCC to be certain that the future year models are accurately reflecting the likely impact of the scheme at the junctions.</p> <p>This issue formed the basis of the meeting agenda on 09 September 2021.</p> <p>These junctions (and the additional ones that CCC require testing) whilst not directly part of the scheme are located on the local road network and the scheme modelling indicates that there is an impact at these junctions. CCC require these assessments to be undertaken following Best Practice to enable the greatest level of certainty that the impacts of the scheme on the local road network are reasonable and adequately mitigated where required. 9.10 Junction Modelling Technical Note - Rev 1 TR010044/EXAM/9.10 [REP1-030] was previously submitted to CCC as TN73, this has been reviewed by CCC and CCC's comments are provided at deadline 3.</p>
<p>RR-013be RR-048be RR-100be</p>	<p>Table 6 in Section 5 of Appendix W indicates that the proposed scheme increases the Annual Average Daily Traffic on Great North Road by 24% and the B1428 Cambridge Road by 11% CCC have repeatedly asked for the impact on the adjacent junctions on the Great North Rod and Cambridge Road to be assessed to ensure that they can accommodate the predicted increase in traffic as this is a real impact of the scheme on the local road network.</p> <p>It is not sufficient to say that other areas of St Neots see a benefit, this does not change the fact that CCC need to be sure that the adjacent junctions on the local road network can accommodate the increased levels of traffic indicated by the modelling.</p>

<p>RR-013bf RR-048bf RR-100bf</p>	<p>The modelling undertaken in relation to the construction impacts has been discussed at various meetings with the Applicant. The main issues for CCC relate to the way in which non-construction traffic has been modelled.</p> <p>By allowing traffic to use any available route through the model the impact of construction traffic is shown to be spread over a wide area with almost every settlement in the county affected in some way.</p> <p>This has been the subject of discussion with the Applicant as it requires measures to be put in place to minimise the impact of the scheme on key settlements in the county.</p>
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## Cycling

Reference number	Comment
<p>RR-013bg RR-048bg RR-100bg</p>	<p>Whilst LTN 1/20 is aimed at local authorities it states that 'The guidance should be applied to all changes associated with highway improvements' and Gear Change 2020 includes the statement that 'We will ensure that new local and strategic A road schemes include appropriate provision for cycling'. CD 195 accords with LTN 1/20 in that a minimum width of shared path of 3m and suitable setback of 2m (absolute minimum for 60mph roads) from the carriageway is needed and the inclusion of horse riders and pedestrians makes this width and setback as important if not more so. The scheme should be designed to meet the principles behind Gear Change and NPS NN 3.17.</p>
<p>RR-013bh RR-048bh RR-100bh</p>	<p>The section of the existing A428 which is stated as being outside the scope of this scheme is within the order limits. Continuing the route from Eltisley to Caxton Gibbet would meet the core design principles as set out in CD 143 and cost would significantly increase if the gap of 600m was provided later rather than whilst works were underway. In the interim the sections provided would be in practice unusable and there is no guarantee that this would be rectified through designated funds. The Councils, therefore, remain of the view that this should be secured through the DCO and not as a legacy scheme funded through the applicant's Designated Fund scheme.</p>
<p>RR-013bi RR-048bi RR-100bi</p>	<p>Whilst grade separated crossings are generally preferred for all major crossing points, signalised crossings of the A1198 on the north side of Caxton Gibbet junction and on the slip roads may be acceptable provision subject to a better understanding of the traffic flows, and wider NMU network impact. Signalised crossings should also be provided on the slip roads at the Cambridge Road junction and the Applicant is requested to confirm that this is also the intention. The Applicant had noted a further submission will be made at D3, which the Councils will review.</p>
<p>RR-013bj RR-048bj RR-100bj</p>	<p>The Councils acknowledge the Applicant's comments.</p>
<p>RR-013bk RR-048bk RR-100bk</p>	<p>The volume and speed of traffic on the Old St. Neots Rd following dualling works from Hardwick to Cambourne has not reduced to a level which allows for safe crossing by vulnerable users and so CCC is not reassured that the</p>

