

A428 Black Cat to Caxton Gibbet improvements

TR010044

Volume 9

9.74 Applicant's Comments on submissions made by the
Cambridgeshire Authorities at Deadline 5

Planning Act 2008

Rule 8(1)(k)

Infrastructure Planning (Examination Procedure) Rules 2010

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The Infrastructure Planning (Examination Procedure) Rules 2010

A428 Black Cat to Caxton Gibbet improvements Development Consent Order 202[]

9.74 Applicant's Comments on submissions made by the Cambridgeshire Authorities at Deadline 5

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1 Introduction

- 1.1.1 The Development Consent Order (DCO) application for the A428 Black Cat to Caxton Gibbet improvements scheme (the Scheme) was submitted by National Highways (the Applicant) to the Secretary of State for Transport via the Planning Inspectorate on 26 February 2021 and accepted for Examination on 23 March 2021.
- 1.1.2 The purpose of this document is to set out the Applicant's comments on submissions made by the Cambridgeshire Authorities at Deadline 5 of the Examination.
- 1.1.3 The following representations are addressed in this document:
- a. REP5-020 – Cambridgeshire County Council, Huntingdonshire District Council and South Cambridgeshire District Council
 - b. REP5-021 – Cambridgeshire County Council, Huntingdonshire District Council and South Cambridgeshire District Council
 - c. REP5-022 – Cambridgeshire County Council, Huntingdonshire District Council and South Cambridgeshire District Council

2 Applicant's Comments on submissions made at Deadline 5 by the Cambridgeshire Authorities

REP5-020 – Cambridgeshire County Council, Huntingdonshire District Council and South Cambridgeshire District Council

Comments on the Applicant's Deadline 4 submissions

Reference Number	Submission by the Cambridgeshire Authorities/Applicant's Comments
2.2 Land Plans	
REP5-020a	<p>Land take for scheme – All sheets</p> <p>The land plans for the scheme continue to show large areas of land being purchased by the Applicant in areas that adjoin proposed new local highways. CCC reiterates the point made in the Councils' Joint Written Representation [REP1-048], that there should be no assumption that any land not required for highways purposes will be adopted by the LHA as part of the highways.</p>
Applicant's comments	<p>The Applicant has engaged with the Local Highway Authorities and has prepared draft Maintenance Boundary Plans for discussion with the intention that the results of that discussion may be incorporated into the Legal Agreement as principles for the extent of maintenance responsibilities as agreed between the parties.</p>
2.6 Streets, Rights of Way and Access Plans	
REP5-020b	<p>Limits of deviation – All sheets</p> <p>NH have added a single limit of deviation shape onto the plans that would appear to apply to all new and improved rights of way. Please refer to comments on 3.1 Updated draft Development Consent Order [REP4-006] Article 9, below.</p>
Applicant's comments	<p>The Applicant notes the comment and cross refers the Cambridgeshire Authorities to REP5-020j.</p>

Reference Number	Submission by the Cambridgeshire Authorities/Applicant's Comments
REP5-020c	<p>Limits of deviation – Sheets 6, 9, 11, 13 and 14</p> <p>There appear to be inconsistencies on the way CCC roads have been stopped up when they cross the new trunk road, which would apparently leave in some cases small lengths of redundant county roads remaining. Compare Sheets 6 and 9 with Sheet 11, 13 and 14 for details.</p>
Applicant's comments	<p>The Applicant requests further detail on the matter. The Applicant has proposed to stop up and reapply highway where the proposed road level of the new dual carriageway is significantly different to the existing ground level. In the instance where the proposed road level is similar to the existing, the Applicant is not seeking to stop up and reapply the highway. A similar approach has been adopted on other National Highways schemes, for instance the A417 Missing Link and the A47 Wansford to Sutton.</p>
REP5-020d	<p>Limits of deviation – Sheets 11 and 12</p> <p>Existing A428 land beyond immediate road footprint (remaining land after historic bends in road straightened), shown as detrunked on detrunking plans, needs to be stopped up on these plans, to avoid it becoming a maintenance liability for CCC. CCC's position is that it will not adopt land which is not required for highway purpose.</p>
Applicant's comments	<p>The Applicant notes the comments by the Cambridgeshire Authorities and will update the De-trunking and Streets, Rights of Way and Access Plans accordingly and submit into the Examination at Deadline 8.</p>
REP5-020e	<p>Limits of deviation – Sheet 13</p> <p>"Huntingdonshire County Council" should read "Huntingdonshire District Council" on this plan.</p>
Applicant's comments	<p>The Applicant notes the comments and will update the Streets, Rights of Way and Access Plans accordingly. The Plans will be submitted into the Examination at Deadline 8.</p>
REP5-020f	<p>Limits of deviation – All sheets</p> <p>The relevant local highways authority (CCC) should be marked on the relevant plans.</p>

Reference Number	Submission by the Cambridgeshire Authorities/Applicant's Comments
Applicant's comments	The Applicant notes the comments and will update the Streets, Rights of Way and Access Plans accordingly. The Plans will be submitted into the Examination at Deadline 8.
REP5-020g	<p>Local road boundaries – All sheets</p> <p>The Streets, Rights of Way and Access Plans only show carriageways as comprising part of the new and amended local highways. They do not include proposed highways boundary, as requested in the Councils' Joint Written Representation [REP1-048]. The inclusion of a proposed or indicative highway boundary within the DCO Plans would be of benefit to all stakeholders in establishing the anticipated areas of responsibility upon completion of the scheme. CCC requests early engagement during the detailed design development phase to agree the extent of local roads to be handed over to the Council.</p>
Applicant's comments	The Applicant will engage with the local authorities on matters relating to the extent of maintenance responsibility. The Applicant proposes to secure the extent of maintenance through the Legal Agreement.
3.1 Updated draft Development Consent Order	
REP5-020h	<p>Definition of "pre-commencement work" – Article 2</p> <p>The Councils note the addition of the new definition of "pre-commencement work" and suggest that a consequential amendment is made to the definition of "commence" to replace the wording after "other than" and before "and "commencement" is to be construed accordingly" with the new definition.</p>
Applicant's comments	The Applicant has considered this amendment and included it within the dDCO to be submitted at Deadline 6 [TR010044/APP/3.1 v4].
REP5-020i	<p>Definition of "pre-commencement work" – Article 2</p> <p>The Councils request that reference to "protection works" in the definition of "commence" and "pre-commencement works" is updated to refer to utilities protection work, following the explanation provided as to the nature of these works in the pre-commencement plan [REP4-038].</p>

Reference Number	Submission by the Cambridgeshire Authorities/Applicant's Comments
Applicant's comments	<p>It is not appropriate to amend the definition as suggested by CCC because paragraph 2.5.5 of the Pre-Commencement Plan [REP4-038] refers to <i>"fencing and protection slabs"</i> that <i>"will be adopted site wide whenever the Scheme borders or interacts with a service or the public."</i> This reference contemplates a wider application of <i>"protection works"</i> than only 'utilities protection work' and further it must be noted that the Pre-Commencement plan sets out an indicative scope of the works to provide context but also makes it clear that the mitigation/control measures proposed within it would apply to all 'pre-commencement works' and therefore limiting 'protective works' is neither appropriate or necessary.</p>
REP5-020j	<p>Extent of limits of deviation – Article 9</p> <p>The Councils note that the concept of limits of deviation which apply to the public rights of way shown on the streets, rights of way and access plans [REP4-003] has been added to the wording of Article 9. This approach is welcomed.</p> <p>However, the Councils have concerns in relation to the extent of the limits of deviation shown as applying to those routes on the updated streets, rights of way and access plans [REP4-003]. It is noted that the limits of deviation applying to the rights of way are widely drawn, in many cases mirroring the limits of deviation applying to the works plans [APP-009 and APP-010]. As the Councils commented at ISH2, and in their response to the Applicant's comments on Written Representations [REP4-060], it is not appropriate for the public rights of way to be deviated to the extent proposed. The public rights of way serve a particular function and provide wider connectivity and therefore the provision of a route to the west of the carriageway, rather than the east, for example, may have profound implications for the Councils' management of the local network and the experience of users of these routes.</p> <p>It is not clear to the Councils that the worst case routing of each of the public rights of way has been assessed in the Environmental Statement. For example, paragraph 2.5.7 of Chapter 2 of the Environmental Statement notes that the "purpose of the LoD are [sic] to allow minor modifications and refinements to be made to the preliminary design, where necessary, during the detailed design" [APP-071]. It cannot be said that the proposed limits of deviation allow for only minor modifications and refinements of the routes of the public rights of way.</p> <p>The Councils consider that minor modifications and refinements to the public rights of way would be appropriate. The Councils reiterate their request that specific limits of deviation are identified for the rights of way, in the same manner has been proposed for the utilities (see for example sheet 2C on the works plans [APP-009]).</p> <p>The Applicant has previously commented that many of the rights of way connect two points and therefore there is a limit to the practicalities of deviating the routes as widely as the limits of deviation theoretically allow. The Councils therefore query why such wider limits of deviation are necessary. This remains to be demonstrated by the Applicant.</p>

Reference Number	Submission by the Cambridgeshire Authorities/Applicant's Comments
	<p>In relation to those rights of way that are to be provided as substitutes for rights of way which are to be stopped up (see Articles 18 and 29 and Part 2 of Schedule 4), only Article 29 includes reference to the limits of deviation. Article 18 would also need to be updated to refer to the limits of deviation to avoid conflict between these two articles. Consideration will require to be given to whether the precise route lengths specified in column 4 of Schedule 4 preclude the Applicant from relying on the limits of deviation for these substitute routes.</p>
Applicant's comments	<p>It is not the Applicant's intention to make wholesale changes to the public rights of way. The public rights of way have been designed to fulfil a purpose and the intention of making it clear that those routes were subject to limits of deviation was not to allow significant changes but to ensure it was clear that some flexibility applied so that the construction of the routes could respond to other changes being made within the application in accordance with the limits of deviation that applied expressly elsewhere. The Applicant is in ongoing discussions with CCC as what may be required as the detailed design develops in relation to the specific alignment of the public rights of way and if agreed this will be set out in the legal agreement.</p> <p>Article 18 has been updated to address the point raised by CCC in the dDCO submitted at Deadline 6 [TR010044/APP/3.1 v 4].</p>
REP5-020k	<p>Extension of limits of deviation – Article 9(2)</p> <p>The Councils note that Article 9(2) has been updated to provide for consultation of the local highway authority in respect of any proposal to extend the limits of deviation. The Councils welcome the Applicant's further consideration of this matter, however, request that the approval of the local highway authority is required for an extension to the limits of deviation relating to a highway other than a special road or a trunk road.</p> <p>The local highway authority will ultimately be responsible for maintaining the highway assets and must therefore have reasonable certainty as to the location of these assets in order to be able to assess and comment on the proposal and the maintenance burden.</p> <p>The Councils understand from the Applicant that it is unlikely that this power will be used. This being the case, the Councils are unclear as to the objection to the need to seek approval from the local highway authority for deviations to local highways beyond the current limits.</p>
Applicant's comments	<p>The Applicant maintains its view that it is unnecessary for the local highway authority to have a separate approval role in relation to any proposal to extend the limits of deviation. It is appropriate for the Secretary of State to hold this role with any decision being made by the Secretary of State to benefit from the consultation responses received from the local highways authority during that approval process.</p> <p>The Applicant notes that the approach of seeking approval from the Secretary of State after consultation with relevant bodies has wide precedent in made highways Orders to date (including but not limited to A556 Knutsford to Bowden, the A14 Order, the M20 Junction 10a Order, A19/A184 Testos junction, A303 Sparkford to Ilchester, A30 Chiverton to Carland Cross, A63 Castle Street, M42 Junction 6, A19</p>

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	<p>Downhill Lane Junction, A1 Birtley, A585 Windy Harbour) and can see no specific reason why this position should be different on the Scheme.</p>
REP5-0201	<p>Certification of new, altered or diverted streets and other structures – Article 13</p> <p>The Councils reiterate that Article 13 must include a process for certification of the new local highways by the local highway authority and do not agree with the Applicant that this is a matter that can be dealt with purely by the legal agreement. As currently drafted, the dDCO provides that the relevant highway will be handed over to the local highway authority by operation of law once it is complete, whether or not it is certified as complete by the local highway authority. This cannot be overridden by the legal agreement. Certification is a formal stage in the legal process and should therefore be contained within the DCO.</p> <p>The Councils note that the precise details of the handover process can be contained in a legal agreement, however, the certification process must have its foundations in the dDCO to provide certainty for all parties as to when responsibility for maintaining the local highways is passed to the local highway authority.</p> <p>The Councils also note that, whilst discussions in relation to the legal agreement are ongoing, there remain material points at issue between the parties and the legal agreement is not yet concluded.</p>
Applicant's comments	<p>Article 13 of the dDCO [REP4-006] requires that the highways constructed, altered or diverted under this power must be completed to the 'reasonable satisfaction' of the local highway authority. Therefore, the local highway cannot be complete until that first test is met i.e. that it has been completed to the reasonable satisfaction of the local highway authority. Only when that test is met could the local highway be considered to be 'complete' and then transferred over to the local highway authority in accordance with Article 13. If this was not the correct interpretation, reference to 'reasonable satisfaction' would be obsolete. This means that the Council's point that by operation of law the relevant highway will be handed over to the local highway authority when complete is not entirely correct and in fact the relevant highway must be completed to the reasonable satisfaction of the local highway authority.</p> <p>The Applicant also notes that there is no legal requirement for certification to be contained within the dDCO [REP4-006] and there is no precedent contained in any other made highway Orders where this approach has been followed. Therefore, the Applicant can see no justification or need for the certification process proposed by the Council to be included in the dDCO particularly if the full requirements of Article 13 are applied as it includes its own threshold to protect the local highway authority from being handed an asset that is unsatisfactory.</p> <p>The Councils do not disagree that the legal agreement can contain the precise details of the handover process and the Applicant would submit that in the even if the legal agreement is not completed by the end of the Examination there is still protection in Article 13 for the</p>

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	<p>local highway authority because, as noted above, the local highway asset can only ever pass over once the works have been completed to their reasonable satisfaction.</p> <p>The legal agreement merely compliments the process already contained within Article 13 in the dDCO by setting out a clear process between the parties so that there is clarity and certainty as to how the reasonable satisfaction of the local highway authority will be achieved.</p>
REP5-020m	<p>Certification of new, altered or diverted streets and other structures – Article 13(5)</p> <p>The Councils remain of the view that their proposed amendment to Article 13(5) [REP3-039] is necessary to avoid duplication of Article 13(1). The Councils note that the Applicant is considering further the reference to vehicular private means of access in the context of the Scheme [REP4-036] and may have further comments once the Applicant's updated position is available.</p>
Applicant's comments	<p>The Applicant maintains its position and does not agree that this amendment is necessary and as such no changes have been made to the dDCO.</p>
REP5-020n	<p>Certification of new, altered or diverted streets and other structures – Article 13(9)</p> <p>The Councils proposed an amendment to Article 13(9) [REP3-039] to clarify specifically that culverts under bridges are to be maintained by the Applicant. The Applicant has queried why this is necessary [REP4-036]. The Council remains of the view that this is necessary to avoid ambiguity as to whether culverts would be encapsulated by the wording "and structure below", noting that structure is expressed in the singular form. The Councils wish as much certainty as reasonably possible about the assets they will be obliged to maintain.</p> <p>The current proposed wording of Article 13(9) also fails to address a point raised in the Councils' Written Representation [REP1-048] in respect of maintenance responsibilities for the surfaces of bridges which are shared by public rights of way and private means of access. In these instances, the Councils have been clear that the surfaces should be maintained by the private party benefiting from the right of access owing to the greater potential for damage to be caused to such a surface by private vehicular traffic as opposed to public right of way users.</p>
Applicant's comments	<p>The Applicant has made amendments to the dDCO to be submitted at Deadline 6 [TR010044/APP/3.1 v4] to address the above comments made by the Councils.</p>

Reference Number	Submission by the Cambridgeshire Authorities/Applicant's Comments
REP5-020o	<p>Certification of new, altered or diverted streets and other structures – Article 13(10)</p> <p>In relation to the Councils' proposed amendment to Article 13(10), the Councils note that this is being considered further by the Applicant [REP4-036] and the Councils may have further comments once the Applicant's updated position is available.</p>
Applicant's comments	<p>The Applicant has made amendments to the dDCO to be submitted at Deadline 6 [TR010044/APP/3.1 v4] to address the above comment made by the Councils.</p>
REP5-020p	<p>Classification of roads, etc. and permanent stopping up and restriction of use of streets and private means of access – Articles 14(7) and 18(2)</p> <p>In the Councils' comments on the previous version of the dDCO [REP3-039], the Councils requested further clarification from the Applicant of the interaction between Articles 14(7) and 18(2). The Councils note the Applicant's response at REP4-036, however, it appears to the Councils that there are two potential triggers for providing the footpaths, cycle tracks, footways and bridleways: (i) before the authorised development is open for use (Article 14(7)); and (ii) where relevant, before the existing route is stopped up (Article 18(2)). The Councils therefore request further clarification on this matter. The Councils suggest that the timeframe in Article 14(7) is, where relevant subject to the earlier timeframe in Article 18(2).</p> <p>The Councils further consider that the deadline of "before the authorised development is open for use" is vague, as the authorised development is broad in scope. The Councils presume that the intention is for this article to refer to the point at which the main new trunk road is open for use and would be grateful if this could be clarified.</p>
Applicant's comments	<p>The Applicant considers that Articles 14(7) and 18(2) are complimentary and not contradictory. Article 18(2) ensures that an alternative right of way remains available where an existing right of way needs to be stopped up to deliver the Scheme (i.e. a substitute is available during construction). In contrast Article 14(7) ensures that the latest point at which the rights of way become available for use is when the scheme opens for traffic. Therefore where a public right of way is made available prior to the date when the Scheme opens for traffic under Article 18(2), it will also comply with Article 14(7) by virtue of being available at the point at which the Scheme is open for traffic.</p>

Reference Number	Submission by the Cambridgeshire Authorities/Applicant's Comments
REP5-020q	<p>Classification of roads, etc. – Article 14(8)</p> <p>The Councils reiterate their concern that Article 14(8) must provide for de-trunking to take place on a date agreed between the Applicant and the local highway authority. The Councils disagree with the Applicant that a separate legal agreement would be sufficient to address this matter. In the event that the de-trunking date determined by the Applicant under the Order differed from that agreed between the parties to the agreement, the road would be de-trunked on the date determined by the Applicant by operation of law, irrespective of the terms of the agreement.</p> <p>The Councils also note that, whilst discussions in relation to the legal agreement are ongoing, there remains material points at issue between the parties and the legal agreement is not yet concluded.</p>
Applicant's comments	<p>The Applicant has amended Article 14 of the dDCO to be submitted at Deadline 6 [TR010044/APP/3.1 v4] to include a new paragraph (9) which states that the Applicant may only make a determination as to the de-trunking date with the consent of the SoS who must consult with the relevant local highway authority before deciding whether to give that consent. This reflects the approach taken in the A14 Cambridge to Huntingdon Improvement Scheme Development Consent Order as well as within the A585 Windy Harbour to Skippool Improvement Scheme Order.</p> <p>This approach also ensures that should the legal agreement not be completed prior to the end of Examination the Examining Authority may be assured that the local highway authority will not be required to accept a de-trunked highway asset without a due process being followed. The SoS will be asked to agree the de-trunking date and will take into account any response received from the local highway authority through the consultation required before making that decision.</p>
REP5-020r	<p>Classification of roads, etc. – Article 14(16)</p> <p>The Councils welcome the addition of Article 14(16) in relation to the provision of as built plans, however, the Councils request that the timescales within which the plans are to be provided are amended to within 3 months of completion of the relevant footpath, cycle track, footway or bridleway to allow the Councils to update the Definitive Map and Statement.</p>
Applicant's comments	<p>The Applicant has addressed this comment by amending Article 14(6) in the dDCO to be submitted at Deadline 6 [TR010044/APP/3.1 v4].</p>

Reference Number	Submission by the Cambridgeshire Authorities/Applicant's Comments
REP5-020s	<p>Power to alter layout etc. of streets – Article 15(3) and (4)</p> <p>Article 15 provides the Applicant with the power to alter the layout of any street within the Order limits and the layout of any street having a junction with such a street. The Councils' position is that this power may only be exercised with the consent of the street authority. The Applicant has indicated that it is concerned that this will result in a potentially indefinite delay to the progress on the Scheme [REP4-036]. [The Councils would be willing to amend Article 15(4) such that consent is deemed to be granted if no response is received within 28 days.</p>
Applicant's comments	<p>The Applicant is unclear as the point being made here by the Councils as Article 15 of the dDCO [REP4-006] requires the undertaker to obtain the consent of the street authority (Article 15(3)(b)) and where such consent is not received within 28 days that consents is deemed to be granted (Article 15(4)).</p>
REP5-020t	<p>Temporary alteration, diversion, prohibition and restriction of the use of streets – Articles 17(4) and (6)</p> <p>The Councils proposed an amendment to Article 17(4) to include the express ability for the street authority to request further information from the Applicant in response to an application for consent to temporarily alter, divert, prohibit or restrict the use of any street [REP3-039]. The Applicant has indicated that this ability must be subject to control on the timeframes for a decision to be reached [REP4-036]. The Councils highlight that the Councils are under an obligation not to unreasonably withhold or delay consent within the wording of Article 17.</p>
Applicant's comments	<p>The Applicant notes that Article 17 has precedent in highways Orders made to date for example on the M20 Junction 10a Order (article 14) and the A14 Order (article 14) where this additional requirement requested by CCC has not been included. As such the Applicant is of the view that this change to the dDCO is unnecessary.</p>
REP5-020u	<p>Rights under or over streets – Article 39</p> <p>The Councils note that the requirement of 28 days' advance notice proposed by the Councils [REP3-039] is being considered by the Applicant [REP4-036]. The Councils may have further comments on this matter once the Applicant's updated position is available.</p>

Reference Number	Submission by the Cambridgeshire Authorities/Applicant's Comments
Applicant's comments	The Applicant notes that Article 39 was included in the model provisions and it did not include a requirement to provide 28 days' advance notice. A Scheme of this size and complexity must be able to move quickly and it would be impractical to have to provide 28 days notice for every instance when the Applicant needed to use land above or below streets. As such the Applicant is of the view that this change to the dDCO is unnecessary.
REP5-020v	Requirements – Part 1, Schedule 2 The Councils reiterate their request that a requirement relating to borrow pit restoration is sought. The Borrow Pit Excavation and Restoration Report (BPERR) does not negate the need for such a requirement. The Councils' concerns summarised in their responses to the ExA's second written questions [REP4-059] remain and the Councils highlight that the BPERR is not secured by the dDCO.
Applicant's comments	The updated First Iteration Environmental Management Plan submitted at Deadline 6 [TR010044/APP/6.8v2] now contains a Borrow Pits Management Plan that will set out the restoration requirements for borrow pits and as the First Iteration Environmental Management Plan is secured by Requirement 3 of the dDCO [REP4-006] no additional Requirements are needed in the dDCO.
REP5-020w	Requirements – definition of "Ecological Clerk of Works" - Paragraph 1, Part 1, Schedule 2 Please see the Councils' comments on 9.48 Pre-commencement Plan [REP4-038] below
Applicant's comments	The Applicant has responded to the comments on the Pre-Commencement Plan below.
REP5-020x	Requirements – landscaping - Paragraph 6, Part 1, Schedule 2 The Councils note that the Applicant is considering the Councils' proposed amendments to this Requirement [REP4-036] and may have further comments on this matter once the Applicant's updated position is available.
Applicant's comments	While the Applicant has not accepted the changes proposed by the Councils to Requirement 6(5) and 6(7) the Applicant has included the requested detail in the updated First Iteration Environmental Management Plan submitted at Deadline 6 [TR010044/APP/6.8v2] .

