

## Comments on the Applicant's comments on Local Impact Reports

This document sets out the comments on the Applicant's comments on Local Impact Reports by Cambridgeshire County Council (**CCC**), Huntingdonshire District Council (**HDC**) and South Cambridgeshire District Council (**SCDC**) (together, the **Councils**). The table below sets out the topic, question number and the Interested Party that the Applicant's comment responds to, together with the Councils' comment.

Except where expressly stated otherwise below, the Councils reiterate and rely on their comments submitted to the ExA at Deadline 1, Deadline 2 and Deadline 3.

### REP2-003 – Cambridgeshire County Council, Huntingdonshire District Council and South Cambridgeshire District Council

Topic	Reference Number	Councils' Comment
Local Impacts	REP2-003b	<p>National Highways (NH) repeat the argument that overall St Neots sees a reduction in traffic as a result of the proposed scheme and therefore, there is no need for them to undertake any further assessment. They also state that they plan to monitor and manage the SRN but do not intend to monitor the impacts of the scheme on the LRN as this would be the responsibility of the LHA.</p> <p>The Councils have asked for the assessment of the adjacent junction on Great North Road and Cambridge Road St Neots to ensure that they can accommodate the predicted increase in traffic as a result of the introduction of the scheme. Without this assurance that the LRN can accommodate the predicted increase in traffic it will not be possible for CCC as LHA to fulfil its duty to maintain the LRN. It is no answer to that point for the Applicant simply to say that the overall impact of the Scheme on the town of is beneficial.</p> <p>If the LRN in these specific locations cannot accommodate the level of traffic predicted as a result of the scheme, then it is very likely that traffic will not reroute away from less suitable routes and the predicted benefits to locations such as St Neots town centre will not be realised.</p> <p>The Applicant is under an obligation to mitigate the effects of the Scheme. It cannot do so if it does not monitor the impacts of the Scheme on the local road network.</p>

		<p>The applicant needs to monitor the impact of the proposed scheme on all the affected road regardless of who they are managed by and will need to introduce measures to mitigate unacceptable or unforeseen impacts as was agreed as part of the A14 legal agreement.</p>
Toseland	REP2-003c	<p>NH state that Monitoring and evaluation of the impacts of the scheme on the local road network is not considered part of the A428 scheme evaluation.</p> <p>The scheme is predicated on reducing the traffic on inappropriate roads on the LRN as well as making the SRN more efficient and therefore the Applicant will need to monitor the performance of the LRN to show that the predicted benefits are being achieved.</p>
Yelling	REP2-003d	<p>NH state that Monitoring and evaluation of the impacts of the scheme on the local road network is not considered part of the A428 scheme evaluation.</p> <p>The scheme is predicated on reducing the traffic on inappropriate roads on the LRN as well as making the SRN more efficient and therefore the Applicant will need to monitor the performance of the LRN to show that the predicted benefits are being achieved.</p>
Eltisley	REP2-003e	<p>NH state that Monitoring and evaluation of the impacts of the scheme on the local road network is not considered part of the A428 scheme evaluation.</p> <p>The scheme is predicated on reducing the traffic on inappropriate roads on the LRN as well as making the SRN more efficient and therefore the Applicant will need to monitor the performance of the LRN to show that the predicted benefits are being achieved.</p>
Cambourne	REP2-003f	<p>NH state that the issues with traffic on School Lane Cambourne will be addressed via a TN at Deadline 4. This is welcomed, the Councils would appreciate advance sight of this note to enable agreement of this issue at the earliest opportunity.</p>
Dry Drayton	REP2-003g	<p>NH state that the scheme adds around 7% of traffic on to the Avenue, Madingley. And that given that the increases as a result of the scheme are not felt to be significant the applicant does not intend to implement mitigation measures at these locations.</p>

		<p>The details of this are set out in [REP3-028], this document has been reviewed by the LHA and comments are provided separately on this, in the Councils' Deadline 4 submission <b>CLA.D4.OS.A.C</b>. This note [REP3-028] indicates that some of the issues in this area are likely to be due to errors in the model coding and therefore the impacts shown in the model may not occur.</p> <p>Due to the issues highlighted in [REP3-028] the Councils require monitoring of the impact of the scheme in Dry Drayton and Madingley.</p>
Madingley	REP2-003h	See the response to REP2-003g above.
Coton	REP2-003i	<p>The Councils note that in this case where a review of the model has been carried out, it has been confirmed that the model's outputs on the local road network were not accurate. The Applicant states "It should be borne in mind that the model is a strategic traffic model and therefore cannot be expected to replicate flows on local routes particularly where route choice may be finely balanced." This lends weight to the points made by the Councils regarding the need for further modelling in relation to the local network, see for example paras 2.4 onwards in REP1-048 and REP2-003b.</p> <p>NH's response to this issue is to include extracts from the Technical Note (TN) 'Traffic Routeing Impacts at Coton' [REP1-028] that was submitted at Deadline 1. This note has been reviewed by the Councils and comments were provided at Deadline 3.</p> <p>The Applicant recognises the sensitivity of the route through Coton and will consider implementing a monitoring arrangement to determine whether the traffic flows through Coton increases due to the scheme. This commitment to monitor is welcomed.</p>
Local Junction Impacts	REP2-003j and REP2-003k	The comments on this section are covered by the review of <b>REP3-029</b> contained in the Councils' Deadline 4 submission <b>CLA.D4.OS.A.C</b> .
Construction traffic	REP2-003l	The penalty applied to HGV traffic in the model to discourage use of in appropriate routes is confirmed to be 9,999 seconds. This is deemed to be appropriate and should mean that construction traffic (especially HGVs) is not using inappropriate routes through the model.

