

# A428 Black Cat to Caxton Gibbet improvements

TR010044

Volume 8

8.4 Draft Statement of Common Ground with Central Bedfordshire  
Council

Planning Act 2008

Rule 8(1)(e)

Infrastructure Planning (Examination Procedure) Rules  
2010

November 2021

## Infrastructure Planning

Planning Act 2008

**The Infrastructure Planning  
(Examination Procedure) Rules 2010****A428 Black Cat to Caxton Gibbet  
improvements  
Development Consent Order 202[ ]**

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**8.4 Draft Statement of Common Ground with  
Central Bedfordshire Council**

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<b>Author</b>	A428 Black Cat to Caxton Gibbet Improvements Project Team, National Highways

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## STATEMENT OF COMMON GROUND

**This Statement of Common Ground has been prepared and agreed by (1) National Highways Company Limited and (2) Central Bedfordshire Council.**

Signed.....

Anne-Marie Rogers

Senior Project Manager

on behalf of National Highways

Date: 4 November 2021

This statement has been not approved by the Officers of Central Bedfordshire Council.

Signed.....

[NAME]

[POSITION]

on behalf of Central Bedfordshire Council]

Date: [DATE]

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# 1 Introduction

## 1.1 Purpose of this document

- 1.1.1 This Statement of Common Ground (SoCG) has been prepared in respect of the A428 Black Cat to Caxton Gibbet improvements (the Scheme) made by National Highways Company Limited (National Highways) to the Secretary of State for Transport (Secretary of State) for a Development Consent Order (the Order) under section 37 of the Planning Act 2008 (PA 2008).
- 1.1.2 The order, if granted, would authorise National Highways to construct a new 10 mile (16km) dual 2-lane carriageway from the Black Cat roundabout to Caxton Gibbet roundabout and in addition approximately 1.8 miles (3km) of tie-in works. The Scheme includes the following components:
- a. A new three-level grade separated junction at Black Cat roundabout, with the A1 at the lower level, the new dual carriageway on the upper level and a roundabout between the two at approximately existing ground level. In addition to slip roads, a new free flowing link between the A421 eastbound carriageway and the A1 northbound carriageway will also be provided.
  - b. A new grade separated all movements junction will be constructed to the east of the existing Cambridge Road roundabout to provide access to the new dual carriageway and maintain access to the existing A428.
  - c. At the Caxton Gibbet roundabout, a new grade separated all movements junction will be constructed, incorporating the existing roundabout on the south side of the new dual carriageway and a new roundabout on the north side. The new dual carriageway will then tie-in to the existing A428 dual carriageway to the east of the new Caxton Gibbet junction.
  - d. In the vicinity of the new Black Cat junction, direct access onto the A1 from some local side roads and private premises will be closed for safety reasons. A new local road will provide an alternative route. The existing Roxton Road bridge will be demolished and replaced with a new structure to the west to accommodate the realigned A421.
  - e. New crossings will be constructed to enable the new dual carriageway to cross the River Great Ouse, East Coast Main Line railway, Barford Road, the B1046/Potton Road, Toseland Road and the existing A428 at Eltisley.
  - f. The existing A428 between St Neots and Caxton Gibbet will be de-trunked and retained for local traffic and public transport with maintenance responsibility transferred to the local highway authorities.
  - g. An alternative access will be provided to side roads at Chawston, Wyboston and Eltisley.

h. There will be safer routes for walkers, cyclists, and horse riders.

1.1.3 This SoCG has been produced to confirm to the Examining Authority (ExA) where agreement has been reached between the parties to it, and where agreement has not (yet) been reached. SoCGs are an established means in the planning process of allowing all parties to identify and so focus on specific issues that may need to be addressed during the Examination.

## 1.2 Parties to this Statement of Common Ground

1.2.1 This SoCG has been prepared by (1) National Highways as the Applicant and (2) the Central Bedfordshire Council (CBC).

1.2.2 National Highways (formerly known as Highways England) became the Government-owned Strategic Highways Company on 1 April 2015. It is the highway authority in England for the strategic road network and has the necessary powers and duties to operate, manage, maintain and enhance the network. Regulatory powers remain with the Secretary of State. The legislation establishing National Highways made provision for all legal rights and obligations of National Highways, including in respect of the Application, to be conferred upon or assumed by National Highways.

1.2.3 CBC is a prescribed consultee for this application under Sections 42(1)(a) and 56(2)(a) of the PA 2008.

1.2.4 Collectively National Highways and CBC are referred to as ‘the parties’.

## 1.3 Terminology

1.3.1 In Section 3 of this SoCG:

- a. “Agreed” indicates where the issue has been resolved.
- b. “Not Agreed” indicates a final position.
- c. “Under discussion” where these points will be the subject of on-going discussion wherever possible to resolve, or refine, the extent of disagreement between the parties.

1.3.2 It can be taken that any matters not specifically referred to in the Issues chapter of this SoCG are not of material interest or relevance to CBC’s representation and therefore have not been considered in this document. It is recognised however that engagement between both parties will need to continue due to their joint vested interest in the area of the Scheme.

## 2 Record of Engagement

2.1.1 The parties have been engaged in consultation since the pre-application period for the proposed development. A summary of the meetings and correspondence that has taken place between National Highways and CBC in relation to the Application is outlined in the records of engagement set out in Table 2-1.

**Table 2-1 - Record of Engagement**

**RECORDS OF ENGAGEMENT UNDER DEVELOPMENT**

Date	Form of correspondence	Key topics discussed and key outcomes
29/01/2018	Meeting	Meeting held with CBC Highways to introduce the Scheme and discuss the Scheme's impact on side roads within CBC's jurisdiction as well as de-trunking extents and requirements.
29/01/2018	Meeting	Meeting held with CBC to discuss and understand issues associated with waste material placed on land to the north-west of Black Cat Junction on the site of a proposed lorry park and the associated Enforcement Notice that had been imposed by CBC. Also discussed was the status of the gravel pits in operation on the eastern side of the Black Cat Junction.
06/02/2019	Email	Departures from Standard application for Barford Road cross section sent to CBC to complete.
13/03/2018	Email	Confirmation from CBC that there are no heavy or high load requirements for CBC side roads that may impact on the strategic road network.
27/03/2018	Email	Following the meeting on 29/01/2018 with CBC Highways, the A428 project team requested accident data for Barford Road to assist in development the realignment designs.
27/03/2018	Email	CBC Highways provided A428 project team with collision history data relating to the Barford Road Realignment
27/03/2018	Email	A428 project team requested full STATS 19 data for the extent of Barford Road from CBC Highways.
26/03/2018	Email	Discussions with CBC and Bedfordshire and Luton Suicide Prevention Steering Group regarding the design of suicide prevention measures.
10/05/2018	Email	Three draft drawings depicting Representative Viewpoints for Landscape and Visual Impact Assessment (LVIA) shared with CBC.

Date	Form of correspondence	Key topics discussed and key outcomes
18/05/2018	Meeting	Highways England (HE) held a meeting with CBC to discuss the options for the Barford Road realignment.
21/05/2018	Meeting	Archaeology Presentation in Phase 1 Evaluation.
23/05/2018	Meeting	Meeting held with CBC to discuss the updated traffic modelling and environmental surveys with the authority.
23/05/2018	Email	Confirmation that pavement design requirements in Central Bedfordshire can be designed to the Design Manual for Roads and Bridges (DMRB) requirements with specified surface material from CBC.
03/07/2018	Meeting	A meeting was held with BBC, CBC, HDC, and SCDC during which a presentation was given on the Landscape visual impact assessment (LVIA) viewpoints to landscape officers. The ongoing nature of consultation was discussed, and HE invited further thoughts on the initial viewpoint selections for LVIA photomontages, so that they could brief surveyors in August 2018.
13/08/2018	Email	Email informing CBC of the identification of zigzag elm sawfly during ecological surveys.
TBC	Email	Latest programme for the work packages and Local Authority engagement shared by HE.
TBC	Email	Confirmation from CBC that two additional trenches can be dug due to constraints of an overhead line.
TBC	Email	Draft Traffic Forecasting Report shared with CBC.
14/01/2019	Email	Email from CBC asking for details of the scheme which passes through their council area.
21/01/2019	Email	Brief sent from CCC and covering CBC and BBC too.
18/02/2019	Email	Confirmation from CBC that consultation material cannot be displayed at Council Offices but could be displayed at the Sandy Library.
20/02/2019	Email	Confirmation that information booklets for the A428 Scheme can be displayed at the Sandy Library.
03/03/2017		
14/03/2019	Email	Information emailed to BBC, CBC, and CCC on preferred route announcement. Update on progress to geophysical survey.



Date	Form of correspondence	Key topics discussed and key outcomes
15/03/2019	Email	Link to plans etc emailed to BBC, CBC, and CCC.
25/03/2019	Email	Written Scheme of Investigation (WSI) prepared by MHI for geophysical survey sent to BBC, CBC, and CCC.
26/03/2019	Email	CCC comments on WSI, sent on behalf of all three councils.
28/03/2019	Email	Response to some comments on WSI sent back.
29/03/2019	Email	Updated version of geophysics WSI sent to the councils.
01/04/2019	Email	Confirmation that CBC are happy with the content in the draft Statement of Community Consultation.
09/04/2019	Email	Interim geophysical survey results sent to councils.
10/04/2019	Email	Correspondence regarding potential extensions to the 1km archaeological study area and data requests for the majority of St. Neots.
10/04/2019	Email	Cultural heritage: Request for additional data for small outlier compounds etc.
12/04/2019	Email	Confirmation from CBC that proposed study area for compounds is acceptable.
12/04/2019	Email	Request for additional data (from OP).
15/04/2019; 07/05/2019; and 08/05/2019	Email	Emails with CBC regarding an outstanding invoice to be resolved before CBC can send data.
15/04/2019, 24/04/2019, 08/05/2019, 29/05/2019, 12/08/2019, 19/08/2019 and 22/10/2019	Email	Interim geophysical survey results sent to councils.
30/04/2019	Meeting – cultural heritage	Meeting held with BBC, CCC, and CBC to give an update on the programme and work to date, including the aerial photography and geophysical survey. There was discussion of the trenching strategy that led to an agreement that a percentage coverage was not a ubiquitous measure and that trenching could be intensified in areas if it was justified.

Date	Form of correspondence	Key topics discussed and key outcomes
14/05/2019	Email	Interim geophysical survey results sent to councils. Links to georeferenced files also provided.
21/05/2019	Meeting	Community Forum – update on the Scheme’s development.
TBC	Letter	Statutory Consultation Launch Communications.
06/06/2019	Email	Cultural heritage: First draft of Phase 1 trenching layout sent to BBC, CBC, and CCC.
07/06/2019	Email	Email from CBC detailing some initial high-level comments on the trenching plan.
07/06/2019	Email	Agreement to CBC email from CCC.
10/06/2019	Meeting	Trenching strategy discussion and the principles of it.
14/06/2019	Email	Meeting minutes emailed to BBC, CBC, and CCC.
24/06/2019	Email	Cultural Heritage: Second draft of Phase 1 trench layout.
28/06/2019	Email	Cultural Heritage: Further comments received from CBC on Phase 1 trench layout.
22/07/2019	Email	Cultural Heritage: Requesting final comments on the Phase 1 trenching from councils.
22/07/2019	Email	Confirmation from HE to CBC that HE have not been doing any noise monitoring in Sandy.
24/07/2019	Email	Confirmation that CBC comments on the trenching stand – these override comments from CCC.
26/07/2019	Response to Statutory Consultation	CBC Public Consultation response.
06/08/2019	Email and File share	Final trenching plan sent to councils.
06/08/2019	Email	Cultural Heritage: Removal of trenches in an area no longer affected. Request from one landowner to remove trenches.
07/08/2019	Email	Cultural Heritage: CBC not content with removal of trenches at landowner request.
13/08.2019	Email	Update to inform CBC Officers that ground investigations and archaeological surveys will be carried out along the route of the Scheme.

Date	Form of correspondence	Key topics discussed and key outcomes
21/08/2019	Email	Cultural heritage: Request for updated brief. Confirmed that Phase 2 Geophysical Survey results will be targeted in Phase 2 of trenching.
21/08/2019	Email	Cultural heritage: Updated brief sent from CCC on behalf of all councils.
30/09/2019	Meeting	Community Forum – Western Area.
01/10/2019	Email	Email asking how many trenches could be signed off on each monitoring visit.
01/10/2019	Email	Response from CBC regarding trench sign-off and asking if there was a start date for the trenching works.
01/10/2019	Email	Response from BBC regarding trench sign-off.
01/10/2019	Email	Response to CBC and BBC that a start date for trenching was not yet available.
02/10/2019	Meeting	Highways and Planning Technical Working Group.
08/10/2019	Meeting	Strategic Road Users Technical Working Group.
08/10/2019	Meeting	Walkers, Cyclists and Horse Riders Technical Working Group.
17/10/2019	Meeting	An inaugural meeting was held with BBC, CCC, CBC, and SCDC as part of the formation of the Flood Risk/Water Management group. The meeting covered the terms of reference for the working group, the lessons that could be learnt from the A14 and each authorities' areas watercourses and responsibilities. HE also gave an overview of the different types of hydraulic modelling of water course crossings and overland runoff for the three main technical notes to be generated (River Ouse Crossing, Bedfordshire Area and Cambridgeshire Area). The Environment Agency and the Bedford Group of Drainage Boards were also in attendance.
22/10/2019	Email	Cultural heritage: Email from CCC asking about aerial photographic report and whether contractor on board for trenching.
22/10/2019	Email	Confirmation that the aerial photographic report is being reviewed internally and that there is no preferred contractor for trenching works at this stage.
22/10/2019	Email	Cultural heritage: Information on status of aerial photography report sent to councils. Responded to query about trenching contractor – TBC.

Date	Form of correspondence	Key topics discussed and key outcomes
24/10/2019	File transfer	Draft geophysical survey results sent.
24/10/2019	Email	Asked for X-Y plots and shapefiles of results.
24/10/2019	Email	Echoed request from CCC for geophysical shapefiles.
28/10/2019	Email	Cultural heritage: Update on charging for consultation time sent to councils.
05/11/2019	Email	Dropbox link for geophysical X-Y plots.
05/12/2019	Email	Cultural heritage: Copy of MOLA's WSI for the Phase 1 trenching (sent via file share to CCC).
09/12/2019	Meeting	Economic and Benefits Technical Working Group.
10/12/2019	Meeting	Strategic Road Users Technical Working Group.
11/12/2019	Meeting	Highways and Planning Technical Working Group.
13/12/2019	Email and file transfer	Cultural heritage: Phase 2 trenching plan sent to councils.
16/12/2019	Meeting	Walkers, Cyclists and Horse Riders Technical Working Group.
18/12/2019	Email	Cultural heritage: Requested copies of the trenching scope of works and the aerial photo report.
18/12/2019	Email	Cultural heritage: Response confirming AP report was not ready to be sent. Scope of works sent.
18/12/2019	Email	Cultural heritage: Screen shot of slight amendment to Phase 2 trenches.
20/12/2019	Email	Comments from CBC on the Phase 1 WSI from MOLA.
14/10/2019	Meeting	Economic and Benefits Technical Working Group.
13/12/2019	Email	Phase 2 trenching plan sent to councils.
18/12/2019	Email	Requested copies of the trenching scope of works and the aerial photo report.
18/12/2019	Email	Response confirming AP report was not ready to be sent. Scope of Works sent.
18/12/2019	Email	Screen shot of slight amendment to Phase 2 trenches.
20/12/2019	Email	Provided comments on the Phase 1 WSI.

Date	Form of correspondence	Key topics discussed and key outcomes
14/01/2020	Email	A428 Bedfordshire Watercourse Technical Note shared with CBC.
16/01/2020	Email	Request from CBC for historical flood event data for fluvial, pluvial, groundwater, sewer, snowmelt, reservoir and other artificial flood sources.
21/01/2020	Meeting	Economic and Benefits Technical Working Group.
22/01/2020	Email	Formal request from CBC to start drawing up the Planning Performance Agreement (PPA).
24/01/2020	Email	Updated Phase 1 WSI prepared by MOLA shared following comments by CBC, BBC and CCC.
24/01/2020	Email	Cultural heritage: Further comments on Phase 1 WSI from CBC.
24/01/2020	Email	Cultural heritage: Dates for induction.
24/01/2020	Email	Cultural heritage: Confirmation that comments on WSI will be addressed and asked for any other comments from CCC and BBC. Work will start on site on 28/01/2020.
28/01/2020	Email	Cultural Heritage: Email from HE Archaeologist regarding CSCS cards and inductions.
28/01/2020	Email	Cultural Heritage Warned that if they cannot monitor the evaluation then comments to PINS will reflect the fact that they cannot validate results, which they would like to avoid.
28/01/2020	Email	Cultural heritage: Emails regarding trench changes in F44 due to services.
28/01/2020	Email	Cultural heritage: Email confirming work had started and that contingency can be accommodated as required. Informed curators of need for minor changes to Phase 1 trenches for safety reasons. Reminder that comments on Phase 2 trench layout were needed.
28/01/2020	Email	Cultural heritage: Email from CBC asking if the aerial photograph layer was available to inform comments.
28/01/2020	Email	Cultural heritage: CBC trying to determine what aerial photographic information Arial Photography information they have.

Date	Form of correspondence	Key topics discussed and key outcomes
29/01/2020	Email	Cultural heritage: HE confirmed Arial Photography aerial photographic layer not yet available. Requested information from CBC.
29/01/2020	Email	Cultural heritage: Emails with CBC regarding Phase 2 trenching.
30/01/2020-31/01/2020	Email	Cultural heritage: Changes to F44 trenches. All agreed.
31/01/2020	Email	Request for planning data from CBC regarding strategic sites, transport related infrastructure schemes and certainty of development.
10/02/2020	Email	MOLA Report from week 2 of Phase 1 trial trenching shared with CBC.
13/02/2020	Email	Cultural heritage: Emails with CBC regarding photographs of trenches from site and access to MOLA GIS system.
31/03/2020	Email	Request to CBC for details of nearby developments to inform the EIA Cumulative Effects Assessment.
17/02/2020	Email	Cultural heritage: Desk-Based Assessment shared with BBC, CBC, and CCC.
18/02/2020	Email	Cultural heritage: Confirmed which fields CBC will monitor.
TBC	Email	Technical note detailing proposed mitigation for the archaeological excavation works in F44 shared with CBC.
10/02/2020	Email	Draft PPA shared with CBC.
17/02/2020	Email	Draft version of the Archaeological DBA shared with CBC.
24/02/2020	Email	MOLA Report from week 4 of Phase 1 trial trenching shared with CBC.
25/02/2020	Meeting	Economic and Benefits Technical Working Group.
02/03/2020	Email	Cultural heritage: Geophysical survey reports sent to BBC, CBC, and CCC for comment.
02/03/2020	Email	MOLA Report from week 5 of Phase 1 trial trenching shared with CBC.
03/03/2020	Meeting	Walkers, Cyclists and Horse Riders Technical Working Group.
03/03/2020	Email	Cultural heritage: Emails resending geophysical information.