Reference Number	Submission by the Cambridgeshire Authorities/Applicant's Comments
REP5-020x(i)	<p>Requirements – traffic management - Paragraph 6, Part 1, Schedule 2</p> <p>[The Councils note the Applicant's explanation that the traffic management plan must be substantially in accordance with the outline traffic management plan (OCTMP). Further clarification is requested from the Applicant as to whether matters described as "indicative", such as the timings of road closures at paragraph 3.4 of the OCTMP [REP4-011] may be amended through the preparation of the traffic management plan.]</p>
Applicant's comments	<p>The timings shown in the OCTMP [REP4 -011] for road closures are indicative. When the Construction Traffic Management Plan (CTMP) is prepared the timing for closures will be subject to agreement with the relevant Local Highways Authorities for closures on their local road network and National Highways for the Strategic Road Network.</p> <p>Where the Highway Authority has a concern over the potential for a route to remain busy until 21.30 the closure time may be agreed to start later and equally where a route is expected to have low use after 20.00 an earlier closure time may be agreed and included in the CTMP.</p>
REP5-020y	<p>Requirements – detailed design – Paragraph 12, Part 1, Schedule 2</p> <p>The Applicant has confirmed in the Scheme Design Approach and Design Principles document [REP3-014] that this will be incorporated into the First Iteration EMP. However, as commented on in the Councils' response to second written question 2.10.1 [REP4-059], this alone is not adequate as Requirement 12 does not currently require the detailed design to be developed in accordance with the First Iteration EMP. It is necessary that Requirement 12 be updated to refer to the First Iteration EMP in order to ensure that these principles are secured.</p>
Applicant's comments	<p>The Applicant has amended Requirement 12 of the dDCO to be submitted at Deadline 6 [TR010044/APP/3.1 v4] to include reference to the Scheme Design Approach and Design Principles [REP3-014].</p>
REP5-020z	<p>Requirements – working hours – Paragraph 19, Part 1, Schedule 2</p> <p>The Councils have responded to the Applicant's comments on the Councils' proposed amendments to the construction working hours at page 24 of REP4-060. The Councils' position remains unchanged.</p>

Reference Number	Submission by the Cambridgeshire Authorities/Applicant's Comments
Applicant's comments	<p>As previously stated by the Applicant, the core construction hours are as those set out in Paragraph 2.6.244 within Chapter 2, The Scheme [APP-071] of the Environmental Statement. These are as follows:</p> <p>07:00-18:00 Monday to Friday 07:00-13:00 on Saturdays</p> <p>The start-up and shut down periods would be either side of these times. During these periods, the Principal Contractor will be undertaking activities that cause minimal noise such as:</p> <ul style="list-style-type: none"> • Arrival of delivery vehicles to site. • Arrival of vehicles to the works compounds. • Plant and machinery checks. • Arrival and departure of the works force at site. • Site briefings. • Site inspections. • Site preparation – without the use of plant. • Site clean up. • Refuelling. <p>In addition, and as set out in previous representations, the Applicant is willing to engage in discussions with the local authorities so that agreements can be sought when working close to sensitive locations, such as residential properties, or where there are specific activities, such as during school exams, where noise from construction could potentially be minimised. Where appropriate, discussions will be held with local authorities on these matters during the detailed design stage where mitigation can be discussed in more detail.</p>
REP5-020aa	<p>Footpaths, cycle tracks, footways and bridleways – Part 7, Schedule 3</p> <p>The Councils have responded to the Applicant's comments on the Councils' proposed amendments to the status of public rights of way at page 21 of REP4-060. The Councils' position remains unchanged.</p>

Reference Number	Submission by the Cambridgeshire Authorities/Applicant's Comments
Applicant's comments	The Applicant notes this comment from the Cambridgeshire Authorities.
4.3 Book of Reference	
REP5-020ab	<p>Land take – General point</p> <p>The land parcels to be acquired for delivering the scheme, as detailed in the Book of Reference, should be reviewed in relation to any proposed Limits of Deviation to be applied to new or amended local highways (including PROW). This is particularly relevant in light of the amendments made in the Streets, Rights of Way and Access Plans [REP4-003] which now show a revised Limit of Deviation, and the most recent amendments to Article 9 of the dDCO. The implication is that if a revised limit of deviation permits construction works to take place <i>outside</i> of areas of land that have been acquired on a permanent basis, then the Applicant's ability to lawfully dedicate the new highway in such areas may be affected.</p>
Applicant's comments	The Applicant has proposed separate Limits of Deviation in both the Works Plans [APP-009 and APP-010] and the Streets, Rights of Way and Access Plans [APP-013] . The extents of which highway can deviate is shown by the limits of deviation. The limits of deviation for highway are within the proposed extent of permanent land acquisition. The Applicant does not propose highway (through limits of deviation or not) for which land is not permanently sought, unless highway already exists.
7.4 Outline Construction Traffic Management Plan	
REP5-020ac	<p>Restricted routes for construction vehicles – 3.3.3</p> <p>The additional clarity in this paragraph is welcomed.</p>
Applicant's comments	The Applicant notes and welcomes this response from the Cambridgeshire Authorities.
REP5-020ad	<p>Restricted routes for construction vehicles – 3.3.4</p> <p>The restriction outline in the updated paragraph is welcomed.</p>

Reference Number	Submission by the Cambridgeshire Authorities/Applicant's Comments
Applicant's comments	The Applicant notes and welcomes this response from the Cambridgeshire Authorities.
REP5-020ae	<p>Self-diverting traffic – 3.5.10</p> <p>The updated approach to dealing with self-diverting traffic is noted and the approach to providing some mitigation measures where this is a problem is welcomed. However, monitoring the SRN is unlikely to provide any detailed evidence about the impact of self-diverting traffic on the local road network and therefore some monitoring on the local road network pre- and during works would provide a more comprehensive response to this issue. The Highways Authority is only likely to be able to provide qualitative evidence by means of complaints and ad-hoc feedback from councillors and residents, but without traffic monitoring information it may be difficult to ascertain the difference between perception and reality and how much worse the issue is during the works that it was before works commenced.</p>
Applicant's comments	<p>The Applicant considers it's role to be one of maintaining traffic flow on the strategic road network (SRN) .this position is further set out in the Monitor and Manage technical note [TR010044/EXAM/9.81]. The Applicant seeks to ensure that existing traffic remains on the (SRN) through effective traffic management and communicating real time journey information using VMS and other media. This approach negates the need for drivers to self-divert. Therefore, monitoring on the local road network is unnecessary. If there are no issues on the SRN it cannot be reliably concluded that difficulties on the local road are solely and directly attributable to the scheme.Previously consented schemes, A1 Morpeth to Ellingham and A303 Sparkford to Ilchester have both stipulated the following:</p> <p><i>Journey Time Reliability signing can significantly improve driver compliance as it gives reassurance that delays are not as severe as may be perceived. Mobile Variable Message Signs (VMS) shall be deployed and give actual durations to pass through the road works and times to remote destinations.</i></p> <p>The second iteration of the OCTMP, [REP4-012] also commits to the establishment of a traffic management forum that includes the local highway authorities to allow the issue of self-diverting traffic to be assessed if the need arises and for measures to address self-diverting traffic to be agreed and deployed.</p>

Reference Number	Submission by the Cambridgeshire Authorities/Applicant's Comments
8.2 Draft Statement of Common Ground with Historic England Planning	
REP5-020af	<p>Assessment of findings: construction – Table 3-1, page 19</p> <p>CCC notes that the assessment of construction impacts is still under discussion with Historic England and has not been agreed. CCC's Relevant Representation [RR-013], the Councils' Joint Written Representation [REP1-048], paragraphs 12.5.7-12.5.8, and the Councils' Joint Local Impact Report [REP2-003], section 8.2, present our concerns about the magnitude of impact and significance of harm attributed for sites that will be permanently damaged by construction and for which inappropriate mitigation areas or techniques have been presented in the Updated Archaeological Mitigation Strategy at Deadline 4 [REP4-031].</p>
Applicant's comments	<p>This answer was provided in the Applicant's response to Bedford Borough Council's Relevant Representation [REP1-021]. Please see text below:</p> <p>The impact assessment has been undertaken using Design Manual for Roads and Bridges (DMRB) LA104 Environmental Assessment and Monitoring (August 2020). This forms the methodology for assessing impacts for the EIA process for highways schemes. However, this has not been used in isolation. Paragraphs 6.3.15 and 6.3.16 of Chapter 6, Cultural Heritage [APP-075] of the Environmental Statement detail the other guidance documents that have informed the assessment. The impact assessment has also referenced the requirements of National Policy Statement for National Networks (NPSNN) and the National Planning Policy Framework (NPPF) which require the significance of heritage assets to be assessed. This has been completed for each affected heritage asset and archaeological site. The impact assessment process considers the value of each asset (taking the heritage significance of each asset into account), then, independently of the asset's value, a magnitude of impact is identified. Many of the sites with a slight adverse significance of effect have a moderate or large magnitude of impact but because the value of such archaeological features is considered to be low, the significance of the effect is only slight. The assessment of the significance of effect is a reflection of both the value of the asset and the impact upon it. These levels are defined in Table 6.2 of Chapter 6, Cultural Heritage [APP-075] of the Environmental Statement.</p>
8.3 Draft Statement of Common Ground with Natural England	
REP5-020ag	<p>Borrow pit Restoration – Table 3-5 (page 44)</p> <p>The Councils support Natural England's recommendations to fully investigate options for environmental/biodiversity enhancement options as part of restoration of the borrow pits.</p>

Reference Number	Submission by the Cambridgeshire Authorities/Applicant's Comments
Applicant's comments	<p>The Applicant considers that Natural England's comments should be viewed in context and as such the relevant text from the latest version of the Natural England SOCG to be submitted at Deadline 6, the Natural England position states the following with regards to borrow pit restoration:</p> <p><i>"Natural England has advised that impacts from the Scheme should be considered in light of Government policy for the protection of the best and most versatile agricultural land, and that soils should be considered in the context of the sustainable use of land and the ecosystem services they provide as a natural resource.</i></p> <p><i>Natural England has also advised that borrow pits present an opportunity to incorporate multi-functional environmental and biodiversity enhancements and has recommended that options to restore these sites are fully investigated.</i></p> <p><i>Natural England agrees that the proposal to restore land used temporarily for borrow pits to agricultural standards is appropriate and would help to mitigate the overall loss best and most versatile agricultural land across the Scheme."</i></p> <p>As has been stated previously in other responses, the Applicant is not seeking to provide environmental enhancements through restoration of the borrow pits and instead intends to restore borrow pits to enable agricultural use.</p>
8.7 Draft Statement of Common Ground with the National Farmers Union	
REP5-020ah	<p>Soils – Pages 18 and 19</p> <p>The Councils agree with the NFU that further detail in relation to pre-construction soil surveys and soil aftercare and restoration proposals should be provided. The Councils consider that this is particularly pertinent in respect of borrow pits.</p>
Applicant's comments	<p>Annex E Soil Handling and Management Plan of the First Iteration Environmental Management Plan [TR010044/APP/6.8v2] sets out the measures that will be implemented by the Principal Contractor during the construction period in relation to soils. This includes the outline specification for pre-construction soil surveys and soil restoration. The detail contained in Annex E will be developed and form part of the Second Iteration Environmental Management Plan, which as required by Requirement 3 of the draft DCO [TR010044/APP/3.1v4] will be submitted for approval to the Secretary of State following consultation with the relevant local planning and highway authorities and the Environment Agency.</p>

Reference Number	Submission by the Cambridgeshire Authorities/Applicant's Comments
	<p>Table R-5 of Annex R Borrow Pit Outline Management Plan of the First Iteration Environmental Management Plan [TR010044/APP/6.8v2] sets out general control measures which apply to all borrow pits. This includes a cross reference to Annex E of the First Iteration Environmental Management Plan [TR010044/APP/6.8v2] and the controls that would apply to the borrow pit sites.</p>
<p>9.23 Archaeological Mitigation Strategy</p>	
<p>REP5-020ai</p>	<p>Aims of Specific intervention types – 2.3</p> <p>CCC acknowledges the editing that has been done to improve the UAMS but identifies inconsistencies that remain across the document that make it confusing and open to challenge.</p> <p>We note the replacement of 'sampling' to 'targeted excavation' at 2.3.1, which should demonstrate a plan to subject irreplaceable archaeological remains to appropriate levels of investigation and recording prior to their loss. However, the ethos of 'targeted excavation' is still contestable as described in 2.3.6. <i>"The general aim of the sampling targeted excavation is to ensure that deposits are understood. The purpose is to supplement results of the evaluation excavation, where the nature, significant and extent of features does not warrant full excavation, but is designed to record the nature, depth, extent, character and date of archaeological features where this is not already understood."</i> misses the principal issue consistently raised by CCC that the attributes of archaeological sites cannot be fully understood at an evaluation state. All excavation seeks to be enough to understand the character of the site. The Applicant demonstrates a determination to focus on the excavation of individual <i>deposits</i> and <i>features</i> rather than to consider their collective value and relevance to the whole of the targeted archaeological site in question. CCC cannot support the approach as stated and contest that decisions can only be made in the field regarding which of a site's components should be investigated or not.</p>
<p>Applicant's comments</p>	<p>CCC have misinterpreted the purpose of the targeted excavation. The Applicant does not state that the sites are fully understood from evaluation in the Archaeological Mitigation Strategy [REP4-031], barring those that do not warrant any further work (detailed in Table 5.2), hence the need for further investigation. If it was thought they were fully understood, no further mitigation work would be proposed.</p> <p>2.3.6 states "The general aim of the sampling targeted excavation is to ensure that deposits are understood. The purpose is to supplement results of the evaluation excavation, where the nature, significance and extent of features does not warrant full excavation, but is designed to record the nature, depth, extent, character and date of archaeological features where this is not already understood."</p> <p>While Cambridgeshire County Council state that the Applicant 'demonstrates a determination to focus on the excavation of individual <i>deposits</i> and <i>features</i>' this is inaccurate and the aim detailed in 2.3.6 has been misinterpreted. As discussed extensively in previous responses, the purpose of the targeted excavation is to focus on features that will enhance understanding of sites, and where they may</p>

Reference Number	Submission by the Cambridgeshire Authorities/Applicant's Comments
	<p>also provide further artefactual and environmental evidence, as well as respond to research questions identified in the most recent fieldwork. It is not to focus on individual features in isolation.</p>
REP5-020aj	<p>Archaeological Mitigation Requirements – 5.1.2 and 5.1.3</p> <p>The mitigation strategies for Excavation and Archaeological Excavation for the site categories set out in 5.1.2 a and 5.1.2 b are acceptable. The Councils do not agree with category 5.1.2 c as it will be hard or impossible to determine which should be excavation or left unexcavated at the pre-excavation stage.</p> <p>Targeted excavation cannot be prescribed in advance of stripping (5.1.3 b). It is suggested that this reference be removed and the UAMS show two categories of excavation: a. Detailed excavation, b. Standard excavation and explain these in Section 8 and 9. It can be explained in the relevant text area that lighter sampling may be required for some areas of archaeological excavation in the field subject to negotiation after stripping. Note: 5.1.3 a and b both deal with 'archaeological excavation' so the terminology remains at issue as it is not clear. Section 9 heading could be simplified to show 'Standard excavation'.</p>
Applicant's comments	<p>Please see the response to REP5-020ai above.</p> <p>Nowhere in the AMS [REP4-031] does it state that decisions about what to excavate will be made prior to stripping. It has always been envisaged that areas will be stripped (as per section 9.2) before decisions are made. This is detailed in section 9.2 of the AMS which states:</p> <p>9.2.5 Each location will be opened under direct archaeological supervision using an appropriate 360° mechanical excavator fitted with a toothless ditching bucket.</p> <p>9.2.6 Any archaeological deposits/features identified will be cleaned and hand excavated in an archaeologically controlled and stratigraphic manner, sufficient to meet the aims and objectives of the investigation.</p> <p>9.2.7 Archaeological remains will be investigated and recorded in line with the aims of this mitigation strategy and as detailed in the SSWSI. Not all features will require excavation and some features may only be recorded in plan.</p> <p>However, the AMS will be updated at a future deadline to clarify that the areas for Targeted Excavation will be stripped before decisions to excavate are made.</p>

Reference Number	Submission by the Cambridgeshire Authorities/Applicant's Comments
REP5-020ak	<p>Archaeological Mitigation Sites - Table 5.1</p> <p>Further editing is advised. Table 5.1 indicates "intensive" excavation – though section 8 names this as "Detailed Excavation". Consistency of terms between tabulated information and the methods sections is advised for a final revision of the UAMS so that there is no doubt as to meaning and for resourcing purposes.</p> <p>Table 5.1 Archaeological Mitigation Sites. This cannot be agreed as we remain in disagreement about:</p> <ul style="list-style-type: none"> - the areas for excavation for the following sites: 10, 11, 18, 34, 36-39 - the strategies for excavation of the following sites: 17, 20, 27, 32, 35 - both area and strategy not agreed: 19, 23, 23, 26, 28, 33
Applicant's comments	<p>Section 8 of the AMS [REP4-031] will be updated.</p> <p>The Applicant notes the remainder of the comments. However, we wish to clarify the following points regarding agreement or otherwise of some of the Mitigation areas:</p> <ul style="list-style-type: none"> • Site 17, Field 69-70 – The Applicant had previously been advised by CCC that this site would be agreed if the word 'solely' was removed from Table 5.1 of the AMS [REP4-031], which has been done. This is detailed in Cambridgeshire County Council, Huntingdonshire District Council and South Cambridgeshire District Council's <i>Comments on responses to Relevant Representations (RRs)</i> [REP3-041]. The Applicant has previously commented on numerous occasions about the possibility of retention of features at this site, which will only be decided following topsoil stripping, and will not repeat this here. • There are two Site 23s listed. Should one be Site 24? • Site 32, Field 94 – The Applicant had thought the methodology of this site was agreed, but not the extent. • Site 33, Field 94 – The Applicant had thought the methodology of this site was agreed, but not the extent.

Reference Number	Submission by the Cambridgeshire Authorities/Applicant's Comments
REP5-020al	<p>Archaeological Mitigation Sites and Archaeological mitigation action areas - Table 5.1 and Appendix D:</p> <p>This cannot be agreed for any of the sites assigned for 'Targeted Excavation' We have previously explained our position in the inadequacies of the approach in relation to, for example, the multi-period archaeological remains at Site 17 (Category b Group value/key site). This mitigation strategy cannot be achieved as one cannot foretell which remains are Bronze Age or Saxo-Norman in advance of excavation. It is not fit for purpose.</p> <p>Another example is Site 33, a site of group value/key site according to 5.1.6, where the UAMS proposes "Selected and targeted excavation" in its entry at Appendix D, and lists 14 research objectives to steer the excavations. This is unworkable and not fit for purpose. Excavation of this Iron Age settlement area requires excavation levels in line with the brief given at Appendix B to provide contractors with an ability to meet the majority of the research objectives.</p>
Applicant's comments	<p>Please see the response to REP5-020ai and REP5-020aj above.</p> <p>As stated in the response to REP5-020ak above, the Applicant has previously commented on numerous occasions about the possibility of retention of features at Site 17, which will only be decided following topsoil stripping. Nowhere does it state that this decision would be made before stripping, as this would not be an appropriate strategy.</p> <p>The Applicant does not understand the comments on Site 33 in Field 94. Table 5.1 states that this site is category b. Group value/key site and the work will comprise "Strip area and excavation of features". While Appendix D does state "Selected and targeted excavation" it is a category b site. Notwithstanding this, Appendix D will be updated for this site for clarity at a future deadline.</p>
<p>9.41 Joint Position Statement with Natural England and the Local Authorities on Drainage Ponds</p>	
REP5-020am	<p>Mitigation for loss of ponds</p> <p>The Councils' position is accurately represented within the JPS.</p> <p>The Councils require an update of Annex A to address the outstanding points.</p>

Reference Number	Submission by the Cambridgeshire Authorities/Applicant's Comments
Applicant's comments	<p>The Applicant has updated Annex L Landscape and Ecology Mitigation Plan of the First Iteration Environmental Management Plan [TR010044/APP/6.8v2], submitted at Deadline 6. This includes integration of Annex A 'Details of attenuation basins including intended design principles and planting arrangements' of the Joint Position Statement with Natural England and the Local Authorities on Drainage Ponds [REP4-034] and inputs proposed by the Cambridgeshire Authorities in a meeting held on 29 November 2021.</p>
<p>9.46 Applicants comments on Deadline 3 submissions</p>	
REP5-020an	<p>Traffic Modelling Methodology – REP3-035a</p> <p>The Applicant's response is to state that sensitivity tests are being undertaken based on the Joint Position Statement with the Local Highway Authorities on Junction Modelling [REP3-024] and the Scope of Junction Model Sensitivity Test [REP3-029], both submitted by Deadline 5. To date there has been no discussion on the sensitivity tests with the Councils and therefore the Councils have no certainty that the sensitivity tests will give the assurances required by the Councils.</p>
Applicant's comments	<p>Sensitivity Testing was carried out in accordance with the methodology set out by CCC in their note 'CCC Preferred Method for Deriving Junction Model Flows' [REP3- 043]. More detail of the application of this method is set out in the 'Scope of Junction Model Sensitivity Test' [REP3-029]. Given time constraints, as the methodology has been prescribed by CCC itself, the Applicant did not consider it necessary to discuss the Sensitivity Tests with CCC because their preferred approach was being followed.</p> <p>Details of the Sensitivity tests undertaken and the results achieved are set out in the document 9.68 'Junction Model Sensitivity Test Results' [REP5-018].</p> <p>In addition, the Applicant has shared the Sensitivity Test models and details of the derivation of the traffic flows used, with CCC at the earliest opportunity after Deadline 5 and before Issue Specific Hearing 5 (ISH5), held on 1 December 2021.</p> <p>The Applicant believes that this will provide the Councils with the assurances they require. The Applicant also held a meeting with CCC on 29 November 2021 and agreed to a limited amount of additional work, details of which follow in individual responses below. However, if there are any outstanding concerns from CCC the Applicant will be keen to catch up on a meeting to understand those concerns and consider them.</p> <p>The sensitivity tests outputs have been discussed in considerable detail during Issue Specific Hearing 5 (ISH5) and agreement has been achieved on all junction modelling elements, except two outstanding elements which have been outlined as action points arising from ISH5 as follows:</p>

