

Comments on the Applicant's D5 submissions

This document sets out the comments on the Applicant's Deadline 5 (D5) submissions by Cambridgeshire County Council (**CCC**), Huntingdonshire District Council (**HDC**) and South Cambridgeshire District Council (**SCDC**) (together, the **Councils**). The tables below set out the document in question that the Councils are commenting on, together with the relevant paragraph or reference number.

Except where expressly stated otherwise below, the Councils reiterate and rely on their comments submitted to the ExA at previous deadlines.

9.54 Barbastelle Bat Surveys and Mitigation Technical Note (Rev 2) [REP5-006]

Topic	Paragraph Number	Councils' Comment
Pillar Plantation – hibernation surveys	3.1.20	<p>The Councils are concerned that the applicant has been unable to survey Pillar Plantation for bat hibernation (as agreed with Natural England) and therefore there will be no evidence to inform the affect of the road scheme on hibernation roosts in this location . If access cannot be obtain, a precautionary principle must be adopted and assumption of usage of the site by hibernating Barbastelles.</p> <p>Any outstanding survey work must be incorporated into the Biodiversity Pre-Commencement Plan and inform the constraints plan (paragraph 1.2.4, [APP-239]).</p>
Bat crossing surveys	3.2.6	Until further information and assessment is submitted at Deadline 6, it is not possible for the Councils to determine the appropriateness of the proposed bat mitigation.
Final Assessment	3.2.11	The Councils are concerned that the final assessment will be reported at Deadline 7. This gives very little time to undertake discussions or make alterations to the design, should the findings suggest the proposed bat mitigation is not adequate.
Natural England's position	4	The Councils support Natural England comments requiring further information and justification for the design and location of the bat mitigation structures proposed within Cambridgeshire.

Appendix B – Bat mitigation summary note	Pages 30, 33-35	Until further information and assessment is submitted at Deadline 6, it is not possible for the Councils to determine the appropriateness of the proposed bat mitigation.
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9.58 Aquatic Habitats Surveys 2021 Technical Note [REP5-008]

Topic	Paragraph Number	Councils' Comment
Adequacy of survey work / ES assessment for Aquatic Habitats, Fish and Aquatic Invertebrates	6.1.7	The Councils welcome the findings of the 2021 survey work, which confirms the watercourses and ponds identified as dry in 2018 are considered to be permanently dry. This addresses our previous concerns with regards to the adequacy of survey work / assessment for aquatic habitats, fish and aquatic invertebrates. The Councils consider the assessment set out Chapter 8, Biodiversity [APP-077] of the Environmental Statement to be appropriate.

9.59 Barn Owl Survey Update Technical Note [REP5-009]

Topic	Paragraph Number	Councils' Comment
Barn Owl nest (new)	1.1.3	The Councils note that a new active Barn Owl nest was identified in 2021. The location of the new nest is confidential and not provided within the document. Therefore, it is not possible to determine whether the Applicant's conclusion that the nest will not be impacted by the scheme is accurate. The Councils request bilateral discussions with the Applicant in relation to this matter.

9.60 Updated Bat Surveys 2021 Technical Note [REP5-010]

Topic	Paragraph Number	Councils' Comment
Transect 10, Spot Count Point SP1 (no bat mitigation)	Page 6 & 7 Figure 4, page 37 & 38	<p>The results of the transect 10 survey identify a number of bat passes (Common Pipistrelle and Soprano Pipistrelle) at Spot Count Point SP1 during 12 August 2021 and 09 September 2021. The results demonstrate a bat commuting route along the east-west hedge, that will be severed by the proposal.</p> <p>The Councils are concerned that sheet 5 of the Environmental Master Plan [REP4-047] does not include any bat mitigation measures to avoid adverse impact as a result of severance of the bat flight path. The lack of bat mitigation at this point has the potential to</p>

		<p>result in injury and killing of bats, as well as affecting access to established foraging / commuting routes and therefore has the potential to affect the local bat population. The Councils seek justification from National Highways as to why no bat mitigation measures have been proposed for this location.</p>
Transect 12 – Gallows Brook	Page 10-12 of Figure 4	<p>The results of Transect 12 show Gallow Brook (running of the southern side of the A428, running parallel to the proposed road) is a key foraging / commuting route for bats.</p> <p>The alignment of the proposed Toseland overpass will go over Gallows Brook. However, no bat mitigation is proposed on mitigation proposed on sheet 11 of the Environmental Master Plan [REP4-047] to ensure there will be no adverse effect to this key commuting / foraging route for bats.</p> <p>The Councils seek further information from National Highways to demonstrate how the existing bat flight path along Gallow Brook has been preserved as part of the design of the Toseland Overbridge.</p>
Transect 12 – Static Location S5 (north-south hedge)	Table 6, Page 70	<p>Static Location S5 recorded moderate bat activity in July and September 2021, indicating that the north-south hedge is a key bat commuting corridor for the local bat population.</p> <p>The alignment of the proposed A428 will result in the severance of this north-south hedge. No mitigation is proposed upon sheet 11 of the Environmental Master Plan [REP4-047] to mitigate the effect on this bat commuting / foraging route.</p> <p>Given the evidence provided, the Councils consider that bat mitigation measures are required at this location to avoid adverse effects on the local bat population. The Councils seek justification from National Highways as to why a bat crossing has not been proposed at this location.</p>

9.61 Great Crested Newt Survey Update Technical Note [REP5-011]

Topic	Paragraph Number	Councils' Comment
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Pre-commencement GCN surveys	5.1.1	<p>The Councils note that ponds will be resurveyed in the survey season prior to the start of construction to inform either a District Level Licence for Great Crested Newt or an EPS licence.</p> <p>The Councils continue to be concerned that the requirement for pre-commencement Great Crested Newt surveys have not been included within the Biodiversity Commencement Plan [APP-239], as set out in our response to WQ1 [REP1-051] Q1.3.5.1.c. It is therefore not possible to determine whether adequate survey work for Great Crested Newt will be delivered as part of the scheme.</p>
Pond 37	7.2.1 & 7.2.3	<p>Pond 37 is one of two ponds that will be lost in Cambridgeshire as a result of the proposed development.</p> <p>The status of Pond 37 remains inconclusive, because eDNA were taken outside of the optimal survey season. The Councils support National Highways approach that the presence of GCN continues to be assumed on a precautionary basis.</p> <p>National Highways confirms that <i>“further updating surveys will be carried out prior to the start of construction of the Scheme”</i>, however, they have not been included within the Biodiversity Pre-Commencement Plan [APP-239]. The Councils are therefore concerned that National Highways have not clearly demonstrated that an adequate level of survey work will be completed prior to commencement of works.</p> <p>In addition, the Environmental Master Plan [REP4-047] and First Iteration EMP [APP-234] does not include any new Great Crested Newt breeding ponds to off-set the loss of a GCN breeding pond within Cambridgeshire. The Councils are concerned that the un-mitigated loss of the breeding pond will result in adverse impact on the favourable conservation status of this protected species.</p> <p>The Councils raised concerns with regards to the lack of mitigation for loss of breeding ponds within our response to questions WQ1 [REP1-051], Q1.13.3.1d. This has not been addressed.</p>

Pond 84	7.3.1	<p>Pond 84 is one of two ponds that will be lost in Cambridgeshire as a result of the proposed development.</p> <p>Pond 84 was found to be dry in 2021. We support National Highways conclusion that the pond is unlikely to support any regular breeding by Great Crested Newts. Therefore, this addresses our previous concern with regards to the loss of this ponds for GCNs.</p>
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9.63 Updated Terrestrial Habitat Surveys 2021 Technical Note [REP5-013]

Topic	Paragraph Number	Councils' Comment
Wildlife Trust 2019 survey	1.1.5 & 5.3.1	<p>National Highways refer to the most recent assessment of PRV S8 undertaken by the Wildlife Trust (2019) but have not provided this assessment as evidence to Examination.</p> <p>Cambridgeshire County Council commissions survey work of the Protected Road Verges in Cambridgeshire, with surveys of PRV S8 completed in 2007 and 2012. The Councils are not aware of the 2019 Wildlife Trust survey report and therefore request a copy be submitted to the Examination as evidence.</p>
Protected Road Verge S8	5.3.2	<p>The survey confirmed the Protected Road Verge is of district/county importance. The Councils seek the First Iteration EMP [APP-234] to be updated to include protection of PRV S8 grassland verge.</p>
Arable Flora	5.4.1	<p>National Highways state that the “details of the flora identified in these parcels [six arable fields] is provided in Appendix B and Appendix E”, however the information in Appendices B and E relates only to grassland, not arable fields.</p> <p>It is therefore not possible to determine the location of the flora, its importance and whether / not it is located within the Order Limits.</p> <p>The Councils seek further details of the flora, including location of the notable species, recorded during the arable field surveys.</p>
Arable Flora – fields AF3a, AF3b	5.4.3-5.4.5	<p>Fields AF3a, AF3b and AF3c support notable arable plants. No evidence has been provided to demonstrate that the plants are located outside of the Order Limits. Therefore the Councils seek a plan showing the location of these plants and how this relates to the</p>

		red line boundary. If the plants are located within the redline boundary, the First Iteration EMP [APP-234] should be updated to include arable field margin mitigation strategy.
Arable Flora – field A19	5.4.7	Field A19 supports notable arable plants. No evidence has been provided to demonstrate that the plants are located outside of the Order Limit. Therefore the Councils seek a plan showing the location of these plants and how this relates to the red line boundary. If the plants are located within the redline boundary, the First Iteration EMP [APP-234] should be updated to include arable field margin mitigation strategy.
Condition Assessment for biodiversity net gain	5.5.1	It is unclear how the condition assessment will affect the values used in the Biodiversity Net Gain metrics and consequently the BNG losses / gains. Therefore, the Councils request a revised BNG calculation to take into account the latest survey area.