Date	Form of correspondence	Key topics discussed and key outcomes
05/03/2020	Meeting	Meeting held with BBC, CCC, and CBC during which the project team presented information on the Stage 3 Model, including the model network and area of detailed modelling. The traffic forecasting process was explained and presented to the local authorities as well as the Model Cordon Data.
06/03/2020	Email	Comments from CBC on the draft version of the Archaeological DBA.
06/03/2020	Email	Cultural heritage: Confirmation that no comments on Desk-Based Assessment DBA.
09/03/2020	Email	MOLA Report from week 6 of Phase 1 trial trenching shared with CBC.
11/03/2020	Email	MOLA Report from week 7 of Phase 1 trial trenching shared with CBC.
12/03/2020	Meeting	Further to the meeting on 17 October 2019 a second meeting was held with BBC, CCC, CBC, and SCDC for the Flood Risk/ Water Management Technical Working Group. Each local authorities' watercourse was reviewed and discussed and the terms of reference for the group were finalised and agreed. The Environment Agency and Bedford Group of Drainage Boards were also in attendance.
18/03/2020	Email	Link shared by CBC to assist HE with finding local and hard to reach groups.
23/03/2020	Email	MOLA Report from week 8 of Phase 1 trial trenching shared with CBC.
24/03/2020	Email	Correspondence to CBC that fieldwork will be temporarily stopped as a result of lockdown measures; and a request for remote sign-off for backfilling currently open trenches.
30/03/2020	Email	MOLA Report from week 9 of Phase 1 trial trenching shared with CBC.
02/04/2020	Email	MOLA Report from week 10 of Phase 1 trial trenching shared with CBC.
02/04/2020	Email	List of remaining Phase 1 trial trenches shared with CBC.
03/04/2020	Email	Comments from CBC on the geophysical survey report.
03/04/2020	Email	Cultural heritage: Comments on geophysical survey report.

Date	Form of correspondence	Key topics discussed and key outcomes
08/04/2020	Email	Request for updated housing data from CBC required to complete uncertainty log.
09/04/2020	Email	Cultural heritage: Phase 2 trench layout query.
14/04/2020	Meeting	Cultural heritage: An archaeological consultation meeting was held which included discussion on SOCGs and how COVID-19 might impact archaeological investigation. An update was also provided on Phase 1 fieldwork and the archaeological potential and land access of various fields were discussed. Historic England were also in attendance.
16/04/2020	Email	MOLA Report from week 11 of Phase 1 trial trenching shared with CBC.
20/04/2020	Email	MOLA Report from week 12 of Phase 1 trial trenching shared with CBC.
22/04/2020	Email	Confirmation from Historic England shared with CBC, confirming that F44 is not being considered to be designated as a scheduled ancient monument.
23/04/2020	Email and file share	Cultural heritage: WSI for Phase 2 trenching sent to councils.
24/04/2020	Email	Confirmation from CBC that clearance of archaeological excavations will require a temporary compound where a necessary planning permission would be required.
27/04/2020	Email	Cultural heritage: Sent revised Phase 2 WSI to BBC and CBC.
27/04/2020	Email	Cultural heritage: Comments on Phase 2 WSI from CBC.
28/04/2020	Email	Comments on v3 of the Phase 2 trenching WSI.
28/04/2020	Email	Response from HE Archaeologist HE to CBC comments on Phase 2 WSI.
28/04/2020	Email	Requested final Phase 1 WSI.
30/04/2020	Email	Planner for May archaeological information shared.
30/04/2020	Email	Final Phase 1 WSI sent to CBC.
30/04/2020	Email	Noted that Figure 5 in the Phase 1 WSI was wrong. Asked for an amended version at some stage (not urgent).



Date	Form of correspondence	Key topics discussed and key outcomes
30/04/2020	Email	Email from HE Archaeologist with programme for when reviews needed from curators. Responses from all authorities with some confusion.
01/05/2020	Email	MOLA Report from week 1 of Phase 2 trial trenching shared with CBC.
04/05/2020	Meeting	Meeting with CBC in which the project team explained the ecological approach to F44, an area on the approach to Alington Hill. This area is of archaeological interest for the Scheme so the local authority was interested in how ecological mitigations would be made within the archaeological excavation.
06/05/2020	Email	MOLA Report from week 2 of Phase 2 trial trenching shared with CBC.
07/05/2020	Email	Cultural heritage: Phase 3 geophysics and Phase 3 trench plan sent to councils.
11/05/2020	Email	EWP1 Major Developments work package issued to CBC.
11/05/2020	Email	Proposed environmental work packages for CBC shared by HE.
13/05/2020	Email	MOLA Report from week 3 of Phase 2 trial trenching shared with CBC.
13/05/2020	Email	Cultural heritage: Comments from CBC on the addendum to the geophysical survey report and the proposals for the Phase 3 trench locations.
14/05/2020	Email	Cultural heritage: HE response to comments on Phase 3 trench layout.
15/05/2020	Email	MOLA Report from week 3 of Phase 1 trial trenching shared with CBC.
15/05/2020	Email	Cultural heritage: Information on trench numbers requiring changes in F34.
18/05/2020	Email	MOLA Phase 1 Trenching Report shared with CBC.
19/05/2020	Meeting	This meeting was a Local Model Validation Report (LMVR) and modelling workshop with CCC and CBC during which the project team ran through an overview of the Stage 3 Model, including an overview of the base year model calibration and validation performance.

Date	Form of correspondence	Key topics discussed and key outcomes
19/05/2020	Email	Cultural heritage: Copy of Phase 1 trenching report to BBC, CBC, and CCC.
19/05/2020	Email	Cultural heritage: Response regarding F34 trenches.
20/05/2020	Email	Cultural heritage: Request for Phase 1 trench report figures.
20/05/2020	Email	Latest programme for the work packages and Local Authority engagement shared with CBC.
21/05/2020	Teams Meeting	Cultural Heritage Meeting with BBC, CCC, and CBC during which MOLA gave a presentation on the results of the Phase 1 trenching. Attendees were informed that it was possible that not all trenching results would be available with the submission of the DCO and could be submitted as an addendum.
21/05/2020	Email	Cultural heritage: Slides from presentation sent to Historic England, BBC, CBC, and CCC
21/05/2020	Email	Information from CBC regarding NMP data.
22/05/2020	Email	MOLA Report from week 4 of Phase 2 trial trenching shared with CBC.
29/05/2020	Teams Meeting	Cultural heritage: Following the meeting on the 4 May 2020, an additional cultural heritage meeting was held with CBC to clarify the approach to ecological mitigation with the local authority. The proposed layout of the scope of works was described. Ecological constraints were discussed, along with the archive and publication. The local authority was satisfied with the ecological and archaeological approached set out by the project team.
01/06/2020	Email	MOLA Report from week 5 of Phase 2 trial trenching shared with CBC.
03/06/2020	Email	Cultural heritage: Comments from CBC on Phase 1 trenching report.
10/06/2020	Email	Latest draft of draft PPA with CBC shared.
10/06/2020	Email	MOLA Report from week 7 of Phase 2 trial trenching shared with CBC.
17/06/2020	Email	Comments on draft scope of works for F44 shared by CBC.
18/06/2020	Email	MOLA Report from week 8 of Phase 2 trial trenching shared with CBC.

Date	Form of correspondence	Key topics discussed and key outcomes
18/06/2020	Email	Amended draft of draft PPA with CBC shared.
23/06/2020	Email and file share	Cultural heritage: Phase 3 WSI prepared by MOLA sent to BBC, CBC, and CCC.
24/06/2020	Letter	Supplementary Consultation Launch Communications.
24/06/2020	Email	MOLA Report from week 9 of Phase 2 trial trenching shared with CBC.
24/06/2020	Email	Link for online consultation sent to BBC, CBC, and CCC.
25/06/2020	Teams Meeting	A cultural heritage meeting was held with BBC, CCC, and CBC to discuss five sites (F9, F34, F44, F59 and F97) that would be targeted early for advanced construction activity including compounds, statutory diversions and borrow pits. Concerns over furrows were raised by attendees and further specialist research was undertaken as a result. Historic England were also in attendance HE.
25/06/2020	Email	Notes from Phase 1 presentation issued.
01/07/2020	Email	Cultural heritage: Comments on Phase 3 WSI received from CBC. Plan of F45 trenches also shared.
02/07/2020	Email	Screenshot of trenching plan in F45 shared.
02/07/2020	Email	Asked if trench plan for F45 would be in updated WSI and if a scale plan be sent in due course.
02/07/2020	Email	Latest version of draft PPA with CBC shared.
09/07/2020	Email	Draft trenching layout shared with CBC.
16/07/2020	Email	CBC asked if extracts from Phase 1 eval report reflected the updated report following their comments.
16/07/2020	Email	HE confirmed that the Phase 1 eval report did not reflect comments – some still awaited.
17/07/2020	Email	MOLA Report from week 12 of Phase 2 trial trenching shared with CBC.
21/07/2020	Meeting	A meeting was held with BBC, CCC, and CBC to present the methodology adopted for the traffic forecasting and the results of the future forecasts to the local authorities.
23/07/2020	Email	Local Authority Work Package programme update for July 2020.
24/07/2020	Email	Photos of trenches in F45 shared with CBC.

Date	Form of correspondence	Key topics discussed and key outcomes
24/07/2020	Email	MOLA Report from week 13 of Phase 2 trial trenching shared with CBC.
28/07/2020	Meeting	A meeting was held with CBC to present a summary of the assessment of the wider traffic impacts and junction capacity modelling to be contained in the Transport Assessment (TA).
28/07/2020	Response to Supplementary Consultation	CBC response to Supplementary Consultation.
28/07/2020	Meeting	Cultural heritage meeting including discussion of: <ul style="list-style-type: none"> <li>• Scheme and programme update.</li> <li>• Update provided on engagement of stakeholders, including previous meeting with BBC conservation and archaeology officers, and with Historic England.</li> <li>• Update on progress with archaeological trial trenching.</li> <li>• Discussion of advanced works.</li> <li>• Brook Cottages and listed milestones discussed.</li> </ul>
29/07/2020	Email	MOLA Report from week 14 of Phase 3 trial trenching shared with CBC.
30/07/2020	Meeting	Local Economy Legacy Working Group.
30/07/2020	Email	CBCEWP7 Archaeology WSI+ATT work package issued to CBC County Archaeologist.
30/07/2020	Email	Work package “CCCHWP15 LTN 1/20” issued to CBC for info only.
04/08/2020	Email	Work package on Order Plans & Schedules issued to CBC.
12/08/2020	Email	MOLA Report from week 16 of Phase 3 trial trenching shared with CBC.
17/08/2020	Email	Cultural heritage: Meeting notes for 25 June meeting sent to Historic England, BBC, CBC, and CCC.
19/08/2020	Email	MOLA Report from week 17 of Phase 3 trial trenching shared with CBC.
21/08/2020	Email	Cultural heritage: Received comment on meeting notes from 25 June from CBC.

Date	Form of correspondence	Key topics discussed and key outcomes
25/08/2020	Meeting	HE cultural heritage meeting was held regarding gas diversion in F34 and advance archaeological works. It was recognised that the plan would not impact on the archaeological deposits within F34, but it was agreed it would be preferable to undertake the excavation in advance of work.
25/08/2020	Email from CCC to HE, BBC and CBC	<p>Email explaining following receipt of the notes made in the meeting held on 25 June, the council does not recall the need to provide a revised brief. The council explains they have not received firm plans for F59 and therefore cannot specify an area in a brief.</p> <p>The council explained they are obliged to respond to the consultation plan but advise no such division of Wintringham Park Site, 3 as proposed for the A428, should occur.</p>
27/08/2020	Email	MOLA Report from week 18 of Phase 3 trial trenching shared with CBC.
02/09/2020	Email	MOLA Report from week 19 of Phase 3 trial trenching shared with CBC.
07/09/2020	EMail	Cultural heritage: Minutes from meeting regarding gas diversion in F34 and advance archaeological works
09/09/2020	Meeting	Meeting with CCC, CBC, and HDC to provide an update on the Scheme, Landscape and Visual Impact Assessment (LVIA), landscape design approach and next steps.
09/09/2020	Email	Invite from HE's Archaeologist HE to consultees to invite them to a meeting to discuss the rationale and strategy for mitigation on the A428, to include for discussion on the strategies for the 39 sites have identified during the evaluations.
10/09/2020	Email	MOLA Report from week 20 of Phase 3 trial trenching shared with CBC.
10/09/2020	Email from HE to CBC	Email attaching notes with key points on the Archaeological Mitigation in Field 34. The council explained they are reading the draft specification for archaeology and the phase 2 evaluation report from MOLA.
16/09/2020	Email	MOLA Report from week 21 of Phase 3 trial trenching shared with CBC.
18/09/2020	Meeting	Cultural heritage: Archaeological meeting with BBC, CCC, and CBC to present the results of the Phase 2 trenching evaluation. The presentation was by MOLA.

Date	Form of correspondence	Key topics discussed and key outcomes
22/09/2020	Email and file share	Cultural heritage: Slides of Phase 2 trenching presentation were shared.
22/09/2020	Email from HE to CCC, CBC and BBC	Email attaching the Phase 1 and Phase 2 Archaeology Presentation.
23/09/2020	Email	Cultural heritage: Email sending current draft of the archaeological strategy document prepared by HE in advance of the meeting on 24-09-2020.
23/09/2020	Email	CBC confirmed receipt of the archaeological mitigation table and strategy document and will aim to review.
24/09/2020	Meeting	Cultural heritage: An archaeological meeting was held with BBC and CBC to discuss the archaeological mitigation strategy [TR010044/APP/6.12] with local authority officers. Presentations on the archaeological approach, the rationale and strategy, and the form of the strategy for the Environmental Statement.
25/09/2020	Email	Email from HE requesting file share for the PowerPoint of the meeting held on 24/09/2020. Second email regarding the drawings. Requested examples from the A14 scheme.
25/09/2020	Email and file share	PowerPoint from meeting on 24/09/2020 shared with the councils.
30/09/2020	Email	Water Courses work package issued to CBC Biodiversity/Drainage teams.
30/09/2020	Meeting	Cultural heritage: Minutes of the Phase 2 trenching presentation were shared.
30/09/2020	Meeting	Cultural heritage: Email from HE to CCC, BBC and CBC with attached minutes of the meeting on the Rational, Strategy and Mitigation were shared.
30/09/2020	Email	Email from HE to CCC, BBC and CBC attaching the minutes of the Phase 2 trenching presentation
30/09/2020	Email	Email from HE's Archaeologist HE with dates of the review programme for the evaluation reports.
30/09/2020	Email	Email from HE's Archaeologist HE on inputs required on the mitigation strategy.
30/09/2020	Email	Email from HE to CCC, BBC and CBC providing a series of milestones for the delivery and review of the archaeological

Date	Form of correspondence	Key topics discussed and key outcomes
		evaluation reports by MOLA and agreement made Friday 16 <sup>th</sup> for the next presentation.
02/10/2020	Email	Geophysical Survey Report for Phases 1 and 2 shared with CBC.
02/10/2020	File transfer	Cultural heritage: Updated Phase 1 and 2 trenching reports, plus draft mitigation area figures.
13/10/2020	Email	HE's Archaeologist emailed copies of mitigation area plans in CBC.
14/10/2020	Email	Comments on v4 of Phase 1 report.
15/10/2020	Email	Email from CCC to HE, BBC and CBC explaining the Phase 1 and 2 report, alongside the AECOM proposed mitigation areas have been reviewed. CCC have not had time to review the areas alongside levels of engagement. The council consider the proposal is inconsistent or unworkable. Mitigation area review document may need to be sent to MFT service as this document is too large.
15/10/2020	Email	Emails regarding photographic requirements in Bedfordshire.
15/10/2020	Email	Request for suggested peer review of medieval text in CBC.
16/10/2020	Email	CBC suggested a person for the medieval peer review.
16-10-2020	Meeting	An archaeological meeting was held with BBC, CCC, and CBC present the Phase 3 trenching results. This was the result of all the trenching proposed. The presentation was by MoLA.
18/10/2020	Email	Email from BBC to HE, CCC and CBC outlining key issues with the Phase 1 report, this includes Section 6.3, Section 6.4 and Appendix 4, Table 4.1. The council complained about the length of the document and reported the documents kept crashing on their system. The council raised cross referencing is a time consuming process. The council explained they are part way through reviewing the Phase 2 report.
19/10/2020	Email	Cultural heritage: Information on time required to review medieval paper.
20/10/2020	Email	HE's Archaeologist HE email indicating a lesson's learnt exercise on the trenching will be needed.
21/10/2020	Email	Project management work package "MWP1" issued to CBC for review.



Date	Form of correspondence	Key topics discussed and key outcomes
27/10/2020	File transfer	Cultural heritage: Draft Phase 3 report sent to BBC, CBC, and CCC.
28/10/2020	Email	Comments on Mitigation Strategy and Rationale.
29/10/2020	Meeting	<p>Cultural heritage: An archaeological meeting with BBC, CCC, and CBC was called by HE to review the mitigation rationale document and discuss the archaeological mitigation strategy [TR010044/APP/6.12]. The meeting covered the following:</p> <ul style="list-style-type: none"> <li>- Documents to be included in the DCO.</li> <li>- Discussion on the Rationale and Strategy.</li> <li>- Mitigation strategy for individual sites.</li> </ul>
03/11/2020	Email	Carbon work package “CBCEWP14” issued to CBC for review.
05/11/2020	Email	Cultural heritage: Response to curator comments on the Archaeological Mitigation Strategy.
09/11/2020	Email	Invite from HE’s Archaeologist HE for lessons learnt session.
09/11/2020	Email	Cultural heritage: Comments on Phase 3 trenching report (shared via BOX and resent as a pdf)
10/11/2020	Meeting	A meeting was held with ecologists from BBC and CBC to discuss work package EWP2a.
12/11/2020	Email	Work package “EWP2b” (landscaping) issued to CBC for review.
12/11/2020	Meeting	A meeting was held with BBC, CCC, CBC, SCDC, and HDC to provide a briefing on the draft Development Consent Order to highlight the key articles and provide an overview of the requirements. An overview of the structure of the Environmental Management Plan and explanation of the role of local authorities in the post submission process (covering Adequacy of Consultation responses and Local Impact Reports) was also provided.
17/11/2020	Email	Responses to CBC points, and requests for clarification on the A428 Rationale and Strategy by HE.
17/11/2020	Email	CBC advised no issue with the response to CBC comments on the Rational and Strategy.
20/11/2020	Email	Email to check that CBC had the A428 Phase 1 issue 4 and Phase 2 issue 3 final reports. The revised Phase 3 report will be sent.



