

Our Reference: CLA.D4.CL
Your Reference: TR010044

Contact: Gareth Blackett

4 November 2021

The Planning Inspectorate
National Infrastructure Planning
Temple Quay House
Temple Quay, Bristol
BS1 6PN

Electronic submission only

Dear Sir / Madam,

Application by Highways England for an Order Granting Development Consent for the A428 Black Cat to Caxton Gibbet Road Improvement Scheme

Response to matters at Deadline 4 (D4) for receipt by the Examining Authority

1. Introduction

1.1. I am writing on behalf of Cambridgeshire County Council (20028267), Huntingdonshire District Council (20028273) and South Cambridgeshire District Council (20028271) (the Cambridgeshire Authorities) regarding the A428 Black Cat to Caxton Gibbet Road Improvement Scheme (the Scheme) Development Consent Order (DCO) Examination.

2. Submissions

2.1. Included with this submission are the following documents:

- CLA.D4.LIR.AC.C - Comments on the Applicant's comments on Local Impact Reports;
- CLA.D4.WR.AC.C - Comments on the Applicant's comments on Written Representations;
- CLA.D4.WQ1.AC.C - Comments on the Applicant's comments on other parties' responses to WQ1;
- CLA.D4.OS.A.C - Comments on the Applicant's D3 submissions;
- CLA.D4.WQ2.R - Response to ExA's Second Written Questions (WQ2);
- CLA.D4.WQ2.AS1 - Response to ExA's Second Written Questions (WQ2) Additional Submission 1, Highway Design; and
- CLA.D4.WQ2.AS2 - Response to ExA's Second Written Questions (WQ2) Additional Submission 2, Local Junction Impacts.

3. Statement of Common Ground with the Applicant

3.1. The Councils submitted comments to the Applicant on 27 October for inclusion in an updated Statement of Common Ground (SoCG). It has been agreed that this is to be submitted by the Applicant at D4.

3.2. As agreed with National Highways, the Councils have not reviewed any further additions made to the SoCG by the Applicant between 27 October and 4 November.

We will do so ahead of D5, at which point a revised SoCG will be submitted to the ExA.

4. 9.38 Joint Position Statement with the Local Highway Authorities on Junction Modelling [REP3-024]

- 4.1. Following the publication of the Deadline 3 submissions, the Cambridgeshire Authorities note that there are two versions of the Joint Position Statement with the Local Highway Authorities on Junction Modelling before the Examining Authority. One submitted by the Applicant [REP3-024] and another submitted by Central Bedfordshire Council [REP3-043]. The version submitted by the Applicant [REP3-024] is an earlier version of the Joint Position Statement and does not include the comments submitted to the Applicant by the Cambridgeshire Authorities. In particular, it does not include the Cambridgeshire Authorities' proposal to progress the question of a common modelling methodology.
- 4.2. The Cambridgeshire Authorities wish to clarify that the version of the Joint Position Statement submitted by Central Bedfordshire Council, including the Cambridgeshire Authorities' Technical Note on Modelling [REP3-024] is the correct version for the Examination.

5. 9.41 Joint Position Statement with Natural England and the Local Authorities on Drainage Ponds [REP3-026]

- 5.1. The Cambridgeshire Authorities respectfully request the opportunity to clarify the text at 3.2 of the Cambridgeshire Authorities' Deadline 3 Cover Letter [REP3-034]. The Cambridgeshire Authorities provided comments to the Applicant at a meeting between the parties on 30 September 2021 however time did not allow for the provision of detailed comments on the text to the Applicant prior to Deadline 3. Having now reviewed the Applicant's 9.41 Joint Position Statement with Natural England and the Local Authorities on Drainage Ponds [REP3-026], the Cambridgeshire Authorities wish to clarify their position in relation to the Applicant's proposals. The Cambridgeshire Authorities' position is detailed at Appendix 1. A comparison version showing the changes between 9.41 Joint Position Statement with Natural England and the Local Authorities on Drainage Ponds [REP3-026] and the Cambridgeshire Authorities' position is shown at Appendix 2.

Yours faithfully,

Steve Cox
Executive Director for Place and Economy
Cambridgeshire County Council

Clara Kerr
Strategic Growth Manager
Huntingdonshire District Council

Chris Carter
Delivery Manager Strategic Sites
Greater Cambridge Shared Planning Service on behalf of South Cambridgeshire District Council

Appendix 1

Cambridgeshire Authorities' position on drainage ponds

This position statement has been produced to address Action 2 of Issue Specific Hearing 3 held on 24 September 2021, which requires the “Applicant, NE and Local Authorities (LA) to provide position statement on details of drainage ponds, including intended design principles and planting arrangements”.

