

## Comments on the Applicant's comments on Written Representations

This document sets out the comments on the Applicant's comments on Written Representations **[REP3-008]** 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.

### Applicant comments on the Councils' Written Representation

Topic	Reference Number & Page Number	Councils' Comment
Traffic Modelling	REP1-048a	The Councils recognise that the issues set out in this section have been discussed at the Local Technical Review Group (LTRG) meetings and that these meetings have been informed by the joint issues log. There have been a number of iterations of the Issues Log. The issues have not been addressed to the satisfaction of the Councils meaning that we are not in a position to confirm the impact of the proposed scheme on the local road network.
Traffic Modelling	REP1-048b	The response from National Highways (NH) to this section includes reference to a sensitivity test undertaken at Girton Interchange to address the issues identified by the review of the model. This sensitivity test and the detailed results has not been shared with the Councils by NH.
Traffic Modelling	REP1-048c	This section refers to the Issues of routing through Coton. This has been addressed by the Technical Note (TN) submitted to the examination <b>[REP1-028]</b> and the Councils have commented on this TN separately.

Traffic Modelling	REP1-048d	<p>The Councils raised the issues with the volume of traffic using the B1040 throughout the full extent of the Cordoned model supplied for review.</p> <p>NH refer to a select link analysis done on the B1040 and summarises the results seen. This information has not been supplied to the Councils for review.</p> <p>The Councils acknowledge that the proposed scheme has a beneficial impact on the volume of traffic rat running through the village of Eltisley.</p>
Traffic Modelling	REP1-048e	<p>The key issue here is that the Strategic Model does not adequately represent the observed traffic movements. The use of the alternative Route via the B1040 was also investigated and this showed that there was insufficient traffic making this movement to reflect that indicated by the observed data and therefore the Councils maintain the view that the model does not accurately reflect the movements in this area of the model.</p> <p>NH state that there is traffic making these movements in the with scheme scenario but the fact that there is no traffic making these movements at this junction means it is possible that the level of traffic wanting to make this movement with the scheme might be underrepresented.</p> <p>This makes the issue with the flows used in the operational junction models even more important in this area.</p>
Traffic Modelling	REP1-048f	<p>This point deals with the impact of the scheme on Great North Road St Neots. NH repeat the point that overall the scheme has a betterment on St Neots.</p> <p>This argument is not sufficient because as set out elsewhere if there is congestion on these routes then the predicted rerouting from other routes in St Neots may not be realised which would reduce the benefit of the scheme on St Neots.</p>
Traffic Modelling	REP1-048g	<p>This point deals with the Impact of the scheme on Cambridge Road St Neots. NH repeat the point that overall the scheme has a betterment on St Neots.</p>

		This argument is not sufficient because as set out elsewhere if there is congestion on these routes then the predicted rerouting from other routes in St Neots may not be realised which would reduce the benefit of the scheme on St Neots.
Traffic Modelling	REP1-048h	This point refers to the coding of Girton Interchange in the strategic model NH again refer to the sensitivity test that has been undertaken on this area of the model which has not been supplied to the Councils.
Traffic Modelling	REP1-048i	This point refers to the routing issues through Coton. NH have submitted a TN [TR010044/EXAM/9.8] that indicates that the coding of this model in this area is incorrect. The Councils have reviewed this TN separately. NH have indicated they would be prepared to monitor traffic flows through Coton.
Traffic Modelling	REP1-048j	This point refers to the routing of traffic through the cordoned model that uses the proposed new road and then the A1198 south of the A428.  NH refer to a select link analysis that has been undertaken on this routing with the summary that these are trips going to Cambourne, Caxton and other local villages. The issue for the Councils is that we were not able to see the full range of origins for these trips due to the origin being outside the cordoned model. The Select link analysis has not been shared with the Councils. The provision of this information would allow the Councils to form a view on the nature of the rerouting and the impact on the local road network.
Traffic Modelling	REP1-048k	This point deals with the increase in traffic through Dry Drayton as a result of the introduction of the scheme.  NH repeat the argument that the traffic flows change in the area by 2040 anyway due to the opening of the A14 scheme and traffic to and from Northstowe. However, that analysis undertaken by the Councils indicates that the proposed scheme leads to additional traffic through Dry Drayton.  NH refer to the TN [TR010044/EXAM/9.43], submitted at Deadline 3. However, as set out in the Councils' review of this document to be submitted at Deadline 4 [CLA.D4.OS.A.C],

		<p>the assessment undertaken by NH does not address the issues highlighted by the Councils as the links assessed are not those highlighted by the Councils.</p> <p>The Councils require the impact of the scheme on Dry Drayton to be monitored as it is a direct impact of the scheme.</p>
Traffic Modelling	REP1-048l	<p>This point deals with the increase in traffic through Madingley as a result of the introduction of the scheme.</p> <p>NH repeat the argument that the traffic flows change in the area by 2040 anyway due to the opening of the A14 scheme and traffic to and from Northstowe. However, that analysis undertaken by the Councils indicates that the proposed scheme leads to additional traffic through Madingley.</p> <p>NH refer to the TN [TR010044/EXAM/9.43], submitted at Deadline 3. However, as set out in the Councils' review of this document to be submitted at Deadline 4 [CLA.D4.OS.A.C], the assessment undertaken by NH does not address the issues highlighted by the Councils as the links assessed are not those highlighted by the Councils.</p> <p>The Councils require the impact of the scheme on Madingley to be monitored as it is a direct impact of the scheme.</p>
Traffic Modelling	REP1-048m	<p><u>Local Junction models</u></p> <p>NH have agreed to undertake sensitivity tests at key junctions which will hopefully address this issue. The Councils would welcome discussion on the traffic flows to be used ahead of any additional modelling to minimise the risk of further disagreement on this matter as the traffic flows feed into several areas of the scheme including scheme design and therefore it is vital that we can agree the traffic flows to be used in the junction assessments as soon as possible.</p>
Traffic Modelling	REP1-048n	<p><u>The modelling of the Cambourne Signalised junction</u></p>

