

Response to ExA's Second Written Questions (WQ2)

This document sets out the response to the Examining Authority (ExA)'s Second Written Questions (WQ2) 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 Councils' response.

Question Number	Question for	Question	Councils' response
Q2.3.2 Biodiversity Net Gain (BNG)			
Q2.3.2.1	Applicant Natural England Local Authorities	<p>Metric for calculating BNG</p> <p>e) NE and LAs, please provide comments on the revised BNG assessment using the DEFRA 2.0 metric, submitted by the Applicant [REP3-012] [REP3-013].</p> <p>f) NE, LAs, Applicant, comment on the DEFRA 2.0 metric net gain of 16.48% Habitat units, the net gain of 9.96% of River units and the net loss of -31.66% Hedgerow units, in contrast to the BNG score of 20.5% using the Highways England Metric. How would you describe the overall impact of the Proposed Development on biodiversity and does this affect the ES conclusions in this regard?</p> <p>g) Applicant, in terms of the DEFRA 2.0 metric scores for Habitat units, River</p>	<p>e): We welcome the revised BNG assessment. However, it does not take into account the 2021 habitat survey work (to be submitted at deadline 4). The Councils request that an updated BNG assessment is submitted once the results of the 2021 habitat survey work are available.</p> <p>The assessment is also based on Phase 1 surveys, rather than UK Habitats classification (required for Defra Metric 2.0), which does not consider the condition of the habitats. Therefore, the assessment is based on assumptions of habitat condition rather than field assessment.</p> <p>Page 7 of the calculations [REP3-013] identifies a number of high and medium distinctive habitats (area) that require further compensation in order to deliver the required number of units to reach no net loss.</p>

		<p>units, and Hedgerow units, does the Proposed Development offer opportunities for further improvements/mitigation, such as those identified in the WQ1 response by the Cambridgeshire Councils [REP1-051]?</p> <p>h) Applicant, what would the BNG score be using the DEFRA 3.0 metric?</p>	<p>f): The results of the Biodiversity Metric [REP3-012] does affect the ES conclusions. Table 8-10 of the Biodiversity Chapter [page 71, APP-077] concludes beneficial effects during operation on hedgerow, ‘ponds and other wetlands’ and woodland. However, this does not accord with the Biodiversity Metric 2.0 calculator [REP3-013] which shows there will be a <u>net</u> loss of habitat (area) of high/medium distinctiveness for these habitats. It also highlights that compensation is required in order to deliver the required number of units to reach no net loss (discussed below). Therefore, the current scheme will have an adverse effect on these habitats and not deliver ‘no net loss’.</p> <p><u>Loss of habitats of medium / high distinctiveness</u></p> <p>The BNG metric 2.0 report [REP3-012] identifies an overall +16% increase of habitat (areas). However, it fails to discuss the fundamental trading error, which will result in a <u>net loss</u> in habitat (area) of high and medium distinctiveness.</p> <p>Rule 3 of the Biodiversity Metric 2.0 – User Guide (page 21) states that “<i>Trading down’ must be avoided. Losses of habitat are to be compensated from on a “like for like” or “like for better basis”. Ideally, new or restored</i></p>
--	--	---	--

			<p><i>habitats should aim to achieve a higher distinctiveness and / or condition than habitats lost””.</i></p> <p>Page 7 of the calculations [REP3-013] shows rule 3 has not been implemented because insufficient habitat of the same distinctiveness (or better) has been proposed. An overall loss of the following habitat has been identified:</p> <ul style="list-style-type: none"> - 117.19 units loss of high distinctiveness, including reedbed, woodland and wood pasture habitats. - 94.84 units loss of medium distinctiveness, including arable field margins (tussocky), mixed scrub, ditches and woodland <p>Page 7 also clearly identified that further compensation is required in order to deliver the required number of units to reach no net loss.</p> <p><u>Compensation</u></p> <p>CCC/HDC/SCDC consider that some, if not all, of the net loss of habitat (areas) and hedgerows could be addressed on-site through:</p> <ul style="list-style-type: none"> - Increasing distinctiveness of proposed habitats (e.g., woodland) - Habitat creation / enhancement within temporary construction areas, including borrow-pits and site
--	--	--	---

			<p>compounds / spoil storage areas, which are currently proposed to return to agricultural land. For example, arable field margins, hedgerows, wood-pasture / parkland, woodland, ditches and reedbed can be easily incorporated into agricultural land.</p> <p>Any residual net loss in habitat (area) and hedgerows should be compensated off-site.</p> <p>The Councils request that the Applicant submits further compensation proposals to address the net loss of hedgerow habitat.</p>
Q2.3.5 Habitat Fragmentation			
Q2.3.5.1	Applicant Natural England Local Authorities	<p>Adequacy of mitigation measures</p> <p>a) At ISH3 [EV-044] the Applicant made reference to five underpasses that may be suitable for bats to use to cross the Proposed Development. Applicants indicate the locations of all these underpasses on the Environmental Masterplan [APP-091], and the associated foraging routes. Explain why they are not all referenced in the Schedule of Mitigation [APP-235, EMB – B9].</p> <p>b) Applicant, confirm whether the crossings listed in the Schedule of</p>	<p>c):</p> <p><u>Bats</u></p> <p>Underpasses for bats are considered more successful than overpasses or wire gantries, although not as successful as green bridges. However, success of bats utilising an underpass varies between different roads. Underpasses that connect along existing commuting corridors and are of sufficient height to minimise disruption to bat flight paths are considered to be more successful (Berthinussen A. & Altringham J. (2015)¹.</p>

¹ Berthinussen A. & Altringham J. (2015) Development of a cost-effective method for monitoring the effectiveness of mitigation for bats crossing linear transport infrastructure. DEFRA report, WC1060

		<p>Mitigation [APP-235, EMB – B9], together with the five underpasses, represent the full extent of mitigation measures proposed for all species of animal.</p> <p>c) NE and LAs to comment on the adequacy of measures in quantitative, qualitative, and locational terms.</p>	<p>The applicant has supplied insufficient evidence to demonstrate how the structures will retain existing bat flight lines and heights adequately to demonstrate they will provide adequate mitigation (as discussed below).</p> <p>In addition, the appropriateness of the structures will not be fully known until the final results of the winter 2021 Barbastelle bat surveys. For example, research in Germany has suggested Barbastelle bats flew over roads more often than through an underpass (Kerth & Melber 2009)² and therefore, it will depend on Barbastelle movements as to whether the underpasses are appropriate mitigation measures.</p> <p><u>Hen Brook</u></p> <p>We note that the dimensions of the proposed underpass are shown on the Engineering Sections – Part 3 drawing [work no. 72, sheet 12, APP-019]. The structure is also shown on Appendix C of the Scheme Design Approach [REP3-014], but it is concerning that bat mitigation is not specifically identified as a ‘key constraint on structure design’.</p> <p>The Applicant’s response to Q1.13.3.1(a) states for Hen Brook underpass “<i>the alignment of which allow bats to pass without</i></p>
--	--	---	--

² Kerth G. & Melber M. (2009) Species-specific barrier effects of a motorway on the habitat use of two threatened forest-living bat species. *Biological Conservation*, 142, 270-279.

			<p><i>changing flight height or direction”</i> (page 167, [REP3-007]. However, the proposed structure will be 7m above existing ground level (page 59, Appendix C, [REP3- REP3-014]) and therefore will result in change to the current flight path/height.</p> <p>The Applicant has provided no evidence has been provided to demonstrate how the structure is specifically designed for bats and how these relate to the current bat flight path and height.</p> <p>The Councils are concerned about the dual purpose of the bat underpass and NMU route. There has been no engagement from the Applicant about the design of the underpass for NMU. In addition, given the length of the culvert it is likely to require lighting (either natural gaps or artificial lighting) to best serve as a NMU route. However, if artificial lighting is required, this will conflict with the Applicant’s statement that there will be no lighting of the bat tunnel or other underpasses (last paragraph, page 165 [REP3-007]). At this stage, insufficient information has been provided to demonstrate they have been successfully designed to address both requirements.</p> <p><u>Pillar Plantation</u></p> <p>We note that the dimensions of the proposed underpass are shown on the Engineering</p>
--	--	--	---

			<p>Sections – Part 3 drawing (work no. 92, sheet 16, [APP-019]). The structure is also shown on Appendix C of the Scheme Design Approach [REP3-014], but it is concerning that bat mitigation is not specifically identified as a ‘key constraint on structure design’.</p> <p>The Applicant’s response to Q1.13.3.1(a) states for Pillar Plantation underpass “<i>the alignment of which allow bats to pass without changing flight height or direction</i>” (page 167, [REP3-007]). It is also concerning that the structure will be 2.5m above existing ground level (page 61, Appendix C, [REP3- REP3-014]), which suggests there will be a change in flight path/height.</p> <p>The Applicant has not provided evidence to demonstrate how the structure is specifically designed for bat and how these relate to the current bat flight path and height.</p> <p>The Councils are concerned about the dual purpose of the bat underpass and NMU route. There has been no engagement from the Applicant about the design of the underpass for NMU. In addition, given the length of the culvert it is likely to require lighting (either natural gaps or artificial lighting) to best serve as a NMU route. However, this conflicts with the Applicant’s statement that there will be no lighting of the bat tunnel or other underpasses (last paragraph, page 165 [REP3-007]). At this</p>
--	--	--	---

