

**CBC Table of Replies to ExA Questions dated 15/10/21**

Question number	Question	Answer
Q2.2.1.1	<p><b>Sandy Air Quality Management Area</b> In the absence of specific schemes or initiatives contained within the CBC Air Quality Action Plan 2019 - 2024 [Appendix 7, REP1-055] provided at Deadline 1, how can the effects on air quality in Sandy, as described by the Council in REP1-055 and Local Impact Report [REP2-003] be adequately mitigated?</p>	<p>The Action Plan for Sandy and Ampthill provided some options to work towards reducing the concentrations of pollution within the AQMAs, with the resources available at the time. As monitoring continues, it helps build a background of data to shape future plans through a better understanding in trends/changes, identifying if any AQAP measures have been successful and if any tweaks are necessary, or if new measures may be more appropriate. At the time of producing the AQAP Highways England were requested to assist in identifying measures to work towards reducing air quality pollution in the AQMA (Sandy) and were consulted at all stages of its development.</p> <p>Feedback and collaboration with Highways England on identification of further possible mitigation methods would be advantageous and encouraged (average speed cameras to prevent vehicles braking and accelerating away as currently occurs with the speed camera near the cottages fronting the A1; investigate if reducing the speed from 50 to 40mph would have a positive impact on AQ concentrations in the section of A1 through Sandy, studies have been carried out in other areas and have shown to be of benefit with permanent speed restriction limits).</p>
Q2.3.2.1 (e+f)	<p><b>Metric for calculating BNG</b> NE and LAs, please provide comments on the revised BNG assessment using the DEFRA 2.0 metric, submitted by the Applicant [REP3-012] [REP3-013]. NE, LAs, Applicant, comment on the DEFRA 2.0 metric net gain of 16.48% Habitat units, the net gain of 9.96% of River units and the</p>	<p>No issues within CBC so happy with results</p>

	net loss of -31.66% Hedgerow units, in contrast to the BNG score of 20.5% using the Highways England Metric. How would you describe the overall impact of the Proposed Development on biodiversity and does this affect the ES conclusions in this regard?	
Q2.3.5.1 (C)	<b>Adequacy of mitigation measures</b> C) NE and LAs to comment on the adequacy of measures in quantitative, qualitative, and locational terms.	No issues within CBC
Q2.3.6.1 (C)	<b>Mitigation measures</b> C) Include comments from LAs in the Joint Position Statement with the Applicant and NE on Drainage Ponds [REP3-026].	No issues within CBC
Q2.6.2.1 (a)	<b>Borrow pits</b> a) LAs, NFU and CCE, comment on the Borrow Pits Excavation and Restoration Report [REP3-011] and provide a list of issues relating to size and location, alternatives such as any working quarries, restorations and aftercare, biodiversity, and land contamination that remain outstanding.	There are no proposed borrow pits within CBC and therefore we have left it to the other relevant councils to take a lead and comment on these.
Q2.6.2.2 (b)	<b>Construction compounds</b> b) Applicant and NFU, what details regarding the proposed use of construction compounds have you agreed? What matters remain pending? Have LAs been consulted? What are their views?	CBC have not been consulted on such details
Q2.7.1.1 (a)	<b>Discharging Requirements and Conditions</b> a) All discharging authorities to check the Schedules in the dDCO for accuracy and provide the ExA with suggested corrections and amendments.	<p>There are no proposed borrow pits within CBC and therefore we have left it to the other relevant councils to take a lead and comment on these.</p> <p>Notwithstanding the Archaeology Team are satisfied with Schedule 2, Part 1.9 (Archaeology)</p> <p>Schedule 1 – Authorised development It is noted that there are sections of land identified adjacent to the A1, on continuation 1A of works plan Regulation Sheet 1m which have no cross referenced works numbers</p>