		<p>With regard to the modelling of re-routed “normal” traffic during construction of the proposed scheme, the modelling undertaken indicates that there will be widespread impacts across the county as a result of the modelling methodology used. Whilst it is acknowledged that this is potentially showing the worst-case scenario in the absence of any other information the Councils require a monitoring regime to be put in place to try and minimise the impact of re-routing traffic on the LRN and communities that border these roads.</p> <p>The level of increase of traffic through the villages listed in the table remains a concern and highlights the need for a monitoring regime to be put in place.</p>
Landscape and Visual Impact	REP2-003n	<p>The Applicant states “<i>We welcome the Cambridgeshire authorities view that the extensive areas of mitigation planting will enhance the local and national landscape character. This supports our case that additional planting is not required.</i>” The fact that adequate mitigation planting has been provided in places along the proposed route does not negate the fact that other areas would benefit considerably from additional planting. This is an outstanding area of disagreement for which the councils have previously stated their case.</p>
Bare Ground	REP2-003t	<p>Details of the locations of areas to be left as bare ground would be helpful to make this assessment as the applicant’s response does not define what ‘small areas’ are.</p>
Missed Opportunities	REP2-003x	<p>The response to our comments, particularly around species is disappointing. The applicant obviously has no intention of changing any plant lists in a collaborative approach to landscape design for the areas in question. We feel this is a very negative approach and will not result in a characteristic or climate resilient landscape.</p>
Cultural Heritage – negative impacts	REP2-003z	<p>8.2.5 – Negative impacts during construction: There are two matters that remain in dispute here: “intentional loss of evidence” and aspects of “unenclosed settlement”.</p> <p>“Intentional loss of evidence” will occur if no, or disproportionate levels of excavation are enabled. This is what CCC disputed in relation to the original Archaeological Mitigation Strategy (AMS) and hopes to find changed in the updated version of the AMS [TR010044/EXAM/9.23] and the Written Representation [TR010044/EXAM/9.21].</p>