			<p>stage, insufficient information has been provided to demonstrate they have been successfully designed to address both requirements.</p> <p><u>Bridleway Accommodation Bridge (north of Croxton Park</u></p> <p>Table 2-1 Chapter 2 – The Scheme [page 52-53, APP-071] identifies Bridleway accommodation bridge (north of Croxton Park) as having “<i>consideration of existing bat flight paths during the development of the preliminary designs of the following structures incorporated into the Scheme</i>” and is shown on the Environmental Masterplan [APP-091] as a “<i>EP.1 Protected Species Bat, badger and other mammals crossing North Farm access track overpass</i>”. However, no details are proposed for this crossing and it is unclear whether it is suitable for bats.</p> <p><u>Toseland Road overbridge (Gallows Brook</u></p> <p>Environmental Masterplan (sheet 11) shows a “<i>EP.1 Protected Species Bat, badger and other mammals crossing Toseland Road overpass</i>” [APP_091]. However, no details are proposed for this crossing and it is unclear whether it is suitable for bats.</p>
<p>Q2.3.6 Aquatic Environment and Biodiversity</p>			

Q2.3.6.1	Environment Agency Applicant Local Authorities	<p>Mitigation measures</p> <p>a) EA, how could the various measures identified under Biodiversity in your RR [RR-036], be addressed by the Proposed Development, such as by updating the dDCO or the First Iteration EMP? Applicant to comment.</p> <p>b) Why are Penstock chambers to be provided for some but not all watercourses? Why are Penstock valves, to restrict pollutants entering drainage channels and waterbodies, not to be provided for these chambers, given the important role of these waterbodies and watercourses for biodiversity, including replacement habitat for GCNs [APP-082, Paragraphs 13.8.6 and 13.8.36, Table 13-7]?</p> <p>c) Include comments from LAs in the Joint Position Statement with the Applicant and NE on Drainage Ponds [REP3-026].</p>	<p>c): The Joint Position Statement [REP3-026] does not include the Councils' comments. Please see commentary in the cover letter submitted at Deadline 4 [CLA.D4.CL].</p> <p>The Local Authorities require clarity about how attenuation pond 83 will be restored to mitigate the permanent habitat loss.</p> <p>The Local Authorities request that Annex A of the Joint Position Statement be updated with the proposed enhancements to the existing pond.</p>
Q2.6. Construction methods and effects			
Q2.6.2 Borrow pits, construction compounds, waste management			
Q2.6.2.1	Local Authorities National Farmers Union The Church Commissioners of England Applicant	<p>Borrow pits</p> <p>a) LAs, NFU and CCE, comment on the Borrow Pits Excavation and Restoration Report [REP3-011] and provide a list of issues relating to size and location, alternatives such as any working quarries, restorations</p>	<p>a): The applicant should ensure any imported infill material is not contaminated.</p> <p>The submission of the Borrow Pits Excavation and Restoration Report [TR010044/EXAM/9.24] [REP3-011]</p>

		<p>and aftercare, biodiversity, and land contamination that remain outstanding.</p> <p>b) Applicant, tabulate all the issues raised regarding borrow pits from the LAs, CCE, NFU and any other IPs, and provide your summary responses to each issue, with signposts to details that are elsewhere in your submissions. Cover the issues raised regarding environmental effects, as well as the CA and TP related matters.</p> <p>c) Applicant, how will the detail contained within the Borrow Pits Excavation and Restoration Report [REP3-011] be secured.</p> <p>d) Applicant, confirm how the Borrow Pits Optioneering Report [APP-246] would be secured in the dDCO.</p> <p>e) Applicant, provide details and a specific update here on the possibility of plots affected by borrow pits to be secured by lease.</p>	<p>(BPERR) is welcomed, however, many of the Council's concerns remain.</p> <p>It is, noted that the policy assessment in the BPERR does not match the Applicant's response to the Local Impact Report (LIR) Policy Assessment, in that no reference is made to Policy 19 or 20 in the BPERR.</p> <p>In the Applicant's response to Written Representations (TR010044/EXAM/9.21 Entry REP1-048ck, page 149) [REP3-008], 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 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: (a) risk of harm to human health or safety; (b) privacy for the occupiers of any nearby property; (c) noise and/or vibration levels</i></p>
--	--	--	---

			<p><i>resulting in disturbance; (d) unacceptably overbearing; (e) loss of light to and/or overshadowing of any nearby property; (f) air quality from odour, fumes, dust, smoke or other sources; (g) light pollution from artificial light or glare; (h) increase in litter; and (i) increase in flies, vermin and birds.</i></p> <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. No explicit reference is made in the BPERR to Policy 18, but the several of the topics contained within the policy are referenced.</p>
--	--	--	--

			<p>The Council reiterates its concern as set out in the Councils Joint Written Representations [CLA.D1.WR paragraph 13.7.3] [REP1-048].</p> <p>Paragraph 5.33 of the NPSNN 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>For reference Policy 19 is as follows:</p> <p><i>“All mineral extraction related proposals, and all waste management proposals which are likely to be temporary in nature, must be accompanied by a restoration and aftercare scheme proposal, secured if necessary, by a legal agreement.</i></p> <p><i>Such a proposal must, where appropriate:</i> <i>(a) set out a phasing schedule so as to restore available parts of the site to a beneficial afteruse as soon as is reasonably practicable to do so, and to restore the whole of the site within an agreed timeframe. Only</i></p>
--	--	--	--

			<p><i>in exceptional circumstances, such as where the afteruse is a reservoir or on very small sites where phasing is not practical, will a non-phased scheme be approved;</i></p> <p><i>(b) reflect strategic and local objectives for countryside enhancement and green infrastructure, including those set out in relevant Local Plans and Green Infrastructure Strategies, in the Local Nature Partnerships vision and strategic proposals, as well as any applicable wider Development Plan objectives;</i></p> <p><i>(c) contribute, if feasible, to identified flood risk management and water storage needs (including helping to reduce the risk of flooding elsewhere) or water supply objectives and incorporate these within the restoration scheme;</i></p> <p><i>(d) demonstrate net biodiversity gain through the promotion, reservation, restoration and recreation of priority habitats, ecological networks and the protection and recovery of priority species populations, linked to national and local targets;</i></p> <p><i>(e) protect geodiversity and improve educational opportunities by incorporating this element within the restoration scheme, by leaving important geological faces exposed and retaining access to them; and</i></p> <p><i>(f) incorporate within the restoration scheme amenity uses, such as formal and informal sport, navigation, and recreation uses.</i></p>
--	--	--	--

			<p><i>Where it is determined that restoring the land to agricultural use is the most suitable option (in whole or part), then the land must be restored to the same or better agricultural land quality as it was pre-development.</i></p> <p><i>In the case of mineral workings, restoration schemes which will contribute to addressing or adapting to climate change will, in principle, be supported e.g. through flood water storage; through biodiversity proposals which create habitats that enhance ecological networks (and thus assist species to adapt to climate change); and/or through living carbon sinks.</i></p> <p><i>Any site-specific restoration and after-care requirements are set out in Policy 2: Providing for Mineral Extraction. Where there is a conflict between this policy and Policy 2, then the provisions of Policy 2 take precedence.”</i></p> <p><i>The BPERR states in 1.2.20 that “The borrow pits will be restored in accordance with the principles set out in Environmental Masterplan [APP-091] which is secured through Requirements 6 and 12 of the dDCO [REP1-003].” Also relevant are requirements 3 and 4 in securing the Second and Third Environmental Management Plan. Requirement 12 Detailed Design requires that the “detailed design for the authorised development must accord with: (a) the</i></p>
--	--	--	---

			<p><i>preliminary scheme design shown on the works plans, the general arrangement plans and the engineering section drawings; and (b) the principles set out in the environmental masterplan</i>". In the context of the lack of adequate assessment of local policy, as highlighted by the lack of reference assessment of relevant policy as shown in the BPERR, such a requirement would be inadequate for securing compliance with local policy.</p> <p>In summary, the following issues remain unresolved:</p> <ol style="list-style-type: none"> 1) Inadequate assessment, consideration of restoration options and consequent non-compliance with Minerals and Waste Local Plan Policy. This has implications for the design, operation and restoration of the Caxton Gibbet borrow pits. 2) In the absence of an assessment against Policy 19, CCC will require the ability to approve the detailed design of the borrow pits and restoration proposals, so that the assessment against Policy 19 can be undertaken when the required detail is available.
--	--	--	--

Q2.6.2.2	Applicant Local Authorities National Farmers Unions	<p>Construction compounds</p> <p>a) The ExA notes and acknowledges that details about the height of hoardings around construction compounds in specific locations should be a matter for agreement with the LAs in advance of installation [APP-234, Paragraph 1.6.2]. However, to have greater certainty about visual and landscape effects and other effects, the ExA is persuaded by the several representations [REP1-043] [REP1-051] [REP1-054] [REP1-055] [REP1-084] stating that the maximum height of any hoardings that may be required in the construction compounds should be secured. Applicant, without prejudice, provide details of how you would determine what the maximum height should be and how would you secure it?</p> <p>b) Applicant and NFU, what details regarding the proposed use of construction compounds have you agreed? What matters remain pending? Have LAs been consulted? What are their views?</p>	b): We have agreed the location of the construction compounds. It is accepted that general use of these compounds will be acceptable, but details of mitigation for noise and dust impacts are due to be confirmed in the 2 nd Iteration of the EMP. No details have since been received. The first Iteration is too high level and general to contain the site-specific details required to be agreed.
Q2.6.3 Environmental Management Plan			
Q2.6.3.2	Applicant	<p>Roles and responsibilities</p> <p>a) Applicant, you have not included 'Community Relations Manager' in the list of [REP1-022, Q1.6.3.3], but</p>	b) The Councils are of the view that the Traffic Management Officer should be employed by the Applicant or their contractor.