		<p>within the schedule of authorised development. From a reading of the remainder of the Draft DCO text this land appears to be purely for a continuation of works 8 related to utilities, however confirmation would be appreciated.</p> <p>My only other comments were with regards to Schedule 2 – this isn't an error in the text or an inaccuracy – so this may not be the appropriate place to raise the query – but the wording re. working hours still appears overly flexible, applying very little control on works carried out during unsociable hours.</p> <p>Schedule 2 – Requirements Construction Hours – whilst not an error, CBC has previously made representations with regards to the duration of time during which construction activities can take place, and the wide range of activities which can be undertaken outside of those periods – including bridge and gantry demolition and installation, works over and adjacent to the East Coast Mainline Railway, works associated with the diversion of utilities, lifting operations, delivery of plant, concrete pours and piling. As such, as currently worded, a large proportion of construction activities would not be subject to any control in terms of timing. CBC would be seeking for its own local standards to be applied, as detailed within: <a href="https://www.centralbedfordshire.gov.uk/info/44/planning/674/codes_of_practice_for_planning/2">https://www.centralbedfordshire.gov.uk/info/44/planning/674/codes_of_practice_for_planning/2</a></p> <p>As such CBC would request that the wording of para 19 is amended to refer to local standards, with exceptions by agreement with the Local Authority.</p>
Q2.7.3.4	<p><b>Article 5 – Maintenance of authorised development, and Article 13 – Construction and maintenance of new, altered or diverted streets and other structures</b> Awaiting relevant update [REP3-007, REP1-048ab] in SoCGs in response to CCC [REP1- 048] and CBC [REP1-054 and REP1-055]</p>	<p>Presume that this will be updated in light with the SoCG. However at present CBC are still awaiting a legal costs undertaking and initial heads of terms with regards to the proposed highways side agreement proposed by National Highways</p>

Q2.7.3.6	<p><b>Article 13 – Construction and maintenance of new, altered or diverted streets and other structures</b> See related question(s) in Highway – network and structures</p>	Unclear as to the cross-reference provided, so cannot comment further.
Q2.7.3.7	<p><b>Article 14 – Classification of roads, etc.</b> See related question(s) in Highway – network and structures</p>	Unclear as to the cross-reference provided, so cannot comment further.
Q2.7.3.12	<p><b>Article 55 – Traffic regulation</b> c) Applicant, confirm if different parts of the authorised development will be open for public use at different times [REP1-051]. d) If so, then the ExA could see the point made by the Cambridgeshire Councils [REP1-051] that the provisions in this Article are ambiguous; for instance, would the period of 12 months in Article 55(3) and 24 months in Article 55(7) could then be different calendar periods. How would this be managed and monitored? e) Cambridgeshire Councils further elaborate on your concerns [REP1-051].</p>	N/A - as related to Cambridgeshire queries
Q2.9.2.1	<p><b>Grade separated junctions</b> In light of the Applicant’s response [REP1-022, WQ1.9.2.1], provide any further comments on the interactions between groundwater and surface water at the three grade separated junctions, the various underpasses and culverts, and any geographical low points?</p>	CBC have no additional comments on the interaction between groundwater and surface water. The response given by the Applicant in ‘Deadline 1 Submission - 9.2 Applicant’s Response to the Examining Authority’s First Round of Written Questions’ and the referenced information provided relating to groundwater and surface water in Section 13.9 of ‘6.1 Environment Statement, Chapter 13: Road Drainage and Water Environment’ addresses the issue of potential sources of flooding.
Q2.9.2.2	<p><b>Groundwater Dewatering</b> Applicant, provide an update on the proposed permanent groundwater dewatering systems to be used in connection with the Proposed Development [APP-082, Paragraphs 13.9.118–123], including ongoing maintenance</p>	No comment can be made on the proposed permanent groundwater dewatering system until its design and maintenance has been provided at an upcoming detailed design stage.

	and costs. EA and LAs to comment	
Q2.10.1.1	<p><b>Scheme Design Approach and Design Principles</b> a) The ExA is seeking views from LAs and all parties on the content of the Applicant's Scheme Design Approach and Design Principles [REP3-014], and if the design approach, design vision and design principles will guide the development of the detailed design post consent (should consent be granted) to deliver the following outcomes: i) sensitivity to place, siting and design measures relative to existing landscape, character and function (NPS NN, Paragraphs 4.29, 4.30, 4.33) (other relevant local policies [REP1-051], [REP1-054] [REP1-055]); ii) producing high quality, beautiful and sustainable places (NPS NN, Paragraphs 4.29, Chapter 12 of the NPPF) iii) meeting principal objectives of the Proposed Development, mitigating problems, minimising adverse impacts, and sustaining the improvements to operational efficiency (NPS NN, Paragraph 4.31); iv) taking into account functionality, aesthetics, and technology (NPS NN, Paragraph 4.33); and v) best possible integration with the surrounding landscape [REP3-014, Paragraph 3.1.1].</p> <p>b) Do you feel that the design principles and features of specific structures [REP3-014, Appendix C] cover the range of physical structures, landscape features, and other measures that design principles should be set out for?</p> <p>c) Do you have understanding of the rationale behind the design principles for individual structures, in relation to the</p>	Comments from CBC have been responded to adequately