	<p>reduction in traffic predicted will allow for a safe crossing point in this location. As such, in line with NPS NN, suitable crossing facilities should be provided to reduce existing severance.</p> <p>A footway/cycleway (as shown in (as shown in plan HE551495-ACM-GEN-A428_SW_Z_Z-SK-CH-0482 P03 dated 19/2/20) [<b>APP-013</b>] rather than just a footway will facilitate cyclists crossing and continuing north – south along Toseland Rd or Abbotsley Rd and will prevent cyclists being in the vulnerable position of motorists overtaking on the approaches to the bridge.</p> <p>Any new bridge should provide for NMUs in order to future proof them for new connecting routes. Once built it will be not be possible to retrofit a route along a narrow bridge. At a minimum there should be the necessary width provided in the form of a verge to allow for future cycle or horse-riding links.</p>
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**Highway Design** (as shown in plan HE551495-ACM-GEN-A428\_SW\_Z\_Z-SK-CH-0482 P03 dated 19/2/20)

Reference number	Comment
RR-013bl RR-048bl RR-100bl	The Applicant is understood to already be in Partnership with Cambridgeshire & Peterborough Vision Zero. This commitment is for both the strategic road network and County roads. On this basis, the Applicant's response appears inconsistent with the Applicant's prior commitments.
RR-013bm RR-048bm RR-100bm	The Applicant has indeed provided draft local road standards, but the proposals still include unacceptable departures from standards for carriageway width/cross section. Discussions are ongoing, but CCC's position has not changed.
RR-013bn RR-048bn RR-100bn	The Applicant has not designed the non-trunk roads fully in accordance with DMRB. This approach will increase the maintenance burden on CCC, and introduce uncertainty into the design and acceptance process. Experience on the A14 has informed the Council's position that new assets need to be designed and built to a clear specification, and DMRB provides that in a way that Manual for Streets does not. Designing them to " <i>suit the nature of the existing road</i> " is not an acceptable approach and will not " <i>remove unnecessary safety risks</i> ". The Applicant has not provided any information to CCC to support their assertion that local road highway drainage has been considered during the preliminary design stage. Sustainable drainage may result in additional maintenance liability for CCC. The Applicant's response does not alter the Council's overall position which is clearly stated in the Written Representation [ <b>REP1-048</b> ].
RR-013bo RR-048bo RR-100bo	CCC welcomes the Applicant's commitment to continue engagement on matters relating to the lighting design and strategy but does still require the Applicant to provide a lighting strategy that must be formally agreed with CCC to secure an acceptable lighting design for both the new assets and those on the sections to be de-trunked. The lighting strategy should include the following information which is not exhaustive: <ul style="list-style-type: none"> <li>- Extents of street lighting to be installed, agreement that all street lighting installations that will upon completion be handed over to CCC,</li> </ul>