		<p>“Unenclosed settlement” denotes the form of settlement prior to enclosed form (with large embounding ditches) in the Middle-Late Iron Age. As we are looking to define the earliest date of the pioneer settlers on the clay plain west of Cambridge and knowing that there is indication of earlier prehistoric activity on some sites in the locality (notably at Wintringham Park’s compound area for the A428 scheme - Site 14 Field 59 where later Bronze Age cremation cemetery has been found in the last month, earlier forms of settlement pre-date the enclosed form in the early works A428 site at Site 7 Field 44 and Late Bronze Age occupation was found at Site 17 Field 70), and based on the 3% evaluation trench sample of the scheme area, we cannot realistically say that there are no unenclosed settlement forms present - so the Applicant’s assertion is not accepted. Iron Age features, not closely dated, lying north of the large Iron Age enclosure at the east end of Site 18 Field 74, and east of the Iron Age elements within the main settlement core of the same site, are candidates for this early form of unenclosed living. This is a published regional research question (East of England Regional Research Framework for the Historic Environment – e.g., “LBA-MIA 07: What can we infer about the relationship between open and enclosed settlements?” as well as being a key research objective of the updated AMS (see 4.3.1 and 4.4 especially but not solely 4.4.11.c) and requires testing in the new opportunity afforded by the A428 scheme traversing the clay plain.</p> <p>The updated AMS [TR010044/EXAM/9.23] indicates at 1.5.6 that the Local Authority Curators “will monitor the fieldwork to ensure that it is carried out to the required standard and specification as set out in this AMS and the SSWSIs, and ensure that it will achieve the desired aims and objectives.” It is important to note that we monitor schemes to be compliant with the levels of excavation set out in the local authority brief. We do not approve mitigation strategies or Site-Specific Written Schemes of Investigation that fall below our standards as we would consider excavation areas that do not conform to those prescribed by us, and which exclude known archaeological evidence, to subject archaeological remains to unrecorded loss, falling foul of NPSNN policies 5.139-140 and 5.142. Further to this, we continue to reject the statement made at 2.1.2 and 2.1.3.c [TR010044/EXAM/9.23] regarding the lack of excavation afforded to some archaeological remains/site areas and stress that our opinion was not sought on this matter, the Applicant preferring to consult an academic steering panel, many members of whom do not know Cambridgeshire’s and Bedfordshire’s archaeological resource in the detail required. This</p>
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		<p>approach is discordant with usual professional engagement and unacceptably subjects aspects of the archaeological resource of the A428 to unrecorded loss.</p> <p>8.2.6: We disagree with the interpretation of undated features (e.g., at Site 11) and the rationale of closely defining the site excavation areas based datable material gained from the 1m wide excavation slots in 2m wide evaluation trenches. We disagree with the exclusion of structural features (Site 19) on the grounds that it does not meet the research aims when these expressly deal with unenclosed aspects of sites and their hinterlands in the AMS [TR010044/EXAM/9.23, e.g., 4.4.8, 4.4.10). Site 14 in Wintringham Park has now been excavated by Urban and Civic’s archaeologists, finding an anomalous Bronze Age cremation cemetery within an Iron Age settlement simplistically described in AMS Table 5.1 as “trackway and Iron Age features”. This site can be excised from the A428 scheme as it will not feature in its detailed analysis but be part of a separate development-led investigation programme.</p> <p>We welcome the use of other mechanisms that are in place to enable areas such as Site 23 to expand should further evidence be found but consider this to pose an unplanned risk upon the financial settlement for the archaeology programme. The Applicant’s response denies any interpretation of why apparent isolated features occur in the prehistoric landscape.</p> <p>Site 24’s constrained area of excavation along a string boundary ignores emerging understanding of how the hinterlands of these new types of sites behave – based on evidence discovered at TEA 5 on the A14 scheme.</p> <p>The Applicant appears overly confident in the interpretation of archaeological remains based on 3% evaluation sample of the scheme and stands to misinterpret ‘blank areas that occur <i>within</i> archaeological sites, seeing these as areas where evidence ends, rather than where evidence and the use of space within ancient settlements is different. This is discordant with the rationale and the research aims that seek to address the gaps and weaknesses of our understanding and limits the strategy to dealing with obvious and features in core areas.</p> <p>8.2.7: This statement is welcome.</p>
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Cultural Heritage – missed opportunities	REP2-003aa	<p>8.2.10: The Applicant is reminded of the carbon cost of moving large collections of unwashed and unprocessed materials and should enable ‘dirty’ work to occur within the scheme footprint.</p> <p>8.2.11: The Applicant states that certain aspects of the strategy have been raised for the first time. We would remind them that the AMS would have benefitted from consultation with the local authority Curators before submitting the DCO application.</p> <p>8.2.12: For a scheme that is showcasing a significant Public Archaeology and Community Strategy with innovative approaches to this and other aspects of work, it is not an unreasonable statement for local authorities to make, seeing that we are tasked to support communities and their interests however we can.</p> <p>8.2.13: This is an acceptable comment in terms of ‘normal practice’, but we have all learnt the lessons of the A14 scheme the hard way and with regard to this aspect seek to improve communication with partners and stakeholders on all future infrastructure schemes.</p>
Ecology – negative impacts during construction	REP2-003ac	<p>Our comments work set out in REP2-003 still stand until the Applicant has provided the findings of the 2021 species and habitat survey work. We welcome the Applicant’s commitment to provide this evidence by Deadline 4.</p> <p>8.3.18 – 8.3.19: The Applicant has referred to Questions 1.3.3.1 of REP1-122, which identified an overall increase in hedgerow. However, the updated BNG Assessment using Defra 2.0 [<b>REP3-012 &amp; REP3-013</b>] confirms the scheme will result in an overall 31% loss of hedgerow (biodiversity units).</p> <p>8.3.20 – 8.3.21: The Applicant has referred to Questions 1.3.3.1 of REP1-122 which discusses hedgerow, not address the original comments relating to other habitats. Our original comments still stand.</p>