		<p>references have been made elsewhere. Has this been omitted in error, provide details?</p> <p>b) Who would employ the Traffic Management Officer?</p>	
Q2.7. Draft Development Consent Order			
Q2.7.1 General			
Q2.7.1.1	Discharging Authorities Local Authorities Applicant	<p>Discharging Requirements and Conditions</p> <p>a) All discharging authorities to check the Schedules in the dDCO for accuracy and provide the ExA with suggested corrections and amendments.</p> <p>b) The Applicant states that discharging authority for all requirements is the Secretary of State, following consultation with other bodies as appropriate, for example the relevant planning authority or relevant local highway authority [REP1-022, WQ1.7.1.3]. Applicant to confirm. LAs to comment.</p>	<p>a) The Councils have submitted comments and suggested amendments to the dDCO at REP3-039. The Councils also highlight a number of inaccuracies in relation to Part 7, Schedule 3 of the dDCO in their Written Representation [REP1-048] at paragraphs 6.6.2 and 6.6.3.</p> <p>In addition, the Councils highlight the following required updates and corrections:</p> <p>(i) Schedule 3-</p> <ul style="list-style-type: none"> - In relation to Part 6, page 89, the location should be described as “<i>from point 102 on Sheet 8 to point 101 on Sheet 9</i>”. - In relation to Part 7, page 91, the new footpath between points 8/1 and 8/2 is noted as being 166m in Schedule 3 and 160m in Schedule 4. - In relation to Part 7, page 91, the new cycle track between 8/4 and 9/1 is stated to be 402m in Schedule 3 and 372m in Schedule 4. - In relation to Part 7, page 92, the new cycle track from 9/2 to 9/3 is stated to be 40m in Schedule 3 and 45m in Schedule 4.

			<ul style="list-style-type: none"> - In relation to Part 7, page 92, the new cycle track from 9/4 to 9/5 is stated to be 199m in Schedule 3 and 191m in Schedule 4. - In relation to Part 7, page 92, the new cycle track from 9/6 to 9/7 is stated to be 234m in Schedule 3 and 228m in Schedule 4. - In relation to Part 7, page 92, the new cycle track from 9/8 to 9/9 is stated to be 95m in Schedule 3 and 101m in Schedule 4. - In relation to Part 7, page 92, the new cycle track from 9/10 to 9/11 is stated to be 54m in Schedule 3 and 58m in Schedule 4. - In relation to Part 7, page 92, the new footpath from 11/5 to 11/6 is stated to be 495m in Schedule 3 and 489m in Schedule 4. - In relation to Part 7, page 92, the footway from 11/6 to 11/17 is stated to be 1033m in Schedule 3 and 1040m in Schedule 4. - In relation to Part 7, page 93, the new cycle track from 14/7 to 14/8 is stated to be 140m in Schedule 3 and 149m in Schedule 4. <p>(ii) Schedule 4 –</p> <ul style="list-style-type: none"> - In relation to Part 2, page 104, Reference FA, Sheet 6 of the Streets, Rights of Way and Access Plans [APP-013] appear to show the entirety of the highway on the west of the new dual carriageway, rather than finishing on the east. - In relation to Part 2, page 107, Reference IB, the proposed highway is also shown on Sheet 8 of the Streets, Rights of Way and Access Plans [APP-013].
--	--	--	---

			<p>(iii) Schedule 10 –</p> <ul style="list-style-type: none"> - A number of updates have been proposed to the First Iteration Environmental Management Plan [APP-234], for example, to incorporate the Scheme Design Approach and Design Principles document [REP3-014]. Schedule 10 will need to be updated to refer to the revised version once submitted. - Reference to the environmental statement should include documents 6.4 to 6.13 [APP-230 to APP-239]. - Reference to the archaeological mitigation Strategy should be updated to refer to REP3-010. - Reference to biodiversity pre-commencement plan should be amended to pre-commencement plan and refer to the pre-commencement plan once submitted by the Applicant. <p>b) In respect of requirement 6, the Councils request that consultation on landscaping proposals is carried out with the relevant LHA as well as the relevant planning authority, insofar as the proposals relate to highway functions (e.g., landscaping on road verges).</p> <p>Beyond the requirements, with reference to Article 9(2) and where the maximum limits of deviation relating to local highways are to be extended after the Order is made, CCC requests that such an extension should be</p>
--	--	--	--

			<p>subject to approval of the local highway authority as well as the Secretary of State.</p> <p>Furthermore, with reference to 'Article 13 and Article 14, should the text of article 13 of the draft DCO be amended to provide for the LHA to act as the certifier that new highways have been satisfactorily completed. CCC as the relevant LHA would become the discharging authority for that part of the works.</p> <p>In relation to Article 45 (Felling or lopping of trees and removal of hedgerows), the Councils request that removal of hedgerows within the Order limits but not set out in Part 1 of Schedule 8, is permitted with the prior approval of the local planning authority.</p> <p>The Councils have provided draft amendments and comments on the dDCO at REP3-039 and discussions with the applicant are ongoing.</p>
Q2.7.1.2	Authorities and Statutory Undertakers	<p>Authorities and Statutory Undertakers Comment if you have concerns [REP1-022, Appendix to WQ1.7.1.3]</p>	<p>In the Appendix to WQ1.7.1.3 in relation to article 46(2)(c) (trees subject to tree preservation orders), the Applicant states that there are currently no trees subject to tree preservation orders within the Order limits. Nevertheless, in so far as the Applicant still believes that it is necessary to include this power in the Order, the relevant authorities should be listed (Central Bedfordshire Council, Bedford Borough</p>

			<p>Council, Huntingdonshire District Council and South Cambridgeshire District Council).</p> <p>The Councils note that Bedford Borough Council and Central Bedfordshire County Council are listed as 'statutory undertaker' for all relevant articles, but none of the Cambridgeshire Councils are. The Councils do not necessarily suggest that is incorrect but do not presently understand the distinction and would be grateful for the Applicant's explanation.</p>
Q2.7.2 Definitions			
Q2.7.2.1	Applicant Local Authorities	<p>Pre-commence and pre-commencement</p> <p>The ExA awaits the Pre-commencement plan at D4 [REP3-030].</p> <ul style="list-style-type: none"> a) LAs do you have any comments on definition for pre-commencement as proposed by the Applicant [REP1-022, WQ1.7.2.1], and should it be included in the dDCO in addition to a pre-commencement plan. Applicant to comment. b) Applicant, would the pre-commencement be included in the First Iteration EMP, or be a standalone document? Would it be a certified document? LAs to comment. 	<p>In so far as the Applicant now intends to introduce a pre-commencement plan (the Councils understand that this will be separate to the First Iteration EMP) to control the impacts of any works not included in the current definition of 'commence' in the draft Order [REP1-003], i.e. the pre-commencement works, then the Councils agree that a separate definition for 'pre-commencement works' is necessary for clarity – it will then be simpler to understand which plans apply to each set of works. As to the content of the definition of pre-commencement works, the Councils will have to withhold their comments until they see the content of the pre-commencement plan. There is a direct correlation between what can be included as pre-commencement works and the nature of the controls to be put in place under the pre-commencement plan.</p>

			For example, if the proposed controls under the pre-commencement plan are insufficient in relation to HGV movements, then it may not be appropriate for the definition of pre-commencement works to include HGV heavy activities, such as demolition and site clearance.
Q2.7.3			
Q2.7.3.1	Applicant All Parties	<p>Article 2(4) and 2(5) – Interpretation</p> <p>a) Without prejudice, provide suitable wording for Article 2(4) to clarify that measurements and distances in this dDCO, while ‘approximate’ will remain within the Limits of Deviation in Article 9.</p> <p>b) Without prejudice, provide suitable wording for Article 2(5), that the expected tolerance for the areas described in the Book of Reference allow for small tolerance and will remain within the Limits of Deviation in Article 9.</p> <p>c) Parties, state if you have comments or concerns.</p>	The Councils await the Applicant’s answer to questions a) and b) before commenting. The Councils also refer to their comments in relation to Q2.7.3.7 below.
Q2.7.3.5	Applicant Huntingdonshire District Council	<p>Article 6 – Application of the 1990 Act</p> <p>a) Applicant, should this Article specify the temporary roundabout access at the Wintringham Construction Compound (Work No.74) (Compound) within the District of Huntingdonshire [REP3-008]. HDC</p>	HDC is of the view that Article 6 does not need to specify the temporary roundabout access. The Wintringham Park outline planning permission (17/02308/OUT) approved a permanent roundabout from the current A428. The understanding of HDC is that this is to be constructed for the compound access and thereafter it will revert

		to comment.	back to access for the Wintringham Park development. It is therefore not a temporary measure as was approved under outline planning permission 17/02308/OUT.
Q2.7.3.7	Applicant Local Highway Authorities	Article 14 – Classification of roads, etc. <i>See related question(s) in Highway – network and structures</i>	We deal with the relevant questions below. However, more broadly we have submitted suggested changes to this article in our Comments on Applicant's DCO [REP3-039]. Further to those comments, the Councils believe that once the Applicant has revealed how it intends to make provision for the limits of deviation in relation to PROWs, further amendment to this article may be necessary. This would be to deal with the fact that any PROWs that are provided in application of the power to deviate may not be as described in the final column of Schedule 3, Part 7 and therefore article 14(7) may not be complied with. The PROWs listed in Schedule 3, Part 7 also appear in column (4) of Part 2 of Schedule 4 to the dDCO and are the replacement PROW that must be provided before the PROW listed in columns (1) and (2) of that Part are stopped up. Column (4) includes detailed requirements as to the length of, location of and points to be connected by the replacement PROWs. Again, there PROWs are provided pursuant to the power to deviate may not be compliant with these descriptions – with the result that the condition on which the relevant PROWs can be stopped up is not met. In order to deal with these difficulties, the Councils