		<p>NH have checked the parameters used in the junction assessment and confirm that they are correct. As discussed above the flows used in the junction assessments are not agreed as these have been taken directly from the Strategic Model. Once the flows have been agreed the performance of the junction can be reassessed. The level of over provision suggested by the work undertaken by NH to date would not be acceptable as this might encourage more traffic which would not be compliant with policies dealing with sustainability and carbon zero.</p>
Traffic Modelling	REP1-048o	<p><u>The modelling of Madingley Mulch</u></p> <p>NH refer to this junction being included in an extended M11J13 VISSIM model, this is welcomed but this revised model has not been shared with the Councils. NH have agreed to undertake sensitivity tests at key junctions which will hopefully address this issue.</p>
Traffic Modelling	REP1-048p	<p><u>Wyboston Junction</u></p> <p>Regarding points (ii) and (iii) the point on the peak hours is noted and agreed.</p> <p>Regarding point (iv) the geometries when checked by CCC did not match those on the ground. This can be checked as part of the sensitivity tests to be undertaken by NH.</p> <p>Regarding point (v) the Councils are concerned over the use of flows directly from the strategic model in the testing of the local junctions as the turning proportions don't accurately reflect the observed turning movements.</p> <p>The operation of this junction is key to both the operation of the local road network and the success of the proposed scheme as this is a key access point to both networks. The Councils need assurance that the junctions on Great North Road will be able to accommodate the additional traffic predicted by the Strategic model as this is vital to the operation of the local road network and the realisation of the benefits associated with the scheme because if Great North Road cannot accommodate the predicted additional traffic then the level of rerouting away from the town centre will be reduced and therefore the scheme will not have a beneficial impact on St Neots.</p>

		The Councils hope that these issues will be addressed by NH undertaking the agreed sensitivity test on the Wyboston junction and further assessments of the adjacent junctions on Great North Road.
Traffic Modelling	REP1-048q	The VISSIM model include a number of assumptions that have been derived by Transport for London to aid in the modelling of congested urban road networks. Some of these assumptions have the potential to underestimate the length of queue at these junctions and could lead to the level of performance being over estimated. NH have indicated that these assumptions will be amended in the sensitivity test that are to be undertaken. The Councils wait for the scope of these sensitivity tests to be agreed.
Traffic Modelling	REP1-048r	The overlapping of vehicles is present in all the Vissim Models but is a particular concern for M11 J13. The Councils hope that this will be addressed in the sensitivity tests that NH propose to conduct. The Councils wait for the scope of these sensitivity tests to be agreed.
Traffic Modelling	REP1-048s	<u>Number of runs used for some VISSIM models</u>  The Councils hope that this will be addressed in the sensitivity tests that NH propose to conduct. The Councils wait for the scope of these sensitivity tests to be agreed.
Traffic Modelling	REP1-048t	<u>Conclusions drawn from junction models</u>  The Councils hope that this will be addressed in the sensitivity tests that NH propose to conduct. The Councils wait for the scope of these sensitivity tests to be agreed.
Traffic Modelling	REP1-048u	<u>Construction Impacts</u>  The modelling of the Construction traffic appears to be reasonable although the routes to be used by construction traffic still need to be agreed with the Councils.
Traffic Modelling	REP1-048v	<u>Diverted traffic during construction</u>  The modelling of rerouting traffic during construction is likely to be overestimated due in part to the high speeds assumed in the model on the existing A428 without the scheme

		meaning that more traffic reroutes in the model than might otherwise be expected and therefore the Councils request monitoring be undertaken in key locations (to be agreed) to enable the impact of construction on key roads to be assessed.
Traffic Modelling	REP1-048w	This point relates to rerouting traffic and not construction traffic. The point is that the traffic management should be designed in such a way as to accommodate the level of traffic that would be looking to use the A428. As the strategic model potentially overestimates the level of traffic that would reroute away from the A428, if a speed of 40mph through the road works could be secured on a regular basis.
Traffic Modelling	REP1-048x	If the modelling of the rerouting traffic during construction were to be redone with some form of constraint on unsuitable routes this would aid the Councils in determining the focus of monitoring during construction but if this is not forthcoming then the Councils will seek to secure monitoring for all the key areas that are shown to be impacted by the different construction phases. The Councils will seek to agree this with the Applicant.
Highway Assets	REP1-048z	<p><u>3.4, 3.6 and 3.7</u></p> <p>It is not accepted that the Legal Agreement alone will be sufficient to govern the relationship between the parties regarding the handover of assets (be that via de-trunking or the hand-over of local roads). CCC requires that sufficient protections be inserted into the DCO such that the Applicant cannot set a de-trunking date or hand over assets without the requirements of the Legal Agreement being satisfied.</p> <p>The Applicant has not satisfactorily addressed item 3.10 of the Councils' Written Representation [<b>REP1-048</b>], regarding areas of the de-trunked A428 that are not required for highway purposes, stating that this should be addressed through a separate legal agreement. However, it should be noted that this matter could be resolved through the legal provisions of the DCO without requiring separate agreements or legal processes to be undertaken. The excess land could simply be stopped up through the DCO and the remaining areas that are still essential for the operation of the highway could be de-trunked. It is far more efficient to complete these changes through the DCO than to undertake separate legal processes afterwards.</p>