Reference Number	Submission by the Cambridgeshire Authorities/Applicant's Comments
	<ul style="list-style-type: none"> Update to be provided on discussions regarding potential road space reallocation related design changes referred to by Cambridgeshire County Council (CCC) and Bedford Borough Council (BBC) for Wyboston and Barford roundabouts Further modelling at M11 Junction 13 and Eltisley Junction to be undertaken and flow checks to be provided for Potton Road and Toseland Road for CCC. <p>Though the above submissions are due for Deadline 8, the Applicant can confirm that submissions of the outputs from these tasks will be shared and discussed with CCC as soon as they are completed, which is anticipated to be in advance of Deadline 8.</p>
REP5-020ao	<p>Impacts of the scheme on Coton – REP3-035b</p> <p>The Councils acknowledge that the coding errors in the Coton Area of the model do not mean that the whole model is incorrect and that it is still reasonable to use the strategic model in the assessment of the strategic impact of scheme. However, the errors cast doubt on the impact of the scheme in the local area around Coton and therefore the Councils require monitoring of the impact of the scheme on Coton.</p>
Applicant's comments	<p>As noted in REP3-035b, the Traffic Routeing Impacts at Coton Technical Note [REP1-028] demonstrates that the coding errors were confined to two short links and that the impact is relatively minor and localised.</p> <p>In relation to the point regarding monitoring, please refer to the Monitor and Manage Technical Note [TR010044/EXAM/9.81], submitted at Deadline 6. This sets out that monitoring key points on local roads is possible within the Post Operational Project Evaluation for the purposes of evaluating scheme benefits. These locations must be expected to experience significant change and be quantitatively justified within the results of the traffic forecasting or pertain to a sensitive location. The monitoring results will be shared with the Local Highway Authorities (LHAs).</p>
REP5-020ap	<p>Operation of Caxton Gibbet roundabout – REP3-035c</p> <p>The Applicant's response is to state that sensitivity tests are being undertaken based on the Joint Position Statement with the Local Highways Authorities on Junction Modelling [REP3-024] and the Scope of Junction Model Sensitivity Test [REP3-020], both submitted at Deadline 3. Other comments in relation to the sensitivity tests state that these are to be submitted by Deadline 5. To date there has been no discussion on the sensitivity test with the Councils and therefore the Councils have no certainty that the sensitivity tests will give the assurances required by the Councils.</p>

Reference Number	Submission by the Cambridgeshire Authorities/Applicant's Comments
Applicant's comments	<p>Sensitivity Testing was carried out in accordance with the methodology set out by CCC in their note 'CCC Preferred Method for Deriving Junction Model Flows' [REP3-043]. More detail of the application of this method is set out in the 'Scope of Junction Model Sensitivity Test' [REP3-029]. Given time constraints, as the methodology has been prescribed by CCC itself, the Applicant did not consider it necessary to discuss the Sensitivity Tests with CCC because their preferred approach was being followed.</p> <p>Details of the Sensitivity Tests undertaken and the results achieved are set out in the document 9.68 'Junction Model Sensitivity Test Results' [REP5-018].</p> <p>In addition, the Applicant has shared the Sensitivity Test models and details of the derivation of the traffic flows used, with CCC at the earliest opportunity after Deadline 5.</p> <p>The Applicant believes that this will provide the Councils with the assurances they require.</p> <p>The Applicant believes that after the deliberations, discussions and agreements reached on ISH5 there are no outstanding queries or concerns about Caxton Gibbet Junction.</p>
REP5-020aq	<p>Landscape Effects – REP3-036d</p> <p>The possibility of incorporating Elm is discussed within Annex L of the First Iteration Environmental Management Plan [APP-234] paragraph 1.10.14. This is acknowledged. However, the Councils would like to see a firm commitment to the inclusion of Elm within the mixes.</p>
Applicant's comments	<p>The reference to Elm in Annex L Landscape and Ecology Management Plan of the First Iteration Environmental Management Plan [TR010044/APP/6.8v2] has been updated to set out that Elm will be included in the planting mix if feasible and will be focused in areas of woodland on the edges of the Scheme where a screening function is not required. Furthermore, text has been added to explain that further work will be done to confirm feasibility and identify appropriate stock availability and consultation with the relevant local authorities.</p>
REP5-020ar	<p>Applicant's response the ExA WQ1 6: Effects on NMUs - REP3-035e</p> <p>Paragraphs 3.15 and 3.16 on the NN NPS relates to the commitments to sustainable transport and encouraging modal shift. The Applicant's position on limiting provision to mitigating the disruption to existing routes is not going to encourage modal shift to enable reductions in air pollution and CO2 emissions. See the Councils' Local Impact Report [REP2-003], paragraphs 8.7.14 – 8.7.15. Diversions of existing Public Rights of Way will not increase the opportunity for sustainable travel or leisure activities (particularly as the 2km 'diversion' of 278/7 footpath is effectively an extinguishment/conversion into a roadside footway with no upgraded status). Opening up</p>

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	<p>new routes and connected roadside NMUs will have a positive impact, as per the Councils' Local Impact Report [REP2-003], paragraphs 8.7.20- 8.7.23.</p> <p>Provision for NMUs on the Potton and Toseland bridge during construction will be far more feasible and economical than trying to retro-fit further improvements at a future date, if indeed possible, if adequate space is not provided. The strategic case for provision for a footway and cycleway across the new overbridges has been recognised in the WCHAR report [APP-241 Appendix 8.1] within the strategic opportunities section (3.3) which includes improvements identified:</p> <p><i>'Opportunity 2 providing shared use footway/cycleway facilities where new overbridges are provided across the proposed A428 would make these more comfortable for cyclists to use.'</i></p> <p><i>'Opportunity 4 providing interchange links for walkers and cyclists between the existing A428 and the B1046 Potton Road overbridge could link the proposed Strategic Expansion Location into the quiet road network to the south east of St. Neots.'</i></p> <p>Therefore, NH's statement that provision of facilities is not justified does not seem to accord with their own report.</p> <p>Strategic Opportunity 1 states 'Improving the existing A428 between the Caxton Gibbet and Cambridge Road roundabouts by providing a new shared use footway/cycleway alongside the carriageway would make this an attractive cycle link identified in the Third Cambridgeshire LTP 2011-2013.'</p> <p>It is disappointing that no progress is being made on the matter of NMUs.</p>
Applicant's comments	<p>The Applicant notes the Cambridgeshire Authorities' comments on the paragraphs in the NPS NN which relate to sustainable travel. The Applicant has provided new and upgraded provision for NMUs across the Scheme as tabularised in Appendix to Q1.11.6.4 and Q1.11.6.5 of the Applicant's Response to the Examining Authority's First Round of Written Questions [REP1-022]. The Applicant is not responsible for incorporating all of the Cambridgeshire Authorities public right of way and roadside NMU provision aspirations, especially where there is an insufficient justification for their implementation. The Applicant cannot be expected to fund these aspirations, which are the remit of the local authorities to justify.</p> <p>Furthermore, if the Applicant were to upgrade the isolated sections of footpaths to bridleways, it would be prejudicing the planning decision to upgrade/complete the remainder of the route across third-party land. The Applicant maintains its position, that it does not preclude the Cambridgeshire Authorities from evidencing and delivering their aspirations in the future.</p>

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	<p>The Applicant does not preclude the Cambridgeshire Authorities from designating and implementing NMU provision on the B1046 and Toseland Road bridges in the future. If the Cambridgeshire Authorities have sufficient evidence and justification to warrant such facilities, then it is their responsibility to secure the funding and the land required.</p>
<p>REP5-020as</p>	<p>Wintering and breeding birds - REP3-037j</p> <p>National Highways reference to REP3-036c here doesn't address this point.</p> <p>National Highways have not provided evidence of why mitigation for breeding/wintering birds cannot be incorporated into the proposed agricultural restoration.</p> <p>The adverse impacts on wintering/breeding birds are associated with farmland species indicative of agricultural landscape. The Councils remain unclear as to why compensation cannot be incorporated into the proposed restoration to agricultural land.</p>
<p>Applicant's comments</p>	<p>The Applicant notes the comments from the Cambridgeshire Authorities and advises the impact from the Scheme on birds in the vicinity of the agricultural restoration will be minor and temporary as detailed in the ES Chapter 8 Biodiversity [APP-077]. Only arable or amenity grassland habitat will be lost in these locations and will be returned like for like at the end of construction. The Applicant considers that the temporary minor adverse impact on the birds as a result on the Scheme in these areas is adequately mitigated for in the habitat creation taking place in the permanent land take of the Scheme in the vicinity of these locations.</p>
<p>REP5-020at</p>	<p>Biodiversity Net Gain - REP3-037k</p> <p>National Highways reference to REP3-036c here doesn't address this point.</p> <p>National Highways have not provided evidence of why compensation for residual net loss of hedgerows and habitat (areas) of high / medium distinctiveness identified in the Biodiversity Metric calculator [REP3-013] cannot be incorporated into agricultural restoration of the borrow-pits. For example, loss of arable field margins, parkland and hedgerows which are part of an agricultural landscape, as set out in the Councils response to Q2.3.2.1 [REP4- 059].</p>
<p>Applicant's comments</p>	<p>The Applicant notes the comments from the Cambridgeshire Authorities and advises that the Scheme will not currently result in a net loss in the length of hedgerows. The Applicant refers the Cambridgeshire Authorities to its response to Q.2.3.2.1 [REP4-037] which clarifies that the Scheme will deliver overall increases in woodland, grassland habitat and hedgerow length when compared to baseline values and explains why, in the case of hedgerows, a negative score (-31%) has been calculated for this unit type despite some 3.4km of new hedgerow being created. The Applicant considers that the minor adverse impact as a result on the Scheme in these areas is adequately</p>

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	<p>mitigated for in the habitat creation taking place in the permanent land take of the Scheme in the vicinity of these locations. The Applicant considers that the minor adverse impact as a result of the Scheme in these areas is adequately mitigated for in the habitat creation taking place in the permanent land take of the Scheme in the vicinity of these locations.</p>
REP5-020au	<p>Scheme Junctions 6.3.8 - REP3-038b</p> <p>The Applicant's response is to state that the flows from the model are sufficiently aligned to the observed data but as set out in the Councils' assessment this is not the case. The Applicant refers to the sensitivity tests that are being undertaken. The Applicant has proposed to undertake sensitivity tests at the key Scheme junctions (Black Cat, Caxton Gibbet and Cambridge Road) in Vissim, following the approach 2 suggested by CCC (documented in a note – 'CCC Preferred Method for Deriving Junction Model Flows' [REP3-043]). This is explained in the Scope of Junction Model Sensitivity Test [REP3-029]. Other comments in relation to the sensitivity tests state that these are to be submitted by Deadline 5. To date there has been no discussion on the sensitivity tests with the Councils and therefore the Councils have no certainty that the sensitivity tests will give the assurances required by the Councils.</p>
Applicant's comments	<p>Sensitivity Testing was carried out in accordance with the methodology set out by CCC in their note 'CCC Preferred Method for Deriving Junction Model Flows' [REP3-043]. More detail of the application of this method is set out in the 'Scope of Junction Model Sensitivity Test' [REP3-029]. Given time constraints, as the methodology was prescribed by CCC itself, the Applicant did not consider it necessary to discuss the Sensitivity Tests with CCC because their preferred approach was being followed.</p> <p>Details of the Sensitivity Tests undertaken and the results achieved are set out in the document 9.68 'Junction Model Sensitivity Test Results' [REP5-018].</p> <p>In addition, the Applicant has shared the Sensitivity Test models and details of the derivation of the traffic flows used, with CCC at the earliest opportunity after Deadline 5.</p> <p>The Applicant believes that this will provide the Councils with the assurances they require.</p> <p>The Sensitivity Tests outputs have been discussed in considerable detail during ISH5 and agreement has been achieved on all junction modelling elements, except two outstanding elements which have been outlined as action points arising from ISH5 as follows:</p> <ul style="list-style-type: none"> • Update to be provided on discussions regarding potential road space reallocation related design changes referred to by Cambridgeshire County Council (CCC) and Bedford Borough Council (BBC) for Wyboston and Barford roundabouts

Reference Number	Submission by the Cambridgeshire Authorities/Applicant's Comments
	<ul style="list-style-type: none"> Further modelling at M11 Junction 13 and Eltisley Junction to be undertaken and flow checks to be provided for Potton Road and Toseland Road for CCC. <p>Though the above submissions are due for Deadline 8, the Applicant can confirm that submissions of the outputs from these tasks will be shared and discussed with CCC as soon as they are completed, which is anticipated to be in advance of Deadline 8.</p>
REP5-020av	<p>Existing junctions with no calibrated/validated base models 6.4.2 - REP1-038c2</p> <p>The Applicant states that a response in relation to Wyboston, Barford Road and Madingley Mulch junctions is contained in the Scope of Junction Model Sensitivity Test [REP3-029], submitted at Deadline 3. The Councils commented on this document.</p> <p>It is understood that these junctions will be covered by the sensitivity tests expected at Deadline 5. To date there has been no discussion on the sensitivity tests with the Councils and therefore the Councils have no certainty that the sensitivity tests will give the assurances required by the Councils.</p>
Applicant's comments	<p><u>Wyboston and Barford Road Junctions</u></p> <p>In respect of the Wyboston and Barford Road junctions, Sensitivity Testing was carried out in accordance with the methodology set out by CCC in their note 'CCC Preferred Method for Deriving Junction Model Flows' [REP3- 043]. More detail of the application of this method is set out in the 'Scope of Junction Model Sensitivity Test' [REP3-029]. Given time constraints, as the methodology was prescribed by CCC itself, the Applicant did not consider it necessary to discuss the Sensitivity Tests with CCC because their preferred approach was being followed.</p> <p>Details of the Sensitivity Tests undertaken and the results achieved are set out in the document 9.68 'Junction Model Sensitivity Test Results' [REP5-018].</p> <p>In addition, the Applicant has shared the Sensitivity Test models and details of the derivation of the traffic flows used, with CCC at the earliest opportunity after Deadline 5.</p> <p>The Applicant believes that this will provide the Councils with the assurances they require.</p> <p>The Sensitivity Tests undertaken confirm that the Scheme provides, overall, a substantial benefit to the operation of these junctions, with a minimal deterioration in the performance of the Great North Road (N) arm at the Wyboston junction and the Barford Road (N) arm of the Barford Road junction, resulting from the re-routing of local traffic from within St Neots to access the Scheme via these routes.</p>

Reference Number	Submission by the Cambridgeshire Authorities/Applicant's Comments
	<p>Notwithstanding this, the Applicant has agreed with the Councils to undertake an assessment to examine the potential for the re-allocation of road space at these junctions, once the Scheme opens to traffic, to make better use of the capacity available. This is enlisted as an action from ISH5 and to be completed by Deadline 8.</p> <p><u>Madingley Mulch Junction</u></p> <p>A Technical Note considering the issues at Madingley Mulch junction in the content of traffic capacity issues along the A1303 corridor will be provided at Deadline 8. The Applicant will update the forecast M11 J13 Vissim models to correct the issue identified by CCC, where the North West Cambridge Development zone did not load at the correct location, as well as extending the models to include the A428 main carriageway.</p> <p>The relevant Technical Note(s) will be shared with CCC in advance of Deadline 8, as soon as they are ready for circulation.</p>
REP5-020aw	<p>Existing junctions with no calibrated/validated base models 6.4.5a - REP1-038d</p> <p>The Applicant is proposing sensitivity tests at Wyboston and Barford Road junctions to address the concerns expressed by the Councils, the results of which will be available at Deadline 5. To date there has been no discussion on the sensitivity tests with the Councils and therefore the Councils have no certainty that the sensitivity tests will give the assurances required by the Councils.</p>
Applicant's comments	<p><u>Wyboston and Barford Road Junctions</u></p> <p>Sensitivity Testing was carried out in accordance with the methodology set out by CCC in their note 'CCC Preferred Method for Deriving Junction Model Flows' [REP3- 043]. More detail of the application of this method is set out in the 'Scope of Junction Model Sensitivity Test' [REP3-029]. Given time constraints, as the methodology was prescribed by CCC itself, the Applicant did not consider it necessary to discuss the Sensitivity Tests with CCC because their preferred approach was being followed.</p> <p>Details of the Sensitivity Tests undertaken and the results achieved are set out in the document 9.68 'Junction Model Sensitivity Test Results' [REP5-018].</p> <p>In addition, the Applicant has shared the Sensitivity Test models and details of the derivation of the traffic flows used, with CCC at the earliest opportunity after Deadline 5.</p> <p>The Applicant believes that this will provide the Councils with the assurances they require.</p> <p>In respect of the Wyboston and Barford Road junctions, the Sensitivity Tests undertaken confirm that the Scheme provides, overall, a substantial benefit to the operation of these junctions, with a marginal deterioration in the performance of the Great North Road (N) arm at</p>

Reference Number	Submission by the Cambridgeshire Authorities/Applicant's Comments
	<p>the Wyboston junction and the Barford Road (N) arm of the Barford Road junction, resulting from the re-routing of local traffic from within St Neots to access the Scheme via these routes. These results reconfirm the Applicant's repeated assertions since the DCO submission that the junction modelling outputs are robust and that the Scheme brings in significant benefits not only to the through traffic on the SRN, but also to the local traffic on the local road network.</p> <p>Notwithstanding this, the Applicant has agreed with the Councils to undertake an assessment to examine the potential for the re-allocation of road space at these junctions, once the Scheme opens to traffic, to make better use of the capacity available. This is set out as an action from ISH5 and to be completed by Deadline 8.</p>
REP5-020ax	<p>Existing junctions with no calibrated/validated base models 6.4.5b - REP1-038e</p> <p>The Applicant states that this comment applies primarily to the Cambourne and Scotland Road, Hardwick junctions. In respect of these junctions, the Applicant asserts that the junctions, as assessed with the Scheme in place, have sufficient spare capacity through to 2040 to make it unnecessary to carry out further modelling, to assess the performance of these junctions in order to justify the minimal impact the Scheme has at these locations. The Councils require that assessment of these junctions is undertaken using traffic flows adjusted to observed turning movements to enable assessment of any mitigation required to ensure that the scale of the junction is reduced as a result of the predicted reduction in traffic as a result of the scheme. From the information presented it would appear that these junctions are not to be included in the sensitivity tests due to be submitted at deadline 5 and therefore the Councils will not have the confidence in the results of the modelling in these locations.</p>
Applicant's comments	<p><u>Cambourne and Scotland Road, Hardwick Junctions</u></p> <p>The rationale for not undertaking Sensitivity Tests at these locations is set out in the 'Scope of Junction Model Sensitivity Test' [REP3-029]. The Applicant maintains that the junction capacity modelling undertaken in support of the Transport Assessment Annex [APP-243] demonstrates that the Scheme has a minimal impact on these existing junctions, which are shown to remain well within capacity with the Scheme in place. The results achieved provide sufficient 'headroom' to give confidence that these junctions would remain within capacity with any reasonable set of alternative traffic forecasts, such as those which resulted from the Sensitivity Testing undertaken at other locations around the Scheme. On that basis the Applicant believes that it would be unreasonable and disproportionate to carry out further modelling in respect of these junctions.</p> <p>Since these are existing junctions, there is no question of mitigation being required 'to ensure that the scale of the junction is reduced as a result of the predicted reduction in traffic as a result of the scheme' as stated by the Councils in their response above.</p>

Reference Number	Submission by the Cambridgeshire Authorities/Applicant's Comments
	<p>Notwithstanding the above, the Applicant has agreed with CCC (at a meeting held on 29 November 2021) to carry out a limited amount of sensitivity testing of the Cambourne junction so as to confirm the adequacy of the layout to accommodate the traffic flows with the Scheme in place using an alternative set of traffic flow forecasts. The results of this assessment is to be made available to CCC as soon as possible before Deadline 8.</p> <p>In respect of the existing junction at Scotland Road, Hardwick, following the meeting held on 29 November 2021, the Applicant now understands that CCC are content that no further work needs to be undertaken.</p>
REP5-020ay	<p>Existing junctions with no calibrated/validated base models 6.4.6a - REP1-038f</p> <p>The Applicant reaffirms that the use of flows from the strategic model in the junction models is appropriate but from the analysis of the turn proportions at the junction for which information has been presented the Councils maintain that the turn proportions in the strategic model do not accurately reflect the observed data which is to be expected as strategic models are validated to link flows not turning movements.</p>
Applicant's comments	<p>The Applicant has considered the analysis of turning proportions at the junctions provided by the Councils and has commissioned Sensitivity Testing at the three key Scheme junctions (Black Cat, Cambridge Road and Caxton Gibbet) and at the two junctions on the existing A428 (Wyboston and Barford Road) where we acknowledge that the discrepancy between observed and modelled turning proportions may be significant. The results of this exercise are set out in the document 'Junction Model Sensitivity Test Results' [REP5-018].</p> <p>The Applicant therefore considers that this point has been appropriately addressed.</p>
REP5-020az	<p>Existing junctions with no calibrated/ validated base models 6.4.6b - REP1-038g</p> <p>The Applicant reiterates that sensitivity tests of the Wyboston and Barford Road junctions to assess the implication of using the count data available.</p> <p>Whilst at the Madingley Mulch junction, the Applicant has extended the coverage of the M11 Junction 13 VISSIM model to cover this junction, as it is acknowledged that the problems at this location are connected with traffic queues on the A1303 between Madingley Mulch and M11 Junction 13, which prevent the Madingley Mulch junction from operating to its full potential.</p>