9.64 Applicant's Comments on submissions made at Deadline 4 [REP5-014]

Topic	Paragraph Number	Councils' Comment
REP4-057: Comments on the Applicant's comments on other parties' responses to the Examining Authority's First Written Questions (WQ1)		
Climate Change/Decarbonising Transport Q.1.1.1	REP4-057a	The authorities note that the DfT's approach to supporting the roll out of ultra-low emissions vehicles is via the creation of a Rapid Charge Fund. We welcome the reference to the applicant seeking to identify opportunities to create capacity within the electrical supply at both Caxton Gibbet and the Black Cat junction areas to enable the installation of charge points as well as the potential for any charge points installed at the compound at the Back Cat junction to remain after completion of the Scheme.
Climate Change and carbon emissions Q1.4.1.1	REP4-057c	Please refer to the Councils' comments on submissions made by the authorities on 9.52 Construction Phase Greenhouse Gas Emissions [REP4-042] in Deadline 5 submission REP5-020.
Borrow Pits Q1.6.2.1	REP4-057d	The Applicant's responses are noted. In respect of Policy 7 and Policy 19, the Councils and the Applicant appear to be of differing views. The Councils propose to pursue this through the Statement of Common Ground. The Councils notes that the Applicant, as stated in ISH5, intends to submit additional material in respect of the borrow pits and the EMP at

		<p>Deadline 6. The Councils will therefore reserve further comment until that documentation is available for review.</p> <p>The Councils believe that the Applicant may have misinterpreted paragraph 1 of Policy 19 in relation to the requirement to secure a restoration and aftercare scheme, if necessary, by legal agreement. This is normally used to secure restoration and aftercare in instances where it is not possible to do so using planning conditions. This is often in relation to longer term aftercare, or where there are phased schemes or involves land outside the planning permission area. Assuming that the borrow pit is restored as according to the landowners' wishes, i.e. agriculture, we will leave it to their judgement as to the legal agreements to which they wish to have with the Applicant to ensure the land is returned to them in a satisfactory state, in a timely manner. The Councils' position is that a requirement securing borrow pit restoration is necessary to ensure that borrow pits are adequately restored from a public interest perspective, as well as any agreement with landowners to ensure that the restored borrow pits meet the landowner's needs.</p> <p>This comment has also been made below for '9.65 Applicant's comments on other parties' responses to second round of written questions [REP5-015]', and should be read in the context of other comments made by the Councils with regards to biodiversity, elsewhere in this document. Relevant previous submissions include: Written Representations [REP1-048] Section 13; Local Impact Report [REP2-003] Table 10, paragraphs 8.9.3-4 and Appendix A; REP4-057 Q1.6.2.1; and REP4-060 Minerals and Waste REP1-048cn.</p>
Article 13(3), dDCO Q1.7.3.4	REP4-057e	<p>The Councils note the assurance provided by the Applicant that the "maintenance obligation of private access tracks will rest with the Applicant or the relevant landowner as the case may be." The Councils request clarification from the Applicant as to where this assurance will be secured in the dDCO. CCC acknowledges the applicant's agreement to amend article 13(9) to reflect the fact that LHA's should not be responsible for the surface course of new bridges that carry both a public right of way and a private means of access.</p>
Articles 13 and 14, dDCO – certification Q1.7.3.10 and 1.7.3.11	REP4-057g and REP4-057h	<p>The Applicant's assertion that inserting a certification process in the dDCO and in the legal agreement would be "two measures that would secure the same outcome" misunderstands the Councils' position. The Councils acknowledge that the Applicant would be bound by both the Order and the legal agreement, however, the Councils' amendments to the dDCO</p>

		<p>would ensure that the Order operates in tandem with the more detailed mechanism proposed in the legal agreement to avoid conflict between the terms of the Order and the agreement. In case of a conflict between the two, the Order would take precedence by operation of law. It is therefore key to the Councils that the basis for the Councils' certification of the highways is established in the Order, with the detail to follow in the legal agreement.</p> <p>The Councils also note that, whilst discussions in relation to the legal agreement are ongoing, there remain points at issue between the parties.</p>
<p>Transport Modelling Q1.11.1 (REP1-051)</p>	<p>REP4-057k</p>	<p>a) CCC note the approach taken in relation to Cambourne to Cambridge scheme. CCC is concerned that the omission of the Cambourne to Cambridge scheme might impact the benefits of the proposed scheme.</p> <p>b) CCC acknowledge that there have been a number of meetings and workshops between the Applicant and CCC but the focus of most of these meetings was the strategic modelling which has been deemed to be suitable for the assessment of the strategic impacts of the proposed scheme.</p> <p>The main concern for CCC has been about the opportunity to influence the detailed junction modelling, not the strategic model. CCC asked for sight of the detailed junction models in March 2020 and a second request was made in September 2020. The Applicant confirmed that they would be provided for review, however, the models were only supplied for review after the DCO was submitted in March 2021.</p> <p>CCC were therefore unable to influence the data used in the building of the junction models and the approach taken by the Applicant in the generation of the traffic flows used in the junction models, and this is the root cause of the remaining issues CCC had with the local junction modelling, which could have been avoided had meaningful consultation been undertaken earlier in the process. The comments made by CCC have largely been resisted by the Applicant and their consultants with the response that the modelling undertaken was reasonable and proportionate and the Applicant has resisted undertaking any additional work requested by CCC. Further to a meeting between the Applicant and CCC on 29 November, the Applicant has agreed to undertake additional</p>

		<p>sensitivity tests, although there are still outstanding areas that the Applicant are unwilling to test, such as Great North Road and Cambridge Road in St Neots. The result of the additional information provided is that the count data used in the sensitivity testing is deemed to be suitable. However, there is still additional information needed to enable the full details of the junction modelling to be agreed.</p> <p>c) CCC are concerned that the principal scheme junctions will operate with too much spare capacity. In addition, the results reported in the TA and the sensitivity tests for the scheme junctions focus on the speed of traffic through the junctions and whilst this is one aspect of a junction's performance, it is only one consideration and in fact the volume of traffic is a better indication of the performance of a junction and also informs the form that the junction should take and the number of lanes required. This information is not reported in the TA or the sensitivity test report [REP5-018]. CCC were supplied with the models and supporting information by email at 18:06 on Wednesday 24 November 2021. The revised information indicated that the flows used in the sensitivity test are reasonable and form a reasonable basis for the assessment of the scheme. However, the results present in the sensitivity test report [REP5-018] focus solely on the speeds of traffic which is not the key metric for assessing the operation of a junction. Additional information was requested at the meeting on the 29th November and was received by email at 09:30 on Friday 3 December. More analysis is required of this information and therefore our comments will be provided at D8.</p> <p>CCC require confidence in the traffic flows used in the junction assessments as this is fundamental in enabling the design elements to be confirmed for the junctions included in the sensitivity tests [REP5-018]. The traffic flows have been agreed to be reasonable and are therefore agreed. At the meeting on 29 November 2021 the Applicant agreed to undertake additional sensitivity testing with the results of these tests to be submitted at Deadline 6 or 7. More analysis of this information is required once it has been submitted by the Applicant.</p>
<p>Methodology, inputs and outputs Q1.11.2 (REP1-051)</p>	<p>REP4-0571</p>	<p>CCC have provided detailed comments on the sensitivity tests report [REP5-018] undertaken by the Applicant and submitted at Deadline 5. But it is clear that the sensitivity tests do not include all the junctions for which CCC require greater confidence in the traffic flows used. This confidence is required in order to ensure that the design is adequate to</p>

		<p>enable the smooth operation of the local road network. The Applicant agreed to undertake additional sensitivity testing at the Eltisle Link junction and the Cambourne Junction at the meeting on 29th November 2021 this is due to be submitted at either Deadline 6 and 7. The Applicant also agreed to provide flow checks at the A428/Toseland Road Junction and the Potton Road junction which is due by Deadline 7.</p> <p>CCC do not agree with the position taken by the Applicant in relation to the impact of the scheme on Great North and Cambridge Roads in St Neots as both these roads are shown to experience significant growth in traffic volumes as a direct result of the scheme. CCC need confidence that the upstream junctions on these roads can accommodate the proposed levels of traffic as, without this, it is not possible for us to confirm that they can discharge their duty to ensure smooth operation of the local road network.</p> <p>In addition, if the upstream junctions are shown not to be able to accommodate the predicted levels of traffic this will impact on the level of rerouting away from St Neots Town Centre which could reduce the real benefits of the scheme as traffic continues to use alternative routes rather than rerouting to use the proposed scheme.</p> <p>The Applicant refers to the possibility of monitoring the impacts of the scheme in this area post opening, but the detail of this monitoring is not to be agreed until after the DCO process has been completed. CCC are therefore concerned that areas that need monitoring will not be included and are also concerned about what will be done if the monitoring were to indicate that there were issues as a direct result of the scheme. CCC refers to its submission relating to 'Monitor and Manage' also submitted at Deadline 6.</p> <p>If a monitor and manage approach is to be taken in relation to the impacts of the scheme on any areas including Great North Road and Cambridge Road in St Neots then CCC require an assessment to be undertaken, and the mitigation likely to be required to be agreed as part of the DCO to give confidence that if issues are shown then a solution is ready to be implemented.</p>
<p>Cambridgeshire traffic impacts Q1.11.1.4. (REP1-051)</p>	<p>REP4-057m</p>	<p>a) The flows used in the VISSIM models were not provided in a form that CCC could verify and there was a very real danger that if CCC undertook to redo this work that different assumptions would be made which could result in different results. Further</p>