			<p>suggest that any power to deviate in relation to PROWs must be limited so that any deviated PROWs must either (i) continue to connect the points specified in relation to the PROW to be deviated in column (2) of Part 7 of Schedule 3 and column (3) of Part 2 of Schedule 4, or (ii) be agreed by the LHA as providing equivalent functionality to the PROW as originally proposed in Part 7, Schedule 3 / Part 2, Schedule 4.</p>
Q 2.7.3.8	Cambridgeshire County Council	<p>Traffic Manager responsibilities Typically, no response from a LHA to a permit application is deemed to be acceptance of the request for road space booking. Why does CCC consider this approach to be unacceptable in relation to the Proposed Development?</p>	<p>CCC can confirm that no response after 28 days can be deemed as acceptance.</p>
Q2.7.3.9	Cambridgeshire Councils	<p>Article 22(4) – Protective work to buildings Cambridgeshire Councils, provide justification why a longer notice period, for the undertaker to serve notice on the owners and occupiers of the building of its intention of carrying out protective works under this article, would be more appropriate, in light of the Applicant's response [REP3-007, WQ1.7.3.15].</p>	<p>A longer notice period would be more appropriate, as an occupier of a building requiring this type of work may be temporarily absent (e.g., on holiday), which could be reasonably expected to be for up to 14 days. Therefore, it is possible they will miss the notice given and not be able to respond. Additionally, such works may be very disruptive and require families to make temporary alternative arrangements for their lives and possibly accommodation. For this reason, as much notice as possible should be given, i.e. 28 days, as the applicant should be aware of these works in advance (except in unforeseen emergencies).</p>

Q2.7.3.12	Applicant Local Highway Authorities	<p>Article 55 – Traffic regulation</p> <p>c) Applicant, confirm if different parts of the authorised development will be open for public use at different times [REP1-051].</p> <p>d) If so, then the ExA could see the point made by the Cambridgeshire Councils [REP1-051] that the provisions in this Article are ambiguous; for instance, would the period of 12 months in Article 55(3) and 24 months in Article 55(7) could then be different calendar periods. How would this be managed and monitored?</p> <p>e) Cambridgeshire Councils further elaborate on your concerns [REP1-051].</p>	e) CCC are awaiting Applicant’s response to 2.7.3.12. c) and d) to clarify how this will function.
Q2.7.5 Requirements			
Q2.7.5.2	Applicant Local Authorities	<p>Requirement 19 – Construction hours Awaiting clarification from Cambridgeshire Councils [REP1-051] [REP3-007].</p>	<p>The Councils withdraw their note of inconsistencies set out in REP1-051.</p> <p>The Councils’ position in response to Paragraph 2.6.244 of APP-071 and Requirement 19 of the dDCO [APP-025] is that core construction hours should be 8am to 6pm Monday to Friday, 8am to 1pm Saturday, and no working on Sundays and Bank Holidays. Start-up and shutdown periods of one hour is anticipated, either side of these core hours.</p>
Q2.9. Flood Risk			
Q2.9.2 Interactions between different sources of flooding			

Q2.9.2.1	Environment Agency Local Authorities	<p>Grade separated junctions In light of the Applicant's response [REP1-022, WQ1.9.2.1], provide any further comments on the interactions between groundwater and surface water at the three grade separated junctions, the various underpasses and culverts, and any geographical low points?</p>	The Applicant is proposing to deal with this at the detailed design. If this is necessary at any of the junctions within Cambridgeshire it would be expected that there would be no adverse impact on any receiving surface waters, such as increased flows or pollution
Q2.9.4 Climate Change resilience			
Q2.9.4.1	Applicant Cambridgeshire Councils	<p>Question repeated to seek response from specific respondents</p> <p>Flood Risk and Pollution Control</p> <ul style="list-style-type: none"> a) With reference to the Exception Test, does the FRA demonstrate that the project will be safe for its lifetime, without increasing flood risk elsewhere (NPS NN, paragraphs 5.90 5.115)? b) Will the users of the Proposed Development remain safe in time of flood, even when climate change is considered? c) Will the River Great Ouse replacement floodplain storage be adequate, including with regard to the ongoing quarry restoration works? d) Have all sources of flooding been adequately considered in this assessment, including in-combination effects and the likely 	<p>b) In line with the modelling which has been submitted, the scheme is proposed to accommodate the impacts of climate change while managing surface water.</p> <p>d) The applicant has covered all sources of flooding within the FRA and Drainage Strategy. Modelling carried out within the hydraulic reports considers 65% climate change on watercourse models and 40% on surface water design, which is the current national standards.</p> <p>f) While the proposals are treating the majority of surface water through SuDS, where there is a requirement for additional treatment from areas of higher risk when measured against HEWRAT proprietary treatment is proposed. The LLFA would require greater justification to support the use of proprietary treatment, with more emphasis on natural means of treatment such as suitable planting within the basins which can remove more pollutants.</p>

		<p>effects of climate change?</p> <p>e) Have all reasonable opportunities been taken to reduce overall flood risk as part of the Proposed Development?</p> <p>f) Are the proposed pollution control mechanisms sufficient to protect the environment, including with regard to climate change?</p>	
Q2.10. Good Design			
Q2.10.1 Visual appearance and design principles			
Q2.10.1.1	Local Authorities All Parties	<p>Scheme Design Approach and Design Principles</p> <p>a) The ExA is seeking views from LAs and all parties on the content of the Applicant's Scheme Design Approach and Design Principles [REP3-014], and if the design approach, design vision and design principles will guide the development of the detailed design post consent (should consent be granted) to deliver the following outcomes:</p> <p>i) sensitivity to place, siting, and design measures relative to existing landscape, character, and function (NPS NN, Paragraphs 4.29, 4.30, 4.33) (other relevant local policies [REP1-051], [REP1-054] [REP1-055]);</p> <p>ii) producing high quality, beautiful and sustainable</p>	<p>a) i) The conceptual approach to sensitivity is acceptable but all subject to detailed design progression.</p> <p>a) ii) At a detailed level much more could be done to create high quality, beautiful and sustainable places. The applicant refers to the aesthetic quality of structures, and in paragraph 3.3.15 that "<i>Structures have been designed as a family, with common design details, materials and structures. This approach has been taken to reinforce sense of place, create a memorable journey and maximise efficiency and buildability.</i>"</p> <p>It is considered that there is nothing in the design of the features that relates particularly to the Cambridgeshire landscape or vernacular, and the authorities struggle to see how the structures would reinforce a sense of place. It is not clear at this stage whether the development will add to the</p>

		<p>places (NPS NN, Paragraphs 4.29, Chapter 12 of the NPPF);</p> <ul style="list-style-type: none"> iii) meeting principal objectives of the Proposed Development, mitigating problems minimising adverse impacts, and sustaining the improvements to operational efficiency (NPS NN, Paragraph 4.31); iv) taking into account functionality, aesthetics, and technology (NPS NN, Paragraph 4.33); and v) best possible integration with the surrounding landscape [REP3-014, Paragraph 3.1.1]. <p>b) Do you feel that the design principles and features of specific structures [REP3-014, Appendix C] cover the range of physical structures, landscape features, and other measures that design principles should be set out for?</p> <p>c) Do you have understanding of the rationale behind the design principles for individual structures, in relation to the immediate surroundings, for instance [REP3-014, Appendix C]?</p> <p>d) Are you clear how the Scheme Design Approach and Design</p>	<p>overall quality of the area although its function is not debated.</p> <p>Paragraph 130 (b-c) of the NPPF requires that developments are visually attractive as a result of good architecture, layout and appropriate landscaping. Developments should be sympathetic to local character and history. The authorities question why such a utilitarian palette has been employed, when, particularly on NMU structures, for example sustainable timber, or green “living” bridges that connect both people and wildlife, or public art features would much better have reflected the Department of Levelling Up, Housing & Communities aspirations for the region. There is also little reference to local policy in relation to Design Principles including the South Cambridgeshire Local Plan policy HQ/1 which requires all new development to create coherent, place-responsive design, which is legible and creates a positive sense of place and identity whilst also responding to the local context and respecting local distinctiveness.</p> <p>a) iii) Notwithstanding ongoing discussions on mitigation planting and improving NMU experiences, it is considered that most of the principal objectives of the proposed Development have been met.</p> <p>a) iv) The proposed development is functional, but it is considered that aesthetics</p>
--	--	--	---

		<p>Principles would be secured through the DCO process, and is that adequate [REP3-014, Paragraphs 1.2.1-2]?</p>	<p>and technology have not been a key driver to the design. See comment ii above.</p> <p>a) v) The Councils have expressed concerns about planting mixes locations and quantum of trees, hedges and other landscape typologies which we considered to not yet be acceptable, and which has been resisted repeatedly by the applicant as having been agreed and deferred to the 2nd Iteration Environmental Management Plan.</p> <p>b) Yes, broadly agreed. Please comments on REP3-014 in the Council's D4 submission CLA.D4.OS.A.C for further information.</p> <p>c): No. No information has been provided as to how the individual structures identified have been designed to incorporate embedded biodiversity mitigation. Of particular concern are those structures identified as EP3.1 'mammal crossing' on the Environmental Masterplan [APP-091. For example, preserving the existing bat flight paths are not identified as 'key constraints on structure design' for S19 (New Hen Brook Culvert and Underpass), S37 (Pillar Plantation Culvert and underpass), S31 (Toseland Road Bridge). It is not clear why other structure types or design were either omitted or discounted in the process. (i.e., Overpass designs could include green bridges). Please comments on REP3-014 in</p>
--	--	--	---