<p>Draft DCO – limits of deviation</p>	<p>REP1-048aa</p>	<p>The Councils welcome the further consideration being given by the Applicant to the matters raised in the Councils’ Written Representation [<b>REP1-048</b>].</p> <p>The Councils reiterate their view that the limits of deviation applicable to the Works Plans are not appropriate for the public rights of way as, for example, a public right of way intended to provide connectivity on the west of the Scheme could be provided on the east within the limits of deviation. Ensuring that the public rights of way operate as a coherent network is a material concern to the Councils. The inclusion of a specific limit of deviation for each public right of way will allow the Councils to make an overall assessment of the coherency of the network.</p> <p>The Councils note the Applicant’s comment that: <i>“it is the Applicant’s view that the existing limits of deviation as shown on the Works Plans [<b>APP-090 and APP-010</b>] could be applied to the PROW/NMU routes and that separate limits of deviation for each PROW/NMU route are not necessary”</i>. The Council submits that, since the limits of deviation shown on the Works Plans are significantly wider than those which would apply if each PROW/NMU route had its own limit of deviation as proposed by the Councils, it is for the Applicant to demonstrate why this additional flexibility is necessary. The Councils are not aware of this explanation being before the Examination. The Applicant’s comment that <i>“the proposed PROW/NMU routes for this Scheme are, in a majority of cases, being provided as part of a new carriageway (in the case of a footway/cycleway) or where it will connect to an existing PROW and as such the flexibility as to where the right of way can be located is limited by the need to connect to the existing way”</i> again raises the question as to why wider limits of deviation are necessary.</p> <p>The Applicant has however failed to address the requirement raised in the Councils’ Written Representation [<b>REP1-048</b>], items 3.20 and 3.21, that a legal solution needs to be put in place to ensure that new highways which are constructed on alignments different to those specified in the DCO can be given legal effect. This is of significance because if the new highways are not constructed in accordance with the locations specified in the DCO, other legal processes will be required in order to give them legal effect. CCC does not accept the Applicant’s submission that this is unlikely to occur. It is notable that this has occurred many times in the construction of the A14 scheme - for example at Woolley Road, new bridleways that were specified within the DCO were not constructed on the correct</p>
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		<p>alignment, resulting in separate legal processes being required to legally bring those bridleways into being - similar situations arose at various points across the scheme and it is clear that this must be avoided in future. The Councils require that further revisions to the DCO are made to avert this potential outcome. For example, it should be considered whether, in a situation where the LHA consents to the proposed relocation of a highway, this could serve to give effect to the revised location for the purposes of Schedule 3 of the DCO, thus enabling the new location to be given legal effect. CCC would comment that this issue is quite nuanced and would suggest that the matter is easier discussed to enable a clear demonstration of the problem and give a better opportunity of reaching a solution. The Applicant has proposed that as-built plans will be provided to the LHA to enable the accurate statutory recording of new PROW. This is positive, however until it has had the opportunity to review such plans, the Councils cannot indicate that this proposal is satisfactory for the purposes of updating the Definitive Map and Statement under the clauses of the Wildlife and Countryside Act 1981.</p>
Highway maintenance liability – dDCO article 13(3) and 13(9)	REP1-048ab	<p>In the Applicant’s comments on Written Representations item REP1-048ab, the Applicant acknowledges that it is further considering the appropriate maintenance ‘split’ in situations where a private vehicular means of access and a public right of way share a surface, as referenced at article 13(3) and 13(9) of the dDCO. This is welcomed. In its Written Representation at items 3.25 and 3.26, CCC is clear that any public right of way that shares a surface with a private vehicular means of access should not be maintainable by the LHA. In particular, farm vehicles using one of these shared public/private routes will typically cause more substantial damage to the surface of the way than the lighter bridleway or foot traffic that may pass over it as users of the PROW.</p> <p>Further details are to be provided by the applicant at deadline 4. Therefore, CCC retains its objection at this time.</p>
Highway boundaries – dDCO schedules and plans	REP1-048ac	<p>In applicant’s comments on Written Representations item REP1-048ac, the Applicant states that “the exact boundaries for adoption [on new local roads] will be addressed within the legal agreement to be completed between the parties as these will be the subject of detailed discussions”. The Applicant has also stated that “it is not the intention of the Applicant to ask CCC as LHA to adopt non-highway land”. This is acknowledged by CCC, however at this time CCC cannot indicate its agreement with this answer.</p>

		<p>It is not accepted that the Legal Agreement alone will be sufficient to govern the relationship between the parties regarding the extent of new highway assets to be handed over to the LHA.</p> <p>In its Written Representation at para 3.28-3.29, CCC has requested the inclusion of proposed local road boundaries within the dDCO <i>Streets, Rights of Way and Access</i> plans, so to provide an indication to the LHA of the extent of asset it is expected to inherit. Addressing this request would go some way to informing the process of identifying exact boundaries, as the applicant seeks to do through legal agreement, and it would also help to set the expectations of the public over the extent of the new public highways upon completion of the scheme.</p> <p>CCC wishes to point out that the definition of the extent of the highway is not solely a maintenance issue. It is a legal matter that must be appropriately documented. Therefore, it would be appropriate to have some reference to this in the DCO. CCC's Highways Service has not been contacted with a view to commencing this process to date, despite requests in its Written Representation REP1-048 para 3.30.</p>
Landscaping	REP1-048ac	It is welcomed that the Applicant has acknowledged in its comments on Written Representations REP1-048ac, that CCC wishes to be consulted on landscaping schemes and that it will consider the matter further. CCC agrees that it should only be consulted on landscaping issues that will be of relevance to CCC in its capacity as LHA.
Stopping up of highway	REP1-048ad	The Applicant has addressed concerns raised by CCC in REP1-048, items 3.32 and 3.33, by pointing out at REP1-048ad that the DCO will deploy TROs to prohibit public access from the emergency slip roads provided at Toseland Road (excepting users of the adjacent diverted footpaths who will be served by provision of footways) and Potton Road B1046 (all public traffic).
Highway Design	REP1-048ae to Rep1-048ao inclusive	Not agreed. The Applicant has not justified its approach and still does not seem to understand that it does not decide matters of local road highway design, the Local Highway Authority does. There are also several misleading statements. The Council's position

		<p>remains as stated in the Written Representation [REP1-048]. Specific further comments outlined below.</p>
	<p>REP1-048ae</p>	<p>4.1: The Applicant has clearly pointed out how its own organisational aims and objectives for the SRN align with those of the Vision Zero strategy and should also note it is a named partner in the Cambridgeshire and Peterborough Vision Zero Partnership. However, our concern arises around the apparent reluctance to commit to these same aims and objectives for affected roads not on the SRN. Our position remains that the Applicant should commit to comply with the Vision Zero aims and objectives which apply to ALL roads, not just the SRN and therefore the safety benefits associated with the scheme should be realised for all affected roads, not just those on the SRN.</p> <p>If the Applicant has specific issues regarding complying with the aims and objectives of the Vision Zero strategy, then these should be raised.</p> <p>If further justification is required, the Applicant’s own report “Putting Safety First”<sup>1</sup> outlines the following (p.8):</p> <p><b>“SAVING LIVES THROUGH 3-STAR ROADS</b>  <i>Halving road deaths and injuries is a United Nations Sustainable Development Goal. UN member states have agreed that all new roads will be built to a 3-star or better standard, and that by 2030 more than 75% of travel is on the equivalent of 3-star or better roads. It is estimated that achieving these targets will save an estimated 467,000 lives globally every year.”</i></p> <p>This statement applies to all new roads and is not exclusive to the SRN.</p> <p>In addition, the “Putting Safety First” document also states as part of their Home Safe and Well approach:</p> <p><i>“We’ll continue to work with others to push the boundaries and drive improvements, so we can make sure everyone who works on or uses our network gets home safe and well...”</i></p>

<sup>1</sup> <https://highwaysengland.co.uk/media/npvmcrjg/putting-safety-first.pdf>