		<p>8.3.22: It is accepted that the proposed Root Protection Area for the veteran tree is adequate.</p> <p>8.3.23: It is noted that the Applicant will provide further survey information for the Protected Road Verge by Deadline 4.</p> <p>A 2021 survey commissioned by Cambridgeshire County Council and undertaken by the Wildlife Trust has confirmed the southern end of the PRV (located adjacent to the proposed A428 works) contained populations of Betony, <i>Betonica officinalis</i> and Common Valerian <i>Valeriana officinalis</i>. Both species are in the 'Draft Rare Plant List of Cambridgeshire (vc29)<sup>1</sup>' as Endangered and Vulnerable, respectively, at a county level. And therefore, consider it important that the PRV is adequately protected during the A428 works. Currently, there is no provision within the first iteration EMP to protect the PRV during construction.</p> <p>8.3.26: We welcome the explanation of terrestrial survey work undertaken. Our concern still stands that the impact of the scheme on light-sensitive invertebrate species is still unknown. Artificial light can disrupt their behaviour and have an impact on the wider landscape and their predator species (e.g. bats).</p> <p>If no further terrestrial survey work is to be undertaken, then the applicant must assume the worst-case scenario and that an impact is likely. The applicant must demonstrate how such impacts will be adequately mitigated through the lighting scheme design.</p>
Ecology – missed opportunities	REP2-003ad	<p>8.3.31: The Councils seek confirmation that elm species will be included within the planting mix.</p> <p>8.3.33: It is noted that net gain is not presently a requirement for NSIPs, but the Councils also note that the Government recently amended the Environment Bill currently before Parliament to apply biodiversity net gain requirements to nationally significant infrastructure projects, by reference to the applicable national policy statement. The National Policy</p>

<sup>1</sup> <https://legacy.bas.ac.uk/met/jds/cnhs/vc29%20RPCC.pdf>



		<p>Statement for National Networks requires the Secretary of State to consider whether the applicant has maximised opportunities for biodiversity (5.33).</p> <p>It is important that local policies are also considered:</p> <ul style="list-style-type: none"> <li>• South Cambridgeshire Local Plan Policy NH/4 and Huntingdonshire Local Plan Policy LP 30 seek biodiversity net gain / enhancement, wherever possible; and</li> <li>• Policy 20 (borrow pit restoration) of the Cambridgeshire &amp; Peterborough Minerals and Waste Plan requires delivery of biodiversity net gain.</li> </ul> <p>While the BNG Assessment using Defra 2.0 [REP3-012 &amp; REP3-013] identifies a net gain in biodiversity for habitat areas (16%) and river (10%), the BNG metric highlights the scheme does not adequately compensate for the loss of hedgerow (31%) or loss of habitats high and medium distinctiveness, resulting in a net loss of biodiversity.</p> <p>Furthermore, it is unclear how the scheme meets the requirement of NPS for National Networks to address (paragraph 5.25) <i>“where significant harm cannot be avoided or mitigated, as a last resort, appropriate compensation measures should be sought”</i>; South Cambridgeshire Local Plan policy NH.4 <i>“(2) New development must aim to maintain, enhance, restore or add to biodiversity”</i>; and Huntingdonshire Local Plan policy LP 30 <i>“A proposal will ensure no net loss in biodiversity”</i>.</p> <p>8.3.37: The Councils disagree with the applicant’s position. The Applicant should have designed a scheme that adequately protected and mitigated loss of priority habitat, including arable field margins, as part of their design. The Biodiversity Net Gain assessment shows the scheme will result in the loss of arable field margin habitat [REP3-013].</p> <p>Had the Councils been made aware of the presence of important arable field margins within site compounds prior to submission, we would have raised concerns at the supplementary consultation stage.</p> <p>8.3.43: Our previous comments still stand. We recognise that the scheme will deliver some biodiversity net gain benefits. However, the scheme does not adequately compensate for</p>
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		the loss of hedgerows or loss of habitats of high / medium distinctiveness, as highlighted in the Biodiversity Net Gain Metric 2.0 calculations [REP3-013].
Noise and vibration	REP2-003af	<p>In relation to the Applicant’s response to 8.4.13, regarding the two main areas that will be affected by construction noise within the Huntingdonshire area during the night, namely the Potton Road junction and the Cambridge Road junction, the applicant indicated that, whilst the night-time noise levels would be above the SOAEL at these properties, the duration of such events would be short and not cause any significant adverse effects. The following noise sensitive properties were identified as not being subjected to a significant adverse effect during the night:</p> <p>R20 Parkers Farmhouse (including Bungalow at Parkers Farm), R21 – Rectory Farm Cottage, R23 A and B – 1-2 Rectory Farm Cottages, R25 – Greyholme, R27 – Wintringham Cottages and R28 – Wintringham Hall.</p> <p>Reference is made to paragraphs 11.9.8 to 11.9.11 of Chapter 11, Noise and Vibration [APP-080]. However, three or four of these dwellings have been predicted to experience a “major impact”, for example: <b>R20</b> 6dB above the SOAEL for one month. <b>R23B</b> 4dB above the SOAEL for two months (moderate impact – perhaps major?). <b>R25</b> 4dB above SOAEL for one month and 5dB and 9dB above the SOAEL for two months. <b>R28</b> 8dB above the SOAEL for one month. Furthermore, it is quite often the case that these dwellings have to undergo a “moderate impact” for an additional month. The four dwellings R20, R23B, R25 and R28 should be considered for mitigation works under the Noise Insulation Regulations.</p>
Noise and vibration – operational impacts	REP2-003ah	The Applicant’s response to 8.4.15 is correct in that paragraph 11.9.76 of Chapter 11, Noise and Vibration [APP-080] states moderate and major decreases are predicted.
Climate – positive impacts	REP2-003al	The Councils welcome National Highways commitment to including further detail on greenhouse gas mitigation measures in the next iteration of the EMP. We do, however, wish to reserve the right to provide further comment once we have seen that further detail.
Climate – negative impacts	REP2-003am	The Applicant's response does not address the following statement from the LIR (para 8.6.4) “accompanied by proportionate investment in EV charging infrastructure and in active travel and public transport”. The Councils consider this to be a missed opportunity. It also

