

Comments on Written Representations

This document sets out the comments on Written Representations by Cambridgeshire County Council (**CCC**), Huntingdonshire District Council (**HDC**) and South Cambridgeshire District Council (**SCDC**) (together, the **Councils**). Set out below is the relevant respondent and document reference number.

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

Historic England – TR010044-001015 [REP1-077]

Topic	Paragraph Number	Comment
Introduction Historic England's remit of interest is expressed.	2.2	<p>These comments are given in relation to Cambridgeshire's historic environment area only.</p> <p>Historic England's chief interest is on the designated heritage assets and their setting, specifically scheduled monuments and grade I and II* designations, and grade II listed buildings that could be affected by the proposed development. Grade II listed buildings, conservation areas and non-designated heritage assets are acknowledged as being the remit of County Council and local planning authority advice.</p> <p>We endorse this position as it is a standard working procedure. Furthermore, the District Councils' Conservation Officers also consider impacts on designated heritage assets (listed buildings, registered parks and gardens, conservation areas) and their settings in their areas, while Cambridgeshire County Council's Historic Environment Team advise on impacts and mitigation strategies to non-designated heritage assets on a county-wide basis. These typically, but not exclusively, relate to below ground assets, which comprise the majority of heritage assets in the local archaeological resource.</p>
Regarding Site 17 (Field 70)	3.27	We welcome Historic England's acknowledgement that the local authority [here the County Council's Historic Environment Team] should lead on the mitigation response.

Regarding Local Authority Archaeological Advisors' advisory remit for non-designated archaeological remains	4.5	We welcome Historic England's acknowledgement that the Local Authority Archaeological Advisors should lead on the mitigation response. A Joint Authorities Archaeology Brief has been produced (and recently updated) that sets out the local requirements for the archaeological programme and should not be subordinate to the Archaeological Mitigation Strategy (as inferred from 1.2.5 in the AMS (TR010044/APP/6.12).
Organic Residue Analysis	4.12	Useful advice is presented for the chemical study of ceramic vessels that will be recovered from the excavations. No assessment was made during the evaluation work, so this will need to be included in a revised Archaeological Mitigation Strategy (AMS) and to conform to 7.1.1 of the Joint Authorities' Archaeology Brief that will be appended in a revised AMS.
Archaeomagnetic dating	4.13	Advice on archaeomagnetic dating for kilns, hearths or furnaces is welcome. This is referred to in the Joint Authorities' Archaeology Brief at 6.5 and 7.1.1. We will expect to see a range of absolute dating techniques outlined for use in the Contractor's responding Written Scheme of Investigation.
Conservation of excavated material	4.14	Agreed there is no specific section on conservation, but provisions for this to be addressed is given in various paragraphs in the AMS: e.g. at 6.1.2, 8.6.3, 8.8.4. The requirements for conservation of various materials are covered at 5.5.1.3, 7.1.1 and 7.1.4 of the Joint Authorities' Archaeology Brief and we expect the Contractor's Written Scheme of Investigation to include provision for this, initially as a 'First Aid' approach with more detailed needs identified in the Post-Excavation Assessment (see 5.5.1.3).
Use of animal bone data for comparison with other sites' data sets.	4.15	This is a very important point well made and useful to counter the argument of 'information redundancy' (Appendix C A428 archaeology – rational and strategy; TR010044/APP/6.12) given as a reason to devise low intensity sampling (i.e. 'excavation') strategies at 10% of their plan on some sites, or omit excavating parts of them altogether. See CCC's Relevant Representation (RR-013), Written Representation example section 12.3

		(CLA.D1.WR), Joint LIR paragraph 8.2.5 (REP2-003)
Radiocarbon calibration curve advice and use of chronological modeller	4.18	This is important and welcome advice for all the archaeologists working on the scheme and further supports the need to acquire evidence from a range of sites for input to the model.
Excavation Strategy	4.27	We welcome Historic England's acknowledgement of the role of the local authorities' advisory role and preparation of a brief - referred to but not included in the AMS. We also endorse the need for an iterative and flexible approach but not one that sets the bar too low, as this introduces financial risk into the fieldwork and analysis budgets that may be agreed. For instance, it is more appropriate to provide flexibility by scaling down excavation sampling strategies in the field (and show cost saving measures) than to try to scale up to accommodate intrinsically important evidence when found. This is different to the use of contingency funding needed when exceptional discoveries are made. Moreover, if the research questions are to be addressed, adequate levels of excavation are needed in order to provide meaningful results. We remain unconvinced that the levels shown to Categories 3 and 4 sites, or as proposed for the 'Excavation' and 'Sampling' sites are proportionate and justifiable and instead think that they risk the unrecorded loss of the archaeological resource in some parishes.