		<p><i>“...To truly mature our company culture to a level where no one is killed or injured on our roads, we’ll need to engrain health safety and wellbeing into everything we do. The high standards we expect should be the natural choice for everyone who works for us, not an additional effort. We’ve made excellent progress over the last four years, and it’s because of this progress we’re confident our Home Safe and Well approach is the right direction for the future of our company.” (page 26).</i></p> <p>It is very rare that these journeys will both start and finish on the SRN, and there is a clear statement from the Applicant to work with others to achieve this. Cambridgeshire is one of only a handful of Local Highway Authorities that have taken similar, bold steps to the Applicant in setting ambitious casualty reduction targets towards zero by 2040 and it is disappointing that the Applicant is prepared to argue against working together towards our mutual goals, rather than demonstrating the “high standards” quoted above.</p>
	<p>REP1-048ae</p>	<p>4.4: The Council as the Local Highway Authority is in the best position to determine how best to remove unnecessary safety risks based on the nature of existing local roads, not the Applicant. The Councils position is now summarised very clearly in response to written question 2.11.2.1.</p> <p>The previous Road Safety Audits referred to were not specific to the local roads but general to the whole Scheme and the comments related to avoiding repeated changes in carriageway cross section.</p> <p>The Council is not suggesting that the majority of rural roads are unsafe.</p> <p>A14 post-construction amendments have been needed to address several design aspects that were not fully in accordance with DMRB standards. For example, at Grafham Road the new two-lane carriageway ties into an existing narrow single lane road, hence the provision of narrow road ahead warning signs simply addresses a matter that should have been dealt with at the detailed design stage, not post-construction. Also, at some over-bridge locations double white lines have been provided to prevent inappropriate overtaking due to insufficient stopping sight distance over the brow of the hill. The designer did not assess the DMRB vertical curvature crest ‘K’ value correctly. Again, this should have been dealt with at</p>

		detailed design and it has nothing to do with the provision of a compliant, 7.3m wide, carriageway.
	REP1-048af	4.6.5: The Council notes the Applicant's statement; however it is not a matter of whether there are any fundamental changes in the standards but rather agreeing which version of the standards will actually be used for consistency.
	REP1-048ag	4.7.3: It remains the case that formal departures from standard for reduced cross sections on neither Toseland Road nor B1066/Potton Road have been approved by the local Highway Authority, as required by TD27/05. Therefore, the DfS should not have been incorporated into the scheme.
	REP1-048ag	<p>4.7.5 d): Other local authority roads are subject to lower speeds, typically 30mph, whereas the Council's roads are typically 60mph, so DMRB is wholly appropriate for the latter.</p> <p>4.7.5 e): The Applicant has yet to agree the traffic model with the Council. The Council's statement is based on the information that was provided by the Applicant at the preliminary design stage, so finalised volumes are awaited.</p> <p>It would appear from the response that the Applicant is now offering to construct unkerbed roads at 6.6m width. Whilst an improvement it is still substandard.</p> <p>4.7.5 f): The Council disagrees that splashing of water onto the NMU will occur only in the event of extreme rainfall. The width of water flow against the kerb between gully outfalls will mean that water will be in the wheel path in 'normal' rainfall events if the road is narrow, as currently proposed. Climate change is resulting in more intense rainfall with increased frequency so the frequency of water splashing will increase accordingly.</p>
	REP1-048ah	4.8.2: It is not for the Council to justify why standards should be applied, it is the Applicant's responsibility to justify any variation from standards, which they have not done based on sound engineering reasons. Notwithstanding this, the Councils position is now summarised very clearly in response to written question 2.11.2.1

		4.8.6: DMRB is wholly appropriate for the design of new local roads. This decision rests with the relevant Local Highway Authority, not the Applicant. GG 101 Clause 1.1.1 states <i>“Where DMRB requirements are applied to other roads, the specific highway or local road authority acting as the Overseeing Organisation should decide on the extent to which the requirements are appropriate in any given situation.”</i>
	REP1-048ai	4.9.1 It remains the case that formal departures from standard for reduced cross sections on neither Toseland Road nor B1066/Potton Road have been approved by the local Highway Authority, as required by TD27/05. Therefore, the DfS should not have been incorporated into the scheme.  4.9.2: The Council maintains its view that there will not be isolated sections of wider roads, driver speeds will not necessarily increase unacceptably nor will the temptation to overtake unsafely arise if the roads are designed to fully comply with Standards.
	REP1-048aj	4.10.1 and 4.10.2: The Council’s position remains that the highway drainage design does not currently take account of the required principles.
	REP1-048ak	4.11.2: The Council maintains its view that there will not be isolated sections of wider roads, driver speeds will not necessarily increase unacceptably nor will the temptation to overtake unsafely arise if the roads are designed to fully comply with Standards.  4.11.4: Disagree that providing the standard road width i.e. an additional lane width of 0.65m “...will increase speeds”. Also, even if speeds do increase it is not necessarily more dangerous. Collisions quoted are from earlier 5-year period and include a serious collision at a bend to be removed by scheme.  4.11.6: The Council has not been provided with any junction specific RSA; the Applicant is requested to provide a copy.
	REP1-048al	4.12.2: The Council maintains its view that there will not be isolated sections of wider roads, driver speeds will not necessarily increase unacceptably nor will the temptation to overtake unsafely arise if the roads are designed to fully comply with Standards.

		<p>4.12.7: The decision on applying DMRB standards rests with the relevant Local Highway Authority, not the Applicant. GG 101 Clause 1.1.1 states “Where DMRB requirements are applied to other roads, the specific highway or local road authority acting as the Overseeing Organisation should decide on the extent to which the requirements are appropriate in any given situation.”</p> <p>4.12.8: Apposite term being “very localised widening”. Council expects whole of new constructed length to be constructed to appropriate DMRB standard sufficient for safe 2-way working for large vehicles including NMU traffic.</p>
	REP1-048ao	<p>4.15: The Council as the Local Highway Authority is in the best position to determine how best to assess operational safety on the local roads, not the Applicant.</p> <p>The decision on applying DMRB standards rests with the relevant Local Highway Authority, not the Applicant. GG 101 Clause 1.1.1 states “Where DMRB requirements are applied to other roads, the specific highway or local road authority acting as the Overseeing Organisation should decide on the extent to which the requirements are appropriate in any given situation.”</p> <p>The Applicant’s own preliminary ‘Side Roads Departure from Standards’ documents quote significant reduced construction costs as justification, in part, for the reduced carriageway width. For example, at Toseland Road Doc. Ref. HE551495-ACM-HAC-ZN4_SR_Z_ZZ-DF-CH-4047 states on page 6 D Capital and Whole Life Cost/Value “Providing the proposed narrower road width is estimated to provide an overall cost saving for roadworks and bridgeworks of £1,783,000 compared to the compliant design during the delivery stages of the scheme.” Furthermore, G Structural “For the proposed design, the cost of the overbridge is estimated to cost approximately £817,000 less than for a compliant design, owing to the reduction in the width of the bridge.”</p>
	REP 1-048ar	This change to the construction route near the school is welcomed.