	<p>immediate surroundings, for instance [REP3-014, Appendix C]?  d) Are you clear how the Scheme Design Approach and Design Principles would be secured through the DCO process, and is that adequate [REP3-014, Paragraphs 1.2.1- 2]?</p>	
Q2.10.2.1	<p><b>Design development process</b> a) Are you clear about the design development process and which parties would be consulted through the process [REP3-014, Section 5]?  b) Are you content with the proposed design development process and which parties would be consulted through the process [REP3-014, Section 5]?</p>	Yes
Q2.11.1.1	<p><b>Methodology, inputs and outputs</b> The NPS NN (Paragraphs 5.203, 5.204) explains that the Applicant should have regard to policies set out in local plans and that the Applicant should consult relevant LHAs and LPAs, as appropriate on the assessment of transport impacts. S16 The Traffic Management Act 2004, places a Network Management Duty (NMD) on local traffic authorities, or a strategic highways company (the network management authority), so far as is reasonably practicable, to ensure the expeditious movement of traffic on the authority's road network and facilitating the expeditious movement of traffic on road networks for which another authority is the traffic authority. At ISH2 [EV-038] both CCC and CBC stated that on the basis of the information before them that they were unable to comment on the Proposed Development's likely impact on them being able to fulfil their NMD.  a) Given the Applicant acknowledges the limitations of applying strategic modelling to</p>	<p>Agreed that the sensitivity testing proposed will provide greater confidence in the assessment and forecasting of traffic effects for the Biggleswade North junction. At present CBC are not proposing to undertake further independent junction analysis.</p>

	<p>the localised level of individual junctions, sections of highway and in the case of Coton, how can the ExA and LHAs be confident in the traffic effects stated in the Case for the scheme [APP-240] and Transport Assessment [APP-241 and APP-242] at specific points elsewhere on the local highway network?</p> <p>b)The ExA welcome that the Applicant has proposed to undertake further sensitivity testing, in liaison with LHAs at various locations described in Scope of Junction Model Sensitivity Test [REP3-029]. Do CBC and CCC agree that the scope of that assessment will enable greater confidence in the traffic effects of the Proposed Development? Explain with reasons.</p> <p>c)Do LHAs intend on undertaking further analysis such as has been provided for Caxton Gibbet [REP2-003, Fig 1, 7.2.22]? If so, which locations would this relate to and when will this be provided to the ExA?</p>	
Q2.11.1.2	<p><b>COVID-19</b> At Deadline 1 the Applicant provided additional submission Assessing the Potential Impacts of COVID 19 – The implications for traffic forecasts for the Scheme [REP1-029]. Do LAs and all parties broadly accept the findings of the document provided? If not explain with reasons.</p>	CBC broadly agree
Q2.11.1.3	<p><b>Economic Sensitivity Test</b> At Deadline 1 the Applicant provided additional submission Economic Sensitivity Test Technical Note [REP1-027]. Do LAs and all parties broadly accept the findings of the document provided? If not explain with reasons.</p>	No comment

Q2.11.2.1	<p><b>Road design and layout</b> CCC [REP1-048] have requested that new highways infrastructure be provided in accordance with DMRB.</p> <p>d)With particular regard to route continuity and road safety considerations, how is this justified where the existing roads leading to those points do not currently appear to conform with DMRB? Please provide justification for each location referred to.</p> <p>e)Do other Local Highway Authorities share the view that new highways infrastructure, for which they will be responsible for in future, should conform with DMRB?</p>	<p>Broadly agreed that infrastructure should conform with DMRB, however a minor relaxation in terms of widths has been discussed for a short section within CBC, which is considered likely to be acceptable as it reflects the widths of the connecting carriageway.</p>
Q2.11.5.1	<p><b>De-trunking proposals</b></p> <p>a)Further to the Applicant’s written and oral submissions received so far in the Examination [REP1-021] [REP1-022] [REP3-008], do LHAs consider that they have an accurate understanding of the condition in which the highway asset to be de-trunked will be transferred? b)Applicant, provide updates on the progress made on de-trunking agreements.</p> <p>c)How will LHAs’ agreement to handover at a specific point in time be secured? See related question(s) in Draft Development Consent Order</p>	<p>N/A - as there are no sections proposed for de-trunking within CBC.</p>
Q2.11.6.1	<p><b>Providing opportunities for NMUs</b> At ISH2 [EV-034] it was clear that numerous parties consider the Proposed Development does not sufficiently improve the existing PROW network. The scheme objectives [APP071], also referred to in the Statement of Reasons [APP-030], include ensuring the safety of cyclists, walkers and horse riders and those who use public transport by improving the</p>	<p>N/A - as related to Cambridgeshire queries</p>