		<p>does not address the point made by the Committee on Climate Change regarding demonstrating the proposals would not lead to increases in overall emissions. While we recognise that the emissions from the project are small in the context of the sixth carbon budget, and that further opportunities to mitigate greenhouse gas emissions will be identified, there are still emissions associated with the project. We would welcome further information as to whether remaining emissions will be subject to carbon offset.</p>
Climate – missed opportunities	REP2-003an	<p>The Councils welcome National Highways commitment to including further detail on greenhouse gas mitigation measures in the next iteration of the EMP. We do, however, wish to reserve the right to provide further comment once we have seen that further detail. With regards to the final comment “The Applicant does not intend to include ultra-rapid charge point infrastructure as part of the Scheme” the Councils consider this to be disappointing and no reason is given as to why ultra-rapid charging points will not be considered. This approach is contrary to the commitment to supporting the role out of 6,000 ultra-rapid charge points on the strategic road network made in Decarbonising Transport.</p>
Pedestrians, Cyclists and Equestrian travellers – negative impacts	REP2-003ap	<p>8.7.6: The difference is accounted for in most of the paths affected crossing parish boundaries resulting in the difference of counties. It should be noted that addition to the routes listed in the applicant’s response, bridleway 74/6 will also be impacted on a temporary basis.</p> <p>8.7.7: This is an inadequate response and unsatisfactory. There must be a commitment to make sure that NMU users are not disadvantaged for longer periods than road users. Breaking people’s habits can result in them discontinuing travel on foot and bicycle when a route is reopened, detrimentally affecting mental and physical well-being. Therefore, closure must be minimised.</p> <p>8.7.8 - 8.7.9: Noted.</p> <p>8.7.10: The response given by the Applicant does not provide any reassurance that flooding issues on PROW created by the construction will be resolved adequately.</p>

		<p>8.7.11: We object to the Applicant’s assertion that the mitigation provided is proportionate and reasonable. The net additional length of PROW provided in Cambridgeshire (4.13 Km) is minimal and is primarily the result of a 2km-long diversion of FP 278/7, which is a negative impact on the users of that route. The requirement in the NPS (3.3) is to ‘avoid and mitigate environmental and social impacts in line with the principles set out in the NPPF.’ The NPPF states that ‘opportunities to promote walking, cycling and public transport use are identified and pursued;’ (104 c) The NPS (3.17) also states that ‘The Government also expects applicants to identify opportunities to invest in infrastructure in locations where the national road network severs communities and acts as a barrier to cycling and walking, by correcting historic problems, retrofitting the latest solutions and ensuring that it is easy and safe for cyclists to use junctions’ and that (5.205) ‘Applicants should consider reasonable opportunities to support other transport modes in developing infrastructure. As part of this, consistent with paragraph 3.19-3.22 above, the applicant should provide evidence that as part of the project they have used reasonable endeavours to address any existing severance issues that act as a barrier to non-motorised users.’ The Councils consider that the lack of a safe NMU route between St Neots and Cambourne, connecting settlements along this corridor, and lack of safe crossing provision of the current A428 are existing severance issues that should be addressed as part of the DCO. Given recent government policies and publications on active travel and carbon reduction NH should be implementing high quality NMU infrastructure that at least meets the requirements of LTN 1/20 rather than CD143 quoted which has not been updated to accord with recent guidance such as CD 195.</p> <p>8.7.12: We disagree with the statement on improvements being limited to the sections where NMU routes are severed or disrupted. The ‘Connecting Our Customers 2020-21’ Highways England publication also states that they will: “work with our partners and stakeholders to improve how our roads connect with other transport modes and networks by providing more sustainable options for our customers.” The Councils expect to see National Highways committing to this in practice as well as in guidance.</p> <p>8.7.13: The answer is inadequate and does not address how the A428 scheme aligns with CCC policies [REP1-048 – 6.3].</p>
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		<p>8.7.14: The answer is inadequate and does not address how the A428 scheme aligns with CCC policies [REP1-048 – 6.2.2b-d, and 6.3].</p> <p>8.7.15: The answer is inadequate and does not address how the A428 scheme aligns with CCC policies [REP1-048 – 6.2.2 b-d].</p> <p>8.7.16 a): We request that both the location and type of signalised crossings is provided, noting that our expectation is that the roadside NMUs will be open to pedestrians, cyclists and equestrians.</p> <p>b): We welcome the removal of the localised high point in the terrain which will make the passage for footpath users easier.</p> <p>c): The applicant has not responded to the comments made regarding the request to provide adequate screening for the diverted route.</p> <p>d): We request that both the location and type of signalised crossings is provided, noting that our expectation is that the roadside NMUs will be open to pedestrians, cyclists and equestrians.</p> <p>e): We request that both the location and type of signalised crossings is provided, noting that our expectation is that the roadside NMUs will be open to pedestrians, cyclists and equestrians.</p> <p>g): The answer is inadequate and does not address the concerns over the impacts of the A428 scheme on the current rural nature of the area [REP1-048 – 6.2.6 d (iii)].</p>
<p>Pedestrians, Cyclists and Equestrian travellers – missed opportunities</p>	<p>REP2-003aq</p>	<p>8.1.17: The current A428 is currently unsuitable for equestrian users due to the high volume and speed of traffic. Once through traffic is diverted onto the proposed new A428, then the usage by equestrians (and cyclists and pedestrians) will increase and so the evidence of horse riders not using the current route is not a reasonable basis upon which to make assertions on future usage.</p>