	<ul style="list-style-type: none"> <li>- comply with the current CCC Street lighting Development Specification and CCC's standard detail drawings and the street lighting design brief that is required to be issued by CCC for each section of street lighting installation works,</li> <li>- details of process to be followed to gain design approval from CCC,</li> <li>- agreed specification for as built information to be supplied at final handover stage and</li> <li>- an indicative works programme with commitment from the Applicant to provide regular updates to CCC with regards the project delivery for street lighting installations.</li> </ul>
<p>RR-013bp RR-048bp RR-100bp</p>	<p>CCC welcomes the Applicant's commitment to continue engagement with CCC on matters relating to the handover of street lighting assets but does still require the Applicant to confirm 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 de-trunked sections. CCC would also note that for street lighting assets associated with the de-trunking process there must be a formal detailed discussion and agreement to cover CCC's requirements for the street lighting assets included.</p>
<p>RR-013bq RR-048bq RR-100bq</p>	<p>Noted. Previous comments in the joint Cambridgeshire, Huntingdonshire and South Cambridgeshire written representation (doc ref CLA.D1.WR), paragraphs 3.4 to 3.11, still apply <b>[REP1-048]</b>.</p> <p>While it is noted and positive that the Applicant has acknowledged the need for engagement on matters related to de-trunking, CCC as LHA is not entirely satisfied that the agreement of a de-trunking process hinges on the reaching of a separate legal agreement. Certain protections should be afforded to the LHA within the DCO. Most notably, as pointed out at item 3.7 of doc CLA.D1.WR <b>[REP1-048]</b>, the determination of a de-trunking date and in the draft DCO currently rests entirely with the Applicant. The draft DCO leaves no place for the involvement of the affected LHA or agreement on key asset infrastructure, condition and maintenance. CCC stands to inherit a significant length of new road upon detrunking and such a lack of agency in the process is unsatisfactory.</p> <p>As pointed out at paragraph 3.11, there are areas where new highways are proposed to be constructed on the alignment of the current A428 that is to be de-trunked. CCC's understanding is that such areas cannot legally become the responsibility of the LHA until the pre-existing road has been de-trunked. Most notably this applies to the proposed new local road, 'Caxton Gibbet Junction South West Link Road', where the new construction intersects with the footprint of the current A428 (see <i>Streets, Rights of Way and Access Plan 14</i>) <b>[APP-013]</b>, although there is another section on <i>Streets, Rights of Way and Access Plan 13</i> between point 13/4 and the point at which the existing A428 and the new Eltisley-Caxton Gibbet link road diverge. CCC requires the extent of the road to be de-trunked to be agreed so that the roads to be de-trunked have a defined boundary, prior to the de-trunking taking place. This was explained at the ISH2 Hearing on 23 September 2021 by CCC, and National Highways agreed to consider this matter further.</p>

	<p>Likewise, in areas where the de-trunking boundary includes large verge areas (as identified in paragraph 3.10 of CLA.D1.WR) [REP1-048], it would be possible to alter the de-trunking plans prior to the making of the DCO to exclude these areas, so to ensure that no further legal work is required to stop up these sections of highway at a later date. The <i>Streets, Rights of Way and Access Plans</i> [APP-013] could be altered to include some additional stopping up areas in these locations.</p> <p>The Council explained that these areas contain mature trees and probably arise from an earlier smoothing out of the bends in the road. The highway rights ought to have been stopped up and the land offered back to the landowner at the time. The Applicant appeared to accept this point at the hearing and agreed to take the matter away to resolve.</p> <p>CCC looks forward to detailed discussions regarding agreement for the de-trunking process.</p>
<p>RR-013br RR-048br RR-100br</p>	<p>The Applicant's written response is reassuring but does not acknowledge the fact that changes to the DCO plans would be possible to ensure that this issue does not become problematic during the delivery phase of the scheme.</p> <p>As pointed out in paragraphs 3.27 and 3.28 of document CLA.D1.WR [REP1-048], the presence of <i>Works Plans</i> [APP-009 and APP-010] and <i>Land Plans</i> [APP-008] which show utility assets and land purchase extending a considerable distance away from the proposed new local roads gives cause for concern. It should not be assumed that surplus areas of land or utility corridors will be taken on by the LHA simply because they are proximate to the highway.</p> <p>Inclusion of indicative local highway boundaries in the <i>Streets, Rights of Way and Access plans</i> [APP-013] would offer some reassurance to the LHA and add an element of clarity for all concerned parties, not least the Applicant, about the division of asset responsibility upon completion of the scheme. This is also of relevance to adjoining local landowners who may have an interest in the position of the highway boundary after the new roads are constructed.</p> <p>CCC looks forward to engagement on this subject during the detailed design development phase, but feels discussions on this matter could be helpfully aided by the inclusion within the DCO of indicative highway boundaries.</p>
<p>RR-013bs RR-048bs RR-100bs</p>	<p>CCC has made clear its concerns with regard to protective provisions at various points within paragraphs 3.4 to 3.31 of document CLA.D1.WR [REP1-048]. It is unsatisfactory to leave the resolution of these concerns entirely to a separate legal agreement.</p> <p>In relation to article 9 of the draft DCO, CCC has identified a number of problems at paragraphs 3.15 to 3.22 of doc CLA.D1.WR, with some suggested solutions at item 3.23 [REP1-048].</p>