		<p>information has now been provided on the traffic flows used in the junction modelling. The revised traffic flows are deemed to be reasonable for use in the assessment of the local junctions.</p> <p>b) No further comment on this point.</p> <p>c) The Councils commented on the Girton Technical Note [REP4-040] at Deadline 5 [REP5-020], however the model was not supplied to CCC which means that the revised results could not be agreed. This is due to be submitted by the Applicant at Deadline 6.</p> <p>d) No further comment on this point.</p> <p>e) The impact of the Cambourne to Cambridge scheme on the A428 scheme and vice versa is something that the Applicant should be looking to understand as they are going to be closely related and may impact the benefits of the scheme. It is important to note that the A428 scheme is included in the Cambridge Subregional Model that was used to assess the Cambourne to Cambridge Scheme.</p>
Road Layout Q1.11.2 (REP1-051)	REP4-057n	The Applicant has provided no new information on highway design, and CCC would welcome further discussion on this matter.
De-Trunking Q1.11.5.1	REP4-057p	<p>The DCO as drafted gives the Applicant the ability to set a de-trunking date without any agreement from the LHA, and to de-trunk the road without any agreement over the condition of the existing A428. Even if a separate legal agreement exists setting out the process for the handover of de-trunked assets, if the Applicant determined a date for de-trunking without the LHA's agreement, the highway would be de-trunked as a matter of law, irrespective of what is set out in the agreement.</p> <p>It remains the view of CCC that there needs to be a clear mechanism in the DCO for the de-trunking date to be agreed between the LHA and the Applicant.</p>

Cumulative impacts Q1.7.5	REP4-057r	The impact of the Cambourne to Cambridge scheme on the A428 scheme and vice versa is something that the applicant should be looking to understand, as set out above in response to REP4-057m.
Local Highway impacts Q1.11.10	REP4-057s	The comments made by CCC on the model scope have not been acted on by the Applicant. CCC have provided detailed comments on the sensitivity tests results [REP5-018] separately. The key issue being that there is insufficient information in the Junction Model Sensitivity Test Results Technical Note [REP5-018] submitted at D5 for CCC to form a view on the validity of the results. The models and supporting information were provided to CCC on 24 November 2021, The review of this information indicates that the traffic flows used in the junction models are reasonable, however, the sensitivity test results [REP5-018] only showed speed results for the VISSIM models. Additional information was requested at the meeting on the 29 November 2021 and supplied to CCC on 3 December. CCC are reviewing this information. Please see detailed comments above with reference REP4-057k.
Cultural Heritage Q.1.12.1.1 a)	REP4-057t	The Applicant's response has not accounted for all of the archaeology in Field 73 in this response. The southern part of this field contains the northern extent of newly discovered non designated Medieval remains from the Wintringham Deserted Medieval Village to the south (Historic Environment Record [HER] number MCB1642/01270b), in part overlying the remains of Iron Age and Roman settlement (HER MCB28818), the date for which was established by the trench-based evaluation. Medieval settlement remains from Wintringham DMV also extended into Field 70 but not seen in Field 72, both to the south side of Cambridge Road. Owing to the presence of Medieval DMV settlement remains in the southern half of Field 73, and the presence of a large Iron Age and Roman settlement in the north and centre of the field, mitigation area covers the whole of Field 73. Multi-phased Iron Age and Roman settlement evidence continues east into Field 74, earlier phases being unenclosed. This is the disputed field where the Applicant has defined mitigation area based on obvious areas of later forms of enclosed settlement only (see CCC response to REP4-058n below). As the Regional Research Agenda advises that archaeological investigations should gain an understanding of the earlier, unenclosed forms of prehistoric settlement (REF46 in REP4-031, page 87), it is not clear why the Applicant is not following published professional advice in Field 74. We advise that it is not possible to interpret settlement from an evaluation, merely to provide a high-level indication of

		<p>presence/absence, general character, extent and date (where possible). All of the known remains within Field 74 should be included in the mitigation area, as consistently advised by CCC, to ensure that the research objectives for 'Iron Age' that are set out in Appendix D to REP4-031 (page 192) can be attempted by the archaeological contractor.</p> <p>Decisions should be taken in the field to deselect archaeological features that might not contribute to knowledge gain, as is a typical working procedure in Cambridgeshire, but this is based on suitably selected mitigation areas in the first instance – based on the evaluation results and not historic presumptions of site dynamics.</p>
Cultural Heritage Q.1.12.4.1 e)	REP4-057v	CCC is pleased that the Applicant now agrees to work in line with the Archaeological Brief (Appendix B in REP4-031) and CCC accordingly requests that the Applicant removes the 'Targeted Excavation' approach as a site category in a further amendment to an Updated Archaeological Mitigation Strategy, as this is a method of investigation that can only be applied following an appraisal of a stripped site.
Cultural Heritage Q.1.12.4.2 e)	REP4-057w	CCC reminds the Applicant that all archaeological programmes in Cambridgeshire are led by research objectives (to which we contribute periodic updates) and that this is nothing new. Replacing 'Sampling' with 'Targeted Excavation' is tautologous, however the Applicant's ideology behind the approach has not changed, assuming that no more knowledge can be gained beyond that already gained by the evaluation. With this, and therefore the areas selected for mitigation by a prescribed light touch approach to sites listed for Targeted Excavation, CCC does not agree.
Noise and Vibration Q1.16.1	REP4-057x	The Councils maintain their position in relation to construction hours.
Noise – Monitoring Q1.16.2.5	REP4-057z	The Applicant's reason for not agreeing to undertake short-term operational noise monitoring is because noise barriers have not been proposed. The short-term operational noise monitoring was requested to confirm the accuracy of the noise modelling, not to prove the effectiveness of any noise barrier.
REP4-058: Comments on the Applicant's comments on Local Impact Reports		
Local Impacts REP2-003b	REP4-058a	CCC do not agree with the position taken by the Applicant in relation to the impact of the scheme on Great North Road and Cambridge Roads in St Neots as both these roads are

		<p>shown to experience significant growth in traffic volumes as a direct result of the scheme and CCC need confidence that the upstream junctions on these roads can accommodate the proposed levels of traffic as, without this, it is not possible for CCC to confirm that they can discharge their duty to ensure smooth operation of the local road network.</p> <p>In addition, if the upstream junctions are shown not to be able to accommodate the predicted levels of traffic this will impact on the level of rerouting away from St Neots town centre which would reduce the real benefits of the scheme. Further to a meeting between the Applicant and CCC on 29 November, the Applicant have now agreed to investigate potential mitigation measures at Wyboston roundabout which could mean that the Great North Road arm of the Junction might work better thus negating the need for the assessment of additional junctions. This additional work is due to be submitted by the Applicant by Deadline 8 and CCC will provide comments once it is available.</p> <p>The Applicant refers to the possibility of monitoring the impacts of the scheme in this area post opening, but this is not to be agreed until after the DCO process has been completed. CCC are therefore concerned about what will be done if the monitoring were to indicate that there were issues as a result of the scheme. If this approach is to be followed than CCC require the assessment to be completed and the mitigation likely to be required to be agreed as part of this stage of the process to give confidence that if issues are shown then a solution is ready to be implemented. CCC refers to its submission relating to 'Monitor and Manage' also submitted at Deadline 6.</p>
Toseland REP2-003c Yelling REP2-003d Eltisley REP-003e	REP4-058b REP4-058c REP4-058d	CCC welcome the fact that the Applicant is willing to consider monitoring of the impacts of the scheme in these locations, but CCC require greater details of the monitoring to be undertaken and what mitigation would be put in place if required as part of the DCO rather than waiting until after the DCO. CCC refers to its submission relating to 'Monitor and Manage' also submitted at Deadline 6.
Cambourne REP2-003f	REP4-058e	Detailed comments were provided to this point at D5 [REP5-020] and therefore there are no further comments at this stage.
Dry Drayton REP2-003g	REP4-058f REP4-058g	CCC welcome the fact that the Applicant is willing to consider monitoring of the impacts of the scheme in these locations, but CCC require greater details of the monitoring to be

Madingley REP2-003h Coton REP2-003i	REP4-058h	undertaken and what mitigation would be put in place if required as part of the DCO rather than waiting until after the DCO. CCC refers to its submission relating to 'Monitor and Manage' also submitted at Deadline 6.
Local Junction Impacts REP2-003j and REP2-003k	REP4-058i	Please refer to the Councils' comments on REP4-061as to REP4-061bm.
Construction traffic REP2-003l	REP4-058j	CCC welcome the fact that the Applicant is willing to consider monitoring of the impacts of self-diverting traffic during construction. However, CCC require greater details of the monitoring to be undertaken and what mitigation would be put in place if required as part of the DCO rather than waiting until after the DCO. CCC refers to its submission relating to 'Monitor and Manage' also submitted at Deadline 6.
Cultural Heritage – negative impacts REP2-003z	REP4-058n	CCC remind the Applicant that all work in Cambridgeshire is led by research objectives, to which we contribute information annually and that this is nothing new. Replacing 'Sampling' with 'Targeted Excavation' is tautology, however the ideology behind the approach has not changed, which over-simplifies the archaeological evidence and assumes that nothing more can be gained beyond the evaluation results. With this, and therefore the areas selected for mitigation by a prescribed light touch approach, CCC does not agree.
Ecology – negative impacts during construction	REP4-058p	<p>The Councils welcome the submission of the 2021 ecological survey work, however this has not addressed all of our previous concerns with regards to negative impact of the scheme, and has raised additional concerns.</p> <p>Bats: The Councils are concerned that key bat commuting routes identified within the 2021 survey work (to date) [REP5-010] will be lost to the proposal, resulting in adverse impact to the local bat population due to collisions. The Councils note that the scheme will provide some bat crossings in Cambridgeshire but they are either at locations not currently used as bat crossings and/or could be compromised by other functions (NMU) and are therefore concerned they are not fit for purpose. There is also no evidence how these features will link into the wider landscape.</p> <p>The Councils consider it would be more appropriate to mitigate impact to bats by incorporating bat crossing points at existing bat commuting routes identified within bat</p>