		<p>8.7.18: The response does not address the point that it would be quicker and more cost effective to implement as part of the scheme. Since the area is within the DCO boundary the Applicant will have the ability to use the land required, whereas the County Council would have to go through an additional time-consuming and expensive approach to achieve the same result.</p> <p>8.7.19: We reject the Applicant's response referring to RR-013bn in the Applicant's Response to Relevant Representations [REP1- 021]. It is a general statement and does not address the issue of the 600 metre Eltisbury–Caxton Gibbet Junction link NMU gap.</p> <p>8.7.20: Whilst the bridleway would initially be isolated, it would future proof the aspirations to create an east-west bridleway link that will serve as a key access route from St Neots and the new Wintringham Park development to the countryside and villages to the east.</p> <p>8.7.24: We reject that that is out of the scope of the scheme. It is within the dDCO boundary and should be able to be accommodated. Furthermore, the footway should be upgraded to an NMU open to walkers, cyclists and pedestrians.</p> <p>8.7.25: Noted.</p> <p>8.7.26: We reject the applicant's response since it does not address the issue raised.</p> <p>8.7.27: The Streets, Rights of Way and Access sheet 14 (APP-013) with part 7 schedule 3 shows points 14/8- 14/9 as being footway which is before the filling station entrance not at the entrance as stated in the applicant's comment. This section should be a shared footway/cycleway so that it can be reached by residents from Cambourne who either work at or wish to use the facilities at the services.</p> <p>8.7.28: CCC asserts that the NMU link was not provided as part of the earlier Cambridge to Caxton Gibbet scheme, and by not including the Caxton Gibbet to Black Cat scheme the result will be a significant gap in the NMU provision connecting Cambridge to destinations west of Cambourne. The County Council does not agree with the suggestion that the proposed link between St Neots and Cambourne is too far to be a commuter route. Indeed, the absence of an off-carriageway provision alongside the A428 at the current time is an</p>
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		<p>inhibitor to cycling in the St Neots-Cambourne corridor. Within Cambridgeshire, distances of around 10 miles do not represent uncommon commutes. The 2017 Cambridgeshire Travel Survey reported that 16% of commuter journeys into Cambridge from surrounding communities were made by bicycle, i.e. over longer distances than typical intra-urban journeys<sup>2</sup>.</p> <p>Furthermore, the WCHAR [APP-241 Appendix 8.1] acknowledges at section 2.1.4 that commuter cycle journeys of over 5 miles are not uncommon. The Cambridgeshire Travel Survey, along with the County Council's cycle count data, also provide strong evidence that the provision of good off-carriageway facilities promotes commuter and leisure cycle trips over longer distances. For example, the Travel Survey demonstrates a strong trend of cycle movements into Cambridge via the Guided Busway Bridleway<sup>3</sup>, a long distance off-road route that links the city to surrounding communities. This is backed up by the high cycle count levels recorded along the Busway Bridleway at varied counter locations<sup>4</sup>. Indeed, further studies have reviewed the use of the Guided Busway and provide empirical evidence to support the argument that providing high quality new infrastructure will increase the propensity of nearby residents to walk or cycle<sup>3</sup>. Alongside this, there is the clear benefit of enhancing the off-carriageway connectivity to the villages alongside the current A428. Most notably the villages of Eltisley and Croxton would benefit from active travel links to local facilities, particularly employment and education, at Cambourne, and also to the market town of St Neots and its train station.</p>
<p>Flooding and Water – negative impacts</p>	<p>REP2-003as</p>	<p>The Applicant's response to 8.8.5 is noted that there are no proposals for the inclusion of oil interceptors, which is supported by the LLFA. However, we note that there are still proposals for the use of vortex flow separators, which are still classed as proprietary treatment. The LLFA is still of the opinion that the treatment could be provided through natural means, such as suitable planting within the basins. It is still not clear whether this has been considered. The use of suitable planting would also provide a betterment to the biodiversity from the scheme.</p>