	REP 1-048as	The council would welcome ongoing engagement on this matter as the level of traffic likely to reassign on to the local network is shown by the modelling to be significant and this remains a concern.
	REP 1-048at	This comment is noted, and it is agreed that close working with police on this matter is critical.
Highway Network Impact During Construction	REP1-048au	5.6: The Applicant has failed to address the substantive issue of damage to the local road network caused by construction traffic and diverted traffic. The Applicant merely states that it is committed to keeping existing users of the SRN on the SRN. Construction and diverted traffic will, of necessity use the local road network. In the case of heavier vehicles, this will cause damage to the local road network. This will constitute extraordinary traffic and the provisions of Section 59 of the Highways Act 1980 are relevant and should be included in the Legal Agreement. This is key learning point from the A14 scheme.
	REP 1-048av/aw/ax	This is an acceptable way forward.
	REP1-048ay	5.10: The above comments regarding extraordinary traffic apply.
Non-Motorised Users (NMU) and Public Rights of Way	REP1-048az	<p>6.1: The Applicant's statement that connectivity of the existing RoW is maintained is accepted. However, the existing network starts at a low base level and the sections of shared footway/cycleway proposed for Cambridgeshire are piecemeal and fragmented. They do not form coherent routes and as such do not serve to connect communities or promote increased active travel as required by local and government policies, as set out in the Council's Written Representations sections 6.2-6.3, reference TR010044. They may also encourage users to attempt a journey on foot or by cycle which ends suddenly leaving them with a choice of turning back or continuing in an unsafe environment. In addition, as previously stated, the proposal is for the bare minimum provision and does not take the opportunity to improve and enhance NMU provision for wider society's health and wellbeing, including that of equestrians.</p> <p>6.2.1 - 6.2.17: To say that National Highways is not bound by the same policies is to say that one rule applies for them and another for local highway authorities. This is inconsistent, poor collaborative working that is not in the best public interest. The Design Manual for</p>



		<p>Roads and Bridges, including CD 143, applies to the design of walking, cycling and shared use facilities on and/or adjacent to the motorway and all-purpose trunk road network. All NMU provision along non-trunk roads should therefore accord with LTN 1/20 which states that “The guidance should be applied to all changes associated with highway improvements, new highway construction and new or improved cycle facilities, including those on other rights of way such as bridleways and routes within public open space.”</p> <p>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.’ CCC considers 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. We request details of the type and location of signalled crossings of the slip roads and roundabout north of Caxton Gibbet roundabout.</p>
	REP1-048ba	As above (6.1).
	REP1-048bb	<p>6.4.1: See the CCC response under REP1-048aa.</p> <p>6.4.2: In the applicant’s comments on Written Reps [REP1-048bb], it is stated that details of the handover process for new/amended PROW should be secured within a side legal agreement. CCC wishes to make the point that the handover of PROW should be subject to the same inspection and certification process as new roads, and this is better clarified under article 13 of the dDCO. CCC does not currently have any certainty from the applicant regarding what this handover process will be, and as the side legal agreement is</p>