		<p>surveys [APP-192] and [REP5-010], subject to Natural England’s considered view on this subject.</p> <p>Great Crested Newt breeding pond [REP5-013], pond 37, will be lost from Cambridgeshire. No new ponds are proposed for Cambridgeshire and therefore, the scheme does not compensate for the loss of the GCN breeding pond. It is noted that the Protected Road Verge has over-time decreased in botanical quality, due to lack of management. From 2021, the County Council has improved its management of the PRVs by implementing a cut-and-collect regime. This is expected to have a positive impact on the quality of the PRVs, including S8. To help re-establish the wildflower grassland on the PRVs, the Councils seek that the soil structure and seedbank of the PRV are protected during construction works. The Councils require measures to protect the section of PRV within the Order Limit to prevent vehicles / construction activities from encroaching onto the PRV and damaging / destroying the flora to be incorporated into the First Iteration EMP [REP5-010].</p> <p>The impact of light pollution on terrestrial invertebrates has not been addressed. Without further survey work to clarify the impact of lighting on light sensitive species, we cannot determine the level of impact on the local populations and as a precaution, it is considered the scheme will result in an adverse impact.</p> <p>We note that Table 1 clarifies where lighting will be located, however it doesn’t confirm the type of lighting to be used. Some types of lighting (e.g. UV emitting or LEDs) have greater impact on the lifecycle of invertebrates. The Councils require further information about how the lighting scheme will be designed to mitigate impact to invertebrates, including the maximum level of light spill on to habitats and type of lighting that will be used.</p> <p>This issue was raised at SoCG meeting between the Councils and National Highways on 14 September 2021. A way forward, proposed by National Highways, was to set out principles of how lighting will be designed to minimise impact to invertebrates. The Councils seek further discussions on this matter.</p>
Ecology – missed opportunities REP2-003ad	REP4-058p(i)	Biodiversity Net Gain: The Councils disagree. The scheme will result in a net loss in biodiversity value due to the uncompensated losses of high and medium distinctiveness

		<p>habitats and hedgerows. please refer to the Council's response to Issue Specific Hearing 4, Action Point 8 found in our Deadline 6 submission CLA.D6.ISH4.AP8.</p> <p>The applicant has failed to adequately justify these losses [REP3-012] or provide adequate compensation. Which is disappointing given the potential opportunities to off-set compensation within agricultural restoration of temporarily used land, including borrow-pits.</p> <p>The Biodiversity Net Gain metric provides quantitative evidence that should be considered as part of the biodiversity assessment. The ES Biodiversity Chapter [APP-077] assessment, including tables 8-9 and 8-10 should be updated to reflect the findings of the Biodiversity Net Gain metric, page 7 [REP3-013]. Of particular concern:</p> <p>Table 8-9 [APP-077]: Table 8-9 summarises loss of priority habitats. However, it does not include losses of reedbeds and wood-pasture and parkland which are identified as priority habitats (i.e. high distinctive habitats) within [REP3-013].</p> <p>Table 8-10 [APP-077]: Table 8-10 provides a summary of the operational impacts of the scheme. Inconsistencies with the Biodiversity Net Gain (BNG) metric calculations [REP3-013] are listed below:</p> <p>Table 8-10 shows the scheme will have a slight significant benefit to woodlands of low value and but the BNG metric shows net losses in woodland of high value (high distinctiveness), namely lowland mixed deciduous woodland (-98.77 units) and wood-pasture and parkland (-6.65 units).</p> <p>Table 8-10 shows the scheme will have a slight significant benefit to ponds and other wetland habitats of medium value but the BNG metric shows net loss in reedbeds of high value (high distinctiveness, -11.77 units).</p> <p>Table 8-10 shows the scheme will have a slight significant benefit to hedgerows of medium value but the BNG metric shows net loss in hedgerows (-31%).</p> <p>Table 8-10 does not include net losses of mixed scrub, ruderal/ephermal and ditches (medium distinctiveness) shown within the BNG metric.</p>
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		Arable field margins: The Councils refer National Highways to the Councils' comments above in response to [REP5-013]. Insufficient information has been provided to demonstrate there will be no impact to priority habitat arable field margins.
Noise and Vibration REP2-003af	REP4-058q	The Councils understand that the Applicant will consider noise insulation and temporary rehousing of all properties in the vicinity of the construction works at the detailed design stage, which we are in agreement with.
Climate – negative impacts REP2-003am	REP4-058t	With regards to the approach to offsetting, whilst we note that the approach to carbon offset in relation to the strategic road network is still to be defined, the authorities are concerned that as a result it is not possible to provide adequate certainty for testing this element of the proposed scheme's impacts. In addition, elsewhere in the submissions from the Applicant, for example in the Statement of Common Ground [REP5-003], the Applicant has stated that the scheme will not benefit from carbon offsetting. As such, the Councils request clarity from the Applicant as to its position on this matter and greater certainty and commitment from the Applicant with regards to offsetting residual emissions and the monitoring of offsetting, even if it is not yet possible to precisely determine the means by which this offsetting will be undertaken. We note that paragraph 4.18 of the National Policy Statement on National Networks states that where it is not possible at the time of the application for development consent for all aspects of the proposal to have been settled in precise detail, the applicant should explain in its application which elements of the proposals have yet to be finalised and the reasons why this is the case. As this would appear to be the case with regards to mitigating climate impacts and the approach to carbon offsetting, we would ask that the applicant clearly sets out what aspects of the approach to offsetting need to be finalised and how this will be secured as the Scheme progresses beyond the DCO process.
Climate – missed opportunities REP2- 003an	REP4-058u	The authorities note that the DfT's approach to supporting the roll out of ultra-low emissions vehicles is via the creation of a Rapid Charge Fund. We welcome the reference to the Applicant seeking to identify opportunities to create capacity within the electrical supply at both Caxton Gibbet and the Black Cat junction areas to enable the installation of charge points as well as the potential for any charge points installed at the compound at the Back Cat junction to remain after completion of the Scheme.

Pedestrian, Cyclists and Equestrian travellers	REP4-058v	8.7.7: In their response the Applicant states that they “can foresee no reason why rights of way should not be opened soon as possible”. With the A14 scheme, a decision was made during construction by the Applicant to prioritise work teams to work on the mainline A14 and put the PRow & NMU work on hold until after the road was opened. We seek reassurance that the same decision would not be made again.
Minerals and Waste – negative impacts	REP4-058y	See response to REP4-057d above.
Economy – negative impacts	REP4-058z	the Applicant have not changed their position or addressed concerns raised around the access to and from St Neots Station. Modelling suggests AADT increases of 24% and peak hour increases of 200 PCUs on Cambridge Road. If the A428 upgrade is going to underpin strong economic growth as part of the Ox-Cam-Arc development, ease of access to and from St Neots station to the A428 must be accommodated as a pre-requisite. A response to this specific point from the Applicant would be appreciated.
Borrow Pits – Policy Assessment	REP4-058aa	See response to REP4-057d above.
Cultural Heritage	REP4-058ac	CCC maintains its position in relation to this matter.
REP4-060: Comments on the Applicant’s comments on Written Representations		
Traffic Modelling REP1-048a	REP04-60a	The remaining issues from the issues log that are still outstanding are all set out in the latest SoCG.
Traffic Modelling REP1-048b	REP04-60b	The conclusion of the Girton note [REP4-040] was that strategic model contained coding errors and that the Applicant would monitor the Girton Interchange. CCC are happy with this approach, so no further action needed here.
Traffic Modelling REP1-048c	REP04-60c	CCC's conclusion on the Coton Note [REP1-028] was that the strategic model is wrong in this area and therefore CCC require traffic through Coton to be monitored; the details of which should be secured in the DCO from CCC perspective. CCC refers to its submission relating to ‘Monitor and Manage’ also submitted at Deadline 6.
Traffic Modelling REP1-048d	REP04-60d	CCC require a suitably cordoned network with ‘CSV’ files of the select link matrices for the B1040 Select Link Analysis.

Traffic Modelling REP1-048f Traffic Modelling REP1-048g	REP04-60f REP04-60g	<p>CCC do not agree with the position taken by the Applicant in relation to the impact of the scheme on Great North and Cambridge Roads in St Neots as both these roads are shown to experience significant growth in traffic volumes as a direct result of the scheme. CCC need confidence that the upstream junctions on these roads can accommodate the proposed levels of traffic as without this confidence it is not possible for CCC to confirm that they can discharge their duty to ensure smooth operation of the local road network.</p> <p>In addition, if the upstream junctions are shown not to be able to accommodate the predicted levels of traffic this will impact on the level of rerouting away from St Neots town centre which would reduce the real benefits of the scheme.</p>
Traffic Modelling REP1-048h	REP04-60h	<p>The principle of monitoring the performance of Girton Interchange is agreed by CCC but more detail is needed as to what this will include and what will be done if mitigation is found to be necessary. This needs to be secured in the DCO to ensure confidence that significant effects on the local road network will be mitigated. CCC refers to its submission relating to 'Monitor and Manage' also submitted at Deadline 6.</p>
Traffic Modelling REP1-048i	REP04-60i	<p>CCC welcome the fact that the Applicant is willing to consider monitoring of the impacts of the scheme through Coton, but CCC require greater details of the monitoring to be undertaken and what mitigation would be put in place if required at this stage rather than waiting till after the DCO. This needs to be secured in the DCO to ensure confidence that significant effects on the local road network will be mitigated. CCC refers to its submission relating to 'Monitor and Manage' also submitted at Deadline 6.</p>
Traffic Modelling REP1-048j	REP04-60j	<p>CCC require a suitably cordoned network with 'CSV' files of the select link matrices to examine the routing of traffic using the proposed new road and the A1198 south of A428.</p>
Traffic Modelling REP1-048k	REP04-60k	<p>The principle of monitoring traffic flows through Dry Drayton is agreed by CCC but more detail is needed as to what this will include and what will be done if mitigation is found to be necessary. This needs to be secured in the DCO to ensure confidence that significant effects on the local road network will be mitigated. CCC refers to its submission relating to 'Monitor and Manage' also submitted at Deadline 6.</p>