<sup>2</sup> <https://data.cambridgeshireinsight.org.uk/story/data-story-series-what-we-know-about-cycling-and-around-cambridge-episode-one>

<sup>3</sup> Ogilvie D, Panter J, Guell C, Jones A, Mackett R, Griffin S. Health impacts of the Cambridgeshire Guided Busway: a natural experimental study. Southampton (UK): NIHR Journals Library; 2016 Jan. PMID: 26764445. <https://pubmed.ncbi.nlm.nih.gov/26764445/>

<sup>4</sup> <https://data.cambridgeshireinsight.org.uk/dataset/cambridgeshire-annual-cycle-counts-2018/resource/f6d87fcf-6b88-49ab-a10b-6cf966b47f1c>



		<p>8.8.6: It is accepted that the basins are designed to provide attenuation for the greenfield QBar and the LLFA does not have any concerns regarding this. It is however a concern if the flow controls are to be increased to 5 l/s as suggested within the Drainage Strategy Report. The report is setting out the principles of the scheme. While it is not a concern if the discharge rates are higher than greenfield equivalents where increases are necessary, these should still be as close to the greenfield runoff as possible. In some of the smaller catchments, increasing the runoff rate to 5 l/s could be a large increase compared to the greenfield equivalent.</p> <p>8.87: On pages 109-110 of document TR010044/EXAM/9.22, the applicant states that it notes "the authorities request for clarity regarding the adoption and ongoing maintenance body for the proposed surface water features. As these features will form part of the highway assets to be handed over, these elements will be addressed as part of the ongoing discussions on this point and any agreement reached will be set out within the legal agreement to be completed between the parties". CCC reiterates its position from Written Representation [REP1-048], paragraphs 3.4 to 3.33. Any features that are not essential to the maintenance and operation of new local highways should not by default be considered to be 'adoptable' by the LHA. Specifically, in relation to surface water drainage, any system that does not serve highway drainage should not be assumed to form part of an asset that CCC will maintain.</p>
Minerals and Waste – negative impacts	REP2-003au	<p>The Applicant's response is noted. The Cambridgeshire and Peterborough Minerals and Waste Plan was in development for a number of years and had been subject to several public consultations prior to adoption. The consultation of Proposed Submission version of the plan commenced in November 2020, at which time a fair level of certainty and confidence could be attached to the broad direction of the content of Policies 7 and 19, particularly as their content strays little from their predecessors in the Cambridgeshire and Peterborough Minerals and Waste Core Strategy (2011). The omission of consideration of emerging policy would appear to not be in accordance with paragraph 5.173 of the National Policy Statement for National Networks.</p> <p>Paragraph 5.173 of the National Policy Statement for National Networks sets out that where the project conflicts with a proposal in a development plan, the Secretary of State should</p>

		take account of the stage which the development plan document has reached in deciding what weight to give to the plan for the purposes of determining the planning significance of what is replaced, prevented or precluded. The closer the development plan document is to being adopted by the local plan, the greater the weight which can be attached to the impact of the proposal on the plan.
Economy – negative impacts	REP2-003aw	Please see the response given in REP2-003b – NH acknowledges the increase in traffic on Cambridge Road with the suggested AADT increase around 24% and peak hour increases of approximately 200PCUs. Our concerns remain about access to and from St Neots station supporting the return of commuter traffic and the flow of local and regional business traffic at St Neots East. The Applicant's response does not adequately address the original point made in 8.10.7.

### REP2-002 – 3.1 Applicant's comments on the local policy assessment undertaken by CCC/HDC/SCDC

Topic	Reference Number	Councils' Comment
Borrow Pits – Policy Assessment	Policy 7 Borrow Pits, Policy 19 Restoration and Aftercare	<p>This response cross references to the Councils' D4 submission <b>CLA.D4.WQ1.AC.C</b>, <i>Comments on the Applicant's comments on other parties' response to WQ1</i>, Q1.6.2.1 Borrow Pits. The content below is identical save for the omission of the last two paragraphs which are not relevant to this response.</p> <p>The following comments relate to 9.22 Applicant's Comments on Local Impact Reports [TR010044/EXAM/9.22 page 122] in relation to the Policy Assessment of Policies 7 and 19 of the Cambridgeshire and Peterborough Minerals and Waste Local Plan (2021):</p> <p>[Applicants Comment on Non-compliance with Policy 19 – “<i>The biodiversity requirements of the National Policy Statement for National Networks (NPSNN) apply on a scheme-wide basis and do not require specific provision to be made for individual elements such as borrow pits as if they were applications made in their own right at a local level..</i>”]</p> <p>The Applicant's comments in respect of Policy 19 raise two concerns:</p> <ol style="list-style-type: none"> <li>1. While the Applicant may be correct in stating that the biodiversity requirements for the NPSNN apply on a scheme wide basis, the same is also true of paragraph 5.33</li> </ol>