	<p>routes and connections between communities improving accessibility. The Applicant explains that the PROW network will increase in length by 4.13 km [REP1-022]. However, it is noted that this includes sections of PROW diversions required as a result of the Proposed Development.</p> <p>a) Applicant, what additional NMU provision can be reasonably considered to meet the scheme objectives [APP-071], address the concerns of LHAs and other parties, and align with policy requirements (NPS NN, Paragraphs 3.3 and 5.205)?</p> <p>b) CCC [REP2-003] has expressed concerns that there is a likelihood of increased vehicle speeds on the existing A428 because the traffic levels would reduce as a result of the Proposed Development. Has the Applicant considered the need for physical engineering interventions to ensure the potential for increased traffic speeds do not lead to adverse road safety impacts, particularly for NMUs crossing the corridor but also along it? Explain with reasons.</p> <p>c) CCC, have feasibility studies relating to the provision of a continuous off-road walking and / or cycling link between St Neots and Cambourne been undertaken [EV-034]? Provide evidence that there is demand for such a link. How deliverable is such a scheme, particularly in regard to funding and any known delivery constraints?</p> <p>d) Applicant, justify the gap of approximately 600m in off-road NMU provision between Eltisley and Caxton Gibbet North roundabout.</p> <p>e) The Applicant proposes that LAs could seek funding from Designated Funds associated with RIS2 to improve NMU provision</p>	
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	<p>locally [APP-243]. Provide detail regarding this fund, including how the bidding process works and how potential schemes are assessed. Explain how it is better value for such schemes to be delivered separately from the Proposed Development.</p>	
Q2.11.7.1	<p><b>Outline CTMP Clarification – Travel Plan</b> Notwithstanding the Applicant’s response at D3 to ISH2 Action Point 5 [REP3-019], the Proposed Development would result in around 900 temporary workers being employed in the locality over a number of years.</p> <p>f)How will the commuting effects of workers, employees and contractors involved in the Proposed Development be managed, mitigated and minimised given the Applicant does not currently intend to produce a Travel Plan? LAs to comment.</p> <p>a)How does your position align with the policy requirement in the NPPF (Paragraph 113) which states that all developments that will generate significant amounts of movement should be required to provide a travel plan. LAs to comment. b)Without prejudice, what is the implication of producing a Travel Plan; when can it be produced and presented into Examination; and how would this be secured? LAs to comment.</p>	<p>CBC would be seeking a Travel Plan for construction staff and would be happy to engage with National Highways and / or their delivery partner on this matter.</p>
Q2.11.7.3,	<p><b>Local Highway Impacts</b> On the basis of the information received at D3, ISH2 Action Point 6 [REP3-019], the Applicant proposes to deal with matters relating to traffic informally diverting on to the local network during construction, primarily at source on the strategic road network with little if any measures to discourage or restrict informal traffic diverting on the local</p>	<p>CBC do not consider this to be sufficient. The modelling work carried out to support the application predicts significant and long term informal diversion of traffic during the construction process. CBC have made previous representations on this matter and identified a series of monitoring, management and mitigation actions considered to be proportionate and directly relevant to the predicted impacts of the DCO application. The views of CBC and the mitigation proposed are outlined fully in the</p>

	<p>highway network. Do LHAs consider this to be sufficient? If not, explain with reasons. Applicant to comment.</p>	<p>Joint position statement 9.29 (Document ref. REP3-016)</p>
<p>Q2.11.7.4</p>	<p><b>Highway condition</b></p> <p>a)How does the Applicant intend to ensure no damage occurs to the local highway network as a result of construction traffic using it for access during construction and how will this be secured?</p> <p>b)The Applicant states that highway condition surveys will be undertaken at all access points used by construction vehicles [REP1-022, Q1.11.7.11]. Confirm if this is solely at the point of access to the site from the local highway network or for the entire length of the road leading to and from the site from the existing strategic road network? How will this be secured?</p> <p>c)LHAs to comment.</p>	<p>CBC do not consider that condition surveys at the point of access only would be acceptable. It is considered that the full route from the Strategic Road network to the construction access would require surveying. CBC would also request that CBC highways officers are included within the condition survey process.</p>
<p>Q2.11.7.5</p>	<p><b>Outline CTMP Clarification</b></p> <p>a)To assist in understanding the impact of construction traffic using Station Road, Tempsford, provide a summary of customer contact received relating to the effects of the recent usage of the link by construction HGVs for the archaeological surveys as described at ISH2, Session 3 [EV-035].</p>	<p>This is not considered to be a representative comparison, as the archeological works, outside of the initial delivery of the site cabins, was identified by the applicant as generating light vans and 4 x 4s only. The officer report for the related planning application (ref. CB/20/04083) states that 'with regards to highway and pedestrian safety, there will be no heavy-construction vehicles accessing the site. Vehicles will be of a domestic scale and movements will largely be concentrated at peak times.' In contrast the additional information submitted by the applicant in document ref. 9.32 (Appendix A) suggests that during peak periods up to 25 HGVs may use this route each day. Presuming each HGV is a return journey, this would equate to a peak of 50 HGV movements on Station Road per day.</p> <p>To my knowledge there has been single instance of contact from a local resident regarding the HGV traffic involved in preparing the access for the AW archaeological mitigation at Field 44. The local resident contacted the Planning Case Officer (David Gauntlett) on 20/07/21 and the</p>