Traffic Modelling REP1-048l	REP04-60l	The principle of monitoring traffic flows through Madingley is agreed by CCC but more detail is needed as to what this will include and what will be done if mitigation is found to be necessary. This needs to be secured in the DCO to ensure confidence that significant effects on the local road network will be mitigated. CCC refers to its submission relating to 'Monitor and Manage' also submitted at Deadline 6.
Traffic Modelling REP1-048m	REP04-60m	The approach used by the applicant is roughly in line with the alternative method suggested by CCC as being acceptable. CCC have reviewed the traffic flows used in the sensitivity tests and are broadly content with the flows used.
Traffic Modelling REP1-048n	REP04-60n	<p>The issue for CCC in relation to the Cambourne junction was the use of traffic flows directly from the Strategic model which does not give CCC confidence in the performance of this junction as a result of the scheme.</p> <p>It is clear that this junction has not been included in the sensitivity testing undertaken by the applicant and therefore, CCC still have reservations relating to the impact of the scheme at this junction. Following a meeting between the Applicant and CCC on 29 November, the Applicant has agreed to undertake a sensitivity test at this junction using the developer's revised flows for 2040. This will be submitted at Deadline 7.</p>
Traffic Modelling REP1-048o	REP04-60o	The Madingley Mulch junction is a key junction on the local road network and without additional assessment CCC are not in a position to comment on the performance of this junction. CCC would appreciate early sight of the revised M11 J13 model which the Applicant have indicated will be provided by Deadline 6.
Traffic Modelling REP1-048p	REP04-60p	The Wyboston junction is included in the sensitivity tests report [REP5-018] that have been undertaken and comments are provided on this document separately below, in the table '9.68 Junction Model Sensitivity Test Results'.
Traffic Modelling REP1-048q Traffic Modelling REP1-048r	REP04-60q REP04-60r REP04-60s	The Vissim model assumptions for the key scheme junctions have been amended in the junction model sensitivity tests and comments are provided on this document [REP5-018] separately below, in the table '9.68 Junction Model Sensitivity Test Results'.

Traffic Modelling REP1-048s		
Traffic Modelling REP1-048t	REP04-60t	The sensitivity tests have been undertaken but there was no discussion with CCC and so it was not possible to agree the input changes made to the models. Comments are provided on this document [REP5-018] separately below, in the table '9.68 Junction Model Sensitivity Test Results'. The flows used in the sensitivity tests have been deemed to be suitable for use in the junction models.
Traffic Modelling REP1-048u	REP04-60u	OCTMP has been updated.
Traffic Modelling REP1-048v Traffic Modelling REP1-048w Traffic Modelling REP1-048x	REP04-60v REP04-60w REP04-60x	CCC welcome the fact that the Applicant is willing to consider monitoring of the impacts of self-diverting traffic during construction. However, CCC require greater details of the monitoring to be undertaken and what mitigation would be put in place if required as part of the DCO rather than waiting until after the DCO is agreed. CCC refers to its submission relating to 'Monitor and Manage' also submitted at Deadline 6.
Highway assets REP1-048z	REP4-060y	Please refer to the Councils' comments against REP4-057g and REP4-057h above, relating to Articles 13 and 14, dDCO – certification, Q1.7.3.10 and 1.7.3.11.
Limits of deviation – REP1-048aa	REP4-060z	Further discussions have taken place with the Applicant on this matter. CCC may be content to proceed without specific limits of deviation drawn for each public right of way if the legal agreement contains the requirement for any deviation to the alignment shown on the Streets, Rights of Way and Access Plans [APP-013] to be approved by CCC prior to detailed design taking place. We understand that this approach is acceptable in principle to the Applicant.
Highway maintenance liability – REP1048ab	REP4-060aa	Article 13(3) of the dDCO does not provide the clarity requested by CCC, that shared public rights of way and private means of access will be maintained by the private party benefiting from the access. CCC welcomes the Applicant's intention to amend Article 13(9) and will comment further on the proposed drafting following submission of the updated dDCO at Deadline 6.

Highway boundaries – REP1-048ac	REP4-060ab	CCC wishes to clarify its comments in that CCC’s proposed amendments to Article 13 [REP3-039] that the extent of the highway boundary is included in any request for certification of local highways would address CCC’s concerns in relation to the extent of the publicly maintained local highways being ascertainable by the public and provide the necessary legal event. This would avoid the need for the extent of the local highways to be specified on the order plans.
Landscaping – REP1-048ac	REP4-060ac	CCC welcomes the Applicant’s amendment to the dDCO at Schedule 2 item 6.
NMU and PRoW – REP1-048az	REP4-060av and REP4-060aw	The Councils continue to be of the view that there are missed opportunities with regards to NMUs and that greater provision for NMUs should be provided by the Applicant as part of the Scheme. The Councils refer to the high-level feasibility analysis carried out following Issue Specific Hearing 5 and submitted at Deadline 6.
NMU and PRoW – REP1-048bb	REP4-060ax	<p>6.5.7 b): The response that the verges on the bridge “should be sufficiently wide to accommodate a future NMU facility” does not provide adequate reassurance that this will be the case. The Councils still consider that it is reasonable to require the Applicant to provide all-inclusive NMU provision on all bridge crossings. The Councils note that the Applicant stated at ISH5 that it has agreed to provide equestrian parapets on the Roxton Road bridge crossing, and requests again that the same is provided on the Potton Road and Toseland bridge crossings, as requested in the Councils Joint Written Representations [REP1-048].</p> <p>6.5.7 k): The Councils look forward to receiving confirmation that the section of footway highlighted will be upgraded to a shared use footway/cycleway.</p> <p>6.5.8: Designated Funds were provided for the design and construction of a cycle route from Papworth Everard to Caxton Gibbet (tying in with the Applicant’s works on the Caxton Gibbet north roundabout). The section from Brockley Road to Cambourne was not included in the designated funds allocation.</p>

Biodiversity - Underpass design - NMU & bats	REP4-060ay	6.6.1 Reference is made to the Councils' comments on the Scheme Design Approach and Design Principles [REP3-014] submitted at Deadline 6 in document CLA.D6.ISH5.AP15 in relation to dual functionality of underpass design.
Ecology REP1-048be	REP4-060az	The Councils are concerned about the impact to Great Crested Newt, Protected Road Verge S8, arable field margins, bats and terrestrial invertebrates. Please refer to The Councils response to REP4-058p.
Ecology REP1-048bf	REP4-060ba	<p>The Applicant's response hasn't addressed the Councils previous comments. The Applicant has failed to justify losses to high and medium distinctiveness habitats [REP3-012], which should have been compensated in accordance with the technical guidance for both the Defra Biodiversity Off-setting Metric 2012 (upon which the Highways England metric [APP-206] is based) and the more recent Defra Biodiversity Metric 2.0 (used in [REP3-013]).</p> <p>Please refer to the Council's response to Issue Specific Hearing 4, Action Point 8 submitted at Deadline 6, in document CLA.D6.ISH4.AP8.</p> <p>The loss of hedgerows can only be assessed against the evidence provided as part of the application submission. If the Biodiversity Net Gain assessment is out-of-date, and doesn't reflect the latest design/ hedgerow retention, the Councils suggest it is updated with a more accurate representation of hedgerow losses / gains.</p>
Ecology REP1-048bh and Rep1-048bi	REP4-060bc	<p>The First Iteration EMP [APP-234] does not refer to the protection of the Protected Road Verge S8 to prevent damage / degradation during construction works (e.g. vehicle damage to soil structure). Please see response to REP4-058p above.</p> <p>The Councils reiterate their request for the Applicant to submit evidence of the Protected Road Verge survey undertaken by Wildlife Trust 2019 referenced within their response.</p>
Noise REP1-048bv	REP4-060bg	<p>Working hours: CCC maintains its position in relation to working hours.</p> <p>Commitment to continuous noise monitoring (during construction): The Councils agree that the complaints procedure should be developed at the detailed design stage.</p>

		<p>Noise limits at receptors during construction: Agreed.</p> <p>Noise monitoring once scheme is operational: See the response to REP4-057z above.</p> <p>Local construction management plans: Agreed.</p> <p>Commitment to providing off-site Noise barriers: See the response to REP4-057y above.</p>
Cultural Heritage REP1-048cf	REP4-060bj	<p>Although discussed at length, very little change was made in the meetings and communications following the presentation of site areas to the County Archaeologists. We would encourage the Applicant to take a more positive view of the contribution County Archaeologists are able to make when designing mitigation schemes, as we have significant experience of archaeological resource of our areas.</p>
Cultural Heritage REP1-048cf	REP4-060bk	<p>We agree with the importance of physical field evaluation as a tool, just not with the Applicant's interpretation of the results in some areas and have previously set out our reasons for this in submissions such as REP5-020 (table 9.55), REP4-059 (Q2.12.4.1b), REP3-041 (Cultural Heritage section, pages 6-8), REP2-003 (paragraph 6.2.10) and REP1-048 (section 12.2).</p>
Minerals and Waste REP1-048cn and REP1-048cp	REP04-060bp REP04-060bq	<p>See response to REP4-057d above.</p>
Climate Change REP1- 048cz	REP4-060by	<p>The authorities note that the DfT's approach to supporting the roll out of ultra-low emissions vehicles is via the creation of a Rapid Charge Fund. We welcome the reference to the Applicant seeking to identify opportunities to create capacity within the electrical supply at both Caxton Gibbet and the Black Cat junction areas to enable the installation of charge points as well as the potential for any charge points installed at the compound at the Back Cat junction to remain after completion of the Scheme.</p> <p>With regards to the offsetting of emissions, while we note that the approach to carbon offset in relation to the strategic road network is still to be defined, the authorities are concerned</p>