		<p>still under discussion, CCC is not currently in a position to agree with the Applicant's response.</p> <p>6.4.3: Noted.</p> <p>6.4.4 - 6.4.7: <u>Extinguishment of PROW</u> – CCC has requested in its Written Representation that it is given a role in authorising that extinguishments of PROW are appropriate to proceed. The Applicant states that it feels discussion about such matters is more suitably carried out through the SoCG and asks why such additional controls are required. To expand, the LHA needs to know when PROW are to be extinguished because 1) there might effectively be an alternative provided (e.g. 4 PROW are to be 'merged' into two new routes over the A428), of which the LHA needs to be satisfied before the old routes can be safely extinguished (including that alternative routes provided by the scheme or using pre-existing routes are appropriate and ready to act as a diversion and that there is no deviation from the route shown in the DCO plans), and b) in order for CCC in its role as the Order-Making Authority (OMA) to undertake its statutory duty with regard to effecting changes on the Definitive Map &amp; Statement through appropriate Legal Event Modification Orders under s53 WCA 81. If the OMA does not know the changes are coming it cannot put in place the appropriate follow-up legal work. As NH will be paying for that work, it is in its interest to know when those costs are likely to come back to them. CCC believes that simple amendments to the relevant dDCO clauses (article 18(2) and article 29(2)) should be incorporated now to ensure clarity for all parties and hopes this can be considered further. CCC has also requested additional measures related to noticing under dDCO article 29 which the Applicant would prefer to agree separately, but which it is felt could be easily and more effectively be incorporated into the DCO.</p> <p>6.4.8 - 6.4.10: <u>PROW Widths and Standards</u> – CCC has requested that the Applicant commits to provision of PROWs and NMU routes to minimum width standards by incorporating these widths into part 7 of schedule 3 of the dDCO. The Applicant feels that this should be deferred to the SoCG or side agreement, along with other matters raised by CCC that relate to the standard of construction of PROW. The SOCG and legal agreement are still under negotiation, but it remains the Councils' preference that PROW widths should be held within the DCO, to provide clear governance going forward and align it with the statutory processes that the LHA must follow for all orders affecting PROW that it makes. It</p>
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		<p>would save considerable uncertainty and engender a valuable improvement to the asset-recording process. There is no reason why such an improvement should not be made. We reject this response. To change the layout and/or standard of the route to enable improvements after construction is more expensive and difficult once the trunk road is open than providing facilities for equestrians from the outset. It would be wasteful of the public purse. The NMU users would also undergo further disruption as changes to signage and crossings are carried out. It is also difficult to legally alter the status of a roadside shared pedestrian and cycle NMU route to include equestrians due to a technicality of the law. It is far more efficacious to designate NMU routes for all users at the time of construction.</p> <p>6.5.1: Not agreed, details of the NMU facilities and PRoW should be included in Schedule 1 to avoid any future ambiguity.</p> <p>6.5.2 - 6.5.3: Noted. CCC still awaits details of the technical working groups that it has repeatedly requested (see paragraph 3.30 of its Written Representations [REP1-048] at meetings going back to 2017).</p> <p>6.5.4: Noted. CCC still awaits details of the technical working groups that it has repeatedly requested (see paragraph 3.30 of its Written Representations [REP1-048] but has also requested at meetings going back to 2017).</p> <p>6.5.5: We request that details of the type and location of signalled crossings are provided.</p> <p>6.5.7 a): Once the road is de-trunked, the road will have particular policies that will apply to it, in particular LTN 1/20, so if this road is handed to the LHA with unsatisfactory cycle provision, there is almost an immediate obligation on the LHA to put measures in place to deal with that. Whilst LTN 1/20 is not mandatory it is the most appropriate and recent guidance for cycle provision including provision shared with other users. It feels appropriate that National Highways should lead by example in following Department for Transport policy.</p> <p>6.5.7 b): The design of the bridge needs to allow for any future enhancement of the cycle network and PRoW. There is no surety that the current design would allow for any future segregated provision.</p>
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		<p>6.5.7 c) and d): Noted.</p> <p>6.5.7 e): Appendix C of document 9.26 Scheme Design Approach and Design Principles shows the Toseland Rd bridge as having a footway and cycleway within the verge. CCC does not accept that this should be a footway only. We expect an enhancement to the RoW provision, not the bare minimum. To accord with ROWIP SOA2, GP2 an NMU path should be provided with suitable transition from off to on-road north of the bridge for cyclists and a crossing facility to enable safe access to Abbotsley Road.</p> <p>6.5.7 f): Noted.</p> <p>6.5.7 g): 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 Eltisley–Caxton Gibbet Junction link NMU gap.</p> <p>6.5.7 h), i) and j): We request that details of the type and location of signalled crossings is provided.</p> <p>6.5.7 k): 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.</p> <p>6.5.7 l): Users who wish to go between Cambourne West north towards Papworth would have to cross the A1198 twice. The Cambourne West development has a cycleway which links from the development to the A1198 south of the Caxton Gibbet Park which the Applicant's path should link to. A signalled crossing is needed for a safe NMU link between the services/shop and Caxton Gibbet park.</p> <p>6.5.7 m): Whilst initially an isolated section of bridleway would be created, nevertheless it would futureproof CCC's aspirations to provide an east-west bridleway which would then connect with the new bridleway being created as part of the Wintringham Park development. As stated at the ISH2, it is much simpler and more cost-effective to put in the</p>
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		<p>relevant infrastructure at the point of construction to enable longer term improvements than to try and retrofit it. Wintringham Park is a major development and public authorities have a shared responsibility to plan for growth and the future needs of a large town such as St Neots. It would also connect and provide valuable active travel opportunities for the rural communities to the south of the A428 to access St Neots rather than having to use the car (or not to travel at all).</p> <p>6.5.8: The Applicant has provided funding for a route alongside the A1198 between Papworth and the Caxton Gibbet junction. 6.5.8 refers to the section beyond this along the old A428 from the Brockley Rd to Cambourne which has no provision for NMUs. Traffic volumes and speed along this section of road, which was detrunked when the new section of the A428 was built for the Cambourne development around 2006, are not suitable for NMUs to be on the carriageway.</p>
	<p>REP1-048bd</p>	<p>6.6.1: The width and height for the PROW is noted. As stated in CCC's response to the Applicant's D3 Submission 9.26 Scheme Design Approach and design principles – NMU on 2.18 Local policy and Guidance and at p57 S19, CCC requests that the design is of an oval rather than box shape in order to fit better into the landscape and be less intimidating to the substantial number of NMUs likely to be using the route to and from St Neots. The reason for requesting an upgrade to bridleway status is to futureproof CCC's aspirations to provide an east-west bridleway which would then connect with the new bridleway already being created as part of the Wintringham Park development, as noted at 6.5.7 m above.</p> <p>6.6.2: Noted.</p> <p>6.6.3: Noted.</p> <p>6.6.4: Noted, we are reassured that the gradients on the diversion of FP1/17 are minimal and have no further comment to make.</p> <p>6.6.5: Noted.</p> <p>6.6.6: With the cycle track &amp; footway being provided from 14/7 to 14/8 it would be naïve to expect cyclists to dismount at that point. Provision should continue from 14/8 to 14/11.</p>

		<p>6.6.7: As part of the Cambourne West development a NMU route for pedestrians, cyclists and equestrians will be built along the eastern side of A1198 from the south as far as the farm access road to the south of McDonalds. In the ROW &amp; access plans an NMU will be provided on the opposite side of the A1198 from 14/7 to 14/8 where there will be a crossing. CCC proposes that instead of the section 14/7 to 14/8, an NMU could be built from 14/6 south to the farm access road which would be shorter for the Applicant to construct, whilst providing onward connectivity with an NMU that will be constructed as part of the Cambourne West development.</p> <p>6.6.8: Noted.</p>
Ecology	REP1-048be	<p>a): No further information has been provided as to the potential impact to terrestrial invertebrates that are sensitive to lighting. Without any detailed surveys to determine the level of impact of the scheme on the behaviour of light sensitive species within the scheme and the wider landscape, it must be assumed that the lighting will have an adverse impact. The Councils seek further information about the measures to be implemented as part of the detailed lighting scheme to minimise impact on invertebrates.</p> <p>b): Further evidence from the 2021 survey work is required to provide evidence for this assessment.</p>
	REP1-048bf	The Biodiversity Net Gain Metric 2.0 [REP3-013] confirms that while the scheme will deliver some biodiversity net gain, net loss in value to hedgerow and habitats of high / medium distinctiveness have not been adequately compensated.
	REP1-048bg	<p>b): We welcome the Applicants invite to discuss changes to species types and mixes as part of SoCG discussions.</p> <p>c): During the Drainage Pond meeting with the Applicant, it was confirmed that the loss of two ponds within Cambridgeshire will be compensated for enhancement within pond 83. To date, there is no information provided within the First Iteration EMP to include enhancement of existing ponds. The Applicant's statement is incorrect – the Defra Metric 2.0 will result in a net <u>loss</u> in hedgerow biodiversity value [REP3-013].</p>