			<p>the Council's D4 submission CLA.D4.OS.A.C for further information.</p> <p>d) The applicant has confirmed in the Scheme Design Approach and Design Principles document [REP3-014] that this will be incorporated into the First Iteration EMP. However, this alone is not adequate as Requirement 12 does not currently require the detailed design to be developed in accordance with the First Iteration EMP. It is necessary that Requirement 12 be updated to refer to the First Iteration EMP in order to ensure that these principles are secured.</p> <p>We have stated in other parts of this question, in Q2.10.2.1 and in the Councils' D4 submission CLA.D4.OS.A.C, that the Scheme Design Approach and Design Principles are themselves not adequate. There are changes that we would like to see incorporated in to that document and we will seek to resolve through the DCO process and, by legal agreement, the mechanism for the Councils' approval of relevant elements of the detailed design.</p>
<p>Q2.10.2 Design development process</p>			
<p>Q2.10.2.1</p>	<p>Local Authorities All Parties</p>	<p>Design development process</p> <p>a) Are you clear about the design development process and which parties would be consulted through the process [REP3-014, Section 5]?</p>	<p>a) Paragraph 5.1.4 [REP3-014] does not provide clarity on which parties will be consulted and at key stage of the design development process, including:</p> <ul style="list-style-type: none"> - detailed landscape scheme - detailed borrow-pit restoration

		<p>b) Are you content with the proposed design development process and which parties would be consulted through the process [REP3-014, Section 5]?</p>	<ul style="list-style-type: none"> - detailed design of biodiversity mitigation, such as mammal / bat underpasses - production of second / third iteration EMP - detailed design, routing and boundaries of highway assets. <p>b) The Councils consider that section 5 of REP3-014 does not contain sufficient detail in relation to the detailed design and consultation processes. The key elements of the consultation process result from the responses to the questions the Applicant poses at paragraph 5.1.4.</p> <p>Item 9 of Appendix B of document REP3-014 (EXAM/9.26), 'Scheme response to the Road to Good Design', is headed 'Good road design is collaborative'. The document however does not outline what collaborative working is to be undertaken with CCC as the LHA to agree the extent of local highways and highway assets that are proposed to be handed over to the LHA upon completion of the scheme. As is noted by CCC at para 3.30 of document REP1-048, the agreement of highway boundaries for local roads is of significant importance to CCC in understanding the extent of the assets it is due to inherit as a result of the scheme. Such collaboration is also of value to the applicant and to adjoining private landowners as it serves to clarify, at an early stage, which</p>
--	--	--	---

			<p>parties are expected to assume ongoing responsibility for different assets. This is relevant to the principles of 'good design' as it allows areas of land to be identified that are not necessary for highway purposes which can be returned to their original rural condition or can be allocated for other landscaping or environmental purposes. The applicant has not commented on the means of engagement they intend to undertake with LHAs on this matter.</p>
Q2.11. Highways – network and structures			
Q2.11.1 Transport Modelling			
Q2.11.1.1	Local Highway Authorities Applicant	<p>Methodology, inputs, and outputs</p> <p>The NPS NN (Paragraphs 5.203, 5.204) explains that the Applicant should have regard to policies set out in local plans and that the Applicant should consult relevant LHAs and LPAs, as appropriate on the assessment of transport impacts. S16 The Traffic Management Act 2004, places a Network Management Duty (NMD) on local traffic authorities, or a strategic highways company (the network management authority), so far as is reasonably practicable, to ensure the expeditious movement of traffic on the authority's road network and facilitating the expeditious movement of traffic on road networks for which another authority is the traffic authority. At ISH2 [EV-038] both CCC and CBC stated that on the basis of the</p>	<p>a) The modelling that supports the proposed scheme includes the use of a bespoke strategic model which is based on the South East Regional Transport Model (SERTM) and is built using Saturn Software. The strategic model has been built and validated in accordance with the Department for Transport's Transport Analysis Guidance (TAG) which is Industry standard best practice.</p> <p>The Local Model Validation Report (LMVR) suggests that the model validates very well against the criteria set out in TAG. NH provided CCC with a cordon of the A428 model that covered the whole of Cambridgeshire. CCC have undertaken a review of the model supplied and have agreed that the model forms a reasonable</p>

		<p>information before them that they were unable to comment on the Proposed Development's likely impact on them being able to fulfil their NMD.</p> <p>a) Given the Applicant acknowledges the limitations of applying strategic modelling to the localised level of individual junctions, sections of highway and in the case of Coton, how can the ExA and LHAs be confident in the traffic effects stated in the Case for the scheme [APP-240] and Transport Assessment [APP-241 and APP-242] at specific points elsewhere on the local highway network?</p> <p>b) The ExA welcome that the Applicant has proposed to undertake further sensitivity testing, in liaison with LHAs at various locations described in Scope of Junction Model Sensitivity Test [REP3-029]. Do CBC and CCC agree that the scope of that assessment will enable greater confidence in the traffic effects of the Proposed Development? Explain with reasons.</p> <p>c) Do LHAs intend on undertaking further analysis such as has been provided for Caxton Gibbet [REP2-003, Fig 1, 7.2.22]? If so, which</p>	<p>basis for the assessment of the strategic Impact of the proposed scheme.</p> <p>The review of the strategic model did however highlight several areas where potentially strange routing patterns were noted within the model most notably in the following locations:</p> <ul style="list-style-type: none"> • Coton • B1040 throughout the whole County • A1198 south of Caxton Gibbet • Dry Drayton, and • Madingley <p>NH have provided several technical notes throughout the examination process that look to address these issues, as follows.</p> <p>Coton The routing issues affecting Coton were addressed in Deadline 1 Submission – 9.8 Traffic Routing Impacts at Coton [REP1- 027] This note acknowledges that the routing issues highlighted were due to coding errors in the model at M11 J13 and J12. The routing suggested by the strategic model is very unlikely to be realised due to the nature of the road through Coton and, therefore, the Councils have requested monitoring of traffic through Coton to gauge the true impact of the scheme on this location.</p> <p>B1040</p>
--	--	--	--

		<p>locations would this relate to and when will this be provided to the ExA?</p>	<p>The routing along the B1040 was addressed in the applicant's response to the Councils Written Representations [REP3-008], in this document NH states they have undertaken a Select Link Analysis (SLA) within the model to understand the full origin and destination of the trips using the B1040 and that most of the trips originate from further south on the A1. This assertion appears reasonable but the SLA referred to has not been shared with the Councils and so it has not been possible to verify the origins of trips using the B1040. The Councils have requested monitoring of traffic through Eltisley to gauge the true impact of the scheme on this location.</p> <p>A1198 South of Caxton Gibbet The routing on the A1198 is also covered in REP3-008 but as with the B1040 the results of the SLA have not been shared with the Councils. In addition, the reporting of the SLA results focuses on the destination of the trips rather than the origin. At the meeting with the Applicant on the 19th October 2021 CCC requested the results of the SLA as of the 25th October 2021 this information has not been received.</p> <p>Dry Drayton and Madingley The routing of traffic through Dry Drayton and Madingley has been addressed by NH in Technical Note 9.43 Assessment of Traffic flows at Dry Drayton and Madingley [REP3-028]. This note indicates that there are</p>
--	--	--	--

			<p>coding errors in the model in both Dry Drayton and Madingley areas that means the roads through these Villages are more attractive in the model than they would be in reality. Therefore, as the impact cannot be accurately predicted before the Order is granted, the Councils have requested monitoring of traffic through both Dry Drayton and Madingley to gauge the true impact of the scheme on these Villages.</p> <p>The result of this exercise indicates that in areas more remote from the scheme there are issues with some of the coding in the strategic transport model. However, despite these issues the validation of the model especially near the proposed scheme remains very high and therefore, the Councils remain of the opinion that the strategic model remains suitable for use in the assessment of the strategic impact of the scheme, but it is not suitable for use in the assessment of detailed local impacts due to the issues highlighted in these locations and the comparisons that have been undertaken on the correlation between observed turning movements and the turn proportions indicated by the base year traffic model.</p> <p>b) The local junction modelling is key to understanding the operation of the road network this is vital in enabling the Councils to fulfil their Network Management Duty (NMD). The modelling of individual junctions</p>
--	--	--	--

			<p>also plays a key role in the agreement of the design of the proposed scheme, i.e., are the junctions of sufficient size and scale to cater for the levels of traffic predicted or are they too large which might lead to increased induced traffic which is not policy compliant.</p> <p>As set out in the Local Impact Report (LIR) [REP2-003] 7.2.22 in figure 1 the link flow comparisons between the strategic model and the observed data from 2015 and 2016 show that the model reasonably accurately represents the level of traffic on each approach arm (Link Flow) to the junctions but, as figure 2 indicates, the turn proportions do not accurately represent the observed data. Therefore, the Councils have requested additional analysis be undertaken on the junctions tested in the Transport Assessment [APP-241 and APP-242] using observed count data to adjust future year traffic flows from the strategic model so that they better reflect the turn proportions seen in the observed data. This information is required to give the Councils the confidence in the traffic flows being used in the junction assessments, which, in turn, will allow the Councils to form a view on the suitability of the proposed scheme design, especially with regard to the elements that the Councils will be asked to adopt.</p> <p>The additional sensitivity testing proposed by NH is welcomed by the Councils but the level</p>
--	--	--	---

			<p>of confidence that these tests will afford will depend on the information that is put forward by NH.</p> <p>The scoping note submitted [REP3-029] indicates that the sensitivity tests will be carried out using a methodology consistent with option 2 from the note submitted by the Councils. This should ensure that the sensitivity testing gives a better indication of performance of the junctions tested but this will depend on the exact process used by NH. The Councils request early sight of the traffic data to be used in the sensitivity tests to try to get these agreed as soon as possible and minimise the risk of further disagreement.</p> <p>The other issue that will enable the Councils to have confidence in the modelling of the scheme and resulting impacts on the Local Road Network is a clear understanding of the junctions that will be retested as part of this process. The Councils require all the junctions currently included in the Transport Assessment [APP-241 and APP-242] to be retested using the revised traffic data.</p> <p>In addition, the Councils have set out a list of additional junctions that need to be assessed to enable the impact of the scheme on the Local Road Network to be assessed, specifically junctions on Great North Road and Cambridge Road St Neots as both these</p>
--	--	--	--