		that as a result it is not possible to provide adequate certainty for testing this element of the proposed scheme's impacts. In addition, elsewhere in the submissions from the Applicant, for example in the Statement of Common Ground [REP5-003], the Applicant has stated that the scheme will not benefit from carbon offsetting. As such, the Councils request clarity from the Applicant on this point and require greater certainty and commitment from the applicant with regards to offsetting residual emissions, even if it is not yet possible to precisely determine the means by which this offsetting will be undertaken.
REP4-061: Comments on the Applicant's D3 submissions		
Sensitivity testing of strategic traffic model flows in junction models	REP04-061ae	This is addressed in response to REP4-61az-bm below.
Joint position statement on modelling methodology	REP04-061af	This is addressed in response to REP4-61az-bm below.
Non-motorised users	REP4-061al	Regarding the A1198 crossing, South of the Southern Roundabout to enable NMUs to cross safely to access services, CCC welcomes the Applicant's consideration of a provision of a signalised crossing at this location and awaits their conclusions.
Limits of Deviation	REP4-061an	Further discussions have taken place with the Applicant on this matter. CCC may be content to proceed without specific limits of deviation drawn for each public right of way if the legal agreement contains the requirement for any deviation to the alignment shown on the Streets, Rights of Way and Access Plans [APP-013] to be approved by CCC prior to detailed design taking place. We understand that this approach is acceptable in principle to the Applicant.
Handover of Highways	REP4-061ao	CCC maintains its position, as most recently articulated in document REP5-020.
Impact on Dry Drayton and Madingley	REP4-061as to REP4-061ay	The only difference between the Do Minimum and the Do Something is the introduction of the scheme. The Note on the impact on Dry Drayton and Madingley [REP3-028] indicates that the model coding through Dry Drayton and Madingley was incorrect. The Councils require the impact of the scheme through Dry Drayton and Madingley to be monitored as most of the suggested scheme impact is likely to be due to the errors in the model coding meaning that the roads through Dry Drayton and Madingley are more attractive in the

		model than they would be in real life. The monitoring requested aims to show that the scheme does not have a significant impact in these settlements despite what the modelling indicates.
Scope of Junction Modelling Sensitivity Test	REP4-061az	In the review of the Scope of Junction Modelling Sensitivity Test [REP3-029] CCC set out the rationale for the requirement for all junctions to be tested using the revised Traffic flows. The Applicant has unilaterally decided that this was not necessary and as such CCC do not have sufficient information to form a view on the impact of the proposed scheme on the local road network or the suitability of the proposed DCO design. At the meeting on 29 November 2021 the Applicant undertook to provide additional information on the remaining junctions that CCC are seeking information for. These are due to be submitted at Deadline 6 and 7. This information will be reviewed in due course when available.
Modelling of additional junctions in St Neots Table 3-1 Row 1	REP04-061ba	<p>CCC do not agree with the position taken by the Applicant in relation to the impact of the scheme on Great North and Cambridge Roads in St Neots as both these roads are shown to experience significant growth in traffic volumes as a direct result of the scheme, and CCC need confidence that the upstream junctions on these roads can accommodate the proposed levels of additional traffic. Without this, it is not possible for CCC to confirm that they can discharge their duty to ensure smooth operation of the local road network. In addition, if the upstream junctions are shown not to be able to accommodate the predicted levels of traffic, this will impact on the level of rerouting away from St Neots town centre which would reduce the real benefits of the scheme.</p> <p>CCC welcome the fact that the Applicant is willing to consider monitoring of the impacts of the scheme on Great North Road and Cambridge Road in St Neots, but CCC require greater details of the monitoring to be undertaken and what mitigation would be put in place if required at this stage rather than waiting until after the DCO is agreed. This needs to be secured in the DCO to ensure confidence that significant effects on the local road network will be mitigated. CCC refers to its submission relating to 'Monitor and Manage' also submitted at Deadline 6.</p> <p>the Applicant has agreed to look at possible mitigation at Wyboston junction. It is possible that this will remove the issues indicated on Great North Road. This information will be reviewed once it has been submitted (most likely at Deadline 7).</p>

Flows to be used in the sensitivity test of Key Scheme Junctions Table 3-2 Row 1	REP04-061bb	CCC asked to be included in the discussion of the flows to be used in the sensitivity tests. This did not happen, and the Applicant unilaterally devised the flows. The Note setting out the results of the sensitivity tests [REP5-018] does not include the information to enable the results to be agreed. Additional information was provided to CCC by email at 18:06 on 24 November 2021. A detailed response to the sensitivity tests is provided separately below, for REP5-018 .
Vissim Parameters Table 3-2 Row 1	REP04-061bc	CCC has provided a detailed response to this point in the review of the Junction Model Sensitivity Test Results Technical Note [REP5-018] below.
A428/Toseland Road/Abbotsley junction Table 3-2 Row 2	REP04-061be	CCC do not agree with the decision to exclude this junction from the sensitivity testing. Without this information CCC does not have sufficient information to form a view on the operation of this junction in the with scheme scenario. Further to a meeting with CCC on 29 November, the Applicant has agreed to conduct a sensitivity test on this junction using 2040 flows derived using observed flows. This is due to be submitted by Deadline 7.
Potton Road/B1046 Junction Table 3-2 Row 4	REP04-061bf	CCC do not agree with the decision to exclude this junction from the sensitivity testing. The flows indicated by the Strategic traffic model do not accurately reflect the observed flows at this location and impacts the proposed design at this junction. Without this information CCC does not have sufficient information to form a view on the operation of this junction in the with scheme scenario. Further to a meeting with CCC on 29 November, the Applicant has agreed to conduct a sensitivity test on this junction using 2040 flows derived using observed flows. This is due to be submitted by Deadline 7.
Eltisley Link Junction Table 3-2 Row 5	REP04-061bg	This is a completely new junction configuration that is situated directly on the scheme and CCC need to be sure that size and form of the junction proposed is suitable for the level of traffic projected to be using it in the future. Given that this junction is directly on the scheme and fundamentally changes as a direct result of the scheme it is disappointing that this junction was excluded from the sensitivity testing presented in the Junction Model Sensitivity Test Results Technical Note [REP5-018]. Further to a meeting with CCC on 29 November, the Applicant has agreed to conduct a sensitivity test on this junction using 2040 flows derived using observed flows. We understand this is due to be submitted by the Applicant at Deadline 8.

Cambourne Junction Table 3-2 Row 6	REP04-061bh	CCC does not agree with the decision to exclude this junction from the sensitivity testing. Without this information CCC does not have sufficient information to form a view on the operation of this junction in the with scheme scenario. Further to a meeting with CCC on 29 November, the Applicant has agreed to conduct a sensitivity test on this junction using 2040 flows derived from the Cambourne development Transport Assessment. This is due to be submitted by Deadline 7.
Scotland Road, Hardwick Junction Table 3-2 Row 7	REP04-061bi	At the meeting on 29 November CCC agreed to forego any further testing at this junction as the impacts are likely to be marginal.
Madingley Mulch Junction Table 3-2 Row 8	REP04-061bj	The revised VISSIM model results are not included in the sensitivity testing and therefore CCC are not in a position to form a view on the revised modelling of this junction. Outputs from the revised M11 Junction 13 model (which now includes the Madingley Mulch junction) is due to be submitted at Deadline 6. The Applicant confirmed that they will try to share this with CCC in advance of Deadline 6.
Wyboston Roundabout Table 3-2 Row 9	REP04-061bk	CCC has provided a detailed response to this point in the review of the Junction Model Sensitivity Test Results Technical Note [REP5-018] below.
A428 Barford Road Roundabout Table 3-2 Row 10	REP04-061bl	CCC has provided a detailed response to this point in the review of the Junction Model Sensitivity Test Results Technical Note [REP5-018] below.
M11 J13 and Buckden Roundabout Table 3-2 Row 11	REP04-061bm	With regards to M11 J13, the Applicant states that the results of the extended VISSIM model will be shared with CCC in advance of Deadline 6.

9.65 Applicant's comments on other parties' responses to second round of written questions [REP5-015]

Topic	Paragraph Number	Councils' Comment
Biodiversity - Adequacy of mitigation measures	Q2.3.5.1. c)	Bats: Further information is required to understand the relationship between the proposed bat crossing points, the existing flight paths and the connections to the wider landscape / any guide planting. The Councils await further submissions by the Applicant at Deadline 6 on this subject before commenting further.

		<p>The requirement for the Councils to be involved with bat mitigation discussions, along with Natural England, will help further understand whether or not the designs are appropriate. Please refer to the Councils' annotated Design Principles document, submitted at D6 as CLA.D6.ISH5.AP15, which has identified specific issues for multi-functional underpass structures (NMU and bat / mammal requirements) in Appendix C. However, until survey work / assessment has been completed, the Councils will not know whether or not additional mitigation (e.g. crossing structures) are required.</p> <p>The Councils are concerned that the Environmental Master Plan [REP4-047] identifies a number of crossings as "<i>EP3.1 Protected Species Bat, badger and other mammals crossing</i>", however, the response to question Q2.3.5.1.c suggests that some these structures have not been designed for bats and some are unsuitable. The Councils request an update of the Environmental Master Plan [APP4-047] to better reflect what these 'mammal crossings' will be / will not be designed for.</p> <p>The Councils are also concerned that existing bat crossing points identified in the bat survey work have not been included within the A428 scheme. Currently, there is only one crossing point on an existing bat flight line (Hen Brook) and none at locations supporting moderate bat activity, or low bat activity, see our response above to [REP5-010]. This seems very concerning given the highly fragmented landscape within Cambridgeshire, where commuting routes with even moderate / low activity would be considered important. The Councils hope these points can be discussed further and addressed through bat mitigation discussions with the Applicant and Natural England.</p>
Biodiversity - Aquatic habitats	Q2.3.6.1. c)	We await the submission of further information at Deadline 7 to address concerns relating to Pond 83.
Borrow Pits	Q2.6.2.1	The Applicant's responses are noted. In respect of Policy 7 and Policy 19, Councils and the Applicant appear to be of differing views. The Councils proposes to pursue this through the Statement of Common Ground. The Councils notes that the Applicant, as stated in ISH5, intend to submit additional material in respect of the borrow pits and the EMP at Deadline 6. The Councils will therefore reserve further comment until that documentation is available for review.