		<p>f): The Applicant's statement is inaccurate. While some biodiversity net gain for habitat 'areas' (+16%) will be delivered, the scheme does not adequately compensate for the loss of habitat (area) of medium and high distinctiveness. The proposed landscape scheme results in trading down of distinctiveness and doesn't provided the required like-for-like habitats. Therefore, the scheme is not considered to meet the requirements of the Biodiversity Net Gain metric 2.0 calculator (due to a trading error). This net loss in biodiversity, as well as net loss in hedgerow biodiversity identified in the metric, further compensatory habitats of high &amp; medium distinctiveness &amp; hedgerow need to be provided either on-site or off-site to address this net loss.</p>
	REP1-048bh	The applicant must submit the 2021 survey results as evidence to support their statement.
	REP1-048bi	<p>Previous comments still stand until the Applicant provided the 2021 survey results as evidence to support their response.</p> <p>g): The Councils are not aware of survey work undertaken in 2019 by the Wildlife Trust (no reference is provided) and therefore, a copy of this survey report. Cambridgeshire County Council commissioned the Wildlife Trust to undertake a survey of PRV S8 in 2021 (CCC will share the final survey report with the Applicant – expected in Nov 2021). The survey 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>2</sup> as Endangered and Vulnerable. The Councils seek confirmation when the 'Biodiversity Management Plan' will be produced and seek consultation on the draft document prior to finalisation.</p> <p>The methodology set out for protection of veteran tree ref T311 is appropriate.</p>

<sup>2</sup> <https://legacy.bas.ac.uk/met/jds/cnhs/vc29%20RPCC.pdf>

Landscape	REP1-048bk	Applicant response does not consider any changes and monotonously references the First Iteration Environment Management Plan, which is the document we wish to see altered to respond more sympathetically to the character of the host landscape.
Landscape	REP1-048bn	Proposals for site specific Arboricultural Method Statements to be submitted are noted. No further comments.
Landscape	REP1-048bo	Requested alterations to planting proposals have been rebutted by the Applicant. Original comments stand.
Noise	REP1-048bv	<p>Working hours: Disagree – Our comment 9.1 is still applicable: <i>“The impacts of noise from construction works can be intrusive and affect people’s health and wellbeing if experienced over an extended period. Limiting construction hours can give affected residents a certain amount of respite.”</i></p> <p>The working hours agreed by SCDC and HDC are as follows and we believe are reasonable:</p> <ul style="list-style-type: none"> <li>• 8am - 6pm, Monday to Friday</li> <li>• 8am - 1pm, Saturday</li> <li>• No working on Sundays and Bank Holidays.</li> </ul> <p>(It should be noted that it is expected that additional start-up and shut-down periods are to be requested either side of the core hours). This topic is still under discussion to resolve.</p> <p>Commitment to continuous noise monitoring (during construction): The Applicant confirms that noise monitoring would be based on the outcome of the updated construction noise assessment which would be undertaken at the detailed design stage, which is to include a Noise and Vibration Management Plan bound by Requirement 3 of the DCO. This appears to be acceptable. However, there is no mention about monitoring following justified complaints. It is assumed that this would also be at the detailed design stage.</p> <p>Noise limits at receptors during construction: The Applicant prefers this to be agreed within the Noise and Vibration Management Plan in line with BS5228 Part 1 as set out in para 1.4.4 of Annex B of 1<sup>st</sup> Iteration EMP. This appears to be acceptable.</p>



		<p>However, during the ISH2 on 23<sup>rd</sup> 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.</p> <p>Noise monitoring once Scheme is operational: An assessment of operational noise will be carried out for the purposes of the Noise Insulation Regulations, so this is an ideal opportunity to also verify the road noise modelling at rural dwellings that are less affected by other ambient sounds.</p> <p>Notwithstanding the above, the Applicant’s response is centred upon long term monitoring and comparisons with predicted noise levels. The assessment they propose relies upon continued use of calculations, rather than any “real world” measurements. Due to the inherent inaccuracies/errors that can occur by modelling and its application scheme wide, it does not take into account localised noise mitigation that would have been provided. A noise monitoring scheme detailing the short-term monitoring at specific locations to test the effectiveness of the installed barriers should be submitted and agreed with the LAs.</p> <p>Provision of information to officers during construction phase: Agreed.</p> <p>Local construction management plans: Agreed. However please note: The Applicant’s response states <i>“The proposed approach to management plans during construction is on a topic by topic basis rather than by location.”</i> It is a small point, but the location is key to what mitigation is required for each topic considered.</p> <p>Commitment to providing off-site Noise barriers: The Applicant has not provided any detail about the potential to provide off-site barriers. This issue was about offering residents a noise barrier on the boundary of their land to protect their garden from the increase in road noise.</p> <p>Parkers Farmhouse would benefit from a noise barrier alongside Potton Road to protect the garden that lies to the south of the house. The same applies to Rectory Farm Cottage where a noise barrier could be constructed along the south-eastern boundary of the</p>
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		<p>property, which is south-east of the house. The justification for no barriers at Greyholme and Tithe Farm are acceptable. 1 and 2 Wintringham Cottages would benefit from a noise barrier on their northern property boundary and along the western boundary of 1 Wintringham Cottage. The Applicant's justification for no noise barriers at 3 and 4 Wintringham Cottages is acceptable. Please note that the homeowners may refuse the offer of a noise barrier, in which case, that is the end of the matter.</p> <p>Noise Insulation and Temporary Rehousing policy: Acceptable.</p> <p>Section 61 administration: Acceptable.</p>
Noise	REP1-048bw	<p>9.2: Cambourne West noise modelling: Agreed, regarding the non-inclusion of Cambourne West properties in relation to construction noise impacts due to the units not being expected to be occupied at that time. If the situation changes for any reason this will need to be reviewed to reflect the changing circumstances.</p> <p>Following a meeting on 21<sup>st</sup> October 2021 more clarification and information has been received. Consequently, we are now in agreement with the applicant's comments submitted and accept sufficient modelling and assessment has been carried out in relation to the Cambourne West development.</p>
Noise	REP1-048bx	9.3: Lack of mitigation justification in South Cambridgeshire area: Agreed.
Cultural Heritage	REP1-048cf	<p>12.2.1: The subject of the meetings listed was to discuss the areas for archaeological investigation only, the Applicant-commissioned draft Rationale and Strategy being presented the day before the first meeting on the 24<sup>th</sup> September 2020. The Archaeological Mitigation Strategy [APP-238] was not seen until the DCO was submitted. It is true that a formal response was issued for the Rationale and Strategy by CCC on 15<sup>th</sup> February 2021, but informal responses and discussions in the intervening months made clear that CCC could not accept the categorisation of sites as presented and hoped these discussions would influence changes to the AMS [APP-238] be made prior to deposition. Furthermore, the levels of excavation assigned to some of the archaeological sites were considered to be unacceptably low or nil, flouting national policy (see REP1-048cf 12.2.2), and some evidence considered as not interpretable from the evaluation alone. CCC's expert</p>