			<p>roads are shown to experience significant increases in traffic as a result of the scheme (Approximately 24% increase in AADT with Approx. 200 additional PCU's in the peak hours). The assessment of these junctions should be informed by observed data as required in the sensitivity tests.</p> <p>The Councils require the assessment of these junctions because both Great North Road and Cambridge Road experienced significant delays in 2015 due to congestion on the A428 which regularly saw queues extend back to the Nelson Road/Great North Road and Station Road/Cambridge Road/Cromwell Road Junctions and therefore the Councils need to be assured that the junctions on the LRN can accommodate the additional traffic suggested. Without this information the Councils are not convinced they can fulfil their NMD.</p> <p>c) The Councils undertook a comparison of the turning proportions at all of the junctions for which NH provided information.</p> <p>This information is appended to the Councils' D4 submission in document CLA.D4.WQ2.AS2.</p>
Q2.11.1.2	Local Authorities All Parties	COVID-19 At Deadline 1 the Applicant provided additional submission Assessing the	CCC accept that modelling the impacts of COVID 19 at present is difficult. CCC would welcome the assessment of the impact of

		Potential Impacts of COVID 19 – The implications for traffic forecasts for the Scheme [REP1-029]. Do LAs and all parties broadly accept the findings of the document provided? If not explain with reasons.	COVID 19 on the proposed scheme after DfT release the Uncertainty Toolkit later this year.
Q2.11.1.3	Local Authorities All Parties	Economic Sensitivity Test At Deadline 1 the Applicant provided additional submission Economic Sensitivity Test Technical Note [REP1-027]. Do LAs and all parties broadly accept the findings of the document provided? If not explain with reasons.	CCC broadly accept the findings in the Technical Note [REP1-027].
Q2.11.2 Road layout, junctions and bridges			
Q2.11.2.1	Local Highway Authorities	Road design and layout CCC [REP1-048] have requested that new highways infrastructure be provided in accordance with DMRB. d) With particular regard to route continuity and road safety considerations, how is this justified where the existing roads leading to those points do not currently appear to conform with DMRB? Please provide justification for each location referred to. e) Do other Local Highway Authorities share the view that new highways infrastructure, for which they will be responsible for in future, should conform with DMRB?	Please see separate document CLA.D4.WQ2.AS1 for the Councils' response to this question.

Q2.11.5 De-trunking proposals and new local highway infrastructure			
Q2.11.5.1	The Applicant Local Highway Authorities	<p>De-trunking proposals</p> <ul style="list-style-type: none"> a) Further to the Applicant's written and oral submissions received so far in the Examination [REP1-021] [REP1-022] [REP3-008], do LHAs consider that they have an accurate understanding of the condition in which the highway asset to be de-trunked will be transferred? b) Applicant, provide updates on the progress made on de-trunking agreements. c) How will LHAs' agreement to handover at a specific point in time be secured? <p><i>See related question(s) in Draft Development Consent Order</i></p>	<p>a) CCC has little understanding of the condition in which assets to be de-trunked will be handed over to the LHA. The LHA requires clarity regarding the condition of assets to be handed over, as this will be essential to the assessment of the future maintenance liabilities that the LHA is acquiring. The Authority LHA seeks an accurate assessment of the existing condition of the relevant assets and wishes to reach agreement with the Applicant on the condition in which the assets will be handed over. This will enable agreement with the Applicant regarding the works to be undertaken by the Applicant prior to acceptance and handover.</p> <p>c) CCC has proposed amendments to Article 14 of the dDCO [REP3-039] which provide that the roads to be de-trunked will cease to be trunk roads on a date to be agreed between the applicant and the LHA. CCC is content with the detail of the handover process being included in the legal agreement.</p>
Q2.11.5.2	Cambridgeshire County Council Applicant	<p>Speed limits</p> <ul style="list-style-type: none"> a) CCC, you have referred the ExA to your Written Representations [REP1-048, WQ1.11.5.2]; for completeness provide associated 	Please see paragraph 4.15.1 of [REP1-048].

		<p>paragraph numbers.</p> <p>b) Likewise, Applicant in your comments you have referred the ExA to your comments on Written Representations [REP3-008, WQ1.11.5.2]; provide associated paragraph numbers.</p>	
Q2.11.6 Non-motorised users			
Q2.11.6.1	<p>Applicant Local Highway Authorities Interested Parties</p>	<p>Providing opportunities for NMUs</p> <p>At ISH2 [EV-034] it was clear that numerous parties consider the Proposed Development does not sufficiently improve the existing PROW network. The scheme objectives [APP-071], also referred to in the Statement of Reasons [APP-030], include ensuring the safety of cyclists, walkers, and horse riders and those who use public transport by improving the routes and connections between communities improving accessibility. The Applicant explains that the PROW network will increase in length by 4.13 km [REP1-022]. However, it is noted that this includes sections of PROW diversions required as a result of the Proposed Development.</p> <p>a) Applicant, what additional NMU provision can be reasonably considered to meet the scheme</p>	<p>c) No feasibility work has been undertaken by CCC relating to the provision of a continuous off-road walking/cycling link between St. Neots and Cambourne. It is, however, cited in three key transport strategy documents:</p> <ol style="list-style-type: none"> 1. In the Cambridgeshire LTP 2011-2031³, p4-11 'Interurban cycle network – need for high quality cycle route linking Cambridge with market towns'. There is an indicative map on p4-24 at fig 4.14 showing the strategic cycle route between Cambridge, Cambourne and St Neots (and the link between Cambourne and Huntingdon that has just been completed through the A14 scheme). 2. As a scheme in CCC's Transport Investment Plan⁴ which was envisaged to be delivered by National Highways. See TIP List - Cambridge City and South Cambridgeshire – 2021 (No. 134).

³ [https://www.cambridgeshire.gov.uk/asset-library/imported-assets/The_Local_Transport_Plan_3%20\(1\).pdf](https://www.cambridgeshire.gov.uk/asset-library/imported-assets/The_Local_Transport_Plan_3%20(1).pdf)

⁴ <https://www.cambridgeshire.gov.uk/asset-library/TIP-List-Cambridge-City-and-South-Cambridgeshire-2021.pdf>

		<p>objectives [APP-071], address the concerns of LHAs and other parties, and align with policy requirements (NPS NN, Paragraphs 3.3 and 5.205)?</p> <p>b) CCC [REP2-003] has expressed concerns that there is a likelihood of increased vehicle speeds on the existing A428 because the traffic levels would reduce as a result of the Proposed Development. Has the Applicant considered the need for physical engineering interventions to ensure the potential for increased traffic speeds do not lead to adverse road safety impacts, particularly for NMUs crossing the corridor but also along it? Explain with reasons.</p> <p>c) CCC, have feasibility studies relating to the provision of a continuous off-road walking and / or cycling link between St Neots and Cambourne been undertaken [EV-034]?</p> <p>Provide evidence that there is demand for such a link. How deliverable is such a scheme, particularly in regard to funding</p>	<p>3. In the Transport Strategy for Cambridge and South Cambridgeshire: Transport Strategy and High-Level Programme (March 2014)⁵ p4-29. Policy TSCSC 13 states: <i>“Where there is a requirement for new roads or increased road capacity, these should adhere to the highest possible design standards. Where feasible, pedestrian and cycle facilities will be provided alongside new road infrastructure... This policy applies to new roads delivered by the County Council, new roads that will be passed to the Council through a relevant legal agreement, and those that will remain in third party ownership.”</i></p> <p>Fig 5.14 on pp5-23 to 5.24 specifically lists: <i>‘Create direct cycle route along corridor, connecting Cambridge to Cambourne and onwards to St Neots’</i> as a required intervention alongside the requirement for the A428 highway improvement.</p> <p>National Highways’ <i>Walking, Cycling Horse-riding Assessment and Review (WCHAR) Assessment Report</i> dated February 2020 [APP-241 Appendix 8.1] itself highlights at 2.8 that employment, shops and schools in</p>
--	--	---	--

⁵ <https://www.cambridgeshire.gov.uk/asset-library/imported-assets/Transport-strategy-and-high-level-programme-for-Cambridge-and-South-Cambridgeshire-March-2014.pdf>

		<p>and any known delivery constraints?</p> <ul style="list-style-type: none"> d) Applicant, justify the gap of approximately 600m in off-road NMU provision between Eltisley and Caxton Gibbet North roundabout. e) The Applicant proposes that LAs could seek funding from Designated Funds associated with RIS2 to improve NMU provision locally [APP-243]. Provide detail regarding this fund, including how the bidding process works and how potential schemes are assessed. Explain how it is better value for such schemes to be delivered separately from the Proposed Development. 	<p>St Neots and Cambourne are all potential future NMU trip generators. The document also highlights at 2.14.2 the lack of good connectivity of existing rights of way, and the sheer impossibility of NMUs using many of the crossings due to the enormous volume of traffic on the A428 at present. The user groups Sustrans and Cycling UK highlighted in the consultation that Cambourne is an 'island' due to lack of safe connections east and west as well as the need for a continuous NMU active travel route from Cambourne to St Neots (see p25, Table 3 Stakeholder issues log). Therefore, any surveys of NMUs undertaken by National Highways or anyone else are unlikely to be indicative of actual demand, or of likely demand were good infrastructure to be put in place.</p> <p>The American Journal of Preventative medicine⁶ concluded from the research undertaken by MRC Epidemiology Unit Cambridgeshire 'guided busway' encouraging people to be more active on the commute - MRC Epidemiology Unit that 'Providing new sustainable transport infrastructure was effective in promoting an increase in active commuting. These findings provide new evidence to support reconfiguring transport systems as part of public health improvement strategies.' and as</p>
--	--	---	--