Reference Number	Submission by the Cambridgeshire Authorities/Applicant's Comments
	<p>The Applicant states that a Technical Report with the model findings will be submitted to the Examination and shared with CCC at a future date, most likely by Deadline 5. To date there has been no discussion on the sensitivity tests with the Councils and therefore the Councils have no certainty that the sensitivity tests will give the assurances required by the Councils.</p>
<p>Applicant's comments</p>	<p><u>Wyboston and Barford Road Junctions</u></p> <p>In respect of the Wyboston and Barford Road junctions, Sensitivity Testing was carried out in accordance with the methodology set out by CCC in their note 'CCC Preferred Method for Deriving Junction Model Flows' [REP3- 043]. More detail of the application of this method is set out in the 'Scope of Junction Model Sensitivity Test' [REP3-029]. Given time constraints, as the methodology was prescribed by CCC itself, the Applicant did not consider it necessary to discuss the Sensitivity Tests with CCC because their preferred approach was being followed.</p> <p>Details of the Sensitivity Tests undertaken and the results achieved are set out in the document 9.68 'Junction Model Sensitivity Test Results' [REP5-018].</p> <p>In addition, the Applicant has shared the Sensitivity Test models and details of the derivation of the traffic flows used, with CCC at the earliest opportunity after Deadline 5.</p> <p>The Applicant believes that this will provide the Councils with the assurances they require.</p> <p>The Sensitivity Tests undertaken confirm that the Scheme provides, overall, a substantial benefit to the operation of these junctions, with a minimal deterioration in the performance of the Great North Road (N) arm at the Wyboston junction and the Barford Road (N) arm of the Barford Road junction, resulting from the re-routing of local traffic from within St Neots to access the Scheme via these routes.</p> <p>Notwithstanding this, the Applicant has agreed with the Councils to undertake an assessment to examine the potential for the re-allocation of road space at these junctions, once the Scheme opens to traffic, to make better use of the capacity available.</p> <p>A Technical Note considering the issues at Madingley Mulch junction in the context of traffic capacity issues along the A1303 corridor will be issued at Deadline 8. The applicant will update the forecast M11 J13 Vissim models to correct the issue identified by CCC, where the North West Cambridge Development zone did not load at the correct location, as well as extending the models to include the A428 main carriageway. The Technical Note outlining the model extension/ update will be shared at Deadline 8.</p>

Reference Number	Submission by the Cambridgeshire Authorities/Applicant's Comments
REP5-020ba	<p>Scheme Junctions – Junction Layout Comparison 7.2.1 a) - REP1-038i</p> <p>The rationale for not carrying out further work at the B1046/Potton Road Junction and Eltisley Link junctions is also set out in the Scope of Junction Model Sensitivity Test [REP3- 029].</p> <p>This is not acceptable to the Councils as the scheme is proposing significant changes to both these locations and the Councils need to be convinced that the proposed junction is of sufficient scale to accommodate the level of traffic projected without significant over provision. This is not possible based on the information available to date and therefore it is not possible to confirm the design at these locations.</p>
Applicant's comments	<p><u>B1046/Potton Road Junction and Eltisley Link junctions</u></p> <p>The Applicant maintains that the junction capacity modelling undertaken in support of the Transport Assessment [APP-241] demonstrates that the junctions concerned have been designed to have sufficient capacity to accommodate the design flows adopted, with sufficient headroom to accommodate any uncertainty in the forecasting methodology. The results achieved provide sufficient 'headroom' to give confidence that these junctions would remain within capacity with any reasonable set of alternative traffic forecasts, such as those which resulted from the Sensitivity Testing undertaken at other locations around the Scheme.</p> <p>The question of over provision of traffic capacity at these locations does not arise, because the junctions have been designed to meet the minimum geometric standards prescribed in the Design Manual of Roads and Bridges for the type of junction concerned and no less capacity could reasonably be provided than has been incorporated in the design of the Scheme. . On that basis the Applicant believes that it would be unreasonable and disproportionate to carry out further modelling in respect of these junctions.</p> <p>Notwithstanding the above, the Applicant has agreed with CCC (at a meeting held on 29 November 2021) to carry out a limited amount of sensitivity testing of the Eltisley Link junction so as to confirm the adequacy of the proposed layout to accommodate the traffic flows with the Scheme in place using an alternative set of traffic flow forecasts.</p> <p>In respect of the B1046/ Potton Road junction, an assessment of alternative traffic flow forecasts is to be made to determine whether there is a case for further sensitivity testing.</p> <p>The results of these assessments are to be made available to CCC as soon as possible before Deadline 6, and submitted at Deadline 8.</p>

Reference Number	Submission by the Cambridgeshire Authorities/Applicant's Comments
REP5-020bb	<p>Scheme Junctions – Junction Layout Comparison 7.2.1 c) - REP1-038j</p> <p>The Applicant has proposed to undertake a Sensitivity Test at the key Scheme junctions following the approach 2 suggested by CCC (documented in a note prepared by CCC – “CCC Preferred Method for Deriving Junction Model Flows” [REP3-043]). This is explained in the Scope of Junction Model Sensitivity Test [REP3-029]. This test will show how the proposed junction operates, following the methodology suggested by CCC. To date there has been no discussion on the sensitivity tests with the Councils and therefore the Councils have no certainty that the sensitivity tests will give the assurances required by the Councils.</p>
Applicant's comments	<p>Sensitivity Testing was carried out in accordance with the methodology set out by CCC in their note ‘CCC Preferred Method for Deriving Junction Model Flows’ [REP3- 043]. More detail of the application of this method is set out in the ‘Scope of Junction Model Sensitivity Test’ [REP3-029]. Given time constraints, as the methodology was prescribed by CCC itself, the Applicant did not consider it necessary to discuss the Sensitivity Tests with CCC because their preferred approach was being followed.</p> <p>Details of the Sensitivity tests undertaken and the results achieved are set out in the document 9.68 ‘Junction Model Sensitivity Test Results’ [REP5-018].</p> <p>In addition, the Applicant has shared the Sensitivity Test models and details of the derivation of the traffic flows used, with CCC at the earliest opportunity after Deadline 5.</p> <p>The Applicant believes that this will provide the Councils with the assurances they require.</p> <p>The sensitivity tests outputs have been discussed in considerable details in the ISH5 and the agreement has been achieved on all junction modelling elements, excepting two outstanding elements which have been outlined as action points of ISH 5 as follows:</p> <ul style="list-style-type: none"> • Update to be provided on discussions regarding potential road space reallocation related design changes referred to by Cambridgeshire County Council (CCC) and Bedford Borough Council (BBC) for Wyboston and Barford roundabouts • Further modelling at M11 Junction 13 and Eltisley Junction to be undertaken and flow checks to be provided for Potton Road and Toseland Road for CCC. <p>Though the above submissions are due for Deadline 8, the Applicant can confirm that submissions of the outputs from these tasks will be shared and discussed with CCC as soon as they are completed, which is anticipated to be in advance of Deadline 8.</p>

Reference Number	Submission by the Cambridgeshire Authorities/Applicant's Comments
REP5-020bc	<p>Scheme Junctions – Junction Layout Comparison 7.2.2 - REP1-038k</p> <p>The Applicant has proposed to undertake a Sensitivity Test at the key Scheme junctions following the approach 2 suggested by CCC (documented in a note prepared by CCC – “CCC Preferred Method for Deriving Junction Model Flows” [REP3-043]). This is explained in the Scope of Junction Model Sensitivity Test [REP3-029]. This test will show how the proposed junction operates, following the methodology suggested by CCC. To date there has been no discussion on the sensitivity tests with the Councils and therefore the Councils have no certainty that the sensitivity tests will give the assurances required by the Councils.</p>
Applicant's comments	<p>Sensitivity Testing was carried out in accordance with the methodology set out by CCC in their note 'CCC Preferred Method for Deriving Junction Model Flows' [REP3- 043]. More detail of the application of this method is set out in the 'Scope of Junction Model Sensitivity Test' [REP3-029]. Given time constraints, as the methodology was prescribed by CCC itself, the Applicant did not consider it necessary to discuss the Sensitivity Tests with CCC because their preferred approach was being followed.</p> <p>Details of the Sensitivity tests undertaken and the results achieved are set out in the document 9.68 'Junction Model Sensitivity Test Results' [REP5-018].</p> <p>In addition, the Applicant has shared the Sensitivity Test models and details of the derivation of the traffic flows used, with CCC at the earliest opportunity after Deadline 5.</p> <p>The Applicant believes that this will provide the Councils with the assurances they require.</p> <p>The sensitivity tests outputs have been discussed in considerable details in the ISH5 and the agreement has been achieved on all junction modelling elements, excepting two outstanding elements which have been outlined as action points of ISH 5 as follows:</p> <ul style="list-style-type: none"> • Update to be provided on discussions regarding potential road space reallocation related design changes referred to by Cambridgeshire County Council (CCC) and Bedford Borough Council (BBC) for Wyboston and Barford roundabouts • Further modelling at M11 Junction 13 and Eltisley Junction to be undertaken and flow checks to be provided for Potton Road and Toseland Road for CCC. <p>Though the above submissions are due for Deadline 8, the Applicant can confirm that submissions of the outputs from these tasks will be shared and discussed with CCC as soon as they are completed, which is anticipated to be in advance of Deadline 8.</p>

Reference Number	Submission by the Cambridgeshire Authorities/Applicant's Comments
REP5-020bd	<p>Scheme Junctions – Forecast Traffic Flows 7.3.2 - REP1-038l</p> <p>The rationale for not carrying out further work at the B1046/Potton Road Junction and Eltisley Link junctions is also set out in the Scope of Junction Model Sensitivity Test [REP3- 029].</p> <p>This is not acceptable to the Councils as the scheme is proposing significant changes to both these locations and the Councils need to be convinced that the proposed junction is of sufficient scale to accommodate the level of traffic projected without significant over provision. This is not possible based on the information available to date and therefore it is not possible to confirm the design at these locations.</p>
Applicant's comments	<p><u>B1046/Potton Road Junction and Eltisley Link junctions</u></p> <p>The Applicant maintains that the junction capacity modelling undertaken in support of the Transport Assessment [APP-241] demonstrates that the junctions concerned have been designed to have sufficient capacity to accommodate the design flows adopted, with sufficient headroom to accommodate any uncertainty in the forecasting methodology. The results achieved provide sufficient 'headroom' to give confidence that these junctions would remain within capacity with any reasonable set of alternative traffic forecasts, such as those which resulted from the Sensitivity Testing undertaken at other locations around the Scheme.</p> <p>The question of over provision of traffic capacity at these locations does not arise, because the junctions have been designed to meet the minimum geometric standards prescribed in the Design Manual of Roads and Bridges for the type of junction concerned and no less capacity could reasonably be provided than has been incorporated in the design of the Scheme.. On that basis the Applicant believes that it would be unreasonable and disproportionate to carry out further modelling in respect of these junctions.</p> <p>Notwithstanding the above, the Applicant has agreed with CCC (at a meeting held on 29th November 2021) to carry out a limited amount of sensitivity testing of the Eltisley Link junction so as to confirm the adequacy of the proposed layout to accommodate the traffic flows with the Scheme in place using an alternative set of traffic flow forecasts.</p> <p>In respect of the B1046/Potton Road junction, an assessment of alternative traffic flow forecasts is to be made to determine whether there is a case for further sensitivity testing.</p> <p>The results of these assessments are to be made available to CCC as soon as possible before Deadline 8.</p>

Reference Number	Submission by the Cambridgeshire Authorities/Applicant's Comments
REP5-020be	<p>Scheme Junctions – Forecast Traffic Flows 7.3.3 - REP1-038m</p> <p>This relates to the B1046/Potton Road and (existing A428)/Eltisley junctions. The Scope of Junction Model Sensitivity Test [REP3-029] provides the Applicant's rationale for not carrying out further work in respect of these junctions.</p> <p>This is not acceptable to the Councils as the scheme is proposing significant changes to both these locations and the Councils need to be convinced that the proposed junction is of sufficient scale to accommodate the level of traffic projected without significant over provision. This is not possible based on the information available to date and therefore it is not possible to confirm the design at these locations.</p>
Applicant's comments	<p><u>B1046/Potton Road Junction and Eltisley Link junctions</u></p> <p>The Applicant maintains that the junction capacity modelling undertaken in support of the Transport Assessment [APP-241] demonstrates that the junctions concerned have been designed to have sufficient capacity to accommodate the design flows adopted, with sufficient headroom to accommodate any uncertainty in the forecasting methodology. The results achieved provide sufficient 'headroom' to give confidence that these junctions would remain within capacity with any reasonable set of alternative traffic forecasts, such as those which resulted from the Sensitivity Testing undertaken at other locations around the Scheme.</p> <p>The question of over provision of traffic capacity at these locations does not arise, because the junctions have been designed to meet the minimum geometric standards prescribed in the Design Manual of Roads and Bridges for the type of junction concerned and no less capacity could reasonably be provided than has been incorporated in the design of the Scheme. On that basis the Applicant believes that it would be unreasonable and disproportionate to carry out further modelling in respect of these junctions.</p> <p>Notwithstanding the above, the Applicant has agreed with CCC (at a meeting held on 29th November 2021) to carry out a limited amount of sensitivity testing of the Eltisley Link junction so as to confirm the adequacy of the proposed layout to accommodate the traffic flows with the Scheme in place using an alternative set of traffic flow forecasts.</p> <p>In respect of the B1046/ Potton Road junction, an assessment of alternative traffic flow forecasts is to be made to determine whether there is a case for further sensitivity testing.</p> <p>The results of these assessments are to be made available to CCC as soon as possible before Deadline 8.</p>

Reference Number	Submission by the Cambridgeshire Authorities/Applicant's Comments
REP5-020bf	<p>Scheme Junctions – Forecast Traffic Flows 7.3.4 - REP1-038n</p> <p>The rationale for not carrying out further work at the B1046/Potton Road Junction and Eltisley Link junctions is also set out in the Scope of Junction Model Sensitivity Test [REP3- 029].</p> <p>This is not acceptable to the Councils as the scheme is proposing significant changes to both these locations and the Councils need to be convinced that the proposed junction is of sufficient scale to accommodate the level of traffic projected without significant over provision. This is not possible based on the information available to date and therefore it is not possible to confirm the design at these locations.</p>
Applicant's comments	<p><u>B1046/Potton Road Junction and Eltisley Link junctions</u></p> <p>The Applicant maintains that the junction capacity modelling undertaken in support of the Transport Assessment [APP-241] demonstrates that the junctions concerned have been designed to have sufficient capacity to accommodate the design flows adopted, with sufficient headroom to accommodate any uncertainty in the forecasting methodology. The results achieved provide sufficient 'headroom' to give confidence that these junctions would remain within capacity with any reasonable set of alternative traffic forecasts, such as those which resulted from the Sensitivity Testing undertaken at other locations around the Scheme.</p> <p>The question of over provision of traffic capacity at these locations does not arise, because the junctions have been designed to meet the minimum geometric standards prescribed in the Design Manual of Roads and Bridges for the type of junction concerned and no less capacity could reasonably be provided than has been incorporated in the design of the Scheme. On that basis the Applicant believes that it would be unreasonable and disproportionate to carry out further modelling in respect of these junctions.</p> <p>Notwithstanding the above, the Applicant has agreed with CCC (at a meeting held on 29 November 2021) to carry out a limited amount of sensitivity testing of the Eltisley Link junction so as to confirm the adequacy of the proposed layout to accommodate the traffic flows with the Scheme in place using an alternative set of traffic flow forecasts.</p> <p>In respect of the B1046/ Potton Road junction, an assessment of alternative traffic flow forecasts is to be made to determine whether there is a case for further sensitivity testing.</p> <p>The results of these assessments are to be made available to CCC as soon as possible before Deadline 6.</p>

Reference Number	Submission by the Cambridgeshire Authorities/Applicant's Comments
REP5-020bg	<p>Scheme Junctions – Forecast Traffic Flows 7.3.5 - REP1-038o</p> <p>The rationale for not carrying out further work at the B1046/Potton Road Junction and Eltisley Link junctions is also set out in the Scope of Junction Model Sensitivity Test [REP3- 029].</p> <p>This is not acceptable to the Councils as the scheme is proposing significant changes to both these locations and the Councils need to be convinced that the proposed junction is of sufficient scale to accommodate the level of traffic projected without significant over provision. This is not possible based on the information available to date and therefore it is not possible to confirm the design at these locations.</p>
Applicant's comments	<p><u>B1046/Potton Road Junction and Eltisley Link junctions</u></p> <p>The Applicant maintains that the junction capacity modelling undertaken in support of the Transport Assessment [APP-241] demonstrates that the junctions concerned have been designed to have sufficient capacity to accommodate the design flows adopted, with sufficient headroom to accommodate any uncertainty in the forecasting methodology. The results achieved provide sufficient 'headroom' to give confidence that these junctions would remain within capacity with any reasonable set of alternative traffic forecasts, such as those which resulted from the Sensitivity Testing undertaken at other locations around the Scheme.</p> <p>The question of over provision of traffic capacity at these locations does not arise, because the junctions have been designed to meet the minimum geometric standards prescribed in the Design Manual of Roads and Bridges for the type of junction concerned and no less capacity could reasonably be provided than has been incorporated in the design of the Scheme.. On that basis the Applicant believes that it would be unreasonable and disproportionate to carry out further modelling in respect of these junctions.</p> <p>Notwithstanding the above, the Applicant has agreed with CCC (at a meeting held on 29 November 2021) to carry out a limited amount of sensitivity testing of the Eltisley Link junction so as to confirm the adequacy of the proposed layout to accommodate the traffic flows with the Scheme in place using an alternative set of traffic flow forecasts.</p> <p>In respect of the B1046/ Potton Road junction, an assessment of alternative traffic flow forecasts is to be made to determine whether there is a case for further sensitivity testing.</p> <p>The results of these assessments are to be made available to CCC as soon as possible before Deadline 8.</p>

Reference Number	Submission by the Cambridgeshire Authorities/Applicant's Comments
REP5-020bh	<p>Scheme Junctions – Forecast Traffic Flows 7.3.7 - REP1-038p</p> <p>The rationale for not carrying out further work at the B1046/Potton Road Junction and Eltisley Link junctions is also set out in the Scope of Junction Model Sensitivity Test [REP3- 029].</p> <p>This is not acceptable to the Councils as the scheme is proposing significant changes to both these locations and the Councils need to be convinced that the proposed junction is of sufficient scale to accommodate the level of traffic projected without significant over provision. This is not possible based on the information available to date and therefore it is not possible to confirm the design at these locations.</p>
Applicant's comments	<p><u>B1046/Potton Road Junction and Eltisley Link junctions</u></p> <p>The Applicant maintains that the junction capacity modelling undertaken in support of the Transport Assessment [APP-241] demonstrates that the junctions concerned have been designed to have sufficient capacity to accommodate the design flows adopted, with sufficient headroom to accommodate any uncertainty in the forecasting methodology. The results achieved provide sufficient 'headroom' to give confidence that these junctions would remain within capacity with any reasonable set of alternative traffic forecasts, such as those which resulted from the Sensitivity Testing undertaken at other locations around the Scheme.</p> <p>The question of over provision of traffic capacity at these locations does not arise, because the junctions have been designed to meet the minimum geometric standards prescribed in the Design Manual of Roads and Bridges for the type of junction concerned and no less capacity could reasonably be provided than has been incorporated in the design of the Scheme. . On that basis the Applicant believes that it would be unreasonable and disproportionate to carry out further modelling in respect of these junctions.</p> <p>Notwithstanding the above, the Applicant has agreed with CCC (at a meeting held on 29 November 2021) to carry out a limited amount of sensitivity testing of the Eltisley Link junction so as to confirm the adequacy of the proposed layout to accommodate the traffic flows with the Scheme in place using an alternative set of traffic flow forecasts.</p> <p>In respect of the B1046/ Potton Road junction, an assessment of alternative traffic flow forecasts is to be made to determine whether there is a case for further sensitivity testing.</p> <p>The results of these assessments are to be made available to CCC as soon as possible before Deadline 8.</p>

Reference Number	Submission by the Cambridgeshire Authorities/Applicant's Comments
REP5-020bi	<p>Scheme Junctions – Forecast Traffic Flows 7.3.8 - REP1-038q</p> <p>This relates to the B1046/ Potton Road and (existing A428)/Eltisley junctions. The Scope of Junction Model Sensitivity Test [REP3-029] provides the Applicant's rationale for not carrying out further work in respect of these junctions.</p> <p>This is not acceptable to the Councils as the scheme is proposing significant changes to both these locations and the Councils need to be convinced that the proposed junction is of sufficient scale to accommodate the level of traffic projected without significant over provision. This is not possible based on the information available to date and therefore it is not possible to confirm the design at these locations.</p>
Applicant's comments	<p><u>B1046/Potton Road Junction and Eltisley Link junctions</u></p> <p>The Applicant maintains that the junction capacity modelling undertaken in support of the Transport Assessment [APP-241] demonstrates that the junctions concerned have been designed to have sufficient capacity to accommodate the design flows adopted, with sufficient headroom to accommodate any uncertainty in the forecasting methodology. The results achieved provide sufficient 'headroom' to give confidence that these junctions would remain within capacity with any reasonable set of alternative traffic forecasts, such as those which resulted from the Sensitivity Testing undertaken at other locations around the Scheme.</p> <p>The question of over provision of traffic capacity at these locations does not arise, because the junctions have been designed to meet the minimum geometric standards prescribed in the Design Manual of Roads and Bridges for the type of junction concerned and no less capacity could reasonably be provided than has been incorporated in the design of the Scheme. . On that basis the Applicant believes that it would be unreasonable and disproportionate to carry out further modelling in respect of these junctions.</p> <p>Notwithstanding the above, the Applicant has agreed with CCC (at a meeting held on 29 November 2021) to carry out a limited amount of sensitivity testing of the Eltisley Link junction so as to confirm the adequacy of the proposed layout to accommodate the traffic flows with the Scheme in place using an alternative set of traffic flow forecasts.</p> <p>In respect of the B1046/Potton Road junction, an assessment of alternative traffic flow forecasts is to be made to determine whether there is a case for further sensitivity testing.</p> <p>The results of these assessments are to be made available to CCC as soon as possible before Deadline 8.</p>