	<p>With regard to article 13 of the draft DCO, CCC has at paragraph 3.4 of doc CLA.D1.WR <b>[REP1-048]</b> requested the amendment of the article to provide a mechanism for the certification of the acceptability of new local highways prior their vesting in the LHA. Paragraphs 3.5 and 3.6 of CLA.D1.WR also make reference to key absences from the draft DCO at article 13.</p> <p>Furthermore, paragraphs 3.25 and 3.26 in the doc CLA.D1.WR <b>[REP1-048]</b> explain CCC's concerns regarding the liability for maintenance of shared private vehicular access and public rights of way. These concerns could be easily allayed with some minor textual amendments to the draft DCO.</p>
<p>RR-013bt RR-048bt RR-100bt</p>	<p>CCC remains concerned about the limited information provided on the de-trunking process within the draft DCO. Paragraphs 3.7 to 3.11 of doc CLA.D1.WR in particular explain these concerns in more detail <b>[REP1-048]</b>.</p> <p>While the Applicant's engagement via a separate legal agreement is welcomed, it remains the case that CCC would prefer, where possible, for amendments to be made to the DCO to ensure the interests of the LHA are best protected.</p> <p>Most notably, CCC feels that article 14 of the draft DCO contains insufficient protection for the LHA on the matter of the timing of the de-trunking, the processes for certifying that the road is suitable to be adopted by the LHA, and the condition of assets to be handed over at the point of de-trunking.</p> <p>At the ISH2 hearing on 23.09.2021 the points relating to Handover at articles 13 and 14 were set out by the Council and supported by Central Bedfordshire and Bedford Borough Councils. The Examiners pointed out that the Legal Agreement is not before the Examination, and thus they cannot give it any weight. They have requested that article 14(8) is amended to include requirement for a date to be agreed between the parties for handover. This is to be provided by Deadline 4.</p>
<p>RR-013bu RR-048bu RR-100bu</p>	<p>As with the answer to RR-013bt above, CCC feels that the draft DCO instructs a limited amount of engagement with the LHA on matters of highway design, particularly with regard to asset boundaries, asset management and landscaping. These concerns are outlined at paragraphs 3.30 and 3.31 of doc CLA.D1.WR <b>[REP1-048]</b>. As explained in that document, early discussions on these matters are vital to ensure that the construction of new highways can proceed with due regard to agreed boundaries and asset management preferences, and to enable an efficient handover of assets from the constructor to the LHA.</p> <p>Unfortunately from experience with the A14 improvement scheme, a failure to fully engage on these matters can later cause confusion and delay asset adoption.</p> <p>At the ISH2 hearing on 23.09.202 the points relating to Handover at articles 13 and 14 were set out by the Council and supported by Central Bedfordshire and Bedford Borough Councils. The Examiners pointed out that the Legal Agreement is not before the Examination, and thus they</p>

	<p>cannot give it any weight. They have requested that article 14(8) is amended to include requirement for a date to be agreed between the parties for handover. This is to be provided by Deadline 4.</p> <p>It was also noted that the Applicant advised at the Hearing that it would be providing documentation regarding a framework for engagement with LHAs by Deadline 3. This is welcomed, although the Council's position is reserved until it has reviewed the content.</p>
RR-013bv RR-048bv RR-100bv	<p>Noted. The numbering of the new classification of local roads requires amendment. It is suggested that the A1428 extends from its proposed termination at point 8/4 Sheet 8, and continues including the roundabout, local road through to and including the dumbbell roundabout at the junction with the new A428. The new termination of the A1428 shall be point 9/8 on sheet 9. Everything to the west of point 9/8 is the A1428. Everything to the east will continue to be the B1428. This will ensure a coherent and consistent approach to road classification from the A428 through to St Neots.</p>