⁶ [https://www.ajpmonline.org/article/S0749-3797\(15\)00622-4/fulltext](https://www.ajpmonline.org/article/S0749-3797(15)00622-4/fulltext)

			<p>the lead researcher stated, <i>'People might naturally think of cycle lanes as part of these changes – but this research suggests that we need to look at the wider infrastructure as well.'</i></p> <p>The Councils know from experience of the Cambridgeshire Guided Busway (CGB) that it is difficult to measure actual latent demand for NMU routes prior to new transport schemes, but once in place people are far more likely to use them. In addition, anecdotally, cycle user groups that took part in the WCHAR consultation stated that cyclists in the Cambridge area are generally more willing to commute further than the average cyclist.</p> <p>The CGB comprises 14 miles (22km) of bridle/cycleway alongside the busway itself linking the towns of St Ives, Northstowe new town and Cambridge as well as villages enroute (there is a further 2 miles from Cambridge south to Trumpington). Initially the NMU route was proposed as a rural bridleway but late in design stages was changed to a hard-top surface. The route has been phenomenally successful for commuting cyclists, many of whom regularly cycle the full distance between St Ives and Cambridge. It is successfully shared by equestrians and pedestrians and is a key safe off-road connector in the bridleway network for equestrians. The new NMU route</p>
--	--	--	--

			<p>alongside the local access route provided as part of the A14 scheme from Fenstanton to Cambridge is 11 miles (17.7km). It already being well-used by all classes of NMUs and is set to be similarly successful. This demonstrates the importance of strategic transport authorities taking that common-sense lead to put in place appropriate infrastructure that then encourages modal shift, enables positive change in the health and well-being of communities and provides new employment opportunities regardless of the fact that hard statistical evidence of demand may not be available pre-development. The geography of distance between settlements of St Neots, and Caxton/Cambourne is similar to that of St Ives-Northstowe-Cambridge (CGB) and Fenstanton-Bar Hill-Cambridge (A14), and it is our view that an A428 NMU route would be equally successful in achieving significant modal shift, health and well-being, and economic benefits.</p> <p>As well as the east-west lateral NMU routes, the CGB NMU route now also links north-south from Rampton south to Northstowe, through Longstanton to the A14 LAR NMU route, and down a new NMU route alongside the A1198 to Caxton. The St Neots-Caxton NMU route would link directly into this, providing a long-distance route into Cambridge. There is also an alternative 'soft' bridleway and byway network leading from</p>
--	--	--	--

			<p>Cambourne back northwards through Knapwell and Childerley to Bar Hill and the A14 LAR NMU route/new bridleway links at Madingley through to Girton/Cambridge, into which the A428 NMU route would link.</p> <p>Further evidence of the need for the NMU route is that the Wintringham Park development adds nearly 3000 new homes to the already sizeable 36,000 population of the market town of St Neots. The developer's website rightly highlights footpaths, cycle routes and connectivity with the countryside as a benefit of the new development. St Neots as a town is currently poorly served with good strategic NMU routes connecting the surrounding villages and other towns. The Hen Brook path will be a primary strategic route out from both the new development and the wider town into the countryside (particularly if upgraded to a bridleway as the Councils request). Both this and the Pillar Plantation bridleway could easily link with a new NMU route running alongside the old A428 to Caxton/Cambourne. Cambourne itself has a population of over 10,000 and it should be borne in mind that residents may wish, and should be encouraged to, travel west to St Neots for a variety of trigger journeys including employment. This would relieve pressure on traffic heading into Cambridge.</p>
--	--	--	--

			<p>The applicant maintains that the significant reduction in traffic predicted along the old A428 will mean it is safe for NMUs to use the carriageway. Experience from the section of the A428 which has already been dualled, from Cambridge to Cambourne, shows that traffic volumes and speed are likely to remain too high for use by people walking and on horses and too high for it to feel useable for all but the most confident cyclists.</p> <p>f) As detailed in the Joint Written Representations at 6.5.7 [REP1-048], the Councils believe that NMU improvements within the redline boundary of the development should be delivered by the scheme promotor as they are considered to be essential mitigation for the Scheme. Bidding for funds through Designated Funds is an unknown entity and, as the funds are not guaranteed, this places burden and risk onto the County Council, which it considers is unreasonable. There is a risk that if funds are not secured, the NMU mitigation essential to the Scheme cannot be delivered and this would be to the detriment of local communities. There is also a financial burden on the Council in resourcing officers in trying to secure such funding.</p>
Q2.11.7 Construction traffic impacts			
Q2.11.7.1	Applicant Local Authorities	Outline CTMP Clarification – Travel Plan Notwithstanding the Applicant’s response at D3 to ISH2 Action Point 5 [REP3-019],	a) CCC encourages the Applicant to follow the policy requirement in the NPPF and to provide a Travel Plan. In the absence of said plan, local authorities are limited to

		<p>the Proposed Development would result in around 900 temporary workers being employed in the locality over a number of years.</p> <ul style="list-style-type: none"> f) How will the commuting effects of workers, employees and contractors involved in the Proposed Development be managed, mitigated, and minimised given the Applicant does not currently intend to produce a Travel Plan? LAs to comment. a) How does your position align with the policy requirement in the NPPF (Paragraph 113) which states that all developments that will generate significant amounts of movements should be required to provide a travel plan? LAs to comment. b) Without prejudice, what is the implication of producing a Travel Plan; when can it be produced and presented into Examination; and how would this be secured? LAs to comment. 	<p>signposting the Applicant's employees to information regarding alternative modes of travel.</p> <p>b) The Travel Plan could be secured by incorporating it into the outline traffic management plan, secured by requirement 11. CCC requests that the applicant provide a Co-ordinator to ensure the actions in the plan are achieved.</p>
Q2.11.7.3	Local Highway Authorities	<p>Local Highway Impacts</p> <p>On the basis of the information received at D3, ISH2 Action Point 6 [REP3-019], the Applicant proposes to deal with</p>	<p>Please see comments under Q2.11.7.4 regarding highway condition and diverted traffic, as well as paragraphs 5.5 – 5.10 of the Councils' Written Representation [REP1-048].</p>

		<p>matters relating to traffic informally diverting on to the local network during construction, primarily at source on the strategic road network with little if any measures to discourage or restrict informal traffic diverting on the local highway network. Do LHAs consider this to be sufficient? If not, explain with reasons. Applicant to comment.</p>	
<p>Q2.11.7.4</p>	<p>Applicant Local Highway Authorities</p>	<p>Highway condition</p> <ul style="list-style-type: none"> a) How does the Applicant intend to ensure no damage occurs to the local highway network as a result of construction traffic using it for access during construction and how will this be secured? b) The Applicant states that highway condition surveys will be undertaken at all access points used by construction vehicles [REP1-022, Q1.11.7.11]. Confirm if this is solely at the point of access to the site from the local highway network or for the entire length of the road leading to and from the site from the existing strategic road network? How will this be secured? c) LHAs to comment. 	<p>CCC considers it inevitable that both construction and diverted traffic will cause damage to the local network of roads. Repairing such damage will constitute an additional financial burden to the LHA. The LHA therefore seeks agreement with the Applicant regarding the Applicant reimbursing the Authority for this additional expense.</p> <p>CCC considers that construction traffic and diverted traffic constitute extraordinary traffic upon the local road network and notes that a very high proportion of construction traffic will have heavy axle loads. It is such heavy traffic that is most damaging to roads, especially those that might not have been designed to withstand such use.</p> <p>Accordingly, CCC considers that Section 59 of the Highways Act 1980 is applicable. The Authority wishes to seek agreement with the Applicant in accordance with subsection 3 of Section 59 of the Highways Act. The agreement of such a sum by way of</p>

			<p>compensation at the outset would obviate the need for such discussions once works have commenced and would provide clarity for both parties at the outset.</p> <p>CCC requests the opportunity to comment on the Applicant's response to this question.</p>
Q2.12. Historic Environment			
Q2.12.4 Archaeological Remains			
Q2.12.4.1	Historic England Local Authorities	<p>Archaeological Mitigation Strategy</p> <ul style="list-style-type: none"> a) Please confirm your views on the scope of the revised AMS submitted at D3 [REP3-010] and its response to the joint Archaeological Design Brief? b) In particular, Cambridgeshire Councils, with regard to the Applicant's comments in [REP3-007, Q1.12.4.2], are you satisfied that all areas are included in the revised AMS [REP3-010]? c) CBC are you satisfied that the revised AMS accords with the approved scopes of work and Written Schemes of Investigation for the advanced archaeological works? d) BBC, with regard to R9, are you satisfied with the Applicant's revised wording, as described in [REP3-007, Q1.12.4.2]? 	<p>a) We are pleased to see that the Joint Authorities' Archaeological Brief has now been included in the Updated Archaeological Mitigation Strategy (UAMS [REP3-10]) as Appendix. This will allow the local authority curators to monitor compliance with this and the UAMS once it has been approved (see 7.1.2, 7.1.4-7.1.5).</p> <p>We are also pleased to see the requirements set out in the brief have now been inserted into Section 8 and 9 of the UAMS, although Section 9 still contains an aspect of site 'sampling' that is not acceptable and the inclusion of an unspecified area of Site 17 proposed for possible preservation in situ in Section 11 (11.3.1), which we have advised against in principle, as the features found in the evaluation of that area are not robust enough to withstand the effects of the construction of temporary works, removal and reinstatement (not specified).</p>