Date	Form of correspondence	Key topics discussed and key outcomes
20/11/2020	Email	Confirmation that CBC had received the Phase 1 (issue 4) and Phase 2 (issue 3) final reports.
20/11/2020	We Transfer and CCC file share	Cultural heritage: Revised Phase 3 report sent to Historic England, BBC, CBC, and CCC.
25/11/2020	Meeting	Lessons learnt session for the A428 Evaluation reporting process.
25/11/2020	Email	Email to CBC stating that we had thought that it was agreed that the Phase 1 report could be submitted as is and then amendments made for the HER submission of the report. Asked CBC to confirm if amendments were required.
25/11/2020	Email	CBC had missed that the Phase 1 amendments would not be included in the DCO submission. Asked for confirmation that issue 4 of the report would go into the EIA.
30/11/2020	Email	Notified CBC that HE had addressed CBC and BBC comments, but that no comments were received from CCC. Asked if CBC wanted to see the revised document.
30/11/2020	Email	Confirmed that CBC would like to review the revised rationale and strategy by HE.
04/12/2020	Meeting	Cultural heritage: discussion on SoCG, archives and other matters relating to mitigation.
04/12/2020	Email	Draft SoCG info sent to CBC following the meeting.
04/12/2020	Email	Email from HE with notes and actions from lessons learnt session.
21/01/2021	File share	Final version of Phase 1 trenching report issued to councils.
31/01/2021 (TBC)	Email	Planning data requested from CBC, including public transport schemes.
03/02/2021	Briefing	Officers from BBC, CCC, and CBC were briefed on a Scheme walk through which included mainline alignment design and reason for changes, junction locations and designs, key structures, public rights of way proposals, borrow pits and key constraints and design considerations. The structure of the DCO application and the key documents within it were also covered. A recap was provided on the role of local authorities in the post submission period, as well as an update on the draft legal agreements.
05/02/2021	Meeting	In this meeting with BBC, CCC, and CBC, the results of the sensitivity tests for the update of the Uncertainty Log were

Date	Form of correspondence	Key topics discussed and key outcomes
		presented to the local authorities. This is reported in application document [TR010044/APP/7.9] - Sensitivity Test Utilising 2020 Uncertainty Log Data.
21/04/2021	Email	Email from HE to CBC providing a link to the confidential ecological appendices
25/05/2021	Meeting	Biodiversity update meeting including introduction to the SoCG and biodiversity impacts, effects and mitigation. Meeting minutes were provided following the meeting on 27/05/2021.
26/05/2021	Meeting	Cultural heritage update meeting including introduction to the SoCG and cultural heritage impacts, effects and mitigation. Meeting minutes were provided following the meeting on 28/05/2021.
10/06/2021	Meeting	Air quality and noise and vibration update meeting including introduction to the SoCG and air quality and noise and vibration impacts, effects and mitigation. Meeting minutes were provided following the meeting on 16/06/2021.
22/06/2021	Meeting	Meeting to discuss the cultural heritage elements of the SOCG. Meeting minutes were provided following the meeting on 30/06/2021.
23/06/2021	Meeting	Meeting to discuss the biodiversity elements of the SOCG and update the team on the landscape and visual effects assessment. Meeting minutes were provided following the meeting on 30/06/2021.
23/06/2021	Email	Email from CBC querying why borrow pits are not being discussed as part of the Material Assets and Waste Update presentation
23/06/2020	Email	WSI for Phase 3 prepared by MOLA shared.
25/06/2021	Email	Email from HE to BBC, CBC and CCC detailing a borrow pit technical note is being prepared and once issued HE will set up a specific meeting to discuss borrow pits.
01/07/2021	Meeting	Joint meeting with BBC, CBC and CCC on material assets and waste covering roles in Examination, navigating the ES, the SOCG and material assets and waste impacts, effects and mitigation. Meeting minutes were provided following the meeting on 08/07/2021.
01/07/2021	Meeting	Joint meeting with BBC and CBC about construction impacts on traffic.

Date	Form of correspondence	Key topics discussed and key outcomes
02/07/2021	Meeting	Local Technical Review Group meeting - discussion on strategic and local models.
05/07/2021, 08/07/2021 and 27/07/2021	Email	Email from HE to CBC requesting the names of specialist team members from CBC geology and soils, road drainage and water environment, climate and population and human health with a view to organising future SOCG meetings. No response received.
05/07/2021, 08/07/2021 and 27/07/2021	Email	Email from HE to CBC landscape team requesting availability for a future meeting.
08/07/2021	Email	Email from HE to CBC issuing the meeting minutes and presentation slides for the material assets and waste meeting on 01/07/2021.
TBC	Email	Comments on Geophysical Survey Report for Phases 1 and 2 and proposals for Phase 3 Trench locations from CBC.
TBC	Email	Draft scope of works for excavation in Field 44 shared with CBC.
TBC	Email	Photos taken of trenches in F39 shared with CBC.
TBC	Email	Phase 1 archaeological trenching results shared with CBC.
TBC	Email	Updates to the work package programme as of April 2020 shared by HE.
TBC	Email	Draft PPA with CBC shared by HE.
TBC	Email	Programme for work packages and Local Authority engagement for June 2020 shared by HE.
TBC	Email	Programme for work packages and Local Authority engagement for July 2020 shared by HE.
TBC	Email	Comments from CBC on the Phase 3 WSI from MOLA.
XX/06/2021	Letter from CBC to HE (via the Planning Inspectorate)	Letter from CBC to HE detailing their Relevant Representation.
20/07/2021	Meeting	Meeting with CBC and BBC on the Outline Construction Traffic Management Plan

Date	Form of correspondence	Key topics discussed and key outcomes
22/07/2021	Meeting	Meeting to discuss the air quality and noise and vibration elements of the SOCG.
28/07/2021	Email	Email from HE to CBC issuing the meeting minutes and presentation slides following the air quality and noise and vibration SOCG meeting on 22/07/2021.
28/07/2021	Email	Email from CBC Landscape Team advising that they don't have capacity to be involved in relevant discussion for the Scheme.
30/07/2021	Email	Email from HE to CBC detailing the location of the report for the Sensitivity Test using 2020 Uncertainty Log Data which is part of the DCO application documents.
11/08/2021	Email	Email from HE to CBC requesting air quality monitoring data for 2019 and 2020 if available.
12/08/2021	Meeting	JAAB (Joint Archaeological Advisors Brief) meeting with CCC and CBC to discuss outstanding questions about the "Cambridgeshire / Bedfordshire Brief for a Programme of Archaeological Investigation" for the A428.
13/08/2021	Meeting	Meeting between HE, the Cambridgeshire authorities (CCC, HDC and SCDC), BBC, CBC on borrow pits and the additional information provided in the Borrow Pit Technical Note. Meeting minutes were provided following the meeting on 23/08/2021.
17/08/2021	Email	Email from CBC to HE with NO <sub>2</sub> diffusion tube data and NO <sub>2</sub> , PM <sub>10</sub> and PM <sub>2.5</sub> data at the Sandy monitoring station.
20/08/2021	Email	Email from National Highways to CBC asking if any of the monitoring tubes have been relocated.
20/08/2021	Email	Email from National Highways to CBC requesting predicted operational noise levels for receptors R16, R17 and R18.
23/08/2021	Email	Email from National Highways to CBC detailing that input will be required from CBC to a position statement on HRA and mitigation matters following a meeting between Natural England and National Highways on 23/08/2021. A recording of the meeting was shared.
23/08/2021	Email	Email from National Highways to CBC with the minutes from the Borrow Pits meeting on 13/08/2021.
24/08/2021	Email	Email from CBC to National Highways advising that the monitoring tubes had not been relocated. CBC advised review of the 2019 monitoring data.

Date	Form of correspondence	Key topics discussed and key outcomes
26/08/2021	Email	The position statement for HRA and mitigation matters was shared with CBC for input. No response received.
02/09/2021	Email	Email from National Highways to CBC with daytime noise levels for receptors R16, R17 and R18. National Highways advised that night-time noise levels would follow in a couple of weeks due to scheduled annual leave.
<u>13/09/2021</u>	<u>Meeting</u>	Meeting with CBC Roads team covering Highways, PRoW and WCH items within Table 3-6 of the Statement of Common Ground.
20/09/2021	Meeting	Meeting between NH and CBC to discuss the Joint Position Statement
30/09/2021	Meeting	Meeting with CCC, HDC, SCDC, BBC and CBC in response to Action 2 from the Issue Specific Hearing 3 (24 September 2021). Biodiversity issues discussion on drainage ponds and planting arrangement. Meeting minutes were provided following the meeting on 04/10/2021.
04/10/2021	Email	Position Statement detailing matters related to design principles and planting at attenuation basins circulated to CBC, other host authorities and Natural England for input at Deadline 3 of the Examination.
04/10/2021	Email	Email from CBC re. Position Statement covering the matters raised by CBC at the Open Floor Hearing 1
04/10/2021	Email	Email from CBC re. Position Statement with regards to transport modelling, methodology and outcomes.
05/10/2021	Email	Email from National Highways to CBC with night-time noise predictions at receptors R16, R17 and R18 within CBC.
05/10/2021	Email	Email from CBC to National Highways requesting LA <sub>max</sub> night time noise values.
08/10/2021	Email	Email from National Highways to CBC confirming that LA <sub>max</sub> noise values is not part of the noise and vibration methodology set out in LA 111.
08/10/2021	Email	Email from CBC to National Highways re. SoCG on Highways Design Matters

- 2.1.2 It is agreed that this is an accurate record of the key engagement and consultation undertaken between (1) National Highways and (2) CBC in relation to the issues addressed in this SoCG.
- 2.1.3 The issues and matters highlighted in Section 3 of this SoCG summarise the key issues that have been identified in relation to a number of key areas of the DCO application.

### 3 Issues Raised

**Table 3-1 – DCO and Legal Matters**

Issue	Document Reference	National Highways Position	Central Bedfordshire Council Position	Status	Date
Draft DCO Definitions	Draft Development Consent Order [APP-025]	<p>The draft DCO (dDCO) definitions are appropriate for the Scheme.</p> <p>The updated dDCO submitted at Deadline 1 included the date of the planning permission referred to within the definition of "advanced works permission".</p> <p>While we do not agree that these elements should be deleted from the definition of "commence" we are proposing to submit a pre-commencement plan at Deadline 4.</p>	<p>CBC has suggested the following amendments:</p> <ul style="list-style-type: none"> <li>• Definition of "advanced works permission" on page 5 – insert date of planning permission as 8th April 2021.</li> <li>• CBC would recommend the following underlined elements are deleted from the definition of "commence" in the draft DCO</li> </ul> <p>"commence" means beginning to carry out any material operation (as defined in section 56(4) of the 1990 Act) forming part of the authorised development other than operations consisting of archaeological investigations and mitigation works, environmental surveys, <b>pre-construction mitigation works</b>, investigations for the purpose of assessing and monitoring ground conditions and levels, <b>remedial work in respect of any contamination or other adverse ground conditions, erection of any temporary means</b></p>	The discussions on the definitions are ongoing.	

Issue	Document Reference	National Highways Position	Central Bedfordshire Council Position	Status	Date
			<p>of enclosure, temporary hard standing, receipt and erection of construction plant and equipment, diversion and laying of underground apparatus and utilities, protection works, demolition (save in relation to Brook Cottages), site clearance, construction compound set up, and the temporary display of site notices or advertisements and “commencement” is to be construed accordingly.</p>		
Draft DCO Articles/powers sought	Draft Development Consent Order [APP-025]	The articles and schedules in the dDCO contain those powers required by National Highways to deliver the Scheme. The powers sought are appropriate for the Scheme.	See comments elsewhere.	The discussions on the articles/powers are ongoing.	
Draft DCO Requirements	Draft Development Consent Order [APP-025]	<p>The requirements set out in Part 1 of Schedule 2 of the dDCO are appropriate and provide a suitable framework for securing the necessary and relevant environmental mitigation measures and other environmental control measures.</p> <p>The procedures for discharge requirements as set out in Part 2 of</p>	<p>CBC has requested amendments to the draft DCO requirements (and/or the documents incorporated by reference in Schedule 2) as follows (see CBC representation dated August 2021):</p> <ol style="list-style-type: none"> <li>a. Station Road is not suited to accommodating significant construction traffic or extraordinary loads, and as such</li> </ol>	The discussions on the requirements are ongoing.	



Issue	Document Reference	National Highways Position	Central Bedfordshire Council Position	Status	Date
		<p>Schedule 2 of the dDCO are appropriate and satisfactorily involve CBC.</p> <p>b. Addressed in Table 3-6 (Highways Design, PRoW and WCH)</p> <p>c. Addressed in Table 3-6 (Highways Design, PRoW and WCH), Design Geometry.</p>	<p>CBC requests that this is addressed in connection with the DCO (whether as a DCO requirement, incorporated documents listed in Schedule 2 or some other mechanism). CBC would welcome discussion with National Highways.</p> <p>b. CBC would welcome discussion with National Highways on measures to mitigate the traffic and safety impacts of other diversion routes and incorporating them into the DCO requirements (or incorporated documents listed in Schedule 2), including the timing of any closures and any associated diversions in the context of the proposed works to Barford Road to ensure no conflict between the two.</p> <p>c. CBC requests that access over/under the A428 is easy as possible for people to access without using their cars, in particular securing sufficient width on the bridge deck for the Barford Road and would welcome discussion with National Highways regarding securing as</p>		

Issue	Document Reference	National Highways Position	Central Bedfordshire Council Position	Status	Date
		<p>d. Addressed in Table 34 (Environment)</p> <p>e. Addressed in Table 3-4 (Environment)</p> <p>e.i. Addressed in Table 3-4 (Environment)</p>	<p>a DCO requirement (or incorporated documents listed in Schedule 2).</p> <p>d. Sandy AQMA mitigation as a DCO requirement (or incorporated into documents listed in Schedule 2).</p> <p>e. Additional noise and vibration monitoring and mitigation is requested on the matters outlined in CBC's representation dated August 2021, with the mitigation secured as a DCO requirement (or incorporated documents listed in Schedule 2), including:</p> <p>i. CBC requests that the working hours in the DCO requirements are updated as follows: - 8am to 6pm Monday to Fridays, 8am to 1pm on Saturdays and no working on Sundays or Bank Holidays. However, in view of the size and scale of the project, CBC would consider it would be appropriate to allow variation to these hours where particular circumstances required this</p>		

Issue	Document Reference	National Highways Position	Central Bedfordshire Council Position	Status	Date
		<p>e.ii. The use of noise barriers or enclosures during construction, where necessary, is set out in paragraph 1.4.7 of Annex B of the First Iteration Environmental Management Plan <b>[APP-234]</b>.</p> <p>f. Regarding the additional dust control measures in Table A-3 of Annex A of the First Iteration Environmental Management Plan <b>[APP-234]</b>, this confirms that regular liaison would be undertaken with the local authorities (including any complaints received).</p>	<p>and appropriate mitigation measures were in place.</p> <p>ii. CBC requests that the proposed use of localised noise barriers is set out as forming part of the construction noise mitigation measures required under the First or Second Iteration of the Environmental Management Plan.</p> <p>f. Related to e) above, CBC requests that Table A-3 of the First Iteration Environmental Management Plan is updated so that there is greater clarity and confirmation of close liaison and contact with local authorities in the document.</p> <p>g. Schedule 2, paragraph 5 (Details of consultation) on page 58 – there are documents that CBC would like to be consulted on:</p> <ul style="list-style-type: none"> <li>i. Air Quality Management Plan</li> <li>ii. Noise Management Plan</li> <li>iii. Traffic Management Plan</li> <li>iv. Detailed design of works on CBC highway</li> </ul>		

Issue	Document Reference	National Highways Position	Central Bedfordshire Council Position	Status	Date
			v. Highway lighting on any CBC highway  vi. Noise mitigation		
Draft DCO Protective Provisions	Draft Development Consent Order [APP-025]	The protective provisions, as set out in Part 3 of Schedule 9 of the dDCO, that are relevant to CBC relate to its role as the Lead Local Flood Authority (LLFA). The protective provisions are appropriate for the protection of ordinary watercourses.		The discussions on the protective provisions are ongoing.	
Draft DCO Associated consents / licenses / permits	Draft Development Consent Order [APP-025]  Consents and Agreements Position Statement [APP-029]	The Consents and Agreements Position Statement identifies the consents, licences or permits that National Highways will need to obtain outside of the dDCO in order to deliver the Scheme. This document contemplates the disapplication of specific legislation on the basis that those powers are contained within the dDCO. This approach is appropriate for the Scheme.		The disapplication is subject to the consent of CBC as LLFA and those discussions are ongoing.	
Legal agreement with CBC		The legal agreement provides a mechanism for handing over the local roads constructed as part of the Scheme that are to be maintained by CBC as local highway authority. The measures contained in this	CBC requested additional obligations for the Development Consent Obligation as outlined in its representation dated August 2020 (or other legal agreements eg S278 agreements). This includes the following:	The discussions on the legal agreement are ongoing.	