Reference Number	Submission by the Cambridgeshire Authorities/Applicant's Comments
REP5-020bj	<p>Scheme Junctions – Forecast Traffic Flows 7.3.9 - REP1-038r</p> <p>The Applicant does not agree with the Councils assertion that the assessments undertaken are not based on robust data.</p> <p>The Applicant states that the sensitivity tests at Wyboston and Barton Road junctions will address this issue but the sensitivity tests do not address the concerns of the Councils at other junctions on the local road network.</p> <p>It would appear that the sensitivity tests will be submitted by Deadline 5. To date there has been no discussion on the sensitivity tests with the Councils and therefore the Councils have no certainty that the sensitivity tests will give the assurances required by the Councils.</p>
Applicant's comments	<p><u>Wyboston and Barford Road Junctions</u></p> <p>In respect of the Wyboston and Barford Road junctions, Sensitivity Testing was carried out in accordance with the methodology set out by CCC in their note 'CCC Preferred Method for Deriving Junction Model Flows' [REP3- 043]. More detail of the application of this method is set out in the 'Scope of Junction Model Sensitivity Test' [REP3-029]. Given time constraints, as the methodology was prescribed by CCC itself, the Applicant did not consider it necessary to discuss the Sensitivity Tests with CCC because their preferred approach was being followed.</p> <p>Details of the Sensitivity tests undertaken and the results achieved are set out in the document 9.68 'Junction Model Sensitivity Test Results' [REP5-018].</p> <p>In addition, the Applicant will share the Sensitivity Test models and details of the derivation of the traffic flows used, with CCC at the earliest opportunity after Deadline 5.</p> <p>The Applicant believes that this will provide the Councils with the assurances they require.</p> <p>The Sensitivity Tests undertaken confirm that the Scheme provides, overall, a substantial benefit to the operation of these junctions, with a minimal deterioration in the performance of the Great North Road (N) arm at the Wyboston junction and the Barford Road (N) arm of the Barford Road junction, resulting from the re-routing of local traffic from within St Neots to access the Scheme via these routes.</p> <p>Notwithstanding this, the Applicant has agreed with the Councils to undertake an assessment to examine the potential for the re-allocation of road space at these junctions, once the Scheme opens to traffic, to make better use of the capacity available. The outcome of this exercise will be discussed with CCC after D6 and will be submitted into the Examination at Deadline 8.</p>

Reference Number	Submission by the Cambridgeshire Authorities/Applicant's Comments
REP5-020bk	<p>Table 8-1 – Summary of Existing Junctions without calibrated base models Row 5: A428/A1303 Madingley Mulch Roundabout - REP1-038s</p> <p>The Applicant states that the assessment of this junction is covered by the extension of the M11 J13 VISSIM model. This is agreed as being the preferred option for the modelling of this junction as the issues are caused by downstream issues on the A1303.</p> <p>The revised model has not been discussed or shared with the Councils and therefore it is not possible to confirm if the revised model is acceptable and it is also not possible to confirm if this junction is covered by the sensitivity testing proposed following ISH2.</p>
Applicant's comments	<p>A Technical Note considering the issues at Madingley Mulch junction in the context of traffic capacity issues along the A1303 corridor will be issued to CCC before submission of the document into the Examination at Deadline 8. The Applicant will update the forecast M11 J13 Vissim models to correct the issue identified by CCC, where the North West Cambridge Development zone did not load at the correct location, as well as extending the models to include the A428 main carriageway.</p>
REP5-020bl	<p>Table 8-1 – Summary of Existing Junctions without calibrated base models Row 6: Wyboston Roundabout - REP1-038t</p> <p>The Applicant confirms that this junction is included in the sensitivity testing following ISH2.</p> <p>It is noted that the sensitivity testing is due to be reported at Deadline 5. To date there has been no discussion on the sensitivity tests with the Councils and therefore the Councils have no certainty that the sensitivity tests will give the assurances required by the Councils.</p>
Applicant's comments	<p><u>Wyboston Junction</u></p> <p>In respect of the Wyboston junction, Sensitivity Testing was carried out in accordance with the methodology set out by CCC in their note 'CCC Preferred Method for Deriving Junction Model Flows' [REP3- 043]. More detail of the application of this method is set out in the 'Scope of Junction Model Sensitivity Test' [REP3-029]. Given time constraints, as the methodology was prescribed by CCC itself, the Applicant did not consider it necessary to discuss the Sensitivity Tests with CCC because their preferred approach was being followed.</p> <p>Details of the Sensitivity tests undertaken and the results achieved are set out in the document 9.68 'Junction Model Sensitivity Test Results' [REP5-018].</p> <p>In addition, the Applicant has shared the Sensitivity Test models and details of the derivation of the traffic flows used, with CCC at the earliest opportunity after Deadline 5.</p>

Reference Number	Submission by the Cambridgeshire Authorities/Applicant's Comments
	<p>The Applicant believes that this will provide the Councils with the assurances they require.</p> <p>The Sensitivity Tests undertaken confirm that the Scheme provides, overall, a substantial benefit to the operation of this junction, with a minimal deterioration in the performance of the Great North Road (N) arm at the Wyboston junction, resulting from the re-routing of local traffic from within St Neots to access the Scheme via this route.</p> <p>Notwithstanding this, the Applicant has agreed with the Councils to undertake an assessment to examine the potential for the re-allocation of road space at this junction, once the Scheme opens to traffic, to make better use of the capacity available. The outcome of this exercise will be discussed with CCC prior to submission of information into the Examination at Deadline 8.</p>
REP5-020bm	<p>Table 8-1 – Summary of Existing Junctions without calibrated base models Row 7: Barford Road Roundabout - REP1-038u</p> <p>The Applicant confirms that this junction is included in the sensitivity testing following ISH2.</p> <p>It is noted that the sensitivity testing is due to be reported at Deadline 5. To date there has been no discussion on the sensitivity tests with the Councils and therefore the Councils have no certainty that the sensitivity tests will give the assurances required by the Councils.</p>
Applicant's comments	<p><u>Barford Road Junction</u></p> <p>In respect of the Barford Road junction, Sensitivity Testing was carried out in accordance with the methodology set out by CCC in their note 'CCC Preferred Method for Deriving Junction Model Flows' [REP3- 043]. More detail of the application of this method is set out in the 'Scope of Junction Model Sensitivity Test' [REP3-029]. Given time constraints, as the methodology was prescribed by CCC itself, the Applicant did not consider it necessary to discuss the Sensitivity Tests with CCC because their preferred approach was being followed.</p> <p>Details of the Sensitivity tests undertaken and the results achieved are set out in the document 9.68 'Junction Model Sensitivity Test Results' [REP5-018].</p> <p>In addition, the Applicant will share the Sensitivity Test models and details of the derivation of the traffic flows used, with CCC at the earliest opportunity after Deadline 5.</p> <p>The Applicant believes that this will provide the Councils with the assurances they require.</p> <p>The Sensitivity Tests undertaken confirm that the Scheme provides, overall, a substantial benefit to the operation of this junction, with a minimal deterioration in the performance of the Barford Road_(N) arm at the Barford Road junction, resulting from the re-routing of local traffic from within St Neots to access the Scheme via this route.</p>

Reference Number	Submission by the Cambridgeshire Authorities/Applicant's Comments
	<p>Notwithstanding this, the Applicant has agreed with the Councils to undertake an assessment to examine the potential for the re-allocation of road space at this junction, once the Scheme opens to traffic, to make better use of the capacity available. The outcome of this exercise will be discussed with CCC prior to submission of information into the Examination at Deadline 8.</p>
REP5-020bn	<p>Existing Junctions with no calibrated base models 8.1.4 - REP1-038v</p> <p>The Applicant asserts that this issue will be addressed by the sensitivity testing proposed but it is unclear if all the junctions affected by the scheme will be covered by the sensitivity testing proposed by the applicant.</p>
Applicant's comments	<p>The Applicant has considered the case for Sensitivity Testing at the junctions affected by the Scheme identified by the Councils in their previous submissions and has commissioned Sensitivity Testing at the three key Scheme junctions (Black Cat, Cambridge Road and Caxton Gibbet) and at the two junctions on the existing A428 (Wyboston and Barford Road) where we acknowledge that there may be a case for carrying out Sensitivity Testing because of the significance of the issues identified by the Councils. The results of this exercise are set out in the document 'Junction Model Sensitivity Test Results' [REP5-018].</p> <p>On the basis of the results obtained through the Sensitivity Testing undertaken, the Applicant considers that the case for not carrying out Sensitivity Testing at other locations has been confirmed. That case has already been comprehensively addressed by the Applicant in the document 'Scope of Junction Model Sensitivity Test' [REP3-029].</p> <p>The Applicant therefore considers that this point has been appropriately addressed.</p> <p>Notwithstanding the above, the Applicant has agreed with CCC (at a meeting held on 29 November 2021) to carry out a limited amount of sensitivity testing of the Eltisley Link and Cambourne junctions, and an analysis of traffic flow differences at the B1046/Potton Road and A428/Toseland Road/Abbotsley Road junctions, so as to confirm the adequacy of the layout of these junctions to accommodate the traffic flows with the Scheme in place using an alternative set of traffic flow forecasts. The results of this assessment are to be made available to CCC as soon as possible before Deadline 8.</p> <p>Following the meeting held on 29 November 2021, and following the ISH5 discussions and deliberations, the Applicant understands that the Councils are now content that no further sensitivity Testing is required in respect of any of the other junctions assessed in either the Transport Assessment [APP-241] or the Transport Assessment Annex [APP-242].</p>

Reference Number	Submission by the Cambridgeshire Authorities/Applicant's Comments
REP5-020bo	<p>Existing Junctions with no calibrated base models 8.1.7 - REP1-038w</p> <p>The Councils are still concerned that the Applicant is not proposing to retest all of the junctions impacted by the scheme. This is a concern because there are a number of junctions where confidence is required to ensure that the impact of the proposed scheme at all the junctions particularly on the local road network is fully understood.</p>
Applicant's comments	<p>The Applicant has considered the case for Sensitivity Testing at the junctions affected by the Scheme identified by the Councils in their previous submissions and has commissioned Sensitivity Testing at the three key Scheme junctions (Black Cat, Cambridge Road and Caxton Gibbet) and at the two junctions on the existing A428 (Wyboston and Barford Road) where we acknowledge that there may be a case for carrying out Sensitivity Testing because of the significance of the issues identified by the Councils. The results of this exercise are set out in the document 'Junction Model Sensitivity Test Results' [REP5-018].</p> <p>On the basis of the results obtained through the Sensitivity Testing undertaken, the Applicant considers that the case for not carrying out Sensitivity Testing at other locations has been confirmed. That case has already been comprehensively addressed by the Applicant in the document 'Scope of Junction Model Sensitivity Test' [REP3-029].</p> <p>The Applicant therefore considers that this point has been appropriately addressed.</p> <p>Notwithstanding the above, the Applicant has agreed with CCC (at a meeting held on 29 November 2021) to carry out a limited amount of sensitivity testing of the Eltisley Link and Cambourne junctions, and an analysis of traffic flow differences at the B1046/Potton Road and A428/Toseland Road/Abbotsley Road junctions, so as to confirm the adequacy if the layout of these junctions to accommodate the traffic flows with the Scheme in place using an alternative set of traffic flow forecasts. The results of this assessment are to be made available to CCC as soon as possible before Deadline 8.</p> <p>Following the meeting held on 29 November 2021, and following the ISH5 discussions and deliberations, the Applicant understands that the Councils are now content that no further sensitivity Testing is required in respect of any of the other junctions assessed in either the Transport Assessment [APP-241] or the Transport Assessment Annex [APP-242].</p>

Reference Number	Submission by the Cambridgeshire Authorities/Applicant's Comments
REP5-020bp	<p>9.8 Traffic Routeing Impacts at Coton Technical Note [REP1- 028] - REP3-038x</p> <p>The Applicant has declined to fix the coding errors identified in this area of the model because the flow differences are low, and the traffic is going to Cambridge.</p> <p>The Councils acknowledge that the actual impact of the scheme on Coton is likely to be less than indicated by the modelling because the model coding is incorrect. Therefore, the Councils require monitoring of the traffic levels of traffic through Coton to confirm this assumption.</p> <p>In addition, this approach means that the DCO model may not be suitable for use in the assessment of any other schemes in this area of the County such as M11 J13 without significant work to ensure that the strategic model adequately reflects the operation of the local and strategic road networks.</p>
Applicant's comments	<p>As noted in REP3-035b, the Applicant's Technical Note [REP1-028] demonstrates that the coding errors were confined to two short links and that the impact is relatively minor and localised.</p> <p>The strategic model was specifically developed for the assessment of the Scheme. If at a future stage the model were to be used to assess other schemes within this area, the model would need further development and refinement and that would include a comparison of modelled and observed flows focusing on the area of interest.</p> <p>In relation to the point regarding monitoring, please refer to the Monitor and Manage Technical Note [TR010044/EXAM/9.81], submitted at Deadline 6. This sets out that monitoring key points on local roads is possible within the Post Operational Project Evaluation for the purposes of evaluating scheme benefits. These locations must be expected to experience significant change and be quantitatively justified within the results of the traffic forecasting or pertain to a sensitive location. The monitoring results will be shared with the Local Highway Authorities (LHAs).</p>
REP5-020bq	<p>Traffic Origins and Destinations and Forecast Growth 3.1.1 - REP3-038z</p> <p>The Councils raised the issue that the model showed significant levels of traffic using the road through Coton that were not shown to be using this road in the observed data. The destination of this traffic was not the real issue. The fact that the majority of this traffic was shown to have a destination in Cambridge is not really relevant.</p> <p>The monitoring of the scheme impact through Coton by the Applicant should show that the predicted levels of traffic are not realised should the predicted level of traffic be generated than the Applicant will be required to agree mitigation with CCC and the Parish Council.</p>

Reference Number	Submission by the Cambridgeshire Authorities/Applicant's Comments
Applicant's comments	<p>As noted in the Traffic Routeing Impacts at Coton Technical Note [REP1-028], the model is over-predicting the traffic routeing through Coton in both the with and without Scheme scenarios. However, the relevance of the traffic through Coton being predominantly local traffic with origins/destinations within Cambridge, is that these trips will not be affected by the Scheme.</p> <p>In relation to the point regarding monitoring, please refer to the Monitor and Manage Technical Note [TR010044/EXAM/9.81], submitted at Deadline 6. This sets out that monitoring key points on local roads is possible within the Post Operational Project Evaluation for the purposes of evaluating scheme benefits. These locations must be expected to experience significant change and be quantitatively justified within the results of the traffic forecasting or pertain to a sensitive location. The monitoring results will be shared with the Local Highway Authorities (LHAs).</p>
REP5-020br	<p>Traffic Origins and Destinations and Forecast Growth 3.1.2 – 3.1.10 - REP3-038aa to REP3-038al</p> <p>The Applicant argues that the issues with the model are due to traffic in the model using all routes available. However, the reason that the volumes of traffic through Coton are as they are in the model is due to the errors in the coding highlighted in the Technical Note [REP1-028].</p> <p>The monitoring of the scheme impact through Coton by NH should show that the predicted levels of traffic are not realised should the predicted level of traffic be generated than the Applicant will be required to agree mitigation with CCC and the Parish Council.</p>
Applicant's comments	<p>The Applicant has acknowledged the coding errors in the model and as noted in REP1-028 this explains the over-estimation of traffic flows through Coton in both the base year and future scenarios. However, the Applicant does not consider that this would have any effect on the forecast flow changes at Coton as a result of the Scheme since this traffic is local and would not be affected by the Scheme.</p> <p>In relation to the point regarding monitoring, please refer to the Monitor and Manage Technical Note [TR010044/EXAM/9.81], submitted at Deadline 6. This sets out that monitoring key points on local roads is possible within the Post Operational Project Evaluation for the purposes of evaluating scheme benefits. These locations must be expected to experience significant change and be quantitatively justified within the results of the traffic forecasting or pertain to a sensitive location. The monitoring results will be shared with the Local Highway Authorities (LHAs).</p>

Reference Number	Submission by the Cambridgeshire Authorities/Applicant's Comments
REP5-020bs	<p>9.16 Applicants response to submissions made at Open Floor Hearing 1 [REP1-035] - REP3-038ar</p> <p>The Councils acknowledge the approach taken by the applicant in relation to the testing of the rerouting due to construction of the scheme. The Councils are concerned that the result of this approach to modelling leads to a wider impact of the rerouting than might normally be expected.</p> <p>The Councils are seeking monitoring of key areas both before construction starts to give an accurate baseline and throughout construction to enable the impact of construction of the scheme to be assessed.</p>
Applicant's comments	<p>As noted in REP3-038ar, Traffic Management Plan [APP-244], no attempt was made to influence Strategic Road Network (SRN) traffic to not use alternative routes to the SRN. While other construction traffic could be barred from certain routes, it would be difficult in practice to bar non-construction SRN traffic from using alternative routes. Therefore, the approach to modelling the impacts of construction on traffic patterns is considered robust with the results providing an indication of the routes that are likely to experience increases in flow during the construction period but, for the reason stated above, is likely to overstate those impacts.</p> <p>In relation to the point regarding monitoring during construction, please refer to the Monitor and Manage Technical Note [TR010044/EXAM/9.81], submitted at Deadline 6. This sets out that monitoring key points on local roads is possible within the Post Operational Project Evaluation for the purposes of evaluating scheme benefits. These locations must be expected to experience significant change and be quantitatively justified within the results of the traffic forecasting or pertain to a sensitive location. The monitoring results will be shared with the Local Highway Authorities (LHAs).</p>
REP5-020bt	<p>Ongoing ecological survey work - REP3-040a</p> <p>The Councils welcome the proposed submission of 2021 survey work at Deadline 5. This should be utilised to update the Biodiversity Metric calculations [REP3-013].</p>
Applicant's comments	<p>On analyzing the results of the 2021 surveys, they showed no significant change in habitat area and, or condition, and hence there was no value in redoing the calculations. The relatively small change was a decrease in condition of arable margins which might increase the Habitat measure.</p>

Reference Number	Submission by the Cambridgeshire Authorities/Applicant's Comments
REP5-020bu	<p>Planting - elm - REP3-040b</p> <p>The Councils still seek confirmation that Elm (currently under consideration in the First EMP [APP-234]) will be included in the hedgerow and woodland planting mixes.</p>
Applicant's comments	<p>The reference to Elm in Annex L Landscape and Ecology Management Plan of the First Iteration Environmental Management Plan [TR010044/APP/6.8v2] has been updated to set out that Elm will be included in the planting mix if feasible and will be focused in areas of woodland on the edges of the Scheme where a screening function is not required. Furthermore, text has been added to explain that further work will be done to confirm feasibility and identify appropriate stock availability and consultation with the relevant local authorities.</p>
REP5-020bv	<p>Great Crested Newt REP3-040c</p> <p>The Councils welcome National Highways' proposed submission of a draft ESP licence to mitigate impact to GCN. The Councils welcome confirmation that no GCN breeding ponds will be lost in Cambridgeshire.</p>
Applicant's comments	<p>The Applicant welcomes the support of the Cambridgeshire Authorities in REP5-020bv for submission of a draft European Protected Species licence to mitigate impact on great crested newts. A draft licence was submitted to Natural England for review on 24 November 2021. The grassland receptor sites and new ponds for great crested newt have been included on Figure 2-4 (v3) Environmental Masterplan [TR010044/APP/6.2] of the Environmental Statement, submitted at Deadline 6. The mitigation will be within the permanent landtake for the Scheme.</p>
REP5-020bw	<p>Borrow-pit Biodiversity Net Gain - REP3-040d</p> <p>National Highways reference to REP3-036c here does not adequately address this matter. See the Councils' response to REP3-037j and REP3-037k above.</p>
Applicant's comments	<p>The metric 2.0 Biodiversity net gain calculation took into account temporary loss of these habitats. As it is the Applicant's intention to return this land to agricultural standards (in agreement with the landowner), it will be returned to its former agricultural land use. Accordingly, there is limited opportunity to achieve biodiversity net gain.</p>

Reference Number	Submission by the Cambridgeshire Authorities/Applicant's Comments
REP5-020bx	<p>Missed opportunities for Biodiversity Net Gain - REP3-040e</p> <p>The Councils does not agree. The scheme should deliver at least no net loss, and seek to deliver net gain in accordance with National Policy, as set out in the Councils' response to National Highways response to the Councils' Local Impact Report REP2-003ad, pages 8-10 [REP4-058].</p>
Applicant's comments	<p>The Applicant notes the comments from the Cambridgeshire Authorities and advises the Scheme will not currently result in a net loss in the length of hedgerows. The Applicant refers the Cambridgeshire Authorities to its response to Q.2.3.2.1 [REP4-037] which clarifies that the Scheme will deliver overall increases in woodland, grassland habitat and hedgerow length when compared to baseline values and explains why, in the case of hedgerows, a negative score (-31%) has been calculated for this unit type despite some 3.4km of new hedgerow being created.</p>
REP5-020by	<p>Construction hours REP3-041a</p> <p>The Councils welcome the opportunity to discuss the detail of this matter, as was agreed with the Applicant at a meeting on 10 November.</p>
Applicant's comments	<p>As previously stated by the Applicant, the core construction hours are as those set out in Paragraph 2.6.244 within Chapter 2, The Scheme [APP-071] of the Environmental Statement. These are as follows:</p> <p>07:00-18:00 Monday to Friday 07:00-13:00 on Saturdays</p> <p>The start-up and shut down periods would be either side of these times. During these periods, the Principal Contractor will be undertaking activities that cause minimal noise such as:</p> <ul style="list-style-type: none"> • Arrival of delivery vehicles to site. • Arrival of vehicles to the works compounds. • Plant and machinery checks. • Arrival and departure of the works force at site. • Site briefings.