			<p>Appendix D and Table 5-1 of the UAMS show no amendment to the areas for excavation showing that conflicting interpretations of the evaluation of evidence remain between the Cambridgeshire Councils and the Applicant.</p> <p>The Councils reject the statement at 2.1.2, repeated elsewhere in the document: “Not all sites will be fully excavated, as the primary aim of the Strategy is to maximise knowledge gain”, as we believe this is a non sequitur and consider that knowledge gain will only be acquired through the investigation of known archaeological evidence within the scheme.</p> <p>The two problems with this statement are:</p> <p>1) This position has led to the Applicant identifying features that only require ‘sampling’ (unspecified amount of excavation) and the deselection of associated features from an excavation programme. Archaeological sites are never subject to ‘Full Excavation’ they are only ever sample excavated (usually a third, a quarter or 10% of linear ditches), though some individual features will be excavated in full (e.g., structure, wells, burials) or discrete features, e.g., pits will be half-sectioned. The brief sets out our requirements and we expect that these will be upheld during the course of excavation.</p>
--	--	--	---

			<p>2) Identifying features for excavation at the expense of others, or to conduct a very low level of investigation (not specified), risks the loss of important information within feature fills that cannot be seen on the surface. Recent excavation at the A428's proposed main compound site within Urban and Civic's Wintringham Park development area (Site 14 in Table 5-1 [REP3-010]) has revealed a Bronze Age cremation cemetery and unenclosed Iron Age settlement remains that had not been found or understood from the evaluation trenches. As an example, UAMS Appendix D shows the mitigation strategy for Site 23 - an area where Iron Age occupation including a cremation burial was found. The mitigation area shown is very small and excludes other known contemporary or associated features found in the wider field, while the mitigation strategy is shown as "Sampling around the roundhouse" followed by a long list of research objectives that cannot realistically be met by such an approach. We reject the strategy and the area for this site and have discussed this with the Applicant at length.</p> <p>To exclude areas of irreplaceable archaeological evidence that will otherwise be destroyed without record, and to attempt a reconstruction of past activity in an area based on a 3% evaluation trenching interval is not acceptable professional practice and does not conform to NPSNN policies for</p>
--	--	--	---

			<p>recording archaeological remains in 5.139-5.142.</p> <p>We understand that the Applicant is to deposit a further update AMS to ensure that the principal sections and the Appendices provide consistency of message and are deliverable by an archaeological contractor.</p> <p>b) The Applicant selection of site areas is feature-based and too conveniently omits archaeological remains that provided no dating evidence in single 1m slots opened in ditches or in discrete e.g., ures (e.g., pits). The argument about which trenches contained no or undated evidence over those that did and restricting the mitigation areas to those that did, prevents the broader understanding of how the Iron Age and Roman settlement and task sites interrelated in this area on the clay plain, if at all, and how they worked in relation to roads/trackways and rivers for transport and associated sites known from the Historic Environment Record in very close proximity to the scheme. Designing areas for mitigation is not a perfect science and we have advised an approach that interprets the remains found and that will address the destructive impacts of the A428 scheme on this finite archaeological resource.</p>
<p>Q2.13. Landscape and Visual Effects</p>			<p>Q2.13.3 First Iteration EMP and Landscape and Ecology Management Plan</p>

<p>Q2.13.3.1</p>	<p>Bedford Borough Council Cambridgeshire Councils Natural England</p>	<p>Question repeated to seek response from specific respondents</p> <p>Mitigation</p> <p>a) BBC, are you satisfied with the level of detail regarding the proposed mitigation that would have been secured through the First Iteration EMP, including the Landscape and Ecology Management Plan [APP-234] and the dDCO [APP-025]?</p> <p>b) The ES states that one of the measures to mitigate the effects of construction activities includes sympathetic lighting to minimise disturbance to nearby receptors. The Applicant is not intending to provide any further information about the objectives for lighting measures, than is already provided in the First Iteration EMP [APP-234, Section 1.4]. BBC to comment.</p> <p>c) Would the Proposed Development be sufficiently screened, particularly relative to existing settlements, such as Roxton, or St Neots?</p> <p>d) ExA seeks responses from the Cambridgeshire Councils and NE on the responses provided by the Applicant [REP3-007].</p>	<p>d): The Applicant's response to Cambridgeshire Council's response at Q1.13.3.1 is based on the findings of 2021 survey work. However, this evidence has not been submitted to the Examination. Therefore, we cannot determine whether this survey work is appropriate and whether the Applicant's response [REP3-007] adequately addressed our comments.</p> <p><u>Bats</u></p> <p>We welcome acknowledgement that there will be no lighting of the bat tunnel or other underpasses (last paragraph, page 165 [REP3-007]) but it is unclear if this would be a conflict between its dual purpose as a NMU route.</p> <p>As discussed at question Q2.3.5.1 (above), there are no details on the Environmental Masterplan to demonstrate the bats will pass through underpasses with no change in flight height or direction [APP-091]</p> <p>We welcome the Applicant's confirmation that long term management of the proposed habitats will be carried out for the lifetime of the Scheme. The Applicant states that Annex L of the First Iteration Environmental Management Plan [APP-234] provides an outline of how these habitats will be managed. However, the management of ponds are covered by Annex L. This should</p>
------------------	--	--	--

			<p>be updated in line with the Joint Position Statement with the Applicant and NE on Drainage Ponds [REP3-026] (as amended per the Councils' comments in Cover Letter CLA.D4.CL submitted at Deadline 4. In addition, there's not information about the maintenance of artificial refugia, such as bat boxes.</p> <p>These management prescriptions will be developed further in the Second Iteration Environmental Management Plan. The Councils seek consultation on the development of the Second Iteration EMP.</p>
Q2.13.3.2	Cambridgeshire Councils Natural England	<p>Mitigation Comment on the responses provided by the Applicant [REP3-007].</p>	<p>Please see response to question Q2.13.3.1 (above). Whether or not the mitigation proposed by the Applicant is appropriate will depend upon the outcome of the 2021 surveys.</p>
Q2.16. Noise and Vibration			
Q2.16.1 Construction and Operational effects on sensitive receptors			
Q2.16.1.1	Local Authorities All Parties	<p>Borrow Pits Does the Applicant's Borrow Pits Excavation and Restoration Report [REP3-011] adequately address concerns relating to noise associated with the use of Borrow Pits? If not, explain with reasoning.</p>	<p>We accept the construction noise assessment reported in Chapter 11, Noise and Vibration of the Environmental Statement [APP-080] was based on reasonable worst-case assumptions, including for works associated with the borrow pits. However, whilst a brief description of the noise environment at each borrow pit is stated, site-specific details of mitigation to be employed are not given and do not take account of the actual noise</p>

			<p>sources present (i.e., equipment to be used and expected levels of attenuation expected after noise mitigation has been installed). Reference is again made to the details presented in the 1st Iteration EMP. As discussed, the first Iteration is too high-level and general to contain the site-specific details required to be agreed at this stage. Details of mitigation for noise and dust impacts are due to be confirmed in the Second Iteration of the EMP, as reported in our response to Q2.6.2.2 b).</p> <p>During the ISH2 on 23rd September 2021, Agenda item 9.2 NH stated that temporary screens would not be used due to noise predictions indicating they would not be necessary. In order to provide “Best Practical Means” mitigation due to noisy construction works (especially at night when background noise levels are lower) temporary barriers will probably be essential in certain circumstances.</p>
Q2.16.1.2	Local Authorities All Parties	<p>Noise baseline monitoring Do LAs and IPs agree with the rationale put forward by the Applicant [REP3-019, AppendixB] to explain how the baseline noise monitoring undertaken was sufficient for the purposes of the ES? If not, explain with reasons.</p>	Agreed.
Q2.16.1.3	Local Authorities All Parties	<p>Noise and Vibration Errata</p>	This 9.42 Chapter 11 Noise and Vibration Errata document does not change the methodology used or outcomes reported, as

		Do LAs or IPs have any comments regarding REP3-27 which clarifies that dates of BaseYear traffic data, as referred to in various submissions by the Applicant, should be 2015 rather than 2016.	it appears only to correct a typographical error.
Q2.17. Significant Cumulative Effects			
Q2.17.3 Assessment of combined effects			
Q2.17.3.1	Applicant Local Authorities	Proposed mitigation Applicant, for the receptors that would experience large adverse combined effects, and moderate adverse effects [APP-084] [APP-112] do you believe the First Iteration EMP should identify support and point of contact with the Community Liaison Manager or similar to provide immediate and short-term mitigation to effects of construction period? Should this be identified as additional mitigation? LAs to comment.	Any early engagement with receptors likely to be impacted by the Scheme would be a welcome inclusion. As discussed, the First Iteration EMP is too high level and general in nature (see response to Q2.6.2.2 b and Q2.16.1.1). Site specific details for construction will be required moving forward (Second Iteration EMP), but provision of this information may be too late in some circumstances.. Generally, an early intervention would speed up complaint resolution and reduce the potential for complaints to escalate. Therefore, we agree the First Iteration EMP should identify support and provide a point of contact for the Community Liaison Manager, or similar, to provide immediate and short-term mitigation to effects of the construction period.
Q2.18. Socio-economic effects			
Q2.18.1 Methodology			
Q2.18.1.1	Applicant Local Authorities	Human health Notwithstanding the responses from the Applicant [REP1-022] and PHE [REP1-090], do you believe the First Iteration EMP should identify support and point of contact with the Community Liaison Manager or	Please see the response to question 2.17.3.1.

		similar to provide immediate and short-term mitigation receptors identified by the Cambridgeshire Councils [REP1-051] during the construction period? Should this be identified as additional mitigation? LAs to comment.	
--	--	---	--