		<p>The Councils believe that the Applicant may have misinterpreted paragraph 1 of Policy 19 in relation to the requirement to secure a restoration and aftercare scheme, if necessary, by legal agreement. This is normally used to secure restoration and aftercare in instances where it is not possible to do so using planning conditions. This is often in relation to longer term aftercare, or where there are phased schemes or involves land outside the planning permission area. Assuming that the borrow pit is restored as according to the landowners' wishes, i.e. agriculture, we will leave it to their judgement as to the legal agreements to which they wish to have with the Applicant to ensure the land is returned to them in a satisfactory state, in a timely manner. The Councils' position is that a requirement securing borrow pit restoration is necessary to ensure that borrow pits are adequately restored from a public interest perspective, as well as any agreement with landowners to ensure that the restored borrow pits meet the landowner's needs.</p> <p>This comment has also been made above for '9.64 Applicant's Comments on submissions made at Deadline 4 [REP5-014]', and should be read in the context of other comments made by the Councils with regards to biodiversity, elsewhere in this document. Relevant previous submissions include: Written Representations [REP1-048] Section 13; Local Impact Report [REP2-003] Table 10, paragraphs 8.9.3-4 and Appendix A; REP4-057 Q1.6.2.1; and REP4-060 Minerals and Waste REP1-048cn.</p>
Borrow pits Construction compounds	Q2.6.2.2	Agreed that details of the noise and dust mitigation measures should be contained within the second iteration Environmental Management Plan.
Discharging requirements and conditions	Q2.7.1.1	In relation to the comments on Article 9(2), further discussions have taken place between the Councils and the Applicant. The Councils would be content for the approval of the alignment of local highways to be secured through the legal agreement and understand that this is acceptable to the Applicant in principle.
Requirement 19 – Construction Hours	Q2.7.5.2	CCC maintains its position and requests detailed discussions with the Applicant on this matter.
Methodology, inputs and outputs	Q2.11.1.1	The Applicant states <i>"In respect of the Eltisley Link junctions, the Applicant does not propose to re-visit the junction capacity modelling for the reasons set out in document 9.44 Scope of Junction Model Sensitivity Test [REP3-029]. In summary, this is because the</i>

		<p><i>junction layout changes fundamentally: the future layout does not resemble the existing layout; the pattern of traffic flows at this junction will be fundamentally different with the Scheme because of the removal of through traffic from the existing A428; and that this junction is predicted to operate well within capacity in 2040 with the Scheme in place (max RFC=0.33). Please refer to the Transport Assessment [APP-241] Table 6-9 for more detail. This junction could therefore in principle carry more than double the amount of traffic assigned to it in the Model before reaching its capacity. There is therefore no reason for further modelling, to confirm the adequacy of the layout proposed at this junction in the Scheme.”</i></p> <p>From this it is possible to see that based on the traffic flows predicted the junction is significantly larger than it needs to be. It is for this reason than CCC require the model to be reassessed using revised traffic flows. Further to a meeting with CCC on 29 November, the Applicant has agreed to conduct a sensitivity test on this junction using 2040 flows derived using observed flows.</p>
Road design and layout	Q2.11.2.1	<p>Cambridgeshire CC agree with BBC that the issue of highway design standard is dependent on context, and acceptance of a lower design standard for BBC’s local roads does not imply acceptance of the principle in other LHAs or on other schemes.</p> <p>Cambridgeshire CC have responded separately below to the Applicant’s comments in REP5-017 on our previous submission REP4-056.</p>
Detrunking Proposals	Q2.11.5.1	<p>The Authority notes that the Applicant states that sufficient information regarding the condition of the assets to be handed over will be provided. However, the Authority has received very little information to date and does not understand why such information cannot be provided at this juncture.</p> <p>Article 14(8) of the dDCO remains to be satisfactorily amended to require the Applicant to agree the date of de-trunking with the LHA.</p>
Highway Condition	Q2.11.7.4	<p>The Applicant appears to accept that diverted and construction traffic will cause damage to the local road network. Given this acceptance, CCC considers that subsection 3 of Section</p>

		59 of the Highways Act is applicable and CCC wishes to agree a sum by way of compensation for this damage.
Borrow pits	Q2.16.1.1	Agreed that noise mitigation will be assessed at the detailed design stage, i.e. the Second Iteration EMP where the Applicant will use the “Best Practical Means” (BPM) to reduce noise which may include temporary noise barriers/screens.

9.66 Outline Travel Plan [REP5-016]

Topic	Paragraph Number	Councils' Comment
Incentives	3.1.1	National Highways should provide incentives for those staff who use a sustainable travel mode, or disincentivise staff from using a private car. In addition to the measures proposed, this could be done by charging for car parking, offering priority parking for car sharers, offering free bus taster tickets, or holding ‘bike doctor’ sessions.
Walking	3.2.1	It may be appropriate for a shuttle service to collect and drop off local staff who live within a 2-5 mile radius from the main sites.
Cycling	3.3.1 a.	Drying rooms also to be considered for staff that cycle.
Public transport	3.4.1	The Councils welcome the Applicant’s consideration of a shuttle service that collects and drops off staff from St Neots train station to the Main Compound and Western Compound, based on the shift work timings. This would encourage staff to use the train, allowing them to catch the shuttle to the main sites.
Electric/hybrid vehicles	3.6.1. a.	This point is not considered to provide sufficient clarity at present. The phrase ‘where possible’ needs to be expanded on, and details of how many charging points will be available at Wintringham (main site) and the Western Compound should be provided. These sites have 600 and 400 spaces respectively, and so a commitment to a certain proportion of EV charging points should be given.
Appointment of a Travel Plan Champion/Coordinator	4.2.1	The Travel Plan Champion should be a dedicated post to promote greener travel for staff working over the three sites. The Councils would recommend that each site has a Welcome Pack, which will highlight all the sustainable travel options available to staff. Individuals are

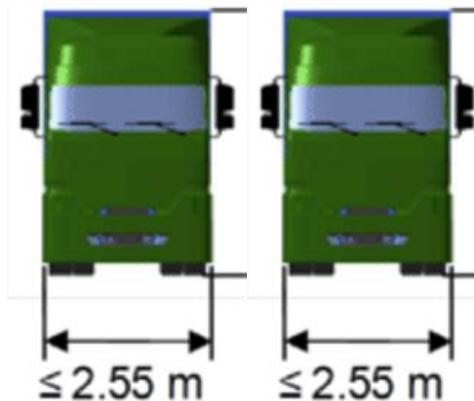
		much more open to changing behaviours when starting a new job or moving location so it is crucial that interventions are put in place in the early stages, and therefore this role should be resourced appropriately.
Staff consultation	4.3.1	The site induction should extend to regular 'toolbox' talks to disseminate information to staff to make them aware of the public transport routes.
Staff consultation	4.3.2	National Highways should make personal travel planning available to staff. This is one-to-one tailored advice offered to an individual to show their available travel options when travelling from home to work. It would be the responsibility of the Travel Plan Coordinator (TPC) to offer this as a service to staff and highlight all options available to each employee. This is the prime opportunity to demonstrate and encourage sign-up to the internal car-sharing platform, and show employees potential car sharing matches.
Example Construction Workers Travel Plan		The Councils would encourage the Applicant to seek best practice examples from other schemes to ensure the Travel Plan is well-considered, and would point to the Silvertown Tunnel Construction Workers Travel Plan (Appendix B, Construction Traffic Management Plan ¹) as a suitable example.

9.67 Applicant's comments on Cambridgeshire County Council's response to WQ2.11.2.1 [REP5-017]

Topic	Paragraph Number	Councils' Comment
Highway design Standards		<p>The Applicant has not responded to the main point made in CCCs answer to WQ2.11.2.1 contained in REP4-056.</p> <p>As stated at paragraph 3.4 of REP4-056, <i>Prudent selection and consistent application of an appropriate design speed to the new section of road will help to ensure 'route continuity' with the existing road.</i></p> <p>The Applicant has selected <u>100km/h</u> as the design speed for B1040, Potton Road and Toseland Road and has proposed horizontal alignment, vertical alignment and superelevation consistent with that speed.</p>

¹ [REDACTED]

However, when it comes to cross section, it appears that the Applicant seems unwilling to propose a cross section commensurate with 100km/h (62.5 mph). The Applicant proposes a 3.0m lane width, which is not suitable on roads where HGVs or buses are likely to encounter each other at oncoming speeds up to 80km/h legally, when the clearance between opposing vehicles' mirrors and between tyre and road edge is likely to be 200mm or less.



At 3.42 the Applicant asserts that '*design speed does not determine the carriageway width*'. CCC point out the converse is true: that it is the carriageway width along with the range of factors involved in calculating the alignment and layout constraints (as previously set out in **REP4-056**) that determines an appropriate design speed. CCC can confirm that a 3.0m lane width would be acceptable to them on a 50 or 60 km/h design speed road, but not at 100km/h.

The Applicant repeatedly talks of the need to decrease vehicle speeds, with no reason given as to why vehicle speeds commensurate with the design speed should not be considered acceptable without the need for further intervention. The Applicant does not mention what average speeds it would expect if 7.3m wide carriageway was constructed, nor what difference reducing that to 6.0m is expected to make. At 3.46 a 7mph reduction due to narrowing is mentioned, but no reason as to why that is necessary or desirable.