		Archaeology Team responded with an update on the same day. The concerns raised appeared to relate to the HGVs that were upgrading part of the private road and preparing the access track. It is understood the information was passed back to the local resident. I am not aware of any further contact from customers about the use of Station Road to access F44 by HGVs or other vehicles.
Q2.12.4.1	<p><b>Archaeological Mitigation Strategy</b></p> <p>a) Please confirm your views on the scope of the revised AMS submitted at D3 [REP3- 010] and its response to the joint Archaeological Design Brief?</p> <p>b) In particular, Cambridgeshire Councils, with regard to the Applicant's comments in [REP3-007, Q1.12.4.2], are you satisfied that all areas are included in the revised AMS [REP3-010]?</p> <p>c) CBC are you satisfied that the revised AMS accords with the approved scopes of work and Written Schemes of Investigation for the advanced archaeological works?</p> <p>d) BBC, with regard to R9, are you satisfied with the Applicant's revised wording, as described in [REP3-007, Q1.12.4.2]?</p>	The Archaeology Team are satisfied with the amendments that have been made to the Archaeological Mitigation Strategy and are content that it is now in line with the approved scopes and written schemes of investigation for the advanced archaeological works at F34 and F44 in Central Bedfordshire.
Q2.16.1.1	<p><b>Borrow Pits</b> Does the Applicant's Borrow Pits Excavation and Restoration Report [REP3-011] adequately address concerns relating to noise associated with the use of Borrow Pits? If not, explain with reasoning.</p>	CBC have had no involvement with the borrow pits or noise impacts from them. CBC believe this is more of an issue for residents within Bedford Borough.
Q2.16.1.2	<p><b>Noise baseline monitoring</b> Do LAs and IPs agree with the rationale put forward by the Applicant [REP3-019, Appendix B] to explain how the baseline noise monitoring undertaken was sufficient for the purposes of the ES? If not, explain with reasons.</p>	CBC think we have challenged the point about the planned additional monitoring data sufficiently, and the applicants have now provided a response detailing why this has not been undertaken and the rationale behind it. CBC note that some additional monitoring/validation work has been undertaken (as referenced in paragraph 1.1.26 of Appendix B) which has identified a negligible change in traffic

		noise levels. CBC do not think we have reason to challenge this point further.
Q2.16.1.3	<b>Noise and Vibration Errata</b> Do LAs or IPs have any comments regarding REP3-27 which clarifies that dates of Base Year traffic data, as referred to in various submissions by the Applicant, should be 2015 rather than 2016.	No comment
Q2.17.3.1	<b>Proposed mitigation</b> Applicant, for the receptors that would experience large adverse combined effects, and moderate adverse effects [APP-084] [APP-112] do you believe the First Iteration EMP should identify support and point of contact with the Community Liaison Manager or similar to provide immediate and short term mitigation to effects of construction period? Should this be identified as additional mitigation? LAs to comment.	The impact to the AQ will be from the operational phase of the development not from the construction phase. Therefore, CBC have no comment to make on this matter.
Q2.18.1.1	<b>Human health</b> Notwithstanding the responses from the Applicant [REP1-022] and PHE [REP1- 090], do you believe the First Iteration EMP should identify support and point of contact with the Community Liaison Manager or similar to provide immediate and short-term mitigation to receptors identified by the Cambridgeshire Councils [REP1-051] during the construction period? Should this be identified as additional mitigation? LAs to comment.	This is a question for Cambridgeshire Councils as it relates to their receptors.