Issue	Document Reference	National Highways Position	Central Bedfordshire Council Position	Status	Date
		<p>agreement are appropriate for the Scheme.</p> <p>a. Addressed in Table 3-6 (Highways Design, PRoW and WCH), Management and Maintenance Responsibilities.</p> <p>Refer also to 9.29 Joint Position Statement with CBC submitted at Open Floor Hearing 1 submitted at Deadline 3</p>	<p>a. An appropriate fund contained in the Development Consent Obligation or secured in some other manner in connection with the DCO should be allocated and payable to CBC for addressing resulting safety, capacity, or amenity issues. CBC would welcome a discussion with National Highways over the appropriate level of funding. In addition to the fund detailed. It is also our position that, due to the considerable amount of monitoring, management and local liaison that will be required throughout the construction period, that funding is put in place in the Development Consent Obligation or secured in some other manner in connection with the DCO payable to CBC to cover the following for the duration of the construction works (and a subsequent reasonable period post completion to carry out any post construction monitoring):</p> <p>i. A CBC officer with specific responsibility for monitoring, addressing and managing</p>		

Issue	Document Reference	National Highways Position	Central Bedfordshire Council Position	Status	Date
		<p>b. With regard to use of <b>temporary</b> traffic management or other measures, the Outline Construction Traffic Management Plan [<b>APP-244</b>] has been updated (Sections 3.5.4, 3.5.5 amended and 3.5.10 added) to explain in greater detail the approach to monitoring, managing and addressing re-routing of traffic should it occur</p> <p>c. National Highways considers further inclusion to commit to monitor and manage activities within the dDCO unnecessary as they are required under the terms of</p>	<p>local impacts, including local liaison</p> <p>ii. CCTV and /or ANPR coverage for impacted routes to enable and support monitoring and enforcement</p> <p>iii. Temporary and/or permanent signage</p> <p>b. Temporary or permanent signal control or other works are expected to be required to regulate traffic flows at the junction onto the A603 from Vinegar Hill. CBC would welcome a discussion with NH to agree an appropriate contribution to deliver these works as part of the Development Consent Obligation or a highways agreement.</p> <p>c. Monitor and Manage proposal - CBC would welcome a discussion with NH as to whether this is something that could be covered by a Development Consent Obligation, for example, or in some other manner in connection with the DCO, including timing, frequency, methodology, governance, triggers for intervention (including</p>		

Issue	Document Reference	National Highways Position	Central Bedfordshire Council Position	Status	Date
		<p>its licence to manage the Strategic Road Network (SRN). Part 4 of the licence commits National Highways to maintenance and replacement of the network and to ensure improvement. Monitoring is undertaken to achieve this. As such monitor and manage activities are limited to the SRN and cannot be extended to local roads.</p> <p>d The proposed scheme does not preclude future development, subject to compliance with DMRB standards. National Highways will work with EWR to help develop any application they consider necessary following confirmation of selected route and station locations. National Highways welcomes the invitation to discuss further with CBC. We suggest this</p>	<p>detriment to the operation of local road approaches), and funding. It is noted that Monitor and Manage is intended to be limited to the SRN and as such CBC would have to express further concern that Monitor and Manage (as currently proposed) will not provide the level of comfort that CBC would be seeking with regards to potential future impacts on local road approaches to impacted junctions, or upon the CBC network immediate to the SRN as a result of displaced traffic.</p> <p>d. A vehicular link off the proposed A428 route to the east of Little Barford should be provided, to enable traffic to divert off this road to the new EWR station and potentially to new homes, prior to it reaching the A1. CBC would welcome a discussion with HE regarding funding or provision in connection with the DCO.</p>		

Issue	Document Reference	National Highways Position	Central Bedfordshire Council Position	Status	Date
		discussion include Bedford Borough Council due to proximity.	e. Article 13 (Construction and maintenance of new, altered or diverted streets and other structures) on page 13 – constructed highways etc. from completion will be maintained by the Local Highway Authority at its expense. However, CBC requests that funding for maintenance is paid by National Highways to CBC as commuted sum/s and secured by the Development Consent Obligation or other statutory agreement.		



**Table 3-2 – Compulsory Acquisition and Property Matters**

Issue	Document Reference	National Highways Position	Central Bedfordshire Council Position	Status	Date
Compulsory Acquisition and Temporary Possession	The Statement of Reasons (SoR) <b>[APP-030]</b> Book of Reference <b>[APP-032]</b>	In order to deliver the Scheme, should the Development Consent Order be made, it would be necessary to temporarily possess and/or acquire land and/or rights owned by CBC. Land Plots in which CBC has an interest, that would be subject to the compulsory acquisition (CA) of land and/or rights are identified in the Book of Reference <b>[APP-032]</b> and Schedule 2 of the Statement of Reasons (SoR) <b>[APP-030]</b> . The extent of the land take identified is required for the Scheme or is required to facilitate or is incidental to the Scheme. National Highways is happy to continue discussions to acquire the land and rights affected through negotiation, outside the CA process.	As the land in question is understood to be all existing highway land, CBC does not object to the acquisition.	Agreed.	

**Table 3-3 – Transport Matters**

Issue	Document Reference	National Highways Position	Central Bedfordshire Council Position	Status	Date
Base Year Traffic Model - Data	Transport Assessment Report – Part 1 [APP-241] Transport Assessment – Part 2 [APP-242]	The Base Year model is underpinned by good quality data that provides a sound basis for model calibration and validation.	CBC are content with the Strategic traffic model that has been developed for the purposes of assessment of the Scheme.	Agreed	Local Technical Review Group meeting on 26 May 2021
Base Year Traffic Model – Fit for Purpose	Transport Assessment Report – Part 1 [APP-241] Transport Assessment – Part 2 [APP-242]	The Base Year has been developed in accordance with DfT TAG procedures and meets the required TAG standards for validation. It gives a reliable representation of base year conditions within the study area. It therefore provides a sound foundation for the development of future traffic flows for assessment of the Scheme.	CBC are content with the Strategic traffic model that has been developed for the purposes of assessment of the Scheme.	Agreed	Local Technical Review Group meeting on 26 May 2021
Future Year Traffic Models – Fit for purpose	Transport Assessment Report – Part 1 [APP-241] Transport Assessment – Part 2 [APP-242]	The future year models fully comply with DfT TAG methods. They provide a reliable forecast of future traffic flows and the impact of the Scheme as reported in the Transport Assessment and Transport Assessment Annex.	CBC are content with the Strategic traffic model that has been developed for the purposes of assessment of the Scheme.	Agreed	Local Technical Review Group meeting on 26 May 2021

Issue	Document Reference	National Highways Position	Central Bedfordshire Council Position	Status	Date
Future Year Traffic Model - Sensitivity Test	Transport Assessment Report – Part 1 [APP-241] Transport Assessment – Part 2 [APP-242]	The sensitivity test carried out using the updated 2020 Uncertainty Log does not result in any significant differences in forecasts flows when compared to the results using the 2018 Uncertainty Log data. This demonstrates that the assessments for the Scheme using the 2018 Uncertainty Log data as submitted are robust and it is appropriate for the Scheme to continue to rely on the 2018 UL Data forecasts.	CBC is content that there are no significant differences between the 2018 and 2020 assessments and thus, generally agree with the traffic model that has been developed for the purposes of assessment of the Scheme.	Agreed	Local Technical Review Group meeting on 26 May 2021
Transport Assessment Methodology	Transport Assessment Report – Part 1 [APP-241] Transport Assessment – Part 2 [APP-242]	The Transport Assessment methodology adopted follows best practice and provides a reasonable indication of the outcomes arising from the Scheme.	Ongoing discussions are being held with the A428 Project Team with regards to a number of remaining queries, including the validation of base models on the A1 corridor south of the Scheme.  Biggleswade North sensitivity testing. Outputs expected mid-November	Under discussion	25/10/21
Monitor and Manage		A Vissim microsimulation model was developed to provide a more detailed assessment at Sandy. The Vissim model results are considered reliable and robust. The Vissim models have been provided to CBC for review and no specific issues have been raised	Saturn vs Vissim – difference in outputs for Sandy and implications for mitigation  Monitor and manage – lack of definition/commitment.	Under discussion	25/10/21

Issue	Document Reference	National Highways Position	Central Bedfordshire Council Position	Status	Date
		with the models at this time [REP3-029].			
Transport Assessment Data collection methods	Transport Assessment Report – Part 1 [APP-241] Transport Assessment – Part 2 [APP-242]	Sufficient data has been collected in order to inform the Transport Assessment and the Transport Assessment Annex in relation to the Scheme.	Ongoing discussions are being held with the A428 Project Team with regards to a number of remaining queries, including the validation of base models on the A1 corridor south of the Scheme.  Biggleswade North sensitivity testing. Outputs expected mid-November.	Under discussion	25/10/21
Transport Assessment	Transport Assessment Report – Part 1 [APP-241] Transport Assessment – Part 2 [APP-242]		Other comments for discussion and clarification:  The Strategic model identifies significant increases in traffic movements through the centre of Sandy (in the order of 3,928 vehicle movements within a 12-hour period), as a result of traffic re-routing onto St. Neots Road to avoid southbound congestion at the A1/A603 junction to the west. This is not an unexpected impact based upon the increased levels of north-south flow predicted following the completion of the A428 scheme and known capacity issues already identified at the A1/A603 junction.	Under discussion	

Issue	Document Reference	National Highways Position	Central Bedfordshire Council Position	Status	Date
			<p>The more detailed VISSIM work (summarised in section 3.18 of the Transport Assessment Annex (APP-243)) however predicts little overall change in the operation of either the A1/A603 junction or changes in flow on St. Neots Road. Whilst it is accepted that VISSIM modelling can be more representative than strategic models when assessing congested networks, the results of the VISSIM model do currently appear counterintuitive, with increased flows on all but one arm of the A1/A603 junction (and an overall net increase of 300 vehicle movements (actual flow) through the junction in the AM peak hour between the 'Do-Minimum' and 'Do-Something' scenarios) resulting in generally improved journey times, and with minimal traffic choosing to route through Sandy to avoid the southbound A1 queues.</p> <p>The potential implications within Sandy, should the initial Strategic Model results be more representative than the VISSIM modelling, are significant, resulting in considerable</p>		

Issue	Document Reference	National Highways Position	Central Bedfordshire Council Position	Status	Date
		<p>Refer also to 9.29 Joint Position Statement with CBC submitted at Open Floor Hearing 1 submitted at Deadline 3</p>	<p>increases in flow through the centre of the town.</p> <p>As such the Council would request that any Monitor and Manage package proposed for Sandy is extended to include assessment of traffic levels passing through the centre of the town, via St. Neots Road. Furthermore, that the requirement for improvement works under 'Monitor and Manage' would be triggered by the deterioration in operation of either the A1/A603 junction or the St. Neots Road/High Street junction.</p> <p>Whilst the Transport Assessment Annex concludes that the overall impact at the junctions within CBC is Minimal overall (Table 3-91 [APP-243]), it is noted that this is global comparison taking into account the overall operation of the junctions and does not therefore make clear that this is partly the result of increased forecast flows on the mainline A1 being offset against reduced flows from the local road junction approaches.</p> <p>It is noted, for example, that in Table 3-75 of the Transport Assessment</p>		

Issue	Document Reference	National Highways Position	Central Bedfordshire Council Position	Status	Date
			<p>Annex [APP-243], that the overall flows through the A1/A603 VISSIM model are predicted to increase by only 29 vehicles in the AM peak hour (2040 forecast), despite the much larger predicted increases in flow on the A1 forecast within the A428 strategic model (with an increase of circa 474 two-way movements on the A1 north of Sandy in the AM Peak hour).</p> <p>Similarly, it is noted in Table 3-78 of the Transport Assessment Annex [APP-243] that the modelling of the Biggleswade North roundabout junction is based upon 2040 forecast flows in which the A1 flows increase by 3% (north) and 8% (south), whilst the local road flows decrease by 17% (east) and 18% (west).</p> <p>As such, and whilst discussions with regards to the modelling in question are ongoing, it appears that the strategic model is routing local traffic away from these junctions due to increased predicted levels of delay for local road traffic.</p> <p>As such, we would be seeking reassurance that any 'Monitor and Manage' approach would also take</p>		

Issue	Document Reference	National Highways Position	Central Bedfordshire Council Position	Status	Date
			<p>into account the operation of the side roads as a criterion for intervention, with funding to be provided by HE to CBC secured in the Development Consent Obligation or some other manner in connection with the DCO, as the expected effect of increased flows on the A1 would be increased difficulty for drivers to exit from local road approaches. This would be applicable to all of the junctions within the CBC area covered by the 'Monitor and Manage' process.</p> <p>Concern regarding lack of definition on management/mitigation on local road network on completion of scheme.</p>		
<p>Transport Assessment Baseline Data</p>	<p>Transport Assessment Report – Part 1 [APP-241] Transport Assessment – Part 2 [APP-242]</p>	<p>Where applicable, the Base Year junctions models are underpinned by good quality data that provides a sound basis for model calibration and validation.</p> <p>(Where Baseline Data is not utilised the assessment is based on outputs from the strategic model)</p>	<p>CBC are awaiting results from sensitivity testing from Biggleswade North roundabout. Due mid-November.</p>	<p>Under discussion</p>	<p>25/10/21</p>
<p>Transport Assessment</p>	<p>Transport Assessment</p>	<p>The Transport Assessment approach to modelling follows best practice and provides a reasonable indication</p>	<p>CBC is in ongoing discussions with HE with regards to elements of the modelling work undertaken,</p>	<p>Under discussion</p>	



Issue	Document Reference	National Highways Position	Central Bedfordshire Council Position	Status	Date
Approach to modelling	Report – Part 1 [APP-241] Transport Assessment – Part 2 [APP-242]	of the outcomes arising from the Scheme.	particularly with regards to the effects of the Proposed Development upon the local highway network and necessary mitigation.		
Transport Assessment Presentation of results	Transport Assessment Report – Part 1 [APP-241] Transport Assessment – Part 2 [APP-242]	The Transport Assessment results presented are a fair reflection of the results obtained from the modelling undertaken.	CBC are content that the Transport Assessment [APP-241] represents a reasonable summary of the modelling work undertaken.	Agreed	
Transport Assessment Construction impacts modelling	Transport Assessment Report – Part 1 [APP-241] Transport Assessment – Part 2 [APP-242]	The Transport Assessment methodology adopted with regard to impacts predicted to arise during the construction phases provides a reasonable indication of the impacts arising from the Scheme.  Refer also to 9.29 Joint Position Statement with CBC submitted at Open Floor Hearing 1 submitted at Deadline 3.	CBC are content that the Strategic Model presents the most suitable available tool to identify construction phase impacts on the wider network. However, as a strategic model this will by definition be less granular and as such monitoring of construction phase impacts to verify effects will be required.	Under discussion	25/10/21

Issue	Document Reference	National Highways Position	Central Bedfordshire Council Position	Status	Date
<p>Transport Assessment Construction impacts general</p>	<p>Transport Assessment Report – Part 1 [APP-241] Transport Assessment – Part 2 [APP-242]</p>	<p>The Transport Assessment methodology adopted with regard to impacts predicted to arise during the construction phases provides a reasonable indication of the impacts arising from the Scheme.</p> <p>National Highways has undertaken reasonable and proportionate traffic modelling to predict the construction impacts on the project and wider road network. Given the size of the scheme there are expected to be certain displacements of traffic and re-routeings, which will cause additional congestion and delays in certain parts of the affected road network, which National Highways intends to mitigate as far as possible, in consultation with the Local Highway Authorities. It is also acknowledged by National Highways that some of these impacts might not be mitigated completely during the course of the construction, and as long as they are tolerable and not disproportionate to implementation of similar schemes elsewhere, some of these adverse impacts will have to be accepted as “short term pain with</p>	<p>The Transport Assessment [APP-241] identifies significant daily increases in traffic on a number of east-west routes, as traffic is predicted to be displaced from the existing A428 during the works (Phases 1 to 4).</p> <p>There are constraints on a number of the routes within the authority area which make them unsuited to accommodating significant changes in traffic flow and/or composition.</p> <p>The displacement of traffic onto local roads will therefore result in considerable and ongoing local concerns, resulting in a significant increase in the resource required from CBC to monitor/manage the effects of displaced traffic.</p>	<p>Under discussion</p>	<p>25/10/21</p>

Issue	Document Reference	National Highways Position	Central Bedfordshire Council Position	Status	Date
		<p>a view to long term gain” through implementation of the scheme.</p> <p>Refer also to 9.29 Joint Position Statement with CBC submitted at Open Floor Hearing 1 submitted at Deadline 3.</p> <p>REP3-016 Deadline 3 Submission - 9.29 Joint Position Statement on matters raised by Central Bedfordshire Council at Open Floor Hearing 1</p>			
<p>Transport Assessment Junction Operational Assessments at: Black Cat Caxton Gibbet</p>	<p>Transport Assessment Report – Part 1 <b>[APP-241]</b> Transport Assessment – Part 2 <b>[APP-242]</b></p>	<p>The operational assessment modelling presented within Transport Assessment with regard to new or modified junctions provides a reasonable indication of the predicted operation of individual junctions.</p>	<p>Does not fall within CBC authority area.</p>	<p>Closed</p>	<p>25/10/21</p>
<p>Transport Assessment Wider impacts Quantification of impacts:</p>	<p>Transport Assessment Annex <b>[APP-243]</b></p>	<p>The quantification of impacts presented within the Transport Assessment Annex is a reliable indication of the impacts arising from the Scheme.</p>	<p>Does not fall within CBC authority area.</p>	<p>Closed</p>	<p>25/10/21</p>

Issue	Document Reference	National Highways Position	Central Bedfordshire Council Position	Status	Date
A428 Wyboston Roundabout A428 Barford Road Roundabout					
Transport Assessment Wider impacts: A428 Wyboston Roundabout A428 Barford Road Roundabout	Transport Assessment Annex <b>[APP-243]</b>	The operational assessment modelling presented within the Transport Assessment Annex with regard to existing junctions provides a reasonable comparison of the predicted operation of individual junctions without and with the Scheme.	Does not fall within CBC authority area.	Closed	25/10/21

**Table 3-4 – Environment Matters**

Issue	Document Reference	National Highways Position	Central Bedfordshire Council Position	Status	Date
<p><b>General</b> Description of the Scheme</p>	<p>Chapter 2, The Scheme [APP-071]</p>	<p>An Environmental Impact Assessment (EIA) has been undertaken to identify the likely significant effects of the Scheme on the environment.</p> <p>The western part of the Scheme is located within CBC. A description of the Scheme and its location are reported in Chapter 2, The Scheme of the Environmental Statement (ES) [APP-071].</p> <p>This is considered an appropriate description of the Scheme.</p>	<p>CBC is content that the Scheme is adequately described in the ES.</p>	<p>Agreed</p>	
<p><b>General</b> Legislation and policy</p>	<p>Chapter 5, Air quality [APP-074] Chapter 6, Cultural heritage [APP-075] Chapter 7, Landscape and visual effects [APP-076] Chapter 8, Biodiversity [APP-077]</p>	<p>National Highways considers that the ES has identified and appropriately considered all applicable legislation and policy pertaining to the following assessments undertaken as part of the EIA of the Scheme:</p> <ul style="list-style-type: none"> <li>• Air quality.</li> <li>• Cultural heritage.</li> <li>• Landscape and visual effects.</li> <li>• Biodiversity.</li> <li>• Geology and soils.</li> </ul>	<p>CBC is content that these assessments have considered all relevant legislation and policy that was in place at the time of undertaking.</p> <p><u>Matters discussed at an air quality and noise and vibration SOCG meeting with CBC on 23.07.2021</u></p> <p>Agreed for air quality and noise and vibration.</p>	<p>Partially agreed</p>	

Issue	Document Reference	National Highways Position	Central Bedfordshire Council Position	Status	Date
	Chapter 9, Geology and soils [APP-078] Chapter 10, Material assets and waste [APP-079] Chapter 11, Noise and vibration [APP-080] Chapter 12, Population and human health [APP-081] Chapter 13, Road drainage and the water environment [APP-082] Chapter 14, Climate [APP-083] Chapter 15, Assessment of cumulative effects [APP-084]	<ul style="list-style-type: none"> <li>• Material assets and waste.</li> <li>• Noise and vibration.</li> <li>• Population and human health.</li> <li>• Road drainage and the water environment.</li> <li>• Climate.</li> <li>• Assessment of cumulative effects.</li> </ul>			
<b>General</b>	Chapter 5, Air quality [APP-074]	The study areas adopted by National Highways within the following assessments are considered to	CBC is content that the geographical extents of the adopted study areas cover the area over which direct and	Partially agreed	