		<p>A driver travelling on a road designed for 100km/h, but stuck behind a slow-moving vehicle such as a tractor, might still attempt to overtake on a 6.0m road which would be a riskier manoeuvre than on a 7.3m road.</p> <p>6.0m wide roads are likely to suffer early deterioration of the carriageway edge. This can itself lead to settlement, pavement failure ('potholes'), standing water on the road and further loss of effective carriageway width or loss of traction. This can only serve to make the road less safe.</p> <p>It is therefore impossible to conclude that a road properly designed for 100km/h in all respects apart from its 6.0m width, is intrinsically safer than the same road built a little wider. That is far too simplistic.</p> <p>A road which has had an appropriate design speed selected, and then has each of the elements of that road designed to accord with that speed, is likely to have a better safety record.</p> <p>To respond to the point made by the Applicant at 3.26, we would agree that application of DMRB standards to the non-trunk road network needs to consider the character and classification of the road. This can be achieved by selecting an appropriate design speed as previously set out, from which appropriate alignment and layout constraints are fixed. Alongside this, Departures from Standards can be proposed by the Designer to suit local characteristics. It should be noted that the Departure process is part of the DMRB, and if acceptable to the relevant Highway Authority, then the design can be considered to be compliant with DMRB. To date, the only departures submitted are for 6.0m wide carriageways which are not acceptable to Cambridgeshire County Council, for all the reasons stated previously.</p> <p>We agree with the point at 3.28 and later at 3.6.5; that the Designer needs to adhere to its obligations under CDM and assess holistically its proposals. It is for the Designer to persuade the Highway Authority (not the other way round) that the proposals are the safest</p>
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		<p>and most appropriate outcome in order to accept any Departure. Cambridgeshire CC are not convinced 6.0m is the safest dimension.</p> <p>Discussions are ongoing with The Applicant on this matter.</p>
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9.68 Junction Model Sensitivity Test Results [REP5-018]

Topic	Paragraph Number	Councils' Comment
Scope of sensitivity testing	3.1.1	CCC welcome the further sensitivity testing at the five locations within their county but note that the Applicant unilaterally decided which junctions to assess with no liaison with LAs. CCC require the testing of all the junctions included in the TA [APP-241 and APP-242] and TAA [APP-243]. At the meeting on 29 November 2021, the Applicant agreed to undertake a number of additional tests. These assessments are due to be submitted at either Deadline 6 or Deadline 7. These assessments will be reviewed once available.
Changes made to the scheme junctions models tested	3.1.2.a.	<ul style="list-style-type: none"> i. Use of National Highways guidance for the standstill distance in the Vissim models is welcomed and agreed. ii. The splitting of HGV's into two classes is welcomed. Details of the methodology used in undertaking this exercise is being reviewed as part of the VISSIM model review that is being undertaken. iii. CCC welcome the use of 10 random speeds. However, it is important to note that it is not just confidence in average speed that is required by CCC, it is confidence in all results forecast by the model. iv. The use of observed flows to determine the peak hours is welcomed by CCC. v. The development of base year matrices for all vehicle types for existing movements is welcomed. vi. The use of absolute flow changes from the Saturn model appears reasonable. The Councils are currently reviewing the detailed information supplied to CCC on 24 November 2021.

		<p>vii. The Applicant converted these flows to vehicles and factored them to the peak hours as in the original TA, which is agreed.</p> <p>viii. The use of the Saturn model to inform the proportion of trips on the new or existing roads is agreed.</p>
Changes made to the local junctions tested	3.1.2.b.	<p>i. The use of pre-Covid observed data is agreed.</p> <p>ii. Identification of AM and PM peak hours using surveyed data is agreed, following review of the additional information supplied to CCC on 24 November 2021.</p> <p>iii. The flow matrices are agreed, following review of the additional information noted above.</p> <p>iv. The use of Arcady is agreed.</p> <p>v. The comparison with pre-Covid queue data is welcomed but as with the scheme junctions there is more to the assessment of a junction's performance than just queues.</p> <p>vi. There is more to validation of the models that just queue lengths. This will be assessed from the additional information.</p> <p>vii. Another method is to increase the demand. Observed traffic flows will always get through a junction by definition. If there is a bigger queue when observed flows are modelled, it could be that there is more demand at the junction than can pass through. Hence demand flows could be calibrated to generate known queue lengths.</p> <p>viii. This was done on vehicle flows factored to the peak hours rather than direct output PCU flows from SATURN, which is agreed.</p> <p>ix. The method used to derive DS flow matrices is agreed.</p>

Outcomes of sensitivity test Black Cat junction	4.2.1	CCC had previously stated that average speed plots alone were not acceptable measures of junction performance. Traffic flows and queue lengths are also required. Additional information setting out the flows and Queue lengths was supplied to CCC by email at 09:30h on 3 December 2021. CCC are reviewing this information as part of the VISSIM review.
Outcomes of sensitivity test Cambridge Road junction	4.3.1	CCC had previously stated that average speed plots alone were not acceptable measures of junction performance. Traffic flows and queue lengths are also required. Additional information setting out the flows and Queue lengths was supplied to CCC on 3 December 2021. CCC is reviewing this information.
Outcomes of sensitivity test Cambridge Road junction	Figure 4.7	Speed on the de-trunked A428 in PM peak looks very slow, indicating extensive queuing. Additional information setting out the flows and Queue lengths was supplied to CCC on 3 December 2021. CCC is reviewing this information.
Outcomes of sensitivity test Caxton Gibbet junction	4.4.1	CCC had previously stated that average speed plots alone were not acceptable measures of junction performance. Traffic flows and queue lengths are also required. Additional information setting out the flows and Queue lengths was supplied to CCC on 3 December 2021. CCC is reviewing this information.
Outcomes of sensitivity test - Wyboston junction	4.5.1	<p>CCC have checked the input flows and geometric inputs. The flows are produced in accordance with the method CCC suggested and 2016 base year model has been run. This shows that the junction is operating reasonably close to what CCC would expect, therefore CCC can confirm that they are happy with forecasting to be based on this model.</p> <p>Forecast flows are acceptable, so CCC are reasonably content with future year assessment of junction.</p>
Outcomes of sensitivity test - Wyboston junction	Table 4-1	The results of the test indicate that the introduction of the scheme does result in a reduction in Ratio of Flow to Capacity (RFC) of the Great North Road southern arm from 1.09 AM and 1.13 PM to 0.70 AM and 0.94 PM, whilst the RFC of Great North Road Northern Arm increases in both the AM and PM peak periods; 0.90 to 0.97 AM and 0.99 to 1.01 PM. The RFC values of all other movements at the junction remain very similar. In addition, the changes in delay and Queues at the junction has been assessed and it is clear that whilst

		<p>there are significant reductions in the levels of Queue and delay on the Great North Road Southern arm the changes to the other arms are more limited with Great North Road Northern arm showing and increase in both Queue and delay. This means that overall, the scheme has a negligible impact on this junction.</p> <p>Further to a meeting between the Applicant and CCC on 29 November, the Applicant has agreed to examine this junction to see if the impact of the scheme may be minimised by re-allocating road-space to provide more balanced flows on each approach arm.</p> <p>RFC values quoted in table 4.1 are from lane results in lane simulation. Values quoted in this table are the worst RFC values per lane per arm during the modelled period. Values may therefore be from different 15 minute time slices for each arm.</p>
Outcomes of sensitivity test - Wyboston junction	Figure 4-10 Wyboston junction 2040 DS AM	<p>This figure shows that the queues in the revised model are more what would be expected indicating that the AM peak extend back to the Alpha Drive junction on the Great North Road Northern Arm whilst the A428 and the Great North Road Southern Arm show very similar queues.</p> <p>CCC have asked the Applicant to look at potential mitigation at this junction to try and balance the flow, queues and delays out around the junction as without this the scheme has a very negligible impact at this junction. The Applicant has agreed to this with the additional information due to be submitted by Deadline 7.</p>
Outcomes of sensitivity test - Wyboston junction	Figure 4-11 Wyboston Junction 2040 DS PM	<p>This figure shows that the queues in the revised model are more what would be expected indicating that the PM peak extend back past the Alpha Drive junction on the Great North Road Northern Arm whilst the A428 and the Great North Road Southern Arm show very similar queues (which are worse than in the AM peak).</p> <p>CCC have asked the Applicant to look at potential mitigation at this junction to try and balance the flow, queues and delays out around the junction as without this the scheme has a very negligible impact at this junction. The Applicant has agreed to this with the additional information due to be submitted by Deadline 7.</p>

Outcomes of sensitivity test - Wyboston junction	Paragraph 4.5.8	CCC disagree that the scheme has a significantly beneficial impact on the Wyboston Junction at best the scheme has a negligible impact as the junction has to be considered as a whole.
Barford Road Junction	4.5.1	<p>CCC have checked the input flows and geometric inputs. The flows are produced in accordance with the method CCC suggested and 2016 base year model has been run. This shows that the junction is operating reasonably close to what CCC would expect, therefore CCC can confirm that they are happy with forecasting to be based on this model.</p> <p>Forecast flows are acceptable, so CCC are reasonably content with future year assessment of junction.</p>
Barford Road Junction	Table 4-2 Results of Sensitivity Testing: Barford Road Junction	<p>The scheme is shown to significantly improve the operation of the existing A428 arms of the junction but the changes to the Barford Road arms is less marked with Barford Road south still over capacity despite the significant reduction in delay and Queue especially in the PM peak.</p> <p>CCC have asked the Applicant to look at potential mitigation at this junction to try and balance the flow, queues and delays out around the junction as without this the scheme has a very negligible impact at this junction. The Applicant has agreed to this with the additional information due to be submitted by Deadline 8.</p>