Reference Number	Submission by the Cambridgeshire Authorities/Applicant's Comments
	<ul style="list-style-type: none"> • Site inspections. • Site preparation – without the use of plant. • Site clean up. • Refuelling. <p>In addition, and as set out in previous representations, the Applicant is willing to engage in discussions with the local authorities so that agreements can be sought when working close to sensitive locations, such as residential properties, or where there are specific activities, such as during school exams, where noise from construction could potentially be minimised. Where appropriate, discussions will be held with local authorities on these matters during the detailed design stage where mitigation can be discussed in more detail.</p>
REP5-020bz	<p>Noise impacts REP3-041b</p> <p>This matter is currently under consideration by the Councils.</p>
Applicant's comments	<p>The Applicant notes this response from the Cambridgeshire Authorities.</p>
REP5-020ca	<p>Noise impacts REP3-041c and REP3-041d</p> <p>We are now satisfied with the Applicant's comment, following further detailed information presented at the meeting referred to on 21 October 2021, when this issue was discussed.</p>
Applicant's comments	<p>The Applicant notes and welcomes this response from the Cambridgeshire Authorities.</p>
REP5-020cb	<p>Applicant's response to submissions made in relation to residual emissions (comments on response to relevant representations) - REP3-041 and REP3-042e</p> <p>The Councils acknowledge the Applicant's approach in relation to plans to continue to refine and optimise carbon reduction measures during detailed design and construction phases in order to further reduce residual emissions. Commitments are also made to scheme level emissions being supported by national level policies in the Transport Decarbonisation Plan (2021)³ and Net Zero Carbon Highways</p>

Reference Number	Submission by the Cambridgeshire Authorities/Applicant's Comments
	<p>Plan (2021)⁴ although as previously noted we are disappointed that policies such as the approach to provision of ultra rapid EV charge points along the strategic roads network as outlined in the Decarbonising Transport Plan are not provided for within this Scheme.</p> <p>With regards to the approach to offsetting, 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 that as a result it is not possible to provide adequate certainty for testing this element of the proposed scheme's impacts. Elsewhere, in the Statement of Common Ground for example, the Applicant has stated that the scheme will not benefit from carbon offsetting. As such, the Councils still 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.</p>
Applicant's comments	<p>The Applicant set out their position on offsetting residual emissions from the Scheme in the Applicant's Comments on submission made at Deadline 4 [REP5-014] in response to REP4-058t.</p> <p>To summarise, National Highways 2030/2040/2050 net zero highways plan states that residual emissions from maintenance and construction activities will be offset from 2039. Additionally, the DfT's Transport Decarbonisation Plan states that any residual emissions arising from 2050 onwards will need to be removed from the atmosphere using greenhouse gas removal processes or using other accepted offset methods if the UK is to meet its net zero target by 2050. Strategies and technologies are still being developed as to how the UK will remove and off set residual emissions so it is not possible to say with any certainty exactly how GHG emissions will be mitigated from 2050.</p>
9.48 Pre-commencement Plan	
REP5-020cd	<p>Limitations – 1.2</p> <p>The Councils acknowledge that the detailed design of the Scheme has not been completed and therefore the scope and methods of pre-construction works are described as indicative. The Councils request confirmation that the final design of the pre-construction works will not give rise to materially greater environmental effects than those outlined indicatively in the pre-commencement plan.</p>
Applicant's comments	<p>The Applicant confirms that works will not be progressed during the pre-commencement phase where they would give rise to materially greater environmental effects than those outlined in the Pre-commencement Plan [TR010044/EXAM/9.48v2], which has been submitted at Deadline 6.</p>

Reference Number	Submission by the Cambridgeshire Authorities/Applicant's Comments
REP5-020ce	<p>Traffic management – 3.1.26 and 3.1.27</p> <p>The traffic management section is noted. If the traffic management is on CCC network we will require permits or road space booking and liaison with streetworks to avoid conflict with other works on our network.</p> <p>The Councils are currently reviewing our position on other detail that may be necessary in the traffic management plan.</p>
Applicant's comments	<p>The traffic management section of the Pre-commencement Plan [TR010044/EXAM/9.48v2], has been revised to include a requirement for permits and road space booking to be obtained from the relevant highway authority where any temporary traffic management is required to facilitate pre-commencement works.</p>
<p>9.49 Overview of handover process for de-trunked assets and local highways</p>	
REP5-020cf	<p>The handover process for detrunked assets – 1.3.3</p> <p>The Councils note the high-level nature of the overview document, however, would emphasise that the handover plan should include details and timings of all work, repairs and upgrade necessary to be carried out by the Applicant to bring all of the detrunked assets up to the detrunked road standards. This requirement is not confined to carriageways and structures.</p>
Applicant's comments	<p>The Applicant notes this comment from the Cambridgeshire Authorities and the extent of the de-trunked assets to be maintained by the local highway authority going forwards will be determined and set out in the legal agreement.</p>
REP5-020cg	<p>The handover process for detrunked assets – 1.3.5</p> <p>The Councils wish to clarify that, whilst the proposed De-trunking Date is set from the outset of the agreement, the actual De-trunking Date will not occur until the Councils have confirmed that the Handover Plan has been complied with to bring the highway assets up to an appropriate standard.</p>
Applicant's comments	<p>The Applicant notes and agrees with this clarification provided by the Cambridgeshire Authorities.</p>

Reference Number	Submission by the Cambridgeshire Authorities/Applicant's Comments
REP5-020ch	<p>The handover process for detrunked assets – 1.3.7</p> <p>As set out in relation to Article 13 above for 3.1 Updated draft Development Consent Order [REP4-005 and REP4-006], the Councils require Article 13 to include a requirement for certification of all highways and PROW. They do not accept that it is sufficient for the provision to be made only in the legal agreement. Certification is part of the formal legal process and as such ought to be contained within the DCO. The purpose of certification is to prevent handover by the undertaker before the LHA is reasonably satisfied that the highway concerned is in ready for handover in accordance with the provision of the DCO (e.g. alignment) and condition.</p> <p>Please see our detailed response to Article 13 above [REP4-005 and REP4-006].</p>
Applicants' comments	The Applicant would refer to its response to REP5-020I above.
9.50 – Strategic Model Test at Girton	
REP5-020ci	<p>Network Issues 2.1.1</p> <p>These coding errors are more extensive than those identified by CCC.</p> <p>The number of coding errors that NH are finding in the strategic model are also increasingly alarming.</p>
Applicant's comments	The two additional coding errors identified were relatively minor, these being a link length on the A428 eastbound being too short by 84m; and Speed Flow Curves not coded on the M11 northbound off-slip. A model test of these corrections demonstrated that their impacts were minor resulting in traffic flow changes of just 1 or 2 PCUs.
REP5-020cj	<p>Network Issues – 2.1.2</p> <p>CCC agree that a sensitivity test is the appropriate way to test the impact of the errors</p>
Applicant's comments	The Applicant notes this comment from the Cambridgeshire Authorities.

Reference Number	Submission by the Cambridgeshire Authorities/Applicant's Comments
REP5-020ck	<p>Assessment – 3.1.7</p> <p>The Applicant states that the Sensitivity Test forecasts show:</p> <p><i>An increase of 193 PCUs on the A14 WB and at the A14/A428 diverge, due to a reduction of 36 seconds on delay.</i></p> <p>CCC note that the figure should be 133 PCU not 193 as stated. However, this is quite a large increase, albeit not of concern to CCC as it is on the SRN.</p> <p>Changes of this magnitude should improve the BCR for the scheme and therefore the revised model should be used in the assessment of the scheme.</p>
Applicant's comments	<p>The Applicant confirms that the increase at the A14/M11 diverge is 133 and not 193 PCU's. The increase at the A14/A428 diverge is 193 PCU's as correctly stated. It combines the increase on the A14 on-slip road (79 PCUs) and A428 WB (114 PCUs) as shown in Figure 3-3.</p> <p>The Applicant considers that such a magnitude of change will have only a negligible effect on the BCR.</p>
REP5-020cl	<p>Figure 3.3</p> <p>The reduction of 48 PCU's through Dry Drayton in PM is welcomed, although this may be present in DM too if the coding were corrected in all model scenarios so this may not be an impact of the scheme and therefore, the Councils still require monitoring of the scheme impact on Dry Drayton.</p>
Applicant's comments	<p>In relation to the point regarding monitoring at Dry Drayton, please refer to the Monitor and Manage Technical Note [TR010044/EXAM/9.81], submitted at Deadline 6. This sets out that monitoring key points on local roads is possible within the Post Operational Project Evaluation for the purposes of evaluating scheme benefits. These locations must be expected to experience significant change and be quantitatively justified within the results of the traffic forecasting or pertain to a sensitive location. The monitoring results will be shared with the Local Highway Authorities (LHAs).</p>
REP5-020cm	<p>Figure 3.4</p> <p>The sensitivity test appears to suggest quite a large reduction in delay on the A14 WB approach to Girton Interchange. This should improve user benefits of the scheme, although the change should be in DM too so the impact of the scheme may not be that significant in reality.</p>

Reference Number	Submission by the Cambridgeshire Authorities/Applicant's Comments
Applicant's comments	The Applicant notes the comment from the Cambridgeshire Authorities.
REP5-020cn	<p>Impact on Daily Traffic Forecasts – Table 4.2 – Traffic Flows – 2040 DS AADT in Vehicles</p> <p>The sensitivity test result is relatively small differences in flows on A428 which is not a surprise. The largest differences are in the vicinity of the coding errors, Girton Interchange. The Councils conclusion that NH should monitor Girton Interchange merge at A428 – M11 merge is unchanged.</p>
Applicant's comments	In relation to the point regarding monitoring at the Girton Interchange, Paragraph 3.22.5 of the Transport Assessment Annex [APP-243] sets out that the M11 J14 Girton Interchange will be the subject of a Monitor and Manage approach in which the performance of the network will be monitored and consideration will be given by National Highways to the potential need for interventions, if required.
9.51 – Sensitivity Test for School Lane, Cambourne	
REP5-020co	<p>Network Issues – 2.1.1</p> <p>Coding errors in the strategic model are mounting up, undermining CCC's confidence in the model especially in areas more remote from the proposed scheme. This means that the use of this model in the assessment of other schemes such as M11 J13 and EWR will require very careful checks of the model coding.</p>
Applicant's comments	<p>The network coding errors in the strategic model have primarily been on local roads and not the Strategic Road Network (SRN). Therefore, any volume or distributional impact on the network will be localised and primarily affect short distance trips. CCC have acknowledged [REP1-051] that “the strategic model was found to be sound for use in the assessment of the impacts of the scheme”.</p> <p>The sensitivity tests have shown that the impacts of the coding errors are localised and the resulting flow changes are small. The model has been developed specifically to assess the A428 Black Cat to Caxton Gibbet Scheme and if in future the model were to be adapted to assess other schemes, the model would need to be subject to a validation process that focused upon the area of influence of the scheme that was being assessed. A model should always be reviewed and updated for the specific requirements of the scheme it is being used to assess.</p>

Reference Number	Submission by the Cambridgeshire Authorities/Applicant's Comments
	<p>The model has been subject to a stringent validation process using Department for Transport (DfT) TAG guidelines. As reported in Local Model Validation Report – Appendix B of the Combined Modelling and Appraisal Report [APP-252] the model achieved an excellent validation when comparing modelled and observed link flows and journey times.</p>
REP5-020cp	<p>Assessment – 3.1.2</p> <p>CCC notes the increase in flows through the Cambourne roundabouts and also note that the corrected flows should now be used in the detailed junction assessments for the Cambourne roundabouts to ensure that the impact of the scheme is fully captured at these junctions.</p>
Applicant's comments	<p>Although there is an increase in flows through the Cambourne roundabouts in the sensitivity test, the local modelling shows there is ample capacity and further modelling with the forecast flows from the sensitivity test is not required.</p> <p>The Applicant maintains that the junction capacity modelling undertaken in support of the Transport Assessment Annex [APP-243] demonstrates that the Scheme has a minimal impact on these existing junctions, which are shown to remain well within capacity with the Scheme in place. The results achieved provide sufficient 'headroom' to give confidence that these junctions would remain within capacity with any reasonable set of alternative traffic forecasts, such as those which resulted from the Sensitivity Testing undertaken at other locations around the Scheme. On that basis the Applicant believes that it would be unreasonable and disproportionate to carry out further modelling in respect of these junctions.</p> <p>Since these are existing junctions, there is no question of mitigation being required 'to ensure that the scale of the junction is reduced as a result of the predicted reduction in traffic as a result of the scheme' as stated by the Councils in their response above.</p> <p>Notwithstanding the above, the Applicant has agreed with CCC (at a meeting held on 29 November 2021) to carry out a limited amount of sensitivity testing of the Cambourne junction so as to confirm the adequacy of the layout to accommodate the traffic flows with the Scheme in place using an alternative set of traffic flow forecasts. The results of this assessment is to be made available to CCC as soon as possible before Deadline 8.</p>
REP5-020cq	<p>Conclusions – 5.1.1</p> <p>All of these coding errors are undermining CCC confidence in the strategic model. It would be useful to obtain DM and DS models in which all of the coding errors have been corrected so the combined impact of the errors identified to date can be assessed.</p>

Reference Number	Submission by the Cambridgeshire Authorities/Applicant's Comments
Applicant's comments	<p>As noted in REP5-020co above, the model achieved an excellent validation and network coding errors have primarily been on the local road network and not the Strategic Road Network.</p> <p>The Applicant has carried out sensitivity tests specifically to assess the impact of the coding errors. The sensitivity tests have demonstrated that the impacts of the coding errors are localised and the resulting flow changes are small. For this reason, the Applicant does not propose to carry out a further assessment of the combined impacts.</p>
REP5-020cr	<p>Conclusions – 5.1.4</p> <p>CCC would also like to see the impact of the model coding corrections on A1198 S of Caxton Gibbet. Hence please could the Applicant provide SLA for the A1198 SB, S of Caxton Gibbet, or better still, supply the cordoned models to CCC so we can interrogate the models ourselves.</p>
Applicant's comments	<p>The Applicant provided CCC with the requested Select Link Analysis plots for the A1198 Southbound, south of Caxton Gibbet on 3 December 2021 and CCC acknowledged receipt on the 6 December 2021.</p>
<p>9.52 Construction Phase Greenhouse Gas Emissions</p>	
REP5-020cs	<p>General</p> <p>The Councils welcome the further detail on construction phase emissions as provided in this technical note. This provides further detail on the materials to be used for the Scheme as well as emissions associated with wider construction activities.</p> <p>It is also noted that as the Scheme progresses mitigation measures to reduce emissions will continue to be refined and optimized during detailed design and construction phases. The Councils would encourage the Applicant to include the specification of construction materials with low embodied carbon such as low temperature asphalt. We would also welcome the opportunity to have sight of specifications as these become available.</p>
Applicant's comments	<p>The Applicant notes and welcomes this response from the Cambridgeshire Authorities.</p>

Reference Number	Submission by the Cambridgeshire Authorities/Applicant's Comments
REP5-020ct	<p>Land use change – Para 3.1.1</p> <p>The calculations do not accurately use Biodiversity Net Gain Metric 2.0 Phase 1 habitat areas [REP3-013], if based on the Land Use Carbon Calculations [REP4-048]. Please see our response to Land Use Carbon Calculations [REP4-048] below. The BNG Metric 2.0 calculations also do not include the results of the 2021 habitat survey data (to be submitted at Deadline 5). The Applicant is requested to check the accuracy of the Land Use Carbon Calculations [REP4-048] and whether this would necessitate recalculation of Table 3-2 and if so, to undertake this work</p>
Applicant's comments	<p>The calculation of land use change presented in the Construction Phase Greenhouse Gas Emissions [REP4-042] report submitted at Deadline 4 and referred to in REP5-020ct used data and information on baseline and post-works habitat types and areas taken from the Biodiversity Net Gain: Metric 2 [REP3-012] report, submitted at Deadline 3.</p> <p>This is the most up to date and robust data available for biodiversity. The Applicant does not therefore anticipate any need to recalculate emissions associated with land use change.</p>
9.54 Barbastelle Bat Surveys and Mitigation Technical Note	
REP5-020cu	<p>Summary of Natural England's current position – Section 4.2</p> <p>The Councils support Natural England's position.</p>
Applicant's comments	<p>Structures have been reviewed, and a response has been provided to Natural England taking into account further comments received from Natural England. The Applicant will provide this further Information in the updated Barbastelle Bat Surveys and Mitigation Technical Note [TR010044/EXAM/9.54v3], submitted at Deadline 6.</p>
REP5-020cv	<p>Bat mitigation measures summary note – Appendix B</p> <p>Natural England's comments regarding the lack of evidence to demonstrate the proposed bat mitigation measures are appropriate and reflect the Councils' own concerns set out in response to Q2.3.5.1.c, pages 4-8 [REP4-059].</p>

Reference Number	Submission by the Cambridgeshire Authorities/Applicant's Comments
Applicant's comments	The Applicant provided a response to Natural England on 19 November 2021. Subsequently, further comments received from Natural England are set out in the updated Barbastelle Bat Surveys and Mitigation Technical Note [TR010044/EXAM/9.54v3], submitted at Deadline 6..
9.55 Applicant's response to Cambridgeshire County Council's comments on archaeological mitigation areas	
REP5-020cw	<p>Extent of archaeological site area areas or investigation methodology not agreed – 1.1.2</p> <p>A list of sites showing their areas and reasons for investigation methods was supplied to the Applicant on 30 June 2021, and resupplied with enhanced annotation on 25 October.</p> <p>This reused the list of sites and strategies supplied to the Applicant on 6 November 2020 following the presentation of the Rationale and Strategy (UAMS [REP4-030 and REP4-031] Appendix C) and again on 17 December 2020. Despite this, the list shown at 1.1.2 a of [REP4-045] is incorrect.</p> <ul style="list-style-type: none"> • 1.1.2a - areas not agreed should read Sites 10, 11, 18, 34, 36-39. Total 8 sites. • 1.1.2b - strategy not agreed should read Sites 17, 20, 27, 32, 35. Total 5 sites. • 1.1.2c - area and strategy not agreed should read Sites 19, 23, 24, 26, 28, 33. Total 6 sites. <p>The remaining 11 Cambridgeshire sites are agreed. There are a total of 30 Cambridgeshire sites if Site 14 in Urban and Civic's Wintringham Park development area is excluded (it has already been excavated by their archaeologists and does not need listing in the A428 scheme).</p> <p>This information was included in an updated Statement of Common Ground sent to the Applicant on 11 November, for submission at D5.</p>
Applicant's comments	<p>Please see the response to REP5-020ak above.</p> <p>As stated in Applicant's Comments on submissions made at Deadline 4 [REP5-014] Site 14 <i>"will not be removed from the strategy as knowledge gain from this site will inform excavations within the rest of the Scheme"</i>.</p>
REP5-020cx	<p>Bedfordshire mitigation areas 1.1.4</p> <p>The Applicant does not state if BBC and CBC have approved the mitigation strategies for the 10 sites in their areas.</p>

Reference Number	Submission by the Cambridgeshire Authorities/Applicant's Comments
Applicant's comments	Paragraph 1.1.4 of the Applicant's response to Cambridgeshire County Council's comments on archaeological mitigation areas [REP4-045] states "Mitigation areas within the other local authority areas (Bedford Borough and Central Bedfordshire) have been agreed." This confirms that BBC and CBC have approved the mitigation strategies in their areas.
REP5-020cy	<p>Omitted sites - 1.1.6</p> <p>It is not the case that the Applicant has not had advice from CCC for Sites 27 and 35 since these have been included in documents shared with them since November 2020 (see 1.1.2 above), to frame discussions over the Rationale and Strategy (Appendix C [REP4-030 and REP4-031]) and in discussions for the Statement of Common Ground.</p>
Applicant's comments	As stated in Paragraph 1.1.6 of the Applicant's response to Cambridgeshire County Council's comments on archaeological mitigation areas [REP4-045] , this information was based on information sent by CCC in August 2021 – those sites were missing from that. The Applicant did not want to misrepresent CCC's position by using other information.
REP5-020cz	<p>Industry standard for archaeological evaluation 2.1.5</p> <p>An evaluation trenching sample of 3-4% is not an industry standard. If this were the case this would be published as a such. The Multi-state European Project 'Planarch' 5 statistically tested a range of evaluation trenching strategies for 100s of schemes undertaken across the UK, Ireland and North Europe in combination with non-intrusive evaluation methods concluding that 5-10% trenching samples of development areas were optimal for archaeological prospection and that anything less than 5% trenching opened the results of evaluation programme to uncertainty and introduced levels of unpredictability of the resource and its inherent significance. The concomitant outcome would expose developers to higher contingency costs and programme delays to deal with unanticipated archaeological evidence. However, the industry recognises the high cost of 5-10% trenching is hard to meet, particularly at the pre-determination planning stage, and agrees to balance physical evaluation with non-intrusive survey evidence (geophysical survey, aerial photograph and LiDAR transcriptions) if they are of good enough quality, thereby lowering the density. It is usually agreed that the risks of less than 5% evaluation trenching of a scheme area are balanced in the mitigation phase, where sites that have been found are subject to adequate excavation – proportionate and justifiable – in order to develop robust mitigation strategies that enable sites to be properly preserved by record.</p> <p>The Applicant's strategy for the A428 seeks to omit the excavation of known parts of archaeological sites along its route, or subject them to low intensity excavation, as they believe that they adequately understand what has been found in a c.3.44% sample. This is not sound</p>

Reference Number	Submission by the Cambridgeshire Authorities/Applicant's Comments
	<p>and the Applicant would be better advised as to the impact of destruction the scheme will have upon the ancient settlements and task sites present and be required to address their preservation by record more fully than is currently proposed.</p>
Applicant's comments	<p>The Applicant does not agree that 3-4% evaluation trenching is not industry standard. Planarch is not the industry standard. It was published 20 years ago with the aim of considering the effectiveness of methodologies employed in archaeological decision-making during the planning process. While it is correct that this concluded that a 5-10% trenching sample would be the ideal, as CCC acknowledge this is expensive. However, the study did conclude that on sites such as those found on the A428 Scheme, a 3-5% sample would be required "to expect a moderately good assessment".</p> <p>It should be noted that the definition of industry standard from the Collins Dictionary is "an established standard, norm, or requirement in a particular area of business". By this definition 3-4% is the industry standard. In fact, having reviewed a number of other schemes, including those in Cambridgeshire and on other recent highways schemes, the 3.44% sample undertaken is higher than many of these other schemes:</p> <ul style="list-style-type: none"> • Wintringham Park, Cambridgeshire: three areas – 2%, 2.8% and 2.3% • A27 Arundel Bypass, West Sussex – 5% • M54 to M6 Link Road, Staffordshire – 2.75% +1% contingency (not needed) • Loves Farm, Cambridgeshire – 2.29% • A1 Morpeth to Ellingham, Northumberland – 4% (planned) • Sunnica Solar Farm, Cambridgeshire & Suffolk – 1.5% in Cambridgeshire; 3% in Suffolk (although it is noted that trenches were focused on areas where below ground impact was anticipated) <p>Furthermore, all three Local Planning Authorities have been involved in the decision making regarding the location of trenches. At the first meeting held regarding the Scheme, CCC requested a 3-5% sample for trenching. In addition, CCC requested additional trenches both during the planning stages, and when work was underway in the field. There was opportunity for more trenches to be added if it was believed that the proposals were insufficient.</p> <p>Notwithstanding this, the Archaeological Mitigation Strategy has been devised to consider each archaeological site on its own merit, with the primary aim of maximising knowledge gain. The mitigation sites have therefore been targeted and assigned a category taking all archaeological evidence into account. This has been discussed extensively in previous submissions.</p>