		<p>of the NPSNN which requires the Secretary of State to consider whether the applicant has maximised opportunities for building in beneficial biodiversity or geological features as part of the design. Given that no attempt has been made to undertake an assessment of the development against Policy 19 or an assessment of what opportunities, particularly in relation to biodiversity, may be present, it is not possible for the applicant to demonstrate they have maximised these opportunities.</p> <p>2. The assertion that individual elements of a NSIP scheme should not be held to the same standard as other smaller developments, implies that the Applicant is content to promote a scheme in the knowledge that certain parts of the development, if they were to be assessed against local policy, would not be acceptable. Where this is the case, it is important that a proposal is designed so that it is as close to being in accordance with policy as possible. In the context of point 1 above, this does not appear to have been achieved, and consequently it cannot be demonstrated that the most sustainable solution has been presented.</p> <p>The Council is of the view that through assessment of policy and options for restoration, biodiversity gains may be identified. These may be large in form for set-aside habitats, or small in the form of hedgerow planting or specific agricultural treatment of the restored land. The Council also wishes to highlight that paragraph 5.33 of the NPSNN states that the Secretary of State may use requirements or planning obligations where appropriate in order to ensure that such beneficial features are delivered.</p> <p>In the Applicants response to Written Representations [TR010044/EXAM/9.21 Entry REP1-048ck, page 149], the applicant raises Policy 18 (Amenity Considerations) of the Cambridgeshire and Peterborough Minerals and Waste Local Plan (2021). The lack of inclusion in the LIR was an oversight and the Council welcomes its highlighting by the Applicant. As the ExA will note, Policy 18 addresses a number of topics such as noise, dust, light, air quality, disturbance and other matters covered under the general heading of amenity. It states:</p> <p><i>“Proposals must ensure that the development proposed can be integrated effectively with</i></p>
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		<p><i>existing or planned (i.e. Development Plan allocations or consented schemes) neighbouring development. New development must not result in unacceptable adverse impacts on the amenity of existing occupiers of any land or property, including:</i></p> <ul style="list-style-type: none"> <li><i>(a) risk of harm to human health or safety;</i></li> <li><i>(b) privacy for the occupiers of any nearby property;</i></li> <li><i>(c) noise and/or vibration levels resulting in disturbance;</i></li> <li><i>(d) unacceptably overbearing;</i></li> <li><i>(e) loss of light to and/or overshadowing of any nearby property;</i></li> <li><i>(f) air quality from odour, fumes, dust, smoke or other sources;</i></li> <li><i>(g) light pollution from artificial light or glare;</i></li> <li><i>(h) increase in litter; and</i></li> <li><i>(i) increase in flies, vermin and birds.</i></li> </ul> <p><i>Where there is the potential for any of the above impacts to occur, an assessment appropriate to the nature of that potential impact should be carried out, and submitted as part of the proposal, in order to establish, where appropriate, the need for, and deliverability of, any mitigation.”</i></p> <p>The Borrow Pits Excavation and Restoration Report [TR010044/EXAM/9.24] (BPERR) notes the proximity of occupied buildings, including residential buildings and a hotel, at the two sites near Caxton Gibbet, (see BPERR pages 36 and 45). The Council refers to the relevant specialisms to assess whether this policy has been met and directs the ExA and the Applicant to the relevant sections contained within the council’s submission for acceptability of the development against Policy 18. Given the proximity to occupied buildings a robust management plan will almost certainly be required.</p>
Noise and Vibration	Policy CC/6 – Construction Methods	<p>The Applicants comments on pages 132/133 regarding the level of detail at the First Iteration EMP are agreed. However, significantly more detail is expected at the Second Iteration EMP and detailed design documents moving forward. Consequently, the required level of detail has not been provided to date.</p> <p>The Applicant’s response on communication between construction and local residents on pages 142 and is noted.</p>

Cultural Heritage	Policy NH/14	We do not accept the unrecorded loss of heritage assets and selective schemes of archaeological investigation, as this does not maximise knowledge gain but subjects the current known evidence to interpretive bias before the excavations have begun and appears to be a cost saving exercise.
Street Lighting	Page 142	The Council reiterates their view that further detail is required on the Applicant's lighting proposals so that (i) the County Council can be sure that the lighting of road assets to be maintained by the County Council meet the relevant required standards. The Council does also still require the applicant to provide a lighting strategy to secure an acceptable lighting design for both the new assets and those on the sections to be de-trunked.