		archaeological advice was not sought in the devising of the AMS, particularly with regard to the contradictory notion of knowledge gain (AMS [APP 238] 2.1.2 and Appendix C page 1 paragraph 3).
Cultural Heritage	REP1-048cf	12.2.3 a): This is incorrect. CCC presented clear maps and justification for the inclusion of areas in the AMS repeatedly to the Applicant since 15 <sup>th</sup> October 2020. We do not agree with the Applicant's interpretation of some evidence gained from the evaluation and are seeking to safeguard the archaeological resource from unrecorded loss from construction impacts.
Cultural Heritage	REP1-048cf	12.2.4: Extent of some of the mitigation areas is one aspect, but the level of excavation is also in dispute. For this reason, the AMS cannot be supported in full. Site Specific Written Schemes of Investigation will respond to this AMS and the Local Authority Brief now shown in the Updated AMS [REP3-010 Appendix B] so it is imperative that the AMS can be agreed.
Cultural Heritage	REP1-048cg	The Applicant's confidence that the 3% evaluation sample can provide sufficient understanding of the archaeological evidence of this site area is not reassuring but displays an ignorance of how sites of this period behave. The feature-specific explanation given deals only with the known elements that were targeted by a suitably located evaluation trench that tested plotted cropmarks and geophysical survey anomalies. This demonstrated a significant amount of archaeological evidence that will not occur in isolation. It appears that the over-arching objective of knowledge gain will not be met if areas known to contain archaeological evidence will be subjected to unrecorded loss.
Cultural Heritage	REP1-048ch	The councils stand by the description as given in the Written Representation [REP1-048].
Cultural Heritage	REP1-048ci	The councils stand by the statement at 12.5.8 in their Written Representation [REP1-048].
Minerals and Waste	REP1-048ck	Response noted. Please refer to relevant comments relating to the Policy Assessment in the Comments on the Local Impact Report [CLA.D4.LIR.AC.C] regarding Policy 19.
Minerals and Waste	REP1-048cn	The Applicant has already accepted that the development is required to have regard to local policy as set out in the paragraphs 5.203 and 5.211 of the National Policy Statement

		for National Networks (NPSNN). Furthermore 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. Without undertaking an assessment, such as one which would demonstrate compliance, or lack thereof, with Policy 19, it is not possible to demonstrate that this has been achieved.
Minerals and Waste	REP1-048cp	<p>The Council is of the view that given the lack of detailed information and compliance with local policy, such a requirement is entirely necessary and proportionate. Paragraph 5.33 of the NPSS states that the Secretary of State may use requirements or planning obligations where appropriate in order to ensure that such beneficial features are delivered. As it has not been demonstrated that biodiversity has been maximised, a requirement to ensure it occurs would appear entirely appropriate.</p> <p>Please refer to relevant comments relating to the Policy Assessment in the Comments on the Local Impact Report [CLA.D4.LIR.AC.C] regarding Policy 19 for further context.</p>
Minerals and Waste	REP1-048cr	This matter was resolved as already being covered within the EMP. No further action required.
Flood Risk	REP-048ct	<p>The Applicant's response does not cover the points within 14.3.5 and therefore this is still a concern in relation to water quality and treatment</p> <p>We note that there are ongoing discussions to be had with the CCC Highways Team. In the event that these structures are not to highways adoptable standards, there are no plans in place for the ongoing maintenance of the drainage scheme proposed.</p> <p>The LLFA acknowledges that the applicant has stated that flow control diameters can be used as the limit to the minimum rate of discharge. However, the principles of the report do not indicate this is the case and the LLFA requires certainty around this. While an element of the design can be left for the detailed design stage, the principles of the scheme should be clearly set out in any report that is approved and supported at this stage.</p>
Flood Risk	REP1-048cx	The proposals for managing and treating water should be set out at this stage. While it is noted that treatment can be provided in proprietary features, the preferred treatment of

		<p>surface water should be through natural means. The LLFA would only support a scheme proposing proprietary treatment where this is a last resort. The principles of the scheme should prioritise and give certainty that these features will incorporate suitable planting and treatment from the outset of the proposals. While an element of the design can be left for the detailed design stage, the principles of the scheme should be clearly set out in any report that is approved and supported at this stage.</p>
Climate Change	REP1-048cz	<p>Not sure that much more can be said here. Both the Councils and Applicant have set out their views. However, the Applicant has omitted to respond to the Councils' request to consider "proportionate investment in EV charging infrastructure and in active travel and public transport". This seems to be an outstanding issue that needs to be addressed.</p> <p>The Applicant's response does not address the following statement from the Councils' representation "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 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 Change	REP1-048da	<p>We welcome the inclusion of further details on construction GHG mitigation measures in the next iteration of the EMP and the production of a Technical Note providing a detailed breakdown of construction carbon emissions for Deadline 4. We do, however, wish to reserve the right to provide further comment once we have seen that further detail.</p>
Climate Change	REP1-048db	<p>The Councils would support planting of native and climate resilient species to offset emissions associated with both the land use change and subsequent operation of the road scheme as set out in the Environmental Statement [APP-077]. The Councils accept that the Biodiversity Net Gain (BNG) has been recalculated using the DEFRA Metric 2.0. The Biodiversity Net Gain Metric 2.0 [REP3-013] confirms that while the scheme will deliver some biodiversity net gain, net loss in value to hedgerow and habitats of high / medium distinctiveness have not been adequately compensated.</p>

Climate Change	REP1-048dc	The Councils are satisfied with the Applicant's response to the extent to which the electrification of vehicles has been taken into account as part of the analysis of greenhouse gas emissions and are supportive of taking the precautionary approach.
Climate Change	REP1-048dd	This comment relates to Transport Modelling and consideration of sustainable travel, so needs input from transport colleagues in terms of whether we are satisfied with their approach to sustainable transport.
Climate Change	REP1-048de	The Councils are satisfied that the Applicant has considered the potential flood risk to adjacent communities as part of the ES.
Digital Connectivity	REP1-048di	The National Highways response is noted and understood, but not supported. We disagree that the inclusion of fibre assets (ducts and/or fibre) does not help to address the impacts of the scheme. The inclusion of digital assets would support the UK digital strategy to build a world-class digital infrastructure for the UK. Digital capabilities enable agile working, reducing transport needs and support wider sustainability options. The inclusion of fibre assets within the construction, through rural areas that are less well served with high-speed digital connectivity, will enable easier access for telecoms providers to those rural locations and enhance the digital accessibility to residents in the area. Inclusion of assets from the outset removes the need for future retrofitting of core ducting over an extended trunk route that will require upgraded digital backhaul in the future to support 4G and 5G mobile capabilities.