Issue	Document Reference	National Highways Position	Central Bedfordshire Council Position	Status	Date
Study area definition and extents	<p>Chapter 6, Cultural heritage [APP-075]</p> <p>Chapter 7, Landscape and visual effects [APP-076]</p> <p>Chapter 8, Biodiversity [APP-077]</p> <p>Chapter 9, Geology and soils [APP-078]</p> <p>Chapter 10, Material assets and waste [APP-079]</p> <p>Chapter 11, Noise and vibration [APP-080]</p> <p>Chapter 12, Population and human health [APP-081]</p> <p>Chapter 13, Road drainage and the water environment [APP-082]</p>	<p>reflect current best practice and standards:</p> <ul style="list-style-type: none"> <li>• Air quality.</li> <li>• Cultural heritage.</li> <li>• Landscape and visual effects.</li> <li>• Biodiversity.</li> <li>• Geology and soils.</li> <li>• Material assets and waste.</li> <li>• Noise and vibration.</li> <li>• Population and human health.</li> <li>• Road drainage and the water environment.</li> <li>• Climate.</li> <li>• Assessment of cumulative effects.</li> </ul> <p>National Highways considers that the geographical extents of the adopted study areas are appropriate to identify the likely direct and indirect effects of the Scheme on sensitive features and receptors.</p>	<p>indirect effects of the Scheme are likely to occur.</p> <p><u>Matters discussed at an air quality and noise and vibration SOCG meeting with CBC on 23.07.2021</u></p> <p>Agreed for air quality and noise and vibration.</p>		

Issue	Document Reference	National Highways Position	Central Bedfordshire Council Position	Status	Date
	Chapter 14, Climate <b>[APP-083]</b>  Chapter 15, Assessment of cumulative effects <b>[APP-084]</b>				
<b>General</b>  Application of expert / professional judgements	Chapter 5, Air quality <b>[APP-074]</b>  Chapter 6, Cultural heritage <b>[APP-075]</b>  Chapter 7, Landscape and visual effects <b>[APP-076]</b>  Chapter 8, Biodiversity <b>[APP-077]</b>  Chapter 9, Geology and soils <b>[APP-078]</b>  Chapter 10, Material assets and waste <b>[APP-079]</b>	<p>The identification of likely significant effects on sensitive features and receptors has been informed by professional judgement and the views of relevant technical specialists, where necessary.</p> <p>National Highways considers the application of professional judgement by its specialists within the following assessments to be appropriate and robust:</p> <ul style="list-style-type: none"> <li>• Air quality.</li> <li>• Cultural heritage.</li> <li>• Landscape and visual effects.</li> <li>• Biodiversity.</li> <li>• Geology and soils.</li> <li>• Material assets and waste.</li> <li>• Noise and vibration.</li> <li>• Population and human health.</li> </ul>	<p>CBC is content with how National Highways has applied professional judgement in the assessments of effects on sensitive features and receptors undertaken and reported,</p> <p><u>Matters discussed at an air quality and noise and vibration SOCG meeting with CBC on 23.07.2021</u></p> <p>Not agreed for noise and vibration as CBC are not satisfied on the interpretation of the results.</p> <p>Not agreed for air quality as CBC are not satisfied on the interpretation of the results for Sandy</p>	Partially agreed.	



Issue	Document Reference	National Highways Position	Central Bedfordshire Council Position	Status	Date
	<p>Chapter 11, Noise and vibration [APP-080]</p> <p>Chapter 12, Population and human health [APP-081]</p> <p>Chapter 13, Road drainage and the water environment [APP-082]</p> <p>Chapter 14, Climate [APP-083]</p> <p>Chapter 15, Assessment of cumulative effects [APP-084]</p>	<ul style="list-style-type: none"> <li>Road drainage and the water environment.</li> <li>Climate.</li> <li>Assessment of cumulative effects.</li> </ul>			
<p><b>General</b></p> <p>Assessment assumptions and limitations</p>	<p>Chapter 5, Air quality [APP-074]</p> <p>Chapter 6, Cultural heritage [APP-075]</p> <p>Chapter 7, Landscape and visual effects [APP-076]</p>	<p>The following assessments record the assumptions applied and the approaches taken by National Highways to reduce any uncertainty resulting from any limitations encountered:</p> <ul style="list-style-type: none"> <li>Air quality.</li> <li>Cultural heritage.</li> <li>Landscape and visual effects.</li> </ul>	<p>CBC is content that the assumptions recorded within these assessments are reasonable and accepts that the limitations encountered do not impact upon the validity of the reported findings.</p> <p><u>Matters discussed at an air quality and noise and vibration SOCG meeting with CBC on 23.07.2021</u></p>	<p>Partially agreed</p>	

Issue	Document Reference	National Highways Position	Central Bedfordshire Council Position	Status	Date
	<p>Chapter 8, Biodiversity [APP-077]</p> <p>Chapter 9, Geology and soils [APP-078]</p> <p>Chapter 10, Material assets and waste [APP-079]</p> <p>Chapter 11, Noise and vibration [APP-080]</p> <p>Chapter 12, Population and human health [APP-081]</p> <p>Chapter 13, Road drainage and the water environment [APP-082]</p> <p>Chapter 14, Climate [APP-083]</p> <p>Chapter 15, Assessment of cumulative effects [APP-084]</p>	<ul style="list-style-type: none"> <li>• Biodiversity.</li> <li>• Geology and soils.</li> <li>• Material assets and waste.</li> <li>• Noise and vibration.</li> <li>• Population and human health.</li> <li>• Road drainage and the water environment.</li> <li>• Climate.</li> <li>• Assessment of cumulative effects.</li> </ul> <p>National Highways considers the assumptions adopted in these assessments to be reasonable and appropriate.</p>	<p>Agreed for air quality and noise and vibration.</p>		

Issue	Document Reference	National Highways Position	Central Bedfordshire Council Position	Status	Date
<p><b>General</b> Worst-case scenario: limits of deviation</p>	<p>Works Plans [APP-009] [APP-010] Engineering Sections <b>[APP-017 to APP 022]</b> Chapter 5, Air quality <b>[APP-074]</b> Chapter 6, Cultural heritage <b>[APP-075]</b> Chapter 7, Landscape and visual effects <b>[APP-076]</b> Chapter 8, Biodiversity <b>[APP-077]</b> Chapter 9, Geology and soils <b>[APP-078]</b> Chapter 10, Material assets and waste <b>[APP-079]</b> Chapter 11, Noise and vibration <b>[APP-080]</b></p>	<p>The following assessments have taken into account the lateral limits of deviation forming part of the Scheme design, as defined on the Works Plans <b>[APP-009] [APP-010]</b>, and the vertical limits of deviation defined on the Engineering Sections <b>[APP-017 to APP 022]</b>:</p> <ul style="list-style-type: none"> <li>• Air quality.</li> <li>• Cultural heritage.</li> <li>• Landscape and visual effects.</li> <li>• Biodiversity.</li> <li>• Geology and soils.</li> <li>• Material Assets and Waste.</li> <li>• Noise and Vibration.</li> <li>• Population and human health.</li> <li>• Road drainage and the water environment.</li> <li>• Climate.</li> <li>• Assessment of cumulative effects.</li> </ul> <p>National Highways considers that the maximum extents of possible deviation accounted for in these</p>	<p>CBC is content that these assessments have appropriately considered the worst-case scenario in relation to the potential for the Scheme design and/or its construction to deviate within the lateral and vertical extents defined on the Works Plans and Engineering Sections.</p> <p><u>Matters discussed at an air quality and noise and vibration SOCG meeting with CBC on 23.07.2021</u></p> <p>Agreed for air quality and noise and vibration (for Black Cat end of Scheme).</p>	<p>Partially agreed</p>	

Issue	Document Reference	National Highways Position	Central Bedfordshire Council Position	Status	Date
	<p>Chapter 12, Population and human health [APP-081]</p> <p>Chapter 13, Road drainage and the water environment [APP-082]</p> <p>Chapter 14, Climate [APP-083]</p> <p>Chapter 15, Assessment of cumulative effects [APP-084]</p>	<p>assessments represent the realistic worst-case assessment scenario.</p>			
<p><b>General</b> Presentation of results</p>	<p>Chapter 5, Air quality [APP-074]</p> <p>Chapter 6, Cultural heritage [APP-075]</p> <p>Chapter 7, Landscape and visual effects [APP-076]</p> <p>Chapter 8, Biodiversity [APP-077]</p>	<p>The following application documents present the approaches to, and outcomes of, assessments undertaken to identify the likely significant effects of the construction, operational and (where relevant) the maintenance phases of the Scheme:</p> <ul style="list-style-type: none"> <li>• Air quality.</li> <li>• Cultural heritage.</li> <li>• Landscape and visual effects.</li> <li>• Biodiversity.</li> <li>• Geology and soils.</li> </ul>	<p>CBC is content with the formats and methods adopted by National Highways in presenting the details of the assessments undertaken.</p> <p><u>Matters discussed at an air quality and noise and vibration SOCG meeting with CBC on 23.07.2021</u></p> <p>Agreed for air quality and noise and vibration.</p>	<p>Partially agreed</p>	

Issue	Document Reference	National Highways Position	Central Bedfordshire Council Position	Status	Date
	<p>Chapter 9, Geology and soils [APP-078]</p> <p>Chapter 10, Material assets and waste [APP-079]</p> <p>Chapter 11, Noise and vibration [APP-080]</p> <p>Chapter 12, Population and human health [APP-081]</p> <p>Chapter 13, Road drainage and the water environment [APP-082]</p> <p>Chapter 14, Climate [APP-083]</p> <p>Chapter 15, Assessment of cumulative effects [APP-084]</p>	<ul style="list-style-type: none"> <li>• Material Assets and Waste.</li> <li>• Noise and Vibration.</li> <li>• Population and human health.</li> <li>• Road drainage and the water environment.</li> <li>• Climate.</li> <li>• Assessment of cumulative effects.</li> </ul> <p>National Highways considers that the format and methods used to present the assessments undertaken are clear and unambiguous.</p>			

Issue	Document Reference	National Highways Position	Central Bedfordshire Council Position	Status	Date
<p><b>General</b> Route/junction design selection</p>	<p>Chapter 2, The Scheme [APP-071]  Chapter 3, Assessment of Alternatives [APP-072]</p>	<p>National Highways has undertaken thorough and comprehensive route studies, junction appraisals and optioneering studies during the design-development of the Scheme, in pursuit of establishing its preferred design solution, as described in Chapter 2, The Scheme [APP-071] and Chapter 3, Assessment of Alternatives [APP-072] of the Environmental Statement.</p> <p>In considering, evaluating and balancing constraints and opportunities, National Highways considers that the preliminary design of the new dual carriageway represents the optimum solution to meet the Scheme objectives.</p>	<p>CBC is content that the studies, optioneering exercises and appraisals undertaken by National Highways are appropriate from a design perspective.</p>	<p>Agreed.</p>	<p>September 2021</p>
<p><b>General</b> Approach to modelling</p>	<p>Chapter 5, Air quality [APP-074]  Chapter 11, Noise and vibration [APP-080]  Chapter 13, Road drainage and the water environment [APP-082]</p>	<p>Modelling of existing and future conditions and changes, and the effects and risks of the Scheme, has been undertaken as part of the Air quality, Noise and vibration and Road drainage and the water environment assessment.</p> <p>National Highways considers that the approaches to modelling are appropriate.</p>	<p>CBC is content with the approaches applied to modelling existing and future conditions and changes, and the effects and risks of the Scheme, and that the parameters included / considered in the modelling are appropriate.</p> <p><u>Matters discussed at an air quality and noise and vibration SOCG meeting with CBC on 23.07.2021</u></p>	<p>Partially agreed</p>	

Issue	Document Reference	National Highways Position	Central Bedfordshire Council Position	Status	Date
			Agreed for air quality and noise and vibration.		
<b>Air Quality</b> Data collection methods, baseline data and the identification and sensitivity of relevant features and receptors	Chapter 5, Air quality <b>[APP-074]</b>	<p>The baseline conditions have been collated using desk-based and field-based techniques, and through consultation with stakeholders.</p> <p>National Highways considers the scope, coverage and timing of surveys undertaken to establish the baseline conditions and sensitive features and receptors are in line with best practice and appropriate to inform the assessment of direct and indirect effects reported in Chapter 5, Air quality assessment <b>[APP-074]</b>.</p>	<p>CBC is content that the scope and coverage of surveys undertaken to inform the assessment of air quality effects are sufficiently comprehensive.</p> <p><u>Matters discussed at an air quality and noise and vibration SOCG meeting with CBC on 23.07.2021</u></p> <p>Satisfied with use of data for air quality.</p>	Agreed	23.07.2021
<b>Air Quality</b> Construction and operational effects	Chapter 5, Air quality <b>[APP-074]</b>	<p>The assessment has concluded that no significant effects associated with air pollution would occur through construction activities or as a consequence of traffic movements (emissions) on the road network.</p> <p>Using the traffic models and data generated for the Scheme, the air quality effects within the Sandy AQMA, as set out in Chapter 5, Air Quality <b>[APP-074]</b> of the Environmental Statement are predicted to be, at worst, imperceptible worsening, with some</p>	<p>The Applicant has predicted an adverse impact on our Sandy AQMA but are not proposing to undertake any mitigation to counteract or offset that, and this should be incorporated into the draft DCO requirements.</p> <p>The Applicant has not factored in the cumulative impacts on AQ when combined with the EWR proposals. The applicant needs to resolve this to ensure an accurate assessment of cumulative impacts to accompany the DCO application is reflected in its prediction of air quality impacts. The</p>	Partially agreed	

Issue	Document Reference	National Highways Position	Central Bedfordshire Council Position	Status	Date
		<p>small improvements recorded. Predicted changes would be -0.7 to +0.2 µg/m<sup>3</sup> in annual mean NO<sub>2</sub>. An imperceptible change (&lt;1% of the objective value of 40µg/m<sup>3</sup>) is one so small as to not be measurable and is therefore not considered to be a worsening in air quality at these receptors.</p> <p>These effects are not considered to be significant for air quality based on advice within the DMRB LA 105 air quality standard applied.</p> <p>As noted in the Open Floor Hearing held on 19 August 2021, a sensitivity test has also been undertaken for an update to the traffic uncertainty log. This assessment is presented in Sensitivity Test using 2020 Uncertainty Log Data <b>[APP-249]</b>. The purpose of the Sensitivity Test was to consider the potential impacts of updating the Uncertainty Log to determine whether design changes or further mitigation may be required. This involved comparing the traffic model forecasts using the 2020 Uncertainty Log with the forecasts derived from the 2018 Uncertainty Log that were prepared for the assessment presented in the ES and</p>	<p>impacts on the Sandy AQMA are paramount in this respect, along with securing any necessary mitigation as a DCO requirement (or incorporated into documents listed in Schedule 2).</p> <p>CBC's experience is that the failure in site dust controls that give rise to complaints tend to be because of poor implementation and management controls. Again, Annex A [APP-234] and the associated tables set out a number of management measures that will be implemented to ensure dust controls are effective and we are encouraged by this.</p> <p>Whilst the measures include a website where residents can report complaints, our experience is that residents prefer to complain to their Local Authority rather than the source of the problem. Therefore, close liaison and contact details for relevant Site Managers or other Senior Officials will need to be clearly established to deal with issues as and when they arise. Table A-3 of the First Iteration Environmental Management Plan [APP-234] says that "Regular liaison would be undertaken with the</p>		



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		<p>associated documents. The Sensitivity Test concluded that the forecasts prepared using the 2018 and 2020 Uncertainty Logs were comparable and therefore the data used within the ES was considered robust. As such, the assessment presented in the ES is considered to represent the effects of the proposed Scheme.</p> <p>Even considering the Sensitivity Test, the effect on air quality due to the Scheme is not considered to be significant. Within the sensitivity test predictions only small (1-5% of the objective value) increases in annual mean NO<sub>2</sub> concentrations were predicted at 7 receptors within the Sandy AQMA. A small increase in annual mean concentrations at this number of receptors is not considered to be a significant adverse effect and therefore no mitigation is required.</p> <p>Regarding cumulative air quality effects with the East West Rail (EWR) project, National Highways has responded on this matter in National Highways' Response to Relevant Representations <b>[REP1-021]</b> (see RR013au, RR-048au and</p>	<p>relevant local authorities, this would include discussing any complaints that had been received." However regular is not defined and CBC requests greater clarity and confirmation of close liaison and contact involved in the document.</p> <p>The Applicant during its Air Quality Modelling (see Sensitivity Test using 2020 Uncertainty Log Data report [APP-160 to APP-162] actually identified the potential for medium level impacts for the 7 properties that lie in the existing Sandy AQMA. However, because less than 30 properties are affected, they have simply classed this impact as "not significant". The size or scale of the impact is not the material factor as far as we are concerned – anything that likely to result in an adverse impact on the health of CBC residents at this highly sensitive location and is likely to counteract our fundamental efforts to improve air quality in the AQMA is not acceptable, particularly without mitigation measures to offset those adverse impacts.</p> <p>CBC have produced an Air Quality Action Plan (AQAP) in order to</p>		

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		<p>RR-100au) submitted at Deadline 1. Furthermore, the East West Rail Company has confirmed in its draft Statement of Common Ground [REP1-015] that, at this stage, it is not considered that the EWR Project is a development that is of sufficient certainty to be relevant to the cumulative assessment for the A428 project.</p>	<p>improve air quality in the AQMA. We would contend that rather than offering no mitigation to offset the adverse impacts that they have identified as a result of this project, National Highways could use this as a starting point to identify a range of mitigation measures that could be reasonably implemented. Measures are included in CBC's written representation.</p> <p>Matters discussed at an air quality and noise and vibration SOCG meeting with CBC on 23.07.2021</p> <p>Generally satisfied for construction.</p> <p>Satisfied generally regarding operation, however not satisfied with effect on Sandy AQMA and no proposed mitigation.</p>		
<p><b>Air Quality</b> Embedded and essential mitigation</p>	<p>Chapter 2, The Scheme [APP-071] Chapter 5, Air quality [APP-074]</p>	<p>National Highways considers that:</p> <ul style="list-style-type: none"> <li>• The embedded mitigation measures mentioned in Chapter 2, The Scheme [APP-071]</li> <li>• The essential mitigation measures set out in the First Iteration EMP [APP-234]</li> </ul>	<p>CBC is not content with the form and nature of the air quality mitigation measures.</p> <p><u>Matters discussed at an air quality and noise and vibration SOCG meeting with CBC on 23.07.2021</u></p>	<p>Under discussion</p>	