Reference Number	Submission by the Cambridgeshire Authorities/Applicant's Comments
REP5-020da	<p>Features not found by the geophysical survey 2.1.6</p> <p>The human cremation burial and settlement evidence that were not evident in non-intrusive survey results demonstrates precisely the unpredictability of the resource and how it is investigated. CCC's issue is that the UAMS [REP4-030 and REP4-031] has indicated a low level of excavation for this Iron Age settlement and burial area (Appendix D Site 23). The Councils note that CCC curators found the cremated remains owing to their experience in the nuanced archaeology of clayland Cambridgeshire.</p>
Applicant's comments	<p>There are were only two areas where features not located via the geophysical survey or aerial photographs were noted. However, the fact they were located during the evaluation trenching indicates that this has worked to test the archaeology not located on geophysical survey.</p> <p>This area will be stripped under archaeological supervision and any further burials would be noted. Should further cremations outside of this area be suspected there is a mechanism within 9.2.8 of the AMS [REP4-031] which states "Should archaeological features revealed within the excavation area continue outside of the area and are likely to be subject to construction impact, the excavation area may need to be extended to sufficiently characterise the material. This will only be undertaken with the agreement of the Client's Representative, the ACoW and the Principal Contractor, in consultation with the Curators."</p> <p>Furthermore, paragraph 5.1.16 states that "Toolbox Talk should be given on the appearance of archaeological remains, particularly burials, during soil stripping and the process on how to report these." The Archaeological Clerk of Works will also be on site to examine any areas thus reported. This methodology was successfully utilised on the A14, where site workers identified bone (human and animal) and reported it to the Clerk of Works. Bone was reported frequently by machine drivers as a result of the toolbox talk collaboration.</p> <p>While it is recognised that the CCC Curator was in attendance on site, the cremation was identified and excavated by a MOLA archaeologist.</p>
REP5-020db	<p>Maximising knowledge gain 2.2.2 to 2.2.4</p> <p>A 3% evaluation sample does not provide an adequate record of sites or adequate understanding of past human behaviour. Doing nothing or too little is not acceptable practice and risks the unrecorded loss of significant archaeological evidence. Reasons for not accepting 2.2.4c are given in response to 2.3 of responses to [REP3-030 and REP3- 031] above.</p>
Applicant's comments	<p>Please see the response to REP5-020ai, REP5-020aj and REP5-020al above.</p>

Reference Number	Submission by the Cambridgeshire Authorities/Applicant's Comments
REP5-020dc	<p>CCCs mitigation measures – Table 3-1</p> <p>This was initially shared on 6th November 2020 and updated following the issue of the archaeological brief in December 2020. The advice followed numerous site monitoring visits and while waiting for Phase 3 reports to be delivered. CCC expects the Applicant's strategy to suitably buffer settlement cores to attempt the recovery of burials/burial grounds that can be predicted fore pre-Christian period settlements.</p> <p>It is incorrect to assume that the unenclosed components present at the east end Site 18 have been adequately understood in a low level of evaluation and disappointing that a feature-based approach has been adopted within palimpsests of archaeological sites. Our position is unchanged in relation to the excavation area and strategy advice for the sites listed in Table 3-1.</p> <p>Note, in relation to comments given for Site 23 Field 80 in Table 3-1, our experience is that archaeological remains and human bone, particularly cremations, which is the burial rite for the principal research objective to locate the extent of the Aylesford-Swarling cultural remains, is simply not recognized by non-archaeologists. Skulls are recognizable, mammoth skulls in particular, and anything that is shiny, but that is all.</p> <p>In relation to Plate 17 in the Applicant's response, the Councils ask that the Examiners look at the geophysical remains extending outside the scheme boundaries and consider our case for buffering the linear boundary off which tasks sites and enclosures are known. The low evaluation level is clearly demonstrated. Trench 507 and 695 show features present that are not cultivation furrows.</p> <p>Plate 40 depict the latest event in a series of parish boundaries. The Applicant has misunderstood the character of these features.</p>
Applicant's comments	<p>As stated in Paragraph 1.1.6 of the Applicant's response to Cambridgeshire County Council's comments on archaeological mitigation areas [REP4-045] , this information was based on information sent by CCC in August 2021, as the most recently received comments.</p> <p>The Applicant will not repeat comments on Site 18. Our position contained within the Applicant's response to Cambridgeshire County Council's comments on archaeological mitigation areas [REP4-045] has not changed.</p> <p>In terms of burials, please see the response to REP5-020da above.</p> <p>Plate 17 shows Field 80. While it is acknowledged that the percentage of the areas subject to evaluation was approximately 2.8%, CCC approved the trench array in this field. This does not change the proposed strategy. As previously stated, there is no evidence to justify an extension to this area, and there are mechanisms in place to extend the mitigation area should this be required following the topsoil strip.</p>

Reference Number	Submission by the Cambridgeshire Authorities/Applicant's Comments
	<p>The Applicant disagrees with the comments on the parish boundaries. There was no evidence for any earlier evidence found, despite evaluation trenches located on anomalies appearing to show various iterations of these boundaries. Regardless of this, any surviving features will be examined within mitigation Sites 36 and 37. The full extent of the features within the Scheme boundary is recorded on the geophysical survey.</p>
<p>9.56 Statement of Forthcoming Update to DfT Transport Appraisal Guidance</p>	
<p>REP5-020dd</p>	<p>General</p> <p>This document does not alter CCC's primary position on modelling. CCC agree with the Applicants suggestion that they undertake a sensitivity test to see if the upcoming changes to the data book have a material impact on the economic benefits of the scheme.</p>
<p>Applicant's comments</p>	<p>The Applicant notes in para 1.1.3 of Statement on Forthcoming Updates to DfT Transport Appraisal Guidance [REP4-046] that it will review the updated values of the Transport Analysis Guidance (TAG) Data Book to determine whether they would be likely to result in a material change to the economic appraisal of the Scheme. Following this review the Applicant will advise the examiners whether a sensitivity test is considered necessary to assess the change in economic benefits from adopting the revised Data Book.</p>
<p>Environmental Master Plan</p>	
<p>REP5-020de</p>	<p>General</p> <p>The changes to the Environmental Masterplan are not clear. The Councils seek further clarification from National Highways as to the latest changes to the Environmental Masterplan.</p>
<p>Applicant's comments</p>	<p>Refer to the Applicant response to actions arising from Issue Specific Hearing 6 [TR010044/EXAM/9.73] submitted at Deadline 6 which provides a response to this point under Action Point 9.</p>

Reference Number	Submission by the Cambridgeshire Authorities/Applicant's Comments
Land Use Carbon Calculations	
REP5-020df	<p>Habitat Area: Pre Works (hectares) – Column 2</p> <p>The Habitat Areas: Post – Works for the following Phase 1 habitats are not consistent with the Phase 1 habitats identified in the Biodiversity Metric calculations, page 10 [REP3-013]:</p> <ul style="list-style-type: none"> • A3.1 Parkland and scattered trees – Broadleaved Parkland Scattered Trees • A3.1 Parkland and scattered trees – Broadleaved Urban Street Trees • J1.2 – Cultivated/disturbed land – amenity grassland
Applicant's comments	<p>The habitat areas pre-works are the existing areas of habitat in the baseline, the post works are the habitats that are being reinstated as part of the Scheme. As a result of the Scheme these numbers don't necessarily match. Some will be a result of permanent loss of habitat but in some cases, this will result in an overall increase in habitat area due to the habitat creation as part of landscape mitigation design.</p>
REP5-020de	<p>Habitat Area: Pre Works (hectares) – Column 3</p> <p>The Habitat Areas: Post – Works for the following Phase 1 habitats are not consistent with the Phase 1 habitats identified in the Biodiversity Metric calculations, page 10 [REP3-013]:</p> <ul style="list-style-type: none"> • A1.1.1 Woodland – Broadleaved-semi-natural • A.1.1.2 - Woodland – Broadleaved – Plantation • A.3.1 Parkland and scattered trees -broadleaved urban street trees • A.3.1 Parkland and scattered trees -broadleaved parkland scattered trees • B6 Poor semi-improved grassland • A2.1 Scrub – dense/continuous & A2.2 scrub – scattered • J2.6 Dry Ditch

A428 Black Cat to Caxton Gibbet improvements
Applicant's Comments on submissions made at Deadline 5 by the Cambridgeshire Authorities

Reference Number	Submission by the Cambridgeshire Authorities/Applicant's Comments
Applicant's comments	The habitat areas pre-works are the existing areas of habitat in the baseline, the post works are the habitats that are being reinstated as part of the Scheme. As a result of the Scheme these numbers don't necessarily match. Some will be a result of permanent loss of habitat but in some cases, this will result in an overall increase in habitat area due to the habitat creation as part of landscape mitigation design.

REP5-021 – Cambridgeshire County Council, Huntingdonshire District Council and South Cambridgeshire District Council

Comments on the other parties' Deadline 4 submissions

Reference Number	Submission by the Cambridgeshire Authorities/Applicant's Comments
Central Bedfordshire Council [REP4-063]	
REP5-021a	<p>General</p> <p>CCC support CBC's statement and have a number of locations where monitoring of construction and post construction traffic is required. CCC are seeking reassurance that either NH will commission the monitoring themselves or that financial support will be provided to CCC to facilitate the monitoring.</p> <p>A consistent approach to monitoring and managing the impact of traffic on the local highway network across the Highway Authority areas impacted would be welcomed.</p>
Applicant's comments	<p>In relation to the point regarding monitoring construction and post construction traffic, please refer to the Monitor and Manage Technical Note [TR010044/EXAM/9.81], submitted at Deadline 6. This sets out that monitoring key points on local roads is possible within the Post Operational Project Evaluation for the purposes of evaluating scheme benefits. These locations must be expected to experience significant change and be quantitatively justified within the results of the traffic forecasting or pertain to a sensitive location. The monitoring results will be shared with the Local Highway Authorities (LHAs).</p>

REP5-022 – Cambridgeshire County Council, Huntingdonshire District Council and South Cambridgeshire District Council

Comments on responses to Second Written Questions

Reference Number	Submission by the Cambridgeshire Authorities/Applicant's Comments
National Highways	
REP5-022a	<p>Biodiversity Net Gain – Q2.3.2.1.f</p> <p>National Highways' response to 'net gains' of Defra Metric 2.0 [REP3-013] does not recognize/justify the loss of habitat (area) of medium/high distinctiveness identified, which result in the overall net loss habitat (area) because it doesn't meet the trading rules of Metric 2.0, as highlighted within the Councils' response to Q2.3.2.1 at [REP4-059] and [REP4-061].</p> <p>It also doesn't include the findings of the 2021 habitat survey work (expected to be submitted at Deadline 5).</p> <p>The Councils do not support National Highways' justification that the net loss of Hedgerow units derived from Defra Metric 2.0 is partly due to the fact that 'significant proportion of hedgerows are of poor status'. The calculation already takes into account the condition of existing and newly created hedgerows, shown on page 11 of [REP3-013]. Therefore, this does not justify the net loss. Furthermore, the scheme will result in loss of hedgerows of district/county importance. While new hedgerow planting will be potentially of higher value, it has not been confirmed whether/not a key component of the hedgerows, elm, will be included within the new hedgerows. This is identified as an outstanding issue within the draft SoCG, page 85 [REP4-018].</p>
Applicant's comments	<p>The Metric calculation shows the trading rules have not been satisfied for a number of high and medium distinctiveness habitats. However, for the high distinctiveness woodland habitats (including the Woodland and forest - Lowland mixed deciduous woodland and Woodland and forest - Wood-pasture and parkland) the metric has not taken into account the significant areas of woodland plantation which are mitigating for the loss of these habitats, but as these planted habitats are of lower distinctiveness than the woodland habitats they are replacing, they fail to meet the trading rules. This is a limitation of the metric as it is impossible to claim creation of areas of lowland mixed deciduous woodland (semi-natural woodland) through planting.</p> <p>The trading rules are a guide to recommend which habitats should be provided in compensation for losses but in certain instances there may be ecological justification for why this is not feasible. The increase in 60+ ha of woodland planting is sufficient to mitigate for the loss of the high and medium distinctiveness woodland habitats.</p>

Reference Number	Submission by the Cambridgeshire Authorities/Applicant's Comments
	<p>The calculated loss of hedgerow units is attributed to the worst-case assumption that all existing hedgerows would be removed during construction (i.e. none are retained). Notwithstanding this assumption, the calculation includes for the reinstatement of hedgerows and the creation of new hedgerows, which collectively will result in an overall net increase of 3.4 km.</p>
REP5-022b	<p>Biodiversity Net Gain – Q2.3.2.1g</p> <p>National Highways' response does not consider the outstanding net loss of habitat (areas) of medium/high distinctiveness identified in the Biodiversity Metric, as discussed above.</p> <p>National Highways has provided no evidence to demonstrate why net losses for these habitats & hedgerows cannot be fully compensated through the proposed restoration to agricultural land of borrow-pits, temporary site compounds and soils storage areas. As set out in the Councils response, page 3-4 [REP4-061]. Creation of such habitats would help to mitigate residual impacts to species, including wintering/breeding birds, that cannot be mitigated within the scheme.</p> <p>The Councils consider that the impacts on biodiversity set out in Chapter 8 and calculations of Biodiversity Net Gain are not separate processes. The BNG metric provides quantitative evidence to demonstrate whether there is a net loss/net gain in each habitat type. These results are not reflected in the Chapter 8, Biodiversity [APP-077] assessment. For example, Biodiversity Metric calculations [REP3-013] show an overall net loss in woodland habitat of medium/high distinctiveness and as such is an adverse impact. This conflicts with Chapter 8, Biodiversity [APP-077] which assesses the impact on woodland to be beneficial.</p> <p>National Highways example of funding hives for beekeepers is not relevant to biodiversity, they are a farmed non-native species. Focus should be maintained on compensation for key invertebrate species (county/district importance) that will be impacted by the scheme, such as planting of elm and creation of deadwood.</p> <p>Chapter 8 [APP-077] does not recognise the overall loss of hedgerow value, or trading down of habitat quality/loss of habitats of medium/high distinctiveness. It should be updated accordingly.</p>
Applicant's comments	<p>For high distinctiveness habitats the metric has not taken into account the significant areas of woodland plantation which are of lower distinctiveness than the woodland habitats they are replacing. This is a limitation of the metric as it is impossible to claim creation of areas of lowland mixed deciduous woodland (semi-natural woodland) through planting. The trading rules are a guide to recommend which habitats should be provided in compensation for losses but in certain instances there may be ecological justification for why this is not feasible. It is considered the increase in 60+ ha of woodland planting is sufficient to mitigate for the loss of the high and medium distinctiveness woodland habitats.</p>

Reference Number	Submission by the Cambridgeshire Authorities/Applicant's Comments
	<p>The effects of the Scheme have been assessed using the methods described in the Scoping Report [APP-258] and agreed in the Scoping Opinion [APP-038] and detailed in Chapter 8, Biodiversity [APP-077] of the ES.</p> <p>The Applicant refers the combined authorities to Section 2.7 of <i>Biodiversity Net Gain: Metric 2.0</i> [REP3-012] which details the limitations of undertaking the calculation based upon baseline information gathered at the time of assessment to undertake the National Highways (formerly Highways England) BNG Metric [APP-206]. As the Applicant is not required under legislation or policy to achieve biodiversity net gain as part of Scheme delivery, there is accordingly no requirement for the Applicant to deliver compensation measures (under the auspices of biodiversity net gain) to address the unit losses reported in <i>Biodiversity Net Gain: Metric 2.0</i> [REP3-012], as asserted by the Cambridgeshire Authorities.</p> <p>The Applicant refers the Cambridgeshire Authorities to its response to Q.2.3.2.1 [REP4-037] which clarifies that the Scheme will deliver overall increases in woodland, grassland habitat and hedgerow length when compared to baseline values and explains why, in the case of hedgerows, a negative score (-31%) has been calculated for this unit type despite some 3.4km of new hedgerow being created.</p> <p>The Applicant is not intending to update its assessment or the BNG calculation as it contends that the requirements of paragraph 5.25 of the NPSNN have been met through Chapter 8, Biodiversity [APP-077] of the Environmental Statement, which has not concluded any significant adverse effects on, or significant harm to, habitats post-mitigation.</p> <p>The Applicant wishes to clarify that the EIA process is used to identify the likely significant effects of the Scheme, whereas BNG identifies the changes in biodiversity value brought about by development (or changes in land management) through the calculation of gains and losses to habitats and linear features.</p>
REP5-022c	<p>Aquatic Environment and Biodiversity - Q2.3.6.1.c</p> <p>The Councils request that our outstanding issues are included within a revision to Annex A of the Joint Position for Drainage Ponds [REP3-026].</p>
Applicant's comments	<p>The Applicant has updated Annex L Landscape and Ecology Mitigation Plan of the First Iteration Environmental Management Plan [TR010044/APP/6.8v2], submitted at Deadline 6. This includes integration of Annex A 'Details of attenuation basins including intended design principles and planting arrangements' of the Joint Position Statement with Natural England and the Local Authorities on Drainage Ponds [REP4-034] and inputs proposed by the Cambridgeshire Authorities in a meeting held on 29 November 2021.</p> <p>Pond 83 will not be directly impacted by the Scheme and is part of the A428 estate immediately east of Caxton Gibbet roundabout. The Applicant is currently investigating maintenance proposals for Pond 83.</p>

Reference Number	Submission by the Cambridgeshire Authorities/Applicant's Comments
REP5-022c	<p>Climate Change Resilience - Q2.9.4.1 f)</p> <p>The treatment of surface water from the highway is through the use of basins to attenuate, treat and manage surface water. While this is fine for general runoff, in areas where there is an increased risk of pollution as measured in HEWRAT, the proposals are for the use of proprietary treatment systems. The interceptor will treat water, however, the LLFA only accepts proprietary treatment where justified and all other methods of treatment through SuDS have been ruled out as they are not viewed as sustainable and have a maintenance risk associated to them, meaning that if they are not maintained suitably, they may fail to treat water. The applicant could use suitable planting within the attenuation basins to treat water naturally, while providing an increase to biodiversity across the scheme. This will come with less of a maintenance risk as well. The LLFA is unable to support the use of proprietary treatment until it is clear that full surface water treatment through SuDS is not possible.</p>
Applicant's comments	<p>Vortex flow separators, are the only proprietary system that is proposed on the Scheme, where SuDs systems do meet the water quality requirement for removal of siltation, as assessed in the Appendix 13.2 Assessment of Road Runoff and Spillage Risk to Watercourses (HEWRAT) [APP218] of the Environmental Statement. The Applicant agrees that SuDs systems are to be used as the first method of water quality treatment and proprietary should only be used as a last resort.</p>
REP5-022e	<p>Suitability of Strategic Traffic model - Q2.11.1.1 a)</p> <p>CCC have accepted that the strategic model is broadly suitable for assessing the strategic impacts of the scheme as outlined in the Statement of Common Ground, Table 33, refs 3.1 - 3.3.</p> <p>CCC agree the strategic model validates well against TAG guidelines but stress the comparison of observed and modelled flows in the Local Model Validation Report is based on link flows rather than junction turning flows.</p> <p>CCC note the number of coding errors that NH have identified in the strategic model recently while undertaking more detailed investigation of questions raised by the LHAs and although our conclusions about the suitability of the strategic model have not changed, the number of these errors is concerning.</p> <p>Nonetheless, it is not the suitability of the strategic model for assessing the strategic impact of the scheme that is being questioned, rather the suitability of the strategic model turning flows being used by NH directly in detailed junction models without any reference to observed traffic data.</p>

Reference Number	Submission by the Cambridgeshire Authorities/Applicant's Comments
	<p><u>Application of strategic model flows to local junction models</u></p> <p>CCC welcome the sensitivity tests outlined by NH for the six junctions listed. However, CCC refute the Applicant's assertions that sensitivity tests for the remaining junction models are not required. In the absence of sensitivity tests for the remaining junctions CCC are unable to assess the scheme impact at these locations and are therefore unable to comment on junction design or determine if any scheme mitigation may be required which hinders the LHA's network management duty.</p>
Applicant's comments	<p>As noted in REP5-020co above, the strategic model achieved an excellent validation and network coding errors have primarily been on the local road network and not the Strategic Road Network. The Applicant has carried out sensitivity tests specifically to assess the impact of the coding errors.</p> <p>The sensitivity tests outputs have been discussed in considerable detail during ISH5 and agreement has been achieved on all junction modelling elements, except two outstanding elements which have been outlined as action points arising out of ISH5 as follows:</p> <ul style="list-style-type: none"> • Update to be provided on discussions regarding potential road space reallocation related design changes referred to by Cambridgeshire County Council (CCC) and Bedford Borough Council (BBC) for Wyboston and Barford roundabouts. • Further modelling at M11 Junction 13 and Eltisley Junction to be undertaken and flow checks to be provided for Potton Road and Toseland Road for CCC. <p>Though the above submissions are due for Deadline 8, the Applicant can confirm that submissions of the outputs from these tasks will be shared and discussed with CCC as soon as they are completed, which is anticipated to be in advance of Deadline 8.</p>
REP5-022f	<p>Suitability of Strategic Traffic model - Q2.11.1.1 c)</p> <p>CCC note the ExA welcomes NH's proposal to undertake further sensitivity testing as do CCC. However, the ExA expected this work to be undertaken in liaison with LHAs, CCC note that no such liaison has taken place. CCC provided a detailed review of the scoping note setting out the rationale for the sensitivity testing. However, NH have decided the extent of further work they were prepared to undertake and have proceeded with that.</p> <p>The result of this failure to engage with the LHA's is that whilst the sensitivity tests should give greater clarity as to the performance of the network in the locations that are included the limited scope of the sensitivity tests means that there will be several areas where CCC is not able to confirm the impact of the scheme on the LRN.</p>

Reference Number	Submission by the Cambridgeshire Authorities/Applicant's Comments
Applicant's comments	<p>The sensitivity tests outputs have been discussed in considerable details during ISH5 and agreement has been achieved on all junction modelling elements, except two outstanding elements which have been outlined as action points arising out of ISH5 as follows:</p> <ul style="list-style-type: none"> • Update to be provided on discussions regarding potential road space reallocation related design changes referred to by Cambridgeshire County Council (CCC) and Bedford Borough Council (BBC) for Wyboston and Barford roundabouts. • Further modelling at M11 Junction 13 and Eltisley Junction to be undertaken and flow checks to be provided for Potton Road and Toseland Road for CCC. <p>Though the above submissions are due for Deadline 8, the Applicant can confirm that submissions of the outputs from these tasks will be shared and discussed with CCC as soon as they are completed, which is anticipated to be in advance of Deadline 8</p>
REP5-022g	<p>Business and property accesses Q2.11.2.3</p> <p>CCC acknowledges the first paragraph of the applicant's answer to question 2.11.2.3 and agrees with this statement. With regard to the second paragraph of the applicant's response, it should be noted that the legal agreement is still not finalised and therefore its contents cannot be confirmed as satisfactory to CCC at this time. CCC has requested the inclusion of proposed local road boundaries in its Written Representation [REP1-048] and notes that such information would now be useful in clarifying the extent of business and property accesses that are anticipated to be within and outside the highway.</p>
Applicant's comments	<p>The Applicant maintains its view as presented in response to Q2.11.2.3 [REP4-037] and does not accept that this information is required to be set out in the dDCO.</p>
REP5-022h	<p>De-trunking Q2.11.5.1</p> <p>CCC notes that the applicant's response to question 2.11.5.1(a) makes reference to the making of a separate legal agreement to resolve issues related to the condition of the detrunked road. CCC would point out that, whilst negotiations are ongoing, there are a number of material points at issue between the parties. Until the legal agreement has been finalised, CCC is unable to confirm that it has "an accurate understanding of the condition in which the highway asset to be de-trunked will be transferred", as question 2.11.5.1(a) asks.</p> <p>In relation to question 2.11.5.1(c), the applicant has again referred to a separate legal agreement which will be used to ensure that the condition of the de-trunked asset will meet a certain standard prior to de-trunking, in order to satisfy LHAs that "handover at a specific point in time can be secured". CCC has explained in its Written Representation [REP1- 048] that Article 14(8) of the draft DCO permits the applicant to define the date of detrunking, and that this is not acceptable to CCC. While the applicant and the LHA may be able to reach an</p>