Following ISH3, the applicant organised a meeting with representatives from all the LAs to discuss positions and in advance of the meeting issued proposed design principles and planting arrangements for the drainage ponds.

The applicant also requested Natural England to attend this meeting, however they expressed that they had reviewed and were satisfied with the draft details as circulated but did not intend to attend and will defer to the LAs. Accordingly, at this time, this position statement does not set out the Natural England position on the matter.

Table 1. Joint Position Statement between the host authorities, the Applicant and Natural England at Deadline 3 (05 October 2021)

The Applicant	Cambridgeshire County Council (including Huntingdon District Council and South Cambridgeshire District Council	Bedford Borough Council	Central Bedfordshire Council
The drainage ponds for the Scheme have been designed as part of the wider drainage design to mitigate significant impacts upon the water environment from the Scheme regarding surface water runoff. Further information on the drainage ponds including the design criteria, catchments areas, proposed collection and conveyance systems,	The Local Authorities require clarity about how attenuation pond 83 will be restored to mitigate the permanent habitat loss.	The Local Authority agrees.	The Local Authority agrees.

The Applicant	Cambridgeshire County Council (including Huntingdon District Council and South Cambridgeshire District Council)	Bedford Borough Council	Central Bedfordshire Council
attenuation requirements and water quality measures are presented as part of the application in Appendix 13.2 Drainage Strategy Report [APP 219].			
The applicant agrees to integrate the planting principles and planting scheme into a technical note to inform the examination of changes to the Landscape and Ecological Management Plan (LEMP), Annex L of the First Iteration Environmental Management Plan [APP-234], presented as part of Annex A of this position statement.	The Local Authorities request that Annex A be updated with the proposed enhancements to the existing pond.	The Local Authority will review Annex A and provide an updated position.	The Local Authority will review Annex A and provide an updated position.

Appendix 2

Comparison showing the changes between 9.41 Joint Position Statement with Natural England and the Local Authorities on Drainage Ponds [REP3-026] and the Cambridgeshire Authorities' position

This position statement has been produced to address Action 2 of Issue Specific Hearing 3 held on 24 September 2021, which requires the “Applicant, NE and Local Authorities (LA) to provide position statement on details of drainage ponds, including intended design principles and planting arrangements”.

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<p>The drainage ponds for the Scheme have been designed as part of the wider drainage design to mitigate significant impacts upon the water environment from the Scheme regarding surface water runoff. Further information on the drainage ponds including the design criteria, catchments areas, proposed collection and conveyance systems, attenuation requirements and water quality measures are presented as part of the application in Appendix 13.2 Drainage Strategy Report [APP 219].</p>	<p>The Local Authority agrees. The Local Authorities require clarity about how attenuation pond 83 will be restored to mitigate the permanent habitat loss.</p>	<p>The Local Authority agrees.</p>	<p>The Local Authority agrees.</p>
<p>The applicant agrees to integrate the planting principles and planting scheme into a technical note to inform the examination of changes to the Landscape and Ecological Management Plan (LEMP), Annex L of the First Iteration Environmental Management Plan [APP-234], presented as part of Annex A of this position statement.</p>	<p>The Local Authority will review Annex A and provide an updated position. The Local Authorities request that Annex A be updated with the proposed enhancements to the existing pond.</p>	<p>The Local Authority will review Annex A and provide an updated position.</p>	<p>The Local Authority will review Annex A and provide an updated position.</p>

Summary Report	
Title	pdfDocs compareDocs Comparison Results
Date & Time	13/10/2021 09:31:00
Comparison Time	0.23 seconds
compareDocs version	v4.3.400.130

Sources	
Original Document	A428 Attenuation Basin position statement v4.docx
Modified Document	A428 Attenuation Basin position statement v4 LAs GB and DA 8 Oct 2021.docx

Comparison Statistics	
Insertions	0
Deletions	0
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Moves	0
Font Changes	0
Paragraph Style Changes	0
Character Style Changes	0
TOTAL CHANGES	2

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<u>Moves / Moves</u>	
Font Changes	
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Deleted cells	
Merged cells	
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Comments color	By Author.
Balloons	False

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Show Track Changes Toolbar	Word	True
Show Reviewing Pane	Word	True
Update Automatic Links at Open	Word	[Yes / No]
Summary Report	Word	End
Detail Report	Word	Separate (View Only)
Document View	Word	Print
Remove Personal Information	Word	False