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	Environmental Masterplan [APP-091] First Iteration EMP [APP-234] Schedule of mitigation [APP-235]	are appropriate to avoid, prevent, reduce, manage, control and (where necessary) monitor the adverse effects of the Scheme.	Not agreed as above and because CBC do not think effects on Sandy AQMA have been avoided or mitigated.  CBC Agreed with embedded mitigation at Black Cat roundabout.  CBC Agreed with construction dust mitigation (essential mitigation).		
<b>Cultural Heritage</b> Data collection methods, baseline data and the identification and sensitivity of relevant features and receptors	Chapter 6, Cultural heritage [APP-075]	The baseline conditions have been collated using desk-based and field-based techniques, and through consultation with stakeholders.  National Highways considers the scope, coverage and timing of surveys undertaken to establish the baseline conditions and sensitive features and receptors are in line with best practice and appropriate to inform the assessment of direct and indirect effects reported in Chapter 6, Cultural heritage assessment [APP-075].	<u>Matters discussed at an SOCG meeting with CBC on 22.06.2021</u>  CBC is content with the scope, coverage and findings of the data collection and surveys undertaken inform the assessment of effects on the identified sensitive features and receptors.	Agreed	June 2021
<b>Cultural Heritage</b> Construction and operational effects	Chapter 6, Cultural heritage [APP-075]	The cultural heritage assessment has concluded that construction of the Scheme would result in significant adverse effects of either moderate or large significance on the	<u>Matters discussed at an SOCG meeting with CBC on 22.06.2021</u>  CBC agrees with the conclusions of the cultural heritage assessment.	Agreed	June 2021

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		<p>assets listed in Table 6-6 of Chapter 6, Cultural [APP-075].</p> <p>All other assets identified and assessed would experience either:</p> <ul style="list-style-type: none"> <li>• Slight adverse effects (not significant).</li> <li>• Neutral effects (not significant).</li> <li>• Slight beneficial effects (not significant).</li> </ul> <p>The cultural heritage assessment has concluded that construction of the Scheme would result in less than substantial harm on all assets within CBC listed in Table 6-6 of Chapter 6, Cultural Heritage [APP-075].</p> <p>The operational assessment would not result in any significant adverse effects on the assets identified within Chapter 6, Cultural Heritage [APP-075].</p>			
<p><b>Cultural Heritage</b> Embedded and essential mitigation</p>	<p>Chapter 2, The Scheme [APP-071] Archaeology Mitigation Strategy [APP-238]</p>	<p>National Highways considers that:</p> <ul style="list-style-type: none"> <li>• The embedded mitigation measures within Chapter 2, The Scheme [APP-075].</li> <li>• The essential mitigation measures set out in the First</li> </ul>	<p>The Applicant is in possession of our comments on the Archaeological Mitigation Strategy [APP-238]. CBC understand that the Applicant is working on a revised document which will take these comments into account.</p>	<p>Under discussion</p>	

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	<p>First Iteration EMP [APP-234]</p> <p>Schedule of mitigation [APP-235]</p>	<p>Iteration EMP [APP-234] and the Archaeological Mitigation Strategy [APP-238] are appropriate to avoid, prevent, reduce, manage, control and (where necessary) monitor the adverse effects of the Scheme during its construction and operation.</p> <p>National Highways' Updated Archaeological Mitigation Strategy [REP3-010] submitted at Deadline 3 of the Examination sets out the mitigation measures that would be implemented to reduce the adverse effects of the Scheme on archaeological and built heritage resources.</p> <p>This approach is considered acceptable in order to provide the appropriate mitigation for the archaeological and built heritage resources.</p>	<p>There are elements of the current version of the Archaeological Mitigation Strategy that CBC feel need revision and will review the revised documentation when available.</p> <p><u>Matters raised within CBC's Relevant Representation</u></p> <p>CBC is aware that there is a need to design a robust and consistent mitigation strategy whether carried out as Advanced Works/Enabling Works or Main Works.</p>		
<p><b>Landscape and visual effects</b></p> <p>Data collection methods, baseline data and the identification and sensitivity of</p>	<p>Chapter 7, Landscape and visual effects [APP-076]</p>	<p>The baseline conditions have been collated using desk-based and field-based techniques, and through consultation with stakeholders.</p> <p>National Highways considers the scope, coverage and timing of surveys undertaken to establish the</p>	<p>CBC is content that the scope and coverage of surveys undertaken as part of the assessment are sufficiently comprehensive to identify the likely effects of the Scheme on landscape character and visual amenity.</p>	<p>Agreed</p>	<p>September 2021</p>

Issue	Document Reference	National Highways Position	Central Bedfordshire Council Position	Status	Date
relevant features and receptors		baseline conditions and sensitive features and receptors are in line with best practice and appropriate to inform the assessment of direct and indirect effects reported in Chapter 7, Landscape and visual effects assessment [APP-076].			
<b>Landscape and visual effects</b> Construction and operational effects	Chapter 7, Landscape and visual effects [APP-076]	<p>The assessment has concluded that the Scheme would result in significant adverse effects on areas of local landscape character, and on visual receptors afforded views of the landscape from locations including residential properties, local roads and PRoW.</p> <p>The assessment has concluded that the Scheme would not result in significant adverse effects on sites designated for the landscape value or importance.</p>	CBC is content with the conclusions of the assessment and the significance of the reported effects.	Agreed.	September 2021
<b>Landscape and visual effects</b> Embedded and essential mitigation	Chapter 2, The Scheme [APP-071] Chapter 7, Landscape and visual effects [APP-076]	<p>National Highways considers that:</p> <ul style="list-style-type: none"> <li>The embedded mitigation measures illustrated on the Environmental Masterplan [APP-091].</li> <li>The essential mitigation measures set out in the First Iteration EMP [APP-234]</li> </ul>	CBC is content with the form, nature and extent of the embedded mitigation measures incorporated into the design of the Scheme, and the essential mitigation measures that would be implemented during construction of the Scheme, including associated monitoring.	Agreed	September 2021

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	Environmental Masterplan [APP-091] First Iteration EMP [APP-234] Schedule of Mitigation [APP-235]	are appropriate to avoid, prevent, reduce, manage, control and (where necessary) monitor the adverse effects of the Scheme during its construction and operation.			
<b>Biodiversity</b> Data collection methods, baseline data and the identification and sensitivity of relevant features and receptors	Chapter 8, Biodiversity [APP-077]	<p>The baseline conditions have been collated using desk-based and field-based techniques, and through consultation with stakeholders.</p> <p>National Highways considers the scope, coverage and timing of surveys undertaken to establish the baseline conditions and sensitive features and receptors are in line with best practice and appropriate to inform the assessment of direct and indirect effects reported in Chapter 8, Biodiversity assessment [APP-077].</p> <p>As certain surveys undertaken within the assessment were constrained or limited by factors including land access restrictions, National Highways has shared information with CBC regarding the scope, timing and coverage of surveys it plans to undertake during 2021, and</p>	<p><u>Matters discussed at an SOCG meeting with CBC on 23.06.2021</u></p> <p>CBC is content with the scope, coverage and findings of habitat and species surveys undertaken as part of the assessment, including species which were scoped out of the assessment (as described in Chapter 8, Biodiversity [APP-077]).</p> <p>CBC is in agreement with those surveys planned to be undertaken during 2021 by National Highways, and those planned prior to construction of the Scheme in 2022, and considers these adequate to:</p> <ul style="list-style-type: none"> <li>• Supplement desk-based surveys and field surveys undertaken between the period 2016 – 2020.</li> <li>• Update existing baseline information for habitats, species</li> </ul>	Agreed	June 2021

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		prior to the commencement of construction of the Scheme.	<p>and designated sites gathered during the assessment (so that information remains current).</p> <ul style="list-style-type: none"> <li>• Inform applications for protected species licenses.</li> <li>• Inform the design-development of embedded and essential mitigation measures identified within the assessment.</li> </ul>		
<b>Biodiversity</b> Construction and operational effects	Chapter 8, Biodiversity [APP-077]	<p>The biodiversity assessment [APP-077] has identified that adverse and beneficial effects on habitats, species and designated sites would result from construction and operation of the Scheme; however, none of these effects would be significant.</p> <p>National Highways considers that the assessment findings accurately reflect the likely effects of the Scheme.</p>	<p><u>Matters discussed at an SOCG meeting with CBC on 23.06.2021</u></p> <p>CBC is content with the conclusions of the assessment and the significance of the reported effects.</p>	Agreed	June 2021
<b>Biodiversity</b> Embedded and essential mitigation	Chapter 2, The Scheme [APP-071] Chapter 8, Biodiversity [APP-077]	<p>National Highways considers that:</p> <ul style="list-style-type: none"> <li>• The embedded mitigation measures illustrated on the Environmental Masterplan [APP-091].</li> </ul>	<p><u>Matters discussed at an SOCG meeting with CBC on 23.06.2021</u></p> <p>CBC agree with the biodiversity mitigation proposed as part of the Scheme.</p>	Agreed	June 2021



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	First Iteration EMP [APP-234] Schedule of Mitigation [APP-235] Environmental Masterplan [APP-091] Biodiversity Pre-commencement Plan [APP-239]	<ul style="list-style-type: none"> <li>The essential mitigation measures set out in the First Iteration EMP [APP-234] and Biodiversity Pre-commencement Plan [APP-239] are appropriate to avoid, prevent, reduce, manage, control and (where necessary) monitor the adverse effects of the Scheme on habitats, species and designated sites during its construction and operation.</li> </ul>			
<b>Biodiversity</b> Biodiversity net gain	Appendix 8.19 [APP-206]	<p>Although the achievement of a net gain in biodiversity is not a requirement for nationally significant infrastructure projects, National Highways has sought to achieve an increase in biodiversity through the environmental measures incorporated into the design of the Scheme, as set out in Natural England's advice appended to the Scoping Opinion [APP-231].</p> <p>Using National Highways' Biodiversity Net Gain metric, a net gain of 20.5% across the Scheme has been calculated, when compared to the baseline conditions,</p>	<p><u>Matters discussed at an SOCG meeting with CBC on 23.06.2021</u></p> <p>CBC agreed with this position in a meeting in June 2021.</p>	Agreed	June 2021

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		<p>as reported in Appendix 8.19 [APP-206].</p> <p>The calculation of biodiversity net gain also took account of Breedon Quarry being fully restored by the time of Scheme construction commencing.</p> <p>National Highways considers that the methods used to calculate biodiversity net gain are appropriate for the Scheme.</p>			
<p><b>Geology and Soils</b></p> <p>Data collection methods, baseline data and the identification and sensitivity of relevant features and receptors</p>	<p>Chapter 9, Geology and soils [APP-078]</p>	<p>The baseline conditions relating to geology and soils have been collated using desk-based information sources, and through consultation with stakeholders.</p> <p>National Highways considers the scope, coverage and timing of surveys undertaken to establish the baseline conditions and sensitive features and receptors are in line with best practice, and are appropriate to inform the assessment of direct and indirect effects reported in Chapter 9, Geology and Soils assessment [APP-078].</p> <p>Due to Covid-19 restrictions in 2020/2021, it was not possible for</p>	<p>CBC acknowledges the Covid-19 limitations placed on undertaking soil sampling, and is content that it was appropriate for National Highways to base its assessment of the effects of the Scheme on best and most versatile agricultural land on published data.</p>	<p>Agreed</p>	

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		<p>National Highways to undertake sampling in the field to verify existing soil grades and profiles. Accordingly, the assessment has relied upon published information regarding soil grades and their distribution at a regional scale.</p> <p>National Highways is currently undertaking this sampling to confirm existing soil conditions in mid-2021 (subject to Covid-19 restrictions being relaxed), and will use the information gathered to verify the conclusions of its assessment of the likely effects on best and most versatile agricultural soils and its proposed mitigation measures. A report detailing the survey findings will be submitted to the Examination at Deadline 6.</p>			
<p><b>Geology and Soils</b> Construction and operational effects</p>	<p>Chapter 9, Geology and soils <b>[APP-078]</b></p>	<p>The assessment has concluded that the Scheme would not result in any significant adverse effects on locally or regionally important geological sites.</p> <p>Construction of the Scheme would result in significant adverse effects on areas of land mapped as best and most versatile at a regional scale, these being associated with</p>	<p>CBC is content with the conclusions of the assessment and the significance of the reported effects.</p>	<p>Agreed.</p>	

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		the permanent loss of agricultural land.			
<b>Geology and Soils</b> Embedded and essential mitigation	Chapter 2, The Scheme [APP-071] Chapter 9, Geology and soils [APP-078] Environmental Masterplan [APP-091] First Iteration EMP [APP-234] Schedule of mitigation [APP-235]	National Highways considers that: <ul style="list-style-type: none"> <li>The embedded mitigation measures illustrated on the Environmental Masterplan [APP-091] and in Chapter 2, The Scheme [APP-071].</li> <li>The essential mitigation measures set out in the First Iteration EMP [APP-234]</li> </ul> are appropriate to avoid, prevent, reduce, manage, control and (where necessary) monitor the adverse effects of the Scheme during its construction and operation.	CBC is content with the form and nature of the embedded and essential mitigation measures that would be implemented during construction of the Scheme.	Agreed.	
<b>Material Assets and Waste</b> Data collection methods, baseline data and the identification and sensitivity of relevant features and receptors	Chapter 10, Material assets and waste [APP-079]	The baseline conditions have been collated from a variety of sources including desk-based and input from consultees, and are reported in Chapter 10, Material assets and waste [APP-079].  The baseline information collected is appropriate for this Scheme.	CBC is content that the scope of the assessment is sufficiently comprehensive to identify the likely effects of the Scheme on material assets and waste.	Agreed.	

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<b>Material Assets and Waste</b> Construction and operational effects	Chapter 10, Material assets and waste [APP-079]	The material assets and waste assessment concluded no significant effects in the construction and operation of the Scheme.	CBC is content with the conclusions of the assessment and the significance of the reported effects.	Agreed.	
<b>Material Assets and Waste</b> Embedded and essential mitigation	Chapter 2, The Scheme [APP-071] Chapter 10, Material assets and waste [APP-079] Environmental Masterplan [APP-091] First Iteration EMP [APP-234] Schedule of mitigation [APP-235]	National Highways considers that: <ul style="list-style-type: none"> <li>The embedded mitigation measures illustrated on the Environmental Masterplan [APP-091] and in Chapter 2, The Scheme [APP-071].</li> <li>The essential mitigation measures set out in the First Iteration EMP [APP-234]</li> </ul> are appropriate to avoid, prevent, reduce, manage, control and (where necessary) monitor the adverse effects of the Scheme during its construction and operation.	CBC is content with the form, nature and extent of the embedded mitigation measures incorporated into the design of the Scheme, and the essential mitigation measures that would be implemented during construction of the Scheme.	Agreed.	
<b>Noise and vibration</b> Data collection methods, baseline data and the identification and sensitivity of	Chapter 11, Noise and vibration [APP-080]	The baseline conditions have been collated using desk-based and field-based techniques, and through consultation with stakeholders.  National Highways considers the scope, coverage and timing of surveys undertaken to establish the	CBC is in agreement that the data collected is appropriate for the noise and vibration assessment.  Further baseline monitoring was due to be carried out but “postponed” due to the impacts of Covid 19. CBC has now been advised that this further	Under discussion	

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relevant features and receptors		<p>baseline conditions and sensitive features and receptors are in line with best practice and appropriate to inform the assessment of direct and indirect effects reported in Chapter 11, Noise and vibration assessment <b>[APP-080]</b>.</p> <p>The results of the baseline noise survey have been used to support a validation exercise for the traffic noise prediction modelling.</p> <p>National Highways refers CBC to Appendix B of National Highways response to actions arising from Issue Specific Hearing 2 <b>[REP3-019]</b> held on 23 September 2021 provides further details of the baseline noise data review, which concluded that the 2017 data used in the assessment of Noise and Vibration <b>[APP-080]</b> is sufficient.</p> <p>National Highways is not able to change the core working hours as set out in Chapter 2, The Scheme <b>[APP-071]</b> of the Environmental Statement, as these time periods are required in order to deliver the Scheme within the overall construction programme. A consequence of a change to the core</p>	<p>monitoring will not be taking place but are unclear as to the justification for this, as there was clearly an identified need for the further monitoring in the first place. The justification is requested from National Highways.</p> <p>CBC are concerned about the level of construction noise impact given the duration of the construction project. The proposed hours of work are outside those that we allow for construction sites in Central Bedfordshire, i.e. starting before 8am. CBC would normally allow 8am to 6pm Monday to Fridays, 8am to 1pm on Saturdays and no working on Sundays or Bank Holidays. However, in view of the size and scale of the project, CBC would consider it would be appropriate to allow variation to these hours where particular circumstances required this and appropriate mitigation measures were in place and requests the draft DCO requirements to be updated in this respect. For such a major project, it will be essential to ensure that any noise impacts are robustly controlled in accordance with the provisions of</p>		

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		<p>working hours would be an extension to the construction programme. However, National Highways is willing to engage in discussions with CBC so that agreements can be sought when working close to sensitive locations, such as residential properties, or where there are specific activities, such as during school exams, where noise from construction could potentially be minimised. Where appropriate, discussions will be held with CBC on these matters during the detailed design stage where mitigation can be discussed in more detail. This engagement will be secured in the next revision to the First Iteration Environmental Management Plan <b>[APP234]</b>.</p> <p>National Highways refers CBC to its response to section 10.3 of REP1-055h <b>[REP3-008]</b> which confirms that mitigation measures have been incorporated into the design of the Scheme to minimise adverse operational traffic noise effects due to the Scheme, however, some residual adverse effects will remain. This is acceptable within the context of sustainable development as</p>	<p>BS5228:2009 Parts 1 &amp; 2 at all times and that this is a requirement of the draft DCO.</p> <p>CBC's concern for this phase of the project relate to the identification of significant adverse daytime and night- time noise impacts on a small number of receptors in our area who will see noise levels as a result of the new road scheme increase by around 9dB. The project team are not proposing any further mitigation beyond the embedded mitigation measures already identified to try and address these significant adverse impacts i.e. therefore the +9dB increase will be present even with the embedded mitigation in place. The report states that noise bunds and barriers have been considered, but these have been discounted either because they are not considered to be effective or on cost grounds. We would contend that these are not the only mitigation measures that could or should be considered.</p> <p>CBC requested further details from National Highways on what the actual predicted operational noise levels for the road scheme will be for</p>		

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		<p>factors other than solely noise must also be considered. The responses also sets out the noise mitigation measures it has considered to reduce the magnitude of predicted operational noise increases due to the Scheme at residential properties within the CBC area. These include:</p> <ul style="list-style-type: none"> <li>• 1 and 2 The Barns, Little Barford Road</li> <li>• Rectory Farm, Little Barford Road</li> <li>• Hill Farm, Station Road, Tempsford</li> </ul>	<p>the project at Receptors R16, 17 &amp; 18 that fall within Central Bedfordshire which were provided on 2 September 2021 (day time levels) and 5 October 2021 (night time levels).</p>		
<p><b>Noise and vibration</b> Construction and operational effects</p>	<p>Chapter 11, Noise and vibration <b>[APP-080]</b></p>	<p>A thorough noise and vibration assessment has been undertaken for the construction and operation of the Scheme. The noise and vibration assessment concluded several significant effects in the construction and operational periods of the Scheme as described in Chapter 11, Noise and vibration <b>[APP-080]</b>.</p> <p>National Highways refers CBC to its response to section 10.3 of REP1-055h <b>[REP3-008]</b>, which confirms that mitigation measures have been</p>	<p><u>Matters raised within CBC's Relevant Representation</u></p> <p>CBC is concerned with the noise impacts for the construction and operational use of the Scheme.</p> <p><u>Matters discussed at an air quality and noise and vibration SOCG meeting with CBC on 23.07.2021</u></p> <p>CBC are satisfied with the position regarding construction noise and vibration acknowledging it doesn't include mitigation.</p>	<p>Partially agreed</p>	