### Highway Network Impact

Reference number	Comment																																																																											
RR-013bv RR-048bv RR-100bv	<p>The modelling undertaken indicates that rerouting traffic will be spread over a very wide area with the largest impacts set out in the LIR (Table 17):</p> <table border="1"> <thead> <tr> <th rowspan="2">Settlement</th> <th colspan="3">Construction Phase (Increase in AADT)</th> </tr> <tr> <th>2</th> <th>3</th> <th>4</th> </tr> </thead> <tbody> <tr> <td>Abbotsley</td> <td>275</td> <td>516</td> <td>602</td> </tr> <tr> <td>Broadway, Bourn Airfield</td> <td>734</td> <td>977</td> <td>1004</td> </tr> <tr> <td>Cambourne</td> <td>2447</td> <td>1627</td> <td>2306</td> </tr> <tr> <td>Caxton</td> <td>173</td> <td>535</td> <td>530</td> </tr> <tr> <td>Coton</td> <td>-382</td> <td>-458</td> <td>466</td> </tr> <tr> <td>Elsworth</td> <td>361</td> <td>516</td> <td>535</td> </tr> <tr> <td>Eltisley</td> <td>-511</td> <td>-463</td> <td>1756</td> </tr> <tr> <td>Eynesbury Hardwicke</td> <td>2178</td> <td>2420</td> <td>2515</td> </tr> <tr> <td>Gamlingay</td> <td>531</td> <td>511</td> <td>618</td> </tr> <tr> <td>Great Gransden</td> <td>1210</td> <td>2131</td> <td>2182</td> </tr> <tr> <td>Highfields Caldecote</td> <td>673</td> <td>861</td> <td>901</td> </tr> <tr> <td>Knapwell</td> <td>420</td> <td>717</td> <td>718</td> </tr> <tr> <td>Little Gransden</td> <td>684</td> <td>841</td> <td>851</td> </tr> <tr> <td>Madingley</td> <td>429</td> <td>455</td> <td>455</td> </tr> <tr> <td>Toseland</td> <td>742</td> <td>1622</td> <td>1523</td> </tr> <tr> <td>Waresley</td> <td>884</td> <td>527</td> <td>498</td> </tr> <tr> <td>Yelling</td> <td>482</td> <td>1405</td> <td>1335</td> </tr> </tbody> </table> <p>From this information it is possible to see that the traffic rerouting to avoid the road works on the A428 is spread over a wide area and therefore, there</p>	Settlement	Construction Phase (Increase in AADT)			2	3	4	Abbotsley	275	516	602	Broadway, Bourn Airfield	734	977	1004	Cambourne	2447	1627	2306	Caxton	173	535	530	Coton	-382	-458	466	Elsworth	361	516	535	Eltisley	-511	-463	1756	Eynesbury Hardwicke	2178	2420	2515	Gamlingay	531	511	618	Great Gransden	1210	2131	2182	Highfields Caldecote	673	861	901	Knapwell	420	717	718	Little Gransden	684	841	851	Madingley	429	455	455	Toseland	742	1622	1523	Waresley	884	527	498	Yelling	482	1405	1335
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	<p>needs to be a discussion between the Council and the Applicant to ensure that the necessary monitoring of these locations in terms of both the number of vehicles using the road and the condition of the road before work starts so that the impact of rerouting traffic on local communities in Cambridgeshire is minimised. The Council looks forward to discussing this further with the applicant.</p>
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### Digital Connectivity

Reference number	Comment
<p>RR-013cb RR-048cb RR-100cb</p>	<p>The Councils requested 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. The Applicant responded by stating that the <i>“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.”</i></p> <p>The Planning Act 2008 Guidance on associated development applications for major infrastructure projects (2013) states in paragraph 5 i (Page 3) that <i>“The definition of associated development requires a direct relationship between associated development and the principal development. Associated development should therefore either support the construction or operation of the principal development, or help address its impacts.”</i> A direct impact of an improved A428 network would be increased growth in terms of employment and residential development as a result of increasing capacity and road infrastructure provision. Especially in combination with the future Oxford-Cambridge Spatial Framework. Incorporating provision to enable fibre to be installed at a future date could help enable a smoother transition to facilitate development as a result of A428 Infrastructure provision. Annex A also identifies telecommunications networks as an example of general types of associated development.</p>