Reference Number	Submission by the Cambridgeshire Authorities/Applicant's Comments
	<p>agreement on the timing of de-trunking, a separate legal document does not serve to override article 14(8) of the DCO. Therefore it would be preferable to CCC, and would add clarity for all parties, if the DCO was amended to specify that the date of detrunking must be agreed between the Applicant and the LHA.</p> <p>In respect of local roads, as pointed out in its Written Representation [REP1-048] and in the Councils' Deadline 5 submission document CLA.D5.OS.A.C when commenting on the dDCO [REP4-005 and REP4-006], CCC requires Article 13 of the DCO to include a requirement for certification of all highways and PROW. CCC does not accept that it is sufficient for the provision to be made only in the legal agreement. Certification is part of the formal legal process and as such ought to be contained within the provisions of the DCO – in relation to both the new local roads and the roads to be de-trunked.</p>
Applicant's comments	<p>The Applicant has updated the dDCO submitted at Deadline 6 [TR010044/APP/3.1 v4] to include a new paragraph (9) within Article 14. This new paragraph requires that any de-trunking date must be consented to by the Secretary of State after consultation with the relevant local highway authority. The Applicant notes that this approach reflects the A14 Order and the A585 Windy Harbour Order. It was accepted on the A14 Scheme that the amendment securing Secretary of State consent would be sufficient to allay the concerns of the local highway authority (also CCC in that case) that control was required to ensure that the de-trunked roads to be handed over to the local highway authority would be in a reasonable and acceptable condition (see paragraph 8.2.29 of the A14 ExA Recommendation Report).</p>
REP5-022i	<p>Non-motorised users - Q2.11.6.1 a)</p> <p>The Applicant's mitigations are limited purely to where routes cross the new A428 and short sections of cycleway/footway which do not connect. The National Networks National Policy Statement 3.22 states that "Severance can be a problem in some locations. Where appropriate applicants should seek to deliver improvements that reduce community severance and improve accessibility." CCC provided examples where severance of existing settlements on the A428 corridor should be improved. See the Councils' Local Impact Report [REP2-003], paragraphs 8.7.20- 8.7.28. The Councils maintain that it would be appropriate for the Applicant to deliver these improvements.</p>
Applicant's comments	<p>The Applicant is not solely responsible for delivering all community severance and accessibility improvements within the Cambridgeshire Authorities jurisdiction. The Applicant maintains the view that the Scheme's NMU provision proposed is reasonable and proportionate.</p>

Reference Number	Submission by the Cambridgeshire Authorities/Applicant's Comments
REP5-022j	<p>Non-motorised users - Q2.11.6.1 b)</p> <p>The Applicant is failing to take a clear opportunity to improve safety by not making the roadside NMUs and associated crossing available for equestrians. This missed opportunity was set out in the Council's Local Impact Report [REP2-003], paragraph 8.7.17.</p> <p>The Applicant offers evidence that accidents have reduced on similar roads where traffic have been reduced due to alternative provision. However, no evidence has been provided to show that cycling or walking has increased along these roads. We have the example of the old St. Neots Road between Caxton Gibbet and Hardwick where a new dual carriageway has already been built and where the traffic levels and speeds are too high to allow for safe NMU use. This section will only be used by confident cyclists and as such does not encourage modal shift for users new to cycling or adults wishing to cycle with their children. We would argue therefore that this will also be the case for the remaining length of the old A428 once the new dualled road is available.</p> <p>This also goes back to the point that CCC made at ISH2 regarding the question of 'latent demand from equestrians' (and substantiated in the Councils' response to ExA's Q2.11.6.1c). As set out in the Councils' Written Representations [REP1-048], CCC's Rights of Way Improvement Plan statutory policy (ROWIP) identifies 1) that the bridleway network is fragmented and 2) that equestrians are particularly vulnerable users on roads, and 3) that the A428 road scheme should be used to improve connectivity for NMUs. Users are at present highly unlikely to use the existing A428 or to make use of the existing bridleway crossing because the network is too fragmented and the A428 presents too great a safety hazard. Equestrians are equally unlikely to use the de-trunked A428 as a route in itself, or to have any greater confidence in crossing it if traffic speeds are higher and there is no additional connectivity alongside the old A428.</p> <p>It is disappointing that, despite consistent and additional representation, no progress has been made with the Applicant on the matter of improved NMU provision.</p>
Applicant's comments	<p>The Applicant maintains the position that it is for the Cambridgeshire Authorities to designate and implement the upgrade to equestrian use and that the Applicant does not preclude the Cambridgeshire Authorities from doing so.</p> <p>The Applicant maintains that the Cambridgeshire Authorities still has not demonstrated their claim that road traffic incidents would increase. The evidence offered by the Applicant indicates that the opposite would be true. It is not for the Applicant to evidence the Cambridgeshire Authorities claim that road traffic incident will increase. In addition, the Cambridgeshire Authorities have further claimed that the old St Neots Road between Caxton Gibbet and Hardwick is unsafe and only used by confident cyclist; these items need to be demonstrated and not asserted.</p>

Reference Number	Submission by the Cambridgeshire Authorities/Applicant's Comments
	<p>The Applicant notes the Cambridgeshire Authorities statement that the bridleway network is fragmented, however the Applicant maintains that it is not the sole responsibility of the Applicant to improve the Cambridgeshire Authorities network. Applicant maintains that the Scheme has proposed provision that is reasonable and proportionate.</p>
REP5-022k	<p>Non-motorised users - Q2.11.6.1 d)</p> <p>The provision of NMU facilities should be more than 'essential mitigation' which is the Applicant's position. Mr Tyrrell highlighted at the second ISH that paragraph 315 on the NN NPS in relation to the commitments to sustainable transport and encouraging modal shift. The gap in NMU provision does not encourage sustainable journeys between Eltisley, Cambourne and beyond. Furthermore, the NMU gap will act as a barrier to people walking and riding who would have to be on the carriageway and then cross with no provision, it would also prevent all but the most confident cyclists from using this route. It also does not meet the requirements of the Cambridgeshire & Peterborough LTP1 , CCC's ROWIP2 or Health & Wellbeing Strategy3 and LP16 of the Huntingdonshire Local Plan4 , as set out in the Councils' Written Representations [REP1-048] (pages 29-33). The Councils do not agree with the Applicant's statement that the scheme as currently proposed provides sufficient mitigation. The Councils would ask the Applicant to review their further evidence provided in response to ExA's Q2.11.6c and to reconsider their position.</p>
Applicant's comments	<p>The Applicant maintains that the Scheme's NMU provision proposed is reasonable and proportionate.</p>
REP5-022l	<p>Non-motorised users - Q2.11.6.1 e)</p> <p>As set out in the Councils' Written Representations [REP1-048] on page 38, 6.5.7 (g) a safe NMU crossing west of the Caxton Gibbet roundabout is required to provide a connected route, particularly as this will be a route to school. This crossing point is on the section of road to be built by NH and a suitable refuge needs to be designed and built in as part of NH works. It would be uneconomical and potentially unfeasible to retro-fit a crossing with limited carriageway width. Equally the Potton and Abbotsley overbridges are being built by NH and so the cost of providing NMU provision at a later date will also be uneconomical and possibly unfeasible if there is not enough space. South of the Caxton Gibbet roundabout the new section of road should be designed and built to include a foot and cycleway to connect with the services on both sides of the road as retro-fitting improved provision may not be possible. The additional section of path needed to connect to Cambourne West and the gap in provision between Eltisley and Caxton Gibbet along the existing A428 are both within the red line boundary and so there would be significant delay and cost incurred by the LHA if these sections of missing path were undertaken as a designated fund scheme. It is unacceptable to expect the LHA to undertake these works as part of designated funds.</p>

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	<p>They are within the red line boundary and should be provided as a minimum for NH to meet relevant local and national policies as set out in our Written Representations [REP1-048] paras 6.2 - 6.4.</p> <p>Designated funds are not guaranteed and this pushes the additional burden unnecessarily onto already financially-stretched local authorities. It is noted that the Applicant has not provided any evidence regarding the cost effectiveness of the authority having to carry out works after the main scheme is completed. Designated Funds schemes require the LHA to provide the labour at no additional cost for community engagement, scoping and delivery and associated legal work to enable the appropriate changes to the legal highway asset records to be made. The labour can be extremely significant, but it can be difficult for the LHA to find such resource, particularly if it is of a short-term nature.</p> <p>For example, on the recent A14 Cambridge to Huntingdon scheme, there was and continues to be very strong support for an upgrade to footpath FP4 Girton to a bridleway which would enable ongoing connectivity for cyclists from the A14 Local Access Road NMU into Cambridge, a key strategic route⁵. This was identified and agreed in principle during the A14 initial scheme development but was excluded from the A14 DCO, being just outside the redline boundary.</p> <p>This all results in significant delay in the delivery of the improvements whilst pressure builds from users as to the availability of the missing connections. This is ineffective in terms of cost and time to the LHA, and also results in significant negative impact on users and the local economy.</p> <p>Therefore, it is the Councils' view that it is far more efficient and effective to consider the wider connectivity needed now and delivery the NMU improvements sought as part of the main A428 DCO scheme.</p>
Applicant's comments	<p>The precise location referred to is not clear as three roundabouts are included in the layout of the Caxton Gibbet junction. The Caxton Gibbet north roundabout does have a crossing to allow the A1198 to be safely crossed. This will be a signalised crossing as set out in Applicant's Response to Relevant Representations [REP1-021], Applicant's comments on other parties' responses to first round of written questions [REP3-007], Applicant's Comments on Written Representations [REP3-008], Applicant's Comments on Local Impact Reports [REP3-009] and Applicant response to actions arising from Issue Specific Hearing 2 [REP3-019]. An unsignalised crossing is provided to the west of this roundabout on the new section of road linking Caxton Gibbet and Eltisley. On the basis that there are no NMU facilities whatsoever on the approaches to the existing Caxton Gibbet roundabout this comment is presumably not a reference to an existing school route, but is presumably a future school being provided as part of the Cambourne West development. The Applicant would query why NMU provision is not a condition of that development, as the need appears to arise as a result of the development, not as a result of the Scheme. The same would also apply to provision of NMU facilities on the A1198 where a developer funded approach would be appropriate.</p>

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	<p>It is assumed that reference to the Potton and Abbotsley overbridges means the B1046 and Toseland Road overbridges. The Applicant's position on these bridges has been set out in previous responses and also in this response, item REP5-020ar. The Applicant does not preclude the Cambridgeshire Authorities from designating and implementing NMU provision on the B1046 and Toseland Road bridges in the future.</p> <p>The nature of the response is very clearly expecting the Applicant to fund provision of facilities beyond the scope of the Scheme to make provision where none exists and is the responsibility of the Local Authority. The Applicant has and will continue to support Local Authorities to provide additional public benefit through Designated Funds. These were established to assist with provision of facilities beyond the normal scope of major road schemes</p>
REP5-022m	<p>Damage to local roads at plant crossings – Q2.11.7.4</p> <p>CCC does not accept that construction traffic and deliveries of plant and materials are unlikely to cause damage to the road surfaces. It is well established that vehicles with heavier axle loads are those that cause most damage to the roads, at a deeper structural level as well as surface damage.</p> <p>Accordingly, CCC would seek recompense for such extraordinary traffic using the local road network, in accordance with Section 59 of the Highways Act 1980. CCC wishes to agree with the Applicant an appropriate sum for such damage in accordance with subsection 59 (3) of the Act and that such a sum be included in the Legal Agreement between the Authority and the Applicant.</p>
Applicant's comments	<p>The OCTMP [REP4-012] has set out a means by which the condition of local roads will be monitored through pre and post works condition surveys and has committed to carrying out repairs as agreed between the relevant parties should any deterioration be attributed to damage caused by construction vehicles.</p> <p>Should CCC wish to rely on the power within Section 59 of the Highways Act 1980 then it will be for CCC to establish at that time that the tests contained within that section have been met and the Applicant does not agree that this can or should be secured in advance in the legal agreement or elsewhere.</p>
Bedford Borough Council	
REP5-022a	<p>Draft Development Consent Order – Q2.7.1.1</p> <p>CCC supports BBC's request for record retention beyond the 3 year period proposed.</p>

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Applicant's comments	The Applicant maintains its position as set out in response to Q2.7.1.1 [REP4-037] .
REP5-022a	<p>Road layout, junctions and bridges – Q2.11.2.1</p> <p>CCC agree with BBC that the appropriate highway design standard is dependent on context.</p> <p>As set out in the Councils' own response to WQ [REP4-056] roads for which CCC is the local Highway Authority are rural in nature and have had a 100km/h design speed agreed with NH and it is CCC's view that they need to be designed accordingly. BBC roads are for considerably lower speeds, and therefore of a lower level of provision.</p> <p>CCC endorse the statement '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>
Applicant's comments	The Applicant notes the comment made by the Cambridgeshire Authorities and refers the parties to the Applicant's comments on Cambridge County Council's response to WQ2.11.2.1 [REP5-017] .
REP5-022a	<p>Local Impacts – Q2.11.7.3</p> <p>CCC agree that the best way of dealing with this is for NH to undertake monitoring of areas predicted to be affected by rerouting traffic. CCC have highlighted a number of key areas where monitoring will be required.</p>
Applicant's comments	In relation to the point regarding monitoring, please refer to the Monitor and Manage Technical Note [TR010044/EXAM/9.81] , submitted at Deadline 6. This sets out that monitoring key points on local roads is possible within the Post Operational Project Evaluation for the purposes of evaluating scheme benefits. These locations must be expected to experience significant change and be quantitatively justified within the results of the traffic forecasting or pertain to a sensitive location. The monitoring results will be shared with the Local Highway Authorities (LHAs).

Reference Number	Submission by the Cambridgeshire Authorities/Applicant's Comments
REP5-022a	<p>Archaeological Mitigation Strategy – Q2.12.4.1a</p> <p>We support the position of BBC in their comments given to the revised AMS [REP3-010], in particular the question given with regard to arbitration at paragraph 7.2.6.</p> <p>Levels of excavation are queried at paragraph 9.2.67 and are endorsed by CCC.</p>
Applicant's comments	<p>The response to BBC regarding arbitration stated: "The form of arbitration will be established by the Principal Contractor and their Archaeological Contractor."</p> <p>It is not clear what CCC are referring to with reference to paragraph 9.2.67 as the AMS [REP4-031] does not contain such a paragraph. BBC did comment on a site which had been miscategorised in Section 9.1.2. This has been amended and was due to an error. The Applicant does not believe that BBC were objecting the categories in general.</p>
REP5-022a	<p>Archaeological Mitigation Strategy – Q2.12.4.1.d</p> <p>We would welcome an open dialogue to revise R9 to suit all parties.</p>
Applicant's comments	<p>The Applicant notes this comment from the Cambridgeshire Authorities.</p>
Central Bedfordshire Council	
REP5-022a	<p>Methodology, inputs and outputs – Q2.11.1.1</p> <p>CCC support the view that the sensitivity testing should provide the Councils with greater confidence in the assessment and forecasting of traffic effects of the scheme. However, there has been no liaison with the LHA's in the preparation of the sensitivity testing, nor any agreement on the junctions to be included in the sensitivity testing. Please refer to the Councils own response to this question for further details.</p>

Reference Number	Submission by the Cambridgeshire Authorities/Applicant's Comments
Applicant's comments	Sensitivity Testing was carried out in accordance with the methodology set out by CCC in their note 'CCC Preferred Method for Deriving Junction Model Flows' [REP3- 043] . More detail of the application of this method is set out in the 'Scope of Junction Model Sensitivity Test' [REP3-029] . Given the very short time slot available between various deadlines and the methodology being prescribed by CCC itself, the Applicant therefore did not consider it necessary to discuss the Sensitivity Tests with CCC because their preferred approach was being followed.
REP5-022a	Road design and layout – Q2.11.2.1 The appropriate highway design standard is dependent on context. Acceptance of a lower design standard for CBC's local roads should not imply acceptance of the principle on CCC's roads.
Applicant's comments	The Applicant notes the comments made by Central Bedfordshire Council on matters relating to road design and layout.
REP5-022a	Local Impacts – Q2.11.7.3 CCC agree that the approach proposed by NH to deal with rerouting traffic during construction is not sufficient. The Councils feel that the best way of dealing with this is for NH to undertake monitoring of areas predicted to be affected by rerouting traffic. CCC have highlighted a number of key areas where monitoring will be required.
Applicant's comments	In relation to the point regarding monitoring construction and post construction traffic, please refer to the Monitor and Manage Technical Note [TR010044/EXAM/9.81] , submitted at Deadline 6. This sets out that monitoring key points on local roads is possible within the Post Operational Project Evaluation for the purposes of evaluating scheme benefits. These locations must be expected to experience significant change and be quantitatively justified within the results of the traffic forecasting or pertain to a sensitive location. The monitoring results will be shared with the Local Highway Authorities (LHAs). The Applicant has committed to monitoring approved delivery routes, diversion routes and haul roads which utilise local roads to get from the SRN to site entrances, condition will be assessed by the applicant prior to construction start and during works. The condition of these routes and plant crossing points will be assessed prior to the start of work and remediated to a similar or better condition once the Scheme is complete, or during works if so severe that more timely intervention is required.

Reference Number	Submission by the Cambridgeshire Authorities/Applicant's Comments
	<p>The Applicant does not consider further monitoring outside of the SRN to be appropriate or necessary. The Applicant seeks to ensure existing traffic remains on the strategic road network (SRN) through effective traffic management and communicating real time journey information using VMS and other media. Previously consented schemes, A1 Morpeth to Ellingham and A303 Sparkford to Ilchester have both stipulated the following:</p> <p><i>Journey Time Reliability signing can significantly improve driver compliance as it gives reassurance that delays are not as severe as may be perceived. Mobile Variable Message Signs (VMS) shall be deployed and give actual durations to pass through the road works and times to remote destinations.</i></p> <p>The updated OCTMP, [REP4-012] submitted at Deadline 4 also commits to the establishment of a traffic management forum that includes the local highway authorities to allow the issue of self-diverting traffic to be assessed if the need arises and for measures to address self-diverting traffic to be agreed and deployed.</p>
REP5-022a	<p>Outline CTMP – Q2.11.7.1</p> <p>CCC supports the need for a Travel Plan and endorses the view that the Applicant should follow the relevant NPPF guidance.</p>
Applicant's comments	<p>The Applicant submitted an Outline Travel Plan [REP5-016] at Deadline 5.</p>
Historic England	
REP5-022a	<p>Archaeological Remains – Q2.12.4.1</p> <p>Historic England's comment on the depiction of archaeological mitigation areas in relation to known archaeological evidence, instead of to the road scheme maps – where areas seem to 'hang' unexplained in space, is supported. Without a forensic understanding of the archaeological evidence contained in the Historic Environment Record and as acquired through the evaluation of the A428 area, it is difficult to appreciate the selection of the areas and why the arguments for and against their size have been made. The Applicant has presented this now, using CCC's working documents first supplied in November and December 2020 and then June and October 2021 in Applicant's response to Cambridgeshire County Council's comments on archaeological mitigation areas [REP4-045]. However, we remain disagreed that the Applicant's reduction of CCC's prescribed areas for mitigation and the stated strategies by which they propose to investigate some, but not all, of the remains on some disputed sites. We know no way of being able to date a feature before it has been</p>

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	<p>excavated and would welcome insight into how they propose to select features for contractors to excavate and to answer very specific research question posed, noting that their current agents writing these strategies will not be involved in the implementation phase.</p> <p>We gratefully acknowledge Historic England deferring to our expertise regarding the management of non-designated archaeological remains.</p>
Applicant's comments	<p>The Applicant is puzzled by this response. We do not state anywhere that features can be dated prior to excavation. However, some features have already been dated during the evaluation phase. Please see further the response to REP5-020aj above.</p> <p>A further figure detailing the location of mitigation areas with the results of the evaluation was submitted at Deadline 6, please refer to Archaeological Mitigation Areas with Evaluation Data [TR010044/EXAM/9.87].</p> <p>Paragraph 4.1.3 of the AMS [REP4-031] states "The research questions will be reviewed and updated throughout the project – they are not fixed. For example, excavation at one site may lead to different questions for an adjoining site. The strategy should be flexible, and based on real-time information. The questions will be reviewed during preparation of the SSWSIs, during fieldwork and during preparation of the post-excavation assessment report." It is acknowledged that it may not be possible to answer every research question noted for each site.</p>
Natural England	
REP5-022a	<p>Scheme Design Approach and Design Principles – Q2.10.1.1</p> <p>The Councils' support Natural England's conclusion that there appears to be no details regarding the consultation through the proposed design development process.</p>
Applicant's comments	<p>In addition to the design development process set out in section 5 of the Scheme Design Approach and Principles [REP3-014] the Applicant is also engaging with Local Authorities to prepare the Local Highways Standards, which will aim to provide further clarity regarding detailed design development. In the development of the Local Highways Standards the Applicant is engaging with the various subject matter experts from Local Authorities to understand their requirements and demonstrate how these will be addressed through the design development process. The Local Highways Standards will be incorporated in the corresponding legal agreement that will outline additional processes for managing the implementation of the standards and engagement with Local Authorities.</p>

A428 Black Cat to Caxton Gibbet improvements
Applicant's Comments on submissions made at Deadline 5 by the Cambridgeshire Authorities

Reference Number	Submission by the Cambridgeshire Authorities/Applicant's Comments
	The Applicant notes Action Point 15 from Issue Specific Hearing 5 requests Interested Parties to provide comments on the Scheme Design Approach and Principles [REP3-014] document. The Applicant will respond to any comments made at Deadline 8.