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		<p>incorporated into the design of the Scheme to minimise adverse operational traffic noise effects due to the Scheme, however, some residual adverse effects will remain. This is acceptable within the context of sustainable development as factors other than solely noise must also be considered.</p> <p>The response also confirms that none of the properties specifically identified by CBC are predicted to experience an increase in traffic noise which results in traffic noise levels above the Significant Observed Adverse Effect Level (SOAEL), and thus do not experience significant adverse effects in terms of the policy aims set in Noise Policy Statement for England (NPSE) and National Policy Statement for National Networks (NPSNN).</p> <p>Finally, the response notes that the predicted traffic noise levels at these properties are fairly low, with isolated properties being generally around the Lowest Observed Adverse Effect Level (LOAEL). Therefore, although these are not significant in terms of policy, NPSNN still requires</p>	<p>Partially agreed with operational effects. Not agreed with operational effects at receptors R16, R17 and R18.</p>		

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		mitigation to minimise levels to be considered, within the context of sustainable development.			
<b>Noise and vibration</b> Embedded and essential mitigation	Chapter 2, The Scheme <b>[APP-071]</b> Chapter 11, Noise and vibration <b>[APP-080]</b> Environmental Masterplan <b>[APP-091]</b> First Iteration EMP <b>[APP-234]</b> Schedule of Mitigation <b>[APP-235]</b>	National Highways considers that: <ul style="list-style-type: none"> <li>The embedded mitigation measures illustrated on the Environmental Masterplan <b>[APP-091]</b> and in Chapter 2, The Scheme <b>[APP-071]</b>.</li> <li>The essential mitigation measures set out in the First Iteration EMP <b>[APP-234]</b></li> </ul> are appropriate to avoid, prevent, reduce, manage, control and (where necessary) monitor the adverse effects of the Scheme relating to noise and vibration during its construction and operation.  The working hours as defined within Requirement 19 of the dDCO <b>[APP-025]</b> , will be adhered to throughout Scheme construction.  National Highways refers CBC to its response to section 10.2 of REP1-055h <b>[REP3-008]</b> which sets out the works which are predicted to result in the exceedance of the construction	CBC is content that the mitigation proposed is appropriate for the Scheme.  <u>Matters discussed at an air quality and noise and vibration SOCG meeting with CBC on 23.07.2021</u>  CBC are satisfied with embedded and essential mitigation for construction in close liaison with LPAs regarding out of hours working.  CBC partially agreed with operational mitigation, however further mitigation should be considered for specific properties where significant adverse effects have been identified. Concerned that low noise surfacing doesn't reach far enough.  Level of impact during construction predicted for R16 above the SOAEL in itself is a concern even if this is of very short duration concern. +9dB increase will be present even with the embedded mitigation in place.	Partially agreed	

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		<p>noise SOAEL at R16. The response also confirms that reasonable worst case assumptions have been made in the estimation of construction noise levels presented in the Chapter 11 Noise and Vibration <b>[APP-080]</b> and that the construction noise assessment will be revisited at detailed design stage to ensure Best Practicable Means have been adopted.</p> <p>National Highways refers CBC to its response to section 10.3 of REP1-055h <b>[REP3-008]</b> which sets out the noise mitigation measures it has considered to reduce the magnitude of predicted operational noise increases due to the Scheme at residential properties within the CBC area. These include:</p> <ul style="list-style-type: none"> <li>• 1 and 2 The Barns, Little Barford Road</li> <li>• Rectory Farm, Little Barford Road</li> <li>• Hill Farm, Station Road, Tempsford</li> </ul> <p>This response also notes that National Highways considers its approach to identifying operational</p>	<p>Not acceptable to expect existing residents, no matter how small in number, to be subjected to such significant long-term adverse noise impacts as a result of the operation of the new road scheme and not identify and incorporate further noise mitigation measures that could be implemented, with mitigation secured as a DCO requirement (or incorporated documents listed in Schedule 2).</p>		

Issue	Document Reference	National Highways Position	Central Bedfordshire Council Position	Status	Date
		<p>noise mitigation measures is robust. To summarise, mitigation measures have been incorporated into the design of the Scheme to minimise adverse operational traffic noise effects due to the Scheme, however, some residual adverse effects will remain. This is acceptable within the context of sustainable development as factors other than solely noise must also be considered.</p>			
<p><b>Population and Human Health</b> Data collection methods, baseline data and the identification and sensitivity of relevant features and receptors</p>	<p>Chapter 12, Population and human health <b>[APP-081]</b></p>	<p>The baseline conditions have been collated using desk-based and field-based techniques, and through consultation with stakeholders.</p> <p>National Highways considers the scope, coverage and timing of surveys undertaken to establish the baseline conditions and sensitive features and receptors (e.g. effects on users of the existing PRow network, and recreational users of the River Great Ouse) are in line with best practice and appropriate to inform the assessment of direct and indirect effects reported in Chapter 12, Population and human health assessment <b>[APP-081]</b>.</p>	<p>CBC is content that the scope and coverage of surveys undertaken as part of the assessment are sufficiently comprehensive to identify the likely effects of the Scheme on PRow and recreational users.</p>	<p>Agreed.</p>	

Issue	Document Reference	National Highways Position	Central Bedfordshire Council Position	Status	Date
<p><b>Population and Human Health</b></p> <p>Construction and operational effects</p>	<p>Chapter 12, Population and human health [APP-081]</p>	<p>The population and human health assessment concluded one significant effect in the construction period as a result of the Scheme within CBC. This relates to a temporary moderate adverse effect upon recreational users of the River Great Ouse due to closure during construction. This is reported in Chapter 12, Population and human health [APP-081].</p> <p>No significant effects were reported for the operation of the Scheme.</p>	<p>CBC is content with the conclusions of the assessment and the significance of the reported effects.</p>	<p>Agreed.</p>	
<p><b>Population and Human Health</b></p> <p>Embedded and essential mitigation</p>	<p>Chapter 2, The Scheme [APP-071]</p> <p>Chapter 12, Population and human health [APP-081]</p> <p>Environmental Masterplan [APP-091]</p> <p>First Iteration EMP [APP-234]</p>	<p>The embedded mitigation measures illustrated on the Environmental Masterplan [APP-091] are considered appropriate to avoid, prevent or reduce the adverse effects of the Scheme on PRoW and recreational users in relation to:</p> <ul style="list-style-type: none"> <li>• Maintaining connectivity between existing routes, roads and communities.</li> <li>• Providing safe crossing provision over the new dual carriageway.</li> </ul> <p>The essential mitigation measures set out in the First Iteration EMP [APP-234] are considered</p>	<p>CBC is content with the form, nature and extent of the embedded mitigation measures incorporated into the design of the Scheme, and the essential mitigation measures that would be implemented during construction of the Scheme.</p>	<p>Agreed.</p>	

Issue	Document Reference	National Highways Position	Central Bedfordshire Council Position	Status	Date
	Schedule of Mitigation [APP-235]	appropriate to manage and control the adverse effects of the Scheme on recreational users of the River Great Ouse and PRow temporarily affected by construction of the Scheme.			
<b>Road Drainage and the Water Environment</b> Data collection methods, baseline data and the identification and sensitivity of relevant features and receptors	Chapter 13, Road drainage and the water environment [APP-082]	The baseline conditions have been collated using desk-based and field-based techniques, and through consultation with stakeholders.  National Highways considers the scope, coverage and timing of surveys undertaken to establish the baseline conditions and sensitive features and receptors are in line with best practice and appropriate to inform the assessment of direct and indirect effects reported in Chapter 13, Road Drainage and the Water Environment assessment [APP-082]. The baseline information collected is appropriate for this Scheme.	CBC is content that the scope and coverage of surveys undertaken as part of the assessment are sufficiently comprehensive to identify the likely effects of the Scheme on road drainage and the water environment.	Agreed.	
<b>Road Drainage and the Water Environment</b> Construction and operational effects	Chapter 13, Road drainage and the water environment [APP-082]	The road drainage and the water environment assessment [APP-077] has identified that adverse and beneficial effects on water quality, hydromorphology, groundwater and drainage would result from	CBC is content with the conclusions of the assessment and the significance of the reported effects.	Agreed.	

Issue	Document Reference	National Highways Position	Central Bedfordshire Council Position	Status	Date
		<p>construction and operation of the Scheme; however, none of these effects would be significant.</p> <p>National Highways considers that the assessment findings accurately reflect the likely effects of the Scheme.</p>			
<p><b>Road Drainage and the Water Environment</b></p> <p>Flood risk assessment</p>	<p>Chapter 13, Road drainage and the water environment [APP-082]</p> <p>Flood Risk Assessment [APP-220]</p>	<p>The assessment has concluded that flood risk to and from the construction and operational stages of the Scheme from fluvial, surface water, groundwater and sewer flooding would be low, and accordingly there would be no significant flooding-related effects.</p> <p>National Highways considers that the assessment findings are robust.</p> <p>A detailed maintenance plan is to be provided during the detail design stage of the Scheme.</p>	<p>CBC is content with the findings of the flood risk assessment and recognises that the provision of a detailed maintenance plan which outlines the ownership, techniques and required frequency of maintenance is pivotal.</p> <p>CBC requests National Highways confirmation that this is secured and being provided.</p>	<p>Under discussion</p>	
<p><b>Road Drainage and the Water Environment</b></p> <p>Embedded and essential mitigation</p>	<p>Chapter 2, The Scheme [APP-071]</p> <p>Chapter 13, Road drainage and the water environment [APP-082]</p>	<p>National Highways considers that:</p> <ul style="list-style-type: none"> <li>The embedded mitigation measures illustrated on the Environmental Masterplan [APP-091].</li> </ul>	<p>CBC is content with the form, nature and extent of the embedded mitigation measures incorporated into the design of the Scheme, and the essential mitigation measures that would be implemented during construction of the Scheme.</p>	<p>Agreed.</p>	

Issue	Document Reference	National Highways Position	Central Bedfordshire Council Position	Status	Date
	Environmental Masterplan [APP-091] First Iteration EMP [APP-234] Schedule of Mitigation [APP-235]	<ul style="list-style-type: none"> <li>The essential mitigation measures set out in the First Iteration EMP [APP-234] are appropriate to avoid, prevent, reduce, manage, control and (where necessary) monitor the adverse effects of the Scheme in relation to water quality, hydromorphology, groundwater, drainage and flood risk during its construction and operation.</li> </ul>			
<b>Climate</b> Data collection methods, baseline data and the identification and sensitivity of relevant features and receptors	Chapter 14, Climate [APP-083]	<p>The baseline conditions have been collated using desk-based techniques and through consultation with stakeholders.</p> <p>National Highways considers the scope, coverage and timing of surveys undertaken to establish the baseline conditions and sensitive features and receptors are in line with best practice and appropriate to inform the assessment of direct and indirect effects reported in Chapter 14, Climate assessment [APP-083].</p>	CBC is content that the data used to inform the assessment is sufficiently comprehensive to identify the likely effects of greenhouse gas emissions on climate, and the resilience of the Scheme to the effects of climate change.	Agreed.	



Issue	Document Reference	National Highways Position	Central Bedfordshire Council Position	Status	Date
<b>Climate</b> Construction and operational effects	Chapter 14, Climate <b>[APP-083]</b>	The assessment has concluded that no significant effects associated with greenhouse gas emissions and climate change would result from the Scheme.	CBC is content with the conclusions of the assessment and the significance of the reported effects.	Agreed.	
<b>Climate</b> Embedded and essential mitigation	Chapter 2, The Scheme <b>[APP-071]</b> Chapter 14, Climate <b>[APP-083]</b> Environmental Masterplan <b>[APP-091]</b> First Iteration EMP <b>[APP-234]</b> Schedule of mitigation <b>[APP-235]</b>	National Highways considers that: <ul style="list-style-type: none"> <li>• The embedded mitigation measures illustrated on the Environmental Masterplan <b>[APP-091]</b> and within Chapter 2, The Scheme <b>[APP-071]</b>.</li> <li>• The essential mitigation measures set out in the First Iteration EMP <b>[APP-234]</b></li> </ul> are appropriate to reduce the temporary effects of greenhouse gas emissions, during construction of the Scheme.	CBC is content with the form, nature and extent of the embedded mitigation measures incorporated into the design of the Scheme, and the essential mitigation measures that would be implemented during construction of the Scheme.	Agreed.	
<b>Assessment of Cumulative Effects</b> Baseline data	Chapter 15, Assessment of cumulative effects <b>[APP-084]</b> Appendix 15.1 Long list of other developments <b>[APP-228]</b>	National Highways has undertaken an assessment of the likely significant cumulative effects of the Scheme on the environment resulting from the cumulation of effects with other existing and/or approved developments and projects. The assessment has considered:	CBC is content with the developments and projects identified within both the long list and shortlist, and how these have been categorised within the assessment.	Agreed.	

Issue	Document Reference	National Highways Position	Central Bedfordshire Council Position	Status	Date
	Appendix 15.2 Assessment matrix [APP-229]	<ul style="list-style-type: none"> <li>• Existing completed projects.</li> <li>• Approved but uncompleted projects.</li> <li>• Ongoing activities.</li> <li>• Plans or projects for which an application has been made and which are under consideration by consenting authorities; and</li> <li>• Plans and projects which are reasonably foreseeable.</li> </ul> <p>Cumulative developments and projects were initially identified through a long list [APP-228], with qualifying developments subsequently shortlisted [APP-229] for consideration in the assessment.</p> <p>National Highways considers that its approach to identifying other development projects, their shortlisting and subsequent inclusion in the cumulative effects assessment is robust and appropriate.</p>			
<b>Assessment of Cumulative Effects</b>	Chapter 15, Assessment of cumulative effects [APP-084]	The cumulative effects assessment has concluded that significant adverse cumulative effects would occur in relation to the effects of the following topics interacting	CBC is content with the conclusions of the assessment and the significance of the reported effects.	Agreed.	

Issue	Document Reference	National Highways Position	Central Bedfordshire Council Position	Status	Date
Construction and operational effects	Appendix 15.1 Long list of other developments <b>[APP-228]</b>  Appendix 15.2 Assessment matrix <b>[APP-229]</b>	cumulatively with the effects of other planned projects and developments: <ul style="list-style-type: none"> <li>• Chapter 7, Landscape and visual effects <b>[APP-076]</b>.</li> <li>• Chapter 11, Noise and vibration <b>[APP-080]</b>.</li> </ul> No significant cumulative effects have been identified in relation to other environmental topics. <ul style="list-style-type: none"> <li>• National Highways considers that the outcomes of the cumulative effects assessment (in relation to development interactions) are accurate.</li> </ul>			

**Table 3-5 – Archaeological Matters**

Issue	Document Reference	National Highways Position	Central Bedfordshire Council Position	Status	Date
Archaeology mitigation areas	Archaeology Mitigation Strategy [APP-238]	<p>The extent and methodology of the all the mitigation areas within CBC have been agreed and are listed below:</p> <ul style="list-style-type: none"> <li>• Site 4, Field 34 &amp; 35.</li> <li>• Site 5, Field 34.</li> <li>• Site 6, Field 35.</li> <li>• Site 7, Field 44.</li> </ul>	<p>Matters discussed at an SOCG meeting with CBC on 22 June 2021.</p> <p>CBC agree with the methodology for the archaeology mitigation areas mentioned.</p>	Agreed	June 2021
Council archaeology brief	Archaeological Mitigation Strategy [APP-238]	<p>A brief has been prepared by the Curators at the councils. This is designed to facilitate the production of the Site Specific Written Schemes of Investigation (SSWSIs) by the Archaeological Contractor. The contents of this brief have been taken into account when detailing the overarching scope of works in Part Two of the Archaeological Mitigation Strategy.</p> <p>The Joint Cambridgeshire / Bedfordshire Brief for a Programme of Archaeological Investigation has been incorporated as Appendix B of the Updated Archaeological Mitigation Strategy [REP3-010]</p>	CBC note that a brief must be in place.	Agreed.	

Issue	Document Reference	National Highways Position	Central Bedfordshire Council Position	Status	Date
		submitted at Deadline 3 of the Examination.  A meeting was held on 12 August 2021 with the Curators to discuss the Brief.			

Table 3-6 – Highways, Design, Public Rights of Way and WCH

Issue	Document Reference	National Highways Position	Central Bedfordshire Council Position	Status	Date
<b>Highways Design General Matters</b>					
Implications within Central Bedfordshire for the highway network to the south of the scheme, in particular the A1	CBC Relevant Representation [RR-016a]  Transport Assessment Annex [APP-243]	National Highways has set out all impacts on the wider road network (including the A1 junctions) within the Transport Assessment Annex [APP-243]. Table 3-91 of the Transport Assessment Annex sets out that for the A1/A603 in Sandy, the predicted traffic flow impact is negligible with some increases in flow on the A1 and decreases on the A603-B1042. The predicted operational impact is a marginal increase in delay in 2025 but with	Only  Matters discussed at a meeting held on 12 August 2021. Whilst further modelling work has been presented for the area immediate to Sandy, CBC continue to have concerns over the potential longer-term effects upon Sandy and other impacted junctions on the A1 and also at M1 J13, including the potential impacts upon the operation of the local road approaches to these junctions.	Under Discussion	

Issue	Document Reference	National Highways Position	Central Bedfordshire Council Position	Status	Date
		<p>a more significant reduction in delay in 2040.</p> <p>Paragraph 3.22.5 of the Transport Assessment Annex <b>[APP-243]</b> sets out that the A1/A603 junction will be the subject of a Monitor and Manage approach in which the performance of the network will be monitored, and consideration will be given to the potential need for interventions, if required.</p>	<p>Whilst the reference to Monitor and Manage is acknowledged, there is no specific requirement within the wording of the draft DCO for this, nor is there any detail as to how any such Monitor and Manage approach would operate in practice and who would provide the funding for any management/mitigation measures if identified in the monitoring. CBC would welcome a discussion with regards to all junctions covered by the Monitor and Manage approach.</p> <p>In addition there is scope for impacts away from the A1/A603 junction within Sandy, as raised within CBCs Written Statement. As such CBC would welcome a discussion over a broader application of the approach which takes greater account of the local road network and junction approaches.</p> <p>See also the Joint Position Statement with regards to the CBC concerns raised at Open Hearing 1 (REP3-017) and the CBC comments made upon the Joint Position Statement with regards to Transport Modelling REP3-043).</p>		
Impact on Sustainable Development	General Arrangement Plans <b>[APP-011]</b>	East West Rail has now completed their non statutory consultation. Until East West Rail has determined the route and locations	Failing to properly consider and make provision for pedestrian and cyclist access under and over the new A428 in this location will provide a huge barrier	Under discussion.	