Natural England – TR010044-001028 [REP1-087]

Topic	Paraphrased Number	Comment
Eversden and Wimpole Woods SAC	2.1.2	The Councils support Natural England's position that the Applicant needs to provide additional information to rule out likely significant effects with regard to the Eversden and Wimpole Woods SAC bat population.
Bats	2.3.6	The Councils support the requirement for detailed design of the bat underpass (and any other mammal underpass) to take into account species currently using the features to be severed by their road and heights at which they fly.

Bats	2.3.7	The Councils support the requirement for the lighting scheme to be designed for bats.
Wintering and breeding birds	2.4.2	Natural England is satisfied in principle with the mitigation measures set out in the Biodiversity Management Plan (BMP), subject to agreement of the detail. However, the Councils consider that the residual minor adverse impact to breeding / wintering birds could be further reduced / eliminated through the enhancement of borrow-pits / soil storage areas or compounds which will be restored to agriculture for the benefit of these species.
Badgers	2.4.6	We welcome Natural England's confirmation that there will be no impediment to granting a licence, subject to revised method statement.
Biodiversity Net Gain	2.7.1	We support Natural England advice that consideration should be given to incorporating biodiversity and green infrastructure enhancements into the borrow pit restoration schemes.

Woodland Trust – TR010044-001012 [REP1-100]

Topic	Paragraph Number	Comment
Root Protection Area in relation to T311	8 – 9 (pg 2)	Huntingdonshire District Council Officers concur with the views raised by the Woodland Trust in relation to T311 (Veteran Elm). While a Root Protection Area and Construction Exclusion Zone around this tree is shown on Sheet 35 of 73 of the Tree Protection Plans, clarification is needed as to whether or not this is based on the recommendations of BS5837:2012 or follows Natural England's Standing advice. Given the working area around this tree, the maximum area should be provided to ensure all potential negative impacts of changing the tree's environment are mitigated against.

Camcycle – TR010044-000929 [REP1-053]

Topic	Paragraph Number	Comment
Compliance with NPS NN paragraphs 3.3, 3.17, 5.205 and 5.216, and	1.11.6.1(a)	This representation broadly reflects the views of CCC, albeit the Councils are supportive overall of the scheme.

<p>any other relevant policies which relate to NMU provision.</p>		<p>The Councils support the call for ‘high-quality active travel connectivity between St Neots, Cambourne and all the settlements between’.</p> <p>The Councils do not support use of Designated Funds for this purpose, a case which the Councils have also made. Useful comparison to the St Ives to Cambridge Guided Busway cycle route as a highly popular active travel route is made to support the case for a dedicated NMU route.</p> <p>Reference is made to the unsuitability of several crossings along the route for NMU purposes, which is also a point of concern for the Council and reflected by the Councils’ case.</p>
<p>Extent to which pre-existing severance issues, within the proposed scheme, have been addressed as part of the Proposed Development.</p>	<p>1.11.6(b)</p>	<p>They call for a redesign of crossing points for NMU purposes and for coordination of this work with the EWR project. In summary they make a number of points that the Councils have made including support for safe, high-quality and fully-accessible cycling infrastructure, and for active travel connectivity to be designed and established and overall their representation is supported.</p>

CTC – TR010044-000892 [REP1-059]

Topic	Paragraph Number	Comment
<p>Compliance with NPS NN paragraphs 3.3, 3.17, 5.205 and 5.216, and any other relevant policies which relate to NMU provision.</p> <p>Extent to which pre-existing severance issues, within the proposed scheme, have been addressed as part of the Proposed Development.</p>	<p>1.11.6(a) and (b)</p>	<p>They are of the view that the applicant ‘has failed to address these requirements in their design. The active travel elements of the proposed A428 scheme need to be greatly expanded in order to match the ambition of these Government policies on Active Travel. They identify failings of the scheme to address NPS NN Paragraph 3.17.</p>