Issue	Document Reference	National Highways Position	Central Bedfordshire Council Position	Status	Date
	Streets, Rights of Way and Access Plans [APP-013]	<p>of the proposed stations, it is not appropriate for National Highways to make or coordinate any specific provision for any new infrastructure which may be required as part of the East West Rail scheme.</p> <p>The design of Barford Road is a replacement of the existing infrastructure. The existing infrastructure does not include provision for walkers, cyclists and/or horse-riders and therefore this is not proposed in the design of the Barford Road side road diversion or overbridge.</p> <p>The preliminary design for Barford Road including the bridge crossing has been developed and agreed in consultation with CBC as the maintaining highway authority.</p> <p>The proposed structure over the East Coast Main Line includes vehicular access through the side spans for landowners. No provision has been made for pedestrians and cyclists alongside the East Coast Main Line as there are no existing rights of way within the area.</p>	<p>to that growth and its ability to come forward as a sustainable (and therefore appropriate) scheme. This is further emphasised by the recent East West Rail (EWR) consultation dated 31st March – 9th June 2021 (Section D, page 212), which proposes a new station either north or south of the A428 in this location.</p> <p>The proposed works to Barford Road have the potential to create a barrier to longer term sustainable movement North and South. Where the new dualled A428 passes under Barford Road, the bridge will enable access across the new dual carriageway for vehicles.</p> <p>Specifically, sufficient additional width is requested on the deck of the Barford Road bridge to accommodate pedestrian and cycle provision and sufficient retained width is requested passing under the East-Coast Mainline Bridge to enable future pedestrian and cycle provision.</p>		

Issue	Document Reference	National Highways Position	Central Bedfordshire Council Position	Status	Date
		<p>Details of the proposals are included within the General Arrangement Plans <b>[APP-011]</b> and the WCH provisions are included within the Streets, Rights of Way and Access Plans <b>[APP-013]</b>.</p>			
<p>Traffic Modelling Output – Barford Road</p>	<p>Transport Assessment Annex <b>[APP-243]</b>.</p>	<p>National Highways has set out all impacts on the wider road network (including Barford Road Roundabout) within the Transport Assessment Annex <b>[APP-243]</b>. Information relating to the Barford Road Roundabout is within section 3.12.</p>	<p>The diversion route for the Wyboston to Black Cat junction is considerable and the expectation is that traffic travelling between the A1 and the A428 will instead select to route via Barford Road rather than following the diversionary route. As such further consideration should be given to the monitoring of the related diversion and/or the split between diversionary signage for local and longer distance traffic. It is also noted that there are proposals for a haul road crossing on Barford Road, (para 3.2.3 of the OCTMP (APP-244)). The timing of any closures and any associated diversions should also be considered in the context of the proposed works to Barford Road itself to ensure no conflict between the two. CBC would welcome discussion with HE on mitigation.</p>	<p>Under discussion</p>	



Issue	Document Reference	National Highways Position	Central Bedfordshire Council Position	Status	Date
Impact of Construction Phase upon the Highway Network	Transport Assessment <b>[APP-241]</b> and <b>[APP-242]</b> and the Transport Assessment Annex <b>[APP-243]</b> .	National Highways has provided comprehensive construction traffic flow impacts in the Transport Assessment <b>[APP-241]</b> and <b>[APP-242]</b> and the Transport Assessment Annex <b>[APP-243]</b> . Results from the assessments undertaken have been presented to local councillors, officers and local forums of all the local authorities.	Matters discussed at a meeting held on 12 August 2021. Whilst the Transport Assessment and subsequently provided construction phase flow plots identify the construction phase effects of the Scheme, CBC are not currently content that construction phase impacts have been addressed. In particular, the forecast displacement of traffic onto alternate east-west routes passing through local communities.	Under discussion	
The Outline Construction Management Plan <b>[APP-244]</b>	CBC Relevant Representation <b>[RR-016b]</b>  The Outline Construction Traffic Management Plan (OCTMP) <b>[APP-244]</b>	The Outline Construction Traffic Management Plan (OCTMP) <b>[APP-244]</b> sets out the temporary traffic management processes that will be followed for the safe and efficient construction phases of the Scheme. The development of the OCTMP has been informed through discussions with the Strategic Road Users Technical Working Group which includes representatives from local authorities.  Following a grant of development consent for the Scheme, relevant local highway authorities will have the opportunity to comment on a Traffic Management Plan, which must accord with the OCTMP	It is the view of CBC that, whilst the overarching principles of the OCTMP are supported, there are a number of elements of the plan that are not agreed, due to unknown constraints and/or expected impacts on local communities. In particular, , the proposed use of Station Road, Tempsford for any significant level of construction traffic., or extraordinary loads as detailed in APP-244 is considered is considered to be inappropriate.  Concerns also remain that mitigation works (temporary or permanent) will be required to support the use of the A603 through Moggerhanger as a formal diversion.	Under discussion	

Issue	Document Reference	National Highways Position	Central Bedfordshire Council Position	Status	Date
		<p><b>[APP-244]</b>. Requirement 11 of the draft Development Consent Order (dDCO) <b>[APP-025]</b> makes provision for the preparation of a Traffic Management Plan, that must be consulted upon with the relevant local highway authority before being submitted to the Secretary of State for approval. In making an application to discharge the requirement, a summary report is required to be prepared which must include the written responses from any parties consulted with.</p> <p>National Highways is committed to continuing engagement with the local authority on matters relating to the outline construction traffic management plan.</p> <p>Construction access via Station Road Tempsford is required for the Cadent gas diversion works and the construction of the east abutment of the ECML structure. Cadent have not confirmed the duration of gas main diversion works and thus this access maybe required for 8 to 12 months. Once</p>	<p>Whilst some additional information has been provided with regards to the potential construction traffic proposed to use Station Road (within DCO document ref. 9.32), further information, including duration of expected use, would be required for CBC to understand the full impacts.</p> <p>Whilst Requirement 11 makes provision for the preparation and agreement of individual Traffic Management plans, it is noted that these are expected to be substantially in accordance with the OCTMP.</p> <p>Therefore, CBC is of the view that these issues should be resolved at this stage.</p>		

Issue	Document Reference	National Highways Position	Central Bedfordshire Council Position	Status	Date
		<p>Cadent provide a detailed construction programme National Highways will share these details with the local authority and provide more clarity on how long this construction access through Tempsford will be required.</p>			
<p>The Outline Construction Traffic Management Plan [APP-244]</p>	<p>CBC Relevant Representation <b>[RR-016b]</b></p>	<p>The restrictions sought are sufficiently set out in the Outline Construction Traffic Management Plan as noted below.</p> <p>Chapter 3 of the Outline Construction Traffic Management Plan <b>[APP-244]</b> sets out a number of restrictions as follows:</p> <ul style="list-style-type: none"> <li>• Construction traffic will not be permitted to use a number of specifically identified side roads for the duration of the Scheme construction phase. Appendix C of the Outline Construction Traffic Management Plan <b>[APP-244]</b> sets out the restricted routes.</li> <li>• Carriageway and lane restrictions will be used</li> </ul>	<p>It is the view of CBC that, whilst the overarching principles of the OCTMP are supported, there are a number of elements of the plan that are not agreed, due to known constraints and/or expected impacts on local communities.</p> <p>In particular the proposed use of Station Road, Tempsford for any significant level of construction traffic or extraordinary loads as detailed in APP-244 is considered to be inappropriate.</p> <p>Concerns also remain that mitigation works (temporary or permanent) may be required to support the use of the A603 through Moggerhanger as a formal diversion.</p> <p>Whilst some additional information has been provided with regards to the potential construction traffic proposed to</p>	<p>Under discussion</p>	

Issue	Document Reference	National Highways Position	Central Bedfordshire Council Position	Status	Date
		<p>to create safe working spaces. Indicative closure times are set out in Table 3.1 within the Outline Construction Traffic Management Plan [APP-244]. The indicative closures are shown as being operational for overnight periods.</p> <ul style="list-style-type: none"> <li>Strategic diversion routes will be in place when there are closures on sections of the A428, A421 and the A1. Appendix D of the Outline Construction Traffic Management Plan [APP-244] sets out drawings showing the diversion routes.</li> <li>Speed restrictions and temporary speed limits (to be dealt with by temporary traffic regulation orders).</li> </ul> <p>Following the grant of development consent for the Scheme, relevant local highway authorities will have the opportunity to comment on the Traffic Management Plan, which must accord with the Outline</p>	<p>use Station Road (within DCO document ref. 9.32), further information, including duration of expected use, would be required for CBC to understand the full impacts.</p> <p>Whilst it is appreciated that Requirement 11 makes provision for the preparation and agreement of a Traffic Management Plan, it is noted that this is expected to be substantially in accordance with the OCTMP. Therefore, CBC is of the view that these issues should be resolved at this stage.</p>		

Issue	Document Reference	National Highways Position	Central Bedfordshire Council Position	Status	Date
		<p>Construction Traffic Management Plan [APP-244]. Requirement 11 of the draft Development Consent Order (dDCO) [APP-025] makes provision for the preparation of a Traffic Management Plan, that must be consulted upon with the relevant local highway authority before being submitted to the Secretary of State for approval. In making an application to discharge the requirement, a summary report is required to be prepared which must include the written responses from any parties consulted with.</p>			
The Construction Programme	Outline Construction Traffic Management Plan [APP-244]	<p>Sufficient information regarding the construction programme is contained within the Application in Chapter 2, The Scheme of the Environmental Statement [APP-071]. Further detailed construction works information will be provided at the detailed design stage of the Scheme.</p> <p>Sufficient information for this stage is provided within the Application about the timings of closures with indicative timings for closures set out in the Outline Construction</p>	See CBC Written Representation dated August 2021.	Under discussion	

Issue	Document Reference	National Highways Position	Central Bedfordshire Council Position	Status	Date
		<p>Traffic Management Plan [APP-244].</p> <p>The relevant local highway authorities will have the opportunity to comment on a Traffic Management Plan, which must substantially accord with the Outline Construction Traffic Management Plan [APP-244]. Requirement 11 of the draft Development Consent Order (dCO) [APP-025] makes provision for the preparation of a Traffic Management Plan, that must be consulted upon with the relevant local highway authority before being submitted to the Secretary of State for approval. In making an application to discharge the requirement, a summary report is required to be prepared which must include the written responses from any parties consulted with.</p>			
<b>Geometry and Design</b>					
Design Standards for Junctions and	Works Plans [APP-010]	National Highways has used the geometrical design standards within the DMRB for the design of	CBC has accepted in principle the proposed layout of Barford Road and	Agreed	13/09/2021

Issue	Document Reference	National Highways Position	Central Bedfordshire Council Position	Status	Date
Roads in CBC (CBC) area	General Arrangements <b>[APP-011]</b> Engineering Sections - Part 3 <b>[APP-013]</b> & Part 5 <b>[APP-021]</b>	the proposed Barford Road and accesses. This does not include the paved width for which the below item address:	accesses as per the Proposed Development, subject to detailed design.		
Highways Geometrical Design	Works Plans <b>[APP-010]</b> General Arrangements <b>[APP-011]</b> Engineering Sections - Part 3 <b>[APP-013]</b> & Part 5 <b>[APP-021]</b>	A departure from DMRB standard has been proposed for the paved width cross-section of Barford Road. To keep consistent with existing carriageway in this location, the proposed carriageway width is 6.6m	CBC has accepted the proposed paved width cross section of 6.6m.	Agreed	13/09/2021
Highways Geometrical Design	Engineering Sections - Part 3 <b>[APP-013]</b>	National Highways propose a typical verge width 2.5m on structure along the proposed Barford Road.	CBC does not agree this matter as the Proposed Development should accommodate any future upgrades for NMU provision and associated infrastructure (i.e lighting) that CBC may require.	Under Discussion	
Highways Assets	Works Plans <b>[APP-009]</b> to <b>[APP-010]</b> ; General Arrangement Plans <b>[APP-011]</b> and Permanent Speed Limit Plans <b>[APP-015]</b> .	National Highways has used the geometrical design standards within the Energy Networks Association (ENA Technical Specification 43–8 Overhead Line Clearances) and Avoiding danger from overhead power lines and Health & Safety Executive Guidance Note GS6 (Fourth edition) for the vertical clearances	CBC agree with the proposed vertical clearances.  CBC will comment on specifics during the design consultation stage.	Agreed	13/09/2021

Issue	Document Reference	National Highways Position	Central Bedfordshire Council Position	Status	Date
		<p>between the overhead power cables and the proposed Barford Road.</p> <p>Some matters, including road junction drainage collection systems design will not be finalised until detailed design stage..</p>			
Highways Assets		National Highways proposes a National Speed Limit along Barford Road in keeping with the existing as shown on Sheet 3 of the Permanent Speed Limit Plans <b>[APP-015]</b> .	CBC agree with the proposed speed limit as shown on Sheet 3 of the Permanent Speed Limit Plans <b>[APP-015]</b> .	Agreed	13/09/2021
Highways Assets		National Highways has proposed culverts and ditches along and across Barford Road for CBC to be the maintaining authority as outlined on the General Arrangement Plans <b>[APP-011]</b> and within Appendix 13.3 - Drainage Strategy Report <b>[APP-219]</b> .	CBC agree in principle with the proposals subject to detailed design of the structures.	Agreed	13/09/2021
Highways Assets	General Arrangement Plans <b>[APP-011]</b>	National Highways is not providing lighting along the proposed section of Barford Road	CBC agree with the proposed lighting strategy along Barford Road.  Any signs or road markings are to be retro-reflective.	Agreed	13/09/2021



Issue	Document Reference	National Highways Position	Central Bedfordshire Council Position	Status	Date
		The proposed extent of lighting is shown on the General Arrangement Plans <b>[APP-011]</b>			
Highways Assets		<p>National Highways has proposed landscaping along Barford Road and the accesses as shown on the General Arrangement Plans <b>[APP-011]</b> and Figure 2.4 Environmental Masterplan <b>[APP-091]</b></p> <p>The extent of maintenance responsibility for landscape will be determined at detailed design.</p>		Under Discussion	
Management and Maintenance Responsibilities		<p>The maintenance and asset responsibilities to be adopted by CBC as shown below will be detailed within the Legal Agreement relating to the proposed A428 Black Cat to Caxton Gibbet Development Consent Order.</p> <p>Barford Road as defined in the draft DCO <b>[APP-025]</b> Schedule 3 and within the area of CBC will be the responsibility of CBC highways authority.</p> <p><b>Structures</b></p>	<p>Per Section 4 of the Highways Act 1980, National Highways are to pay CBC for taking on any maintenance liabilities. This payment will be in the form of a commuted sum. The calculation will be based on routine maintenance and lifecycle work activities for assets and are still to be discussed length of time.</p> <p>National Highways are to refer to point 1.B of Section 94 of the Highways Act 1980 in relation to CBC only maintaining the highway rather than the structure.</p> <p>Per Section 277 of the Highways Act 1980, CBC may recover expenses from National Highways for maintenance activities relating to the bridge.</p>	Under Discussion	

Issue	Document Reference	National Highways Position	Central Bedfordshire Council Position	Status	Date
		<p>National Highways will maintain the Barford Road bridge (overbridge) structure that crosses the new trunk road.</p> <p>CBC will be responsible for the maintenance of the carriageway construction above the waterproofing for the bridge structures that pass 'over' the trunk road.</p> <p><b>Drainage</b></p> <p>CBC will be the maintaining authority for the drainage assets servicing the proposed local highway network, including but not limited to the attenuation basins, Sustainable Drainage Systems (SuDS) and culverts.</p> <p><b>Landscaping</b></p> <p>The extent of maintenance responsibility for landscape will be determined at detailed design in collaboration with CBC.</p> <p>National Highways assumes reference to Deed means Legal Agreement.</p>	<p>Per Section 59 of the Highways Act 1980, CBC may recover expenses from National Highways for the diversion of extraordinary traffic onto local roads.</p> <p>The designers should assess the potential drainage impact on an undefined ditch at the south-western end of the Scheme.</p> <p>CBC agrees that details relating to asset handover and maintenance responsibilities will be covered within the legal agreement relating to the proposed A428 Black Cat to Caxton Gibbet Development Consent Order. However the legal agreement is not yet agreed, and CBC are awaiting the determination of whether the Deed requires securing via the DCO. As such it is considered that this matter is still under discussion.</p>		

Issue	Document Reference	National Highways Position	Central Bedfordshire Council Position	Status	Date
Land Ownership: Restoring of stopped up land	Land Plans [APP-008]	<p>The land required for, or affected by, the proposed development is shown on the Land Plans [APP-008] and will be developed further at detailed design.</p> <p>Where highways are being stopped up and there is no existing title plot associated, the half-width of the road will be restored and returned to the adjacent landowners, unless National Highways are seeking permanent acquisition.</p> <p>This is aligned to CBC's position.</p>	<p>Land should be returned, first, to registered owner if the land is registered and second, if not registered then to the adjacent land owners. CBC would object to land currently registered in CBCs name being transferred by virtue of HE's powers for the project to other adjacent land owners after exercising the powers.</p> <p>CBC would like further information of the extent of land in their title.</p>	Under Discussion	

Issue	Document Reference	National Highways Position	Central Bedfordshire Council Position	Status	Date
<b>PROW and WCH Matters</b>					
Impact of the Scheme upon Walkers, Cyclists and Horse riders (WCH)		The proposed design for the Barford Road realignment does not include provision for Walkers Cyclists and Horseriders (WCH), in line with the existing provision. It is noted that the Scheme within the jurisdiction of CBC does not affect any PRoW or NMU provision.	CBC agree that the Proposed Development does not impact existing Public Rights of Way and Walking, Cycling and Horseriding network.	Agreed	

Issue	Document Reference	National Highways Position	Central Bedfordshire Council Position	Status	Date
Impact of the Scheme upon Walkers, Cyclists and Horse riders (WCH)		<p>As stated within Written Response REP1-055e, the proposed structure over the East Coast Main Line includes vehicular access (track width of 3.5m) through the side spans for landowners. No provision has been made for pedestrians and cyclists alongside the East Coast Main Line as there are no existing rights of way within the area.</p> <p>National Highways does not preclude the local authority from implementing enhancement measures or contributing to the additional costs associated with any upgrades. It would be for the local authority to evidence the need for the upgrades and secure any additional land to deliver these facilities</p>	CBC wishes to secure passive provision along Barford Road and under the proposed East Coast Main Line railway underbridge. See also the response to question 1.11.6.1 with regards to rights of way proposals in the vicinity of the scheme (and the Barford Road Bridge)	Under Discussion	