

Comments on the Applicant's D6 submissions

This document sets out the comments on the Applicant's Deadline 6 (D6) submissions by Cambridgeshire County Council (**CCC**), Huntingdonshire District Council (**HDC**) and South Cambridgeshire District Council (**SCDC**) (together, the **Councils**). The tables below set out the document in question that the Councils are commenting on, together with the relevant paragraph or reference number.

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

3.1 Updated draft Development Consent Order [REP6-002 and REP6-003]

Topic	Paragraph Number	Councils' Comment
General	General	The Councils' comments on the updated dDCO are contained in a separate mark-up (document reference CLA.D8.dDCO.C).

6.2 Environmental Master Plan [REP6-006]

Topic	Paragraph Number	Councils' Comment
Great Crested Newt mitigation (pond)	Sheet 5	The Councils are concerned about the appropriateness of the proposed Great Crested Newt mitigation pond given it has been located within a field to be restored to arable and located away from known GCN populations. Further clarify is sought as to why this is suitable for GCN, rather than locating the pond within the affected GCN metapopulation boundary identified on the GCN Survey Update Tech Note [REP5-011] and therefore within surrounded by areas of optimal terrestrial habitat.
Great Crested Newt mitigation (pond)	Sheet 9	The Councils are concerned that a drainage attenuation pond is not suitable as a GCN pond. Its primary function as a drainage feature means it is likely to be dry and at risk of poor water quality. Further clarity is sought to demonstrate how this attenuation pond will be designed to support adequate water quality & quantity to support breeding GCN.
Bat crossing points		The Councils welcome the addition of bat crossing point labels to be installed as part of the Scheme. However, clarification is sought as to why only two of the three embedded measures for bat flight were taken into consideration in ES Chapter 2: Scheme Design

		[APP-071]. The omitted bat crossing point at Bridleway Accommodation Bridge (north of Croxton Park) should be included in the Environmental Masterplan.
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6.8 First Iteration Environmental Management Plan - Rev 2 [REP6-007 and REP6-008]

Topic	Paragraph Number	Councils' Comment
Cultural Heritage	Table 3-4	The Archaeological Mitigation Strategy (AMS) [REP4-031] referenced in Table 3-4 is not agreed by the Councils. By default, all documents that refer to the AMS, including the First Iteration Environmental Management Plan [REP6-007 and REP6-008], are also not agreed. We have set out proposed amendments in REP1-048 section 12, REP2-003 6.25 - 6.2.11; REP3-041 Cultural Heritage response, REP4-059 responses to Q2.12.4 1a and 1b, and REP6-058 Q1.12.1a and e.
Biodiversity	Annex D: Biodiversity Management Plan paragraph 1.6.1	As set out in previous consultation response [REP5-058], there is insufficient measures to protect the Protected Road Verge (S8), Brockley Road and mitigate loss of arable field margins. Additional measures should be incorporated into the Biodiversity Management Plan to address this matter.
Biodiversity	Annex D: Biodiversity Management Plan paragraph 1.14.2	The proposed Great Crested Newt mitigation does not account for the loss of pond 37, which is identified within Table 13-4 of ES Chapter 13 [APP-082]. The Councils seek further evidence to demonstrate this pond will not be directly affected by the scheme.
Biodiversity	Annex D Table D-1	The Councils are concerned about the proposed post-construction monitoring of the bat crossing points being limited to Years 1, 2 and 3. The functionality of these new crossings will be limited until the proposed landscaping scheme, including guide planting for bats, has established to reinstate / create new bat commuting routes. Therefore the bat crossing points should continue to be monitored until the bat commuting routes have become well established. Only at this point will the Applicant be able to provide adequate evidence to demonstrate that the bat mitigation, including the crossing point structures and guide planting, has / has not been successful and establish whether any remedial action is required to address any failures.

Flood Risk	Annex F: Water Management Plan paragraph 4.2.17	It is noted that proprietary treatment is an option for the management of surface water during construction. However, it would be worth noting that the LLFA has a preference towards the options including settlement tanks or lagoons for the treatment of this water, as proprietary treatment systems require regular maintenance to ensure their continued performance.
Cultural Heritage	Annex J: Archaeological management plan	<p>1.3.2: Category c is not approved by the Councils. The methods for excavation should comply with section 6 of the Joint Authorities' Archaeology Brief (currently in REP4-031 Appendix B).</p> <p>1.3.3: a. and b. should be shown together to prevent confusion as to the mitigation requirements (both involving excavation) and to indicate that time will be needed to excavate the sites prior to release.</p> <p>1.3.4: The levels of excavation shown in the lists are not approved owing to the definition of 'Excavation', 'Archaeological excavation' and 'Targeted excavation'. The Councils are concerned that the latter category amounts to a reduction in excavation response in areas that warrant a detailed approach.</p> <p>Table J-1 will require revision to comply with a final approved Archaeological Mitigation Strategy.</p> <p>Nowhere in this Outline Management Plan is it stated that a stockpile might be placed over archaeological remains at Site 17 (Fields 69 & 70). This is welcome as such works would be deleterious to archaeological remains. However, the Councils remain concerned at the Applicant's response in their Comments on the D6 submissions at REP6-034 for REP5-020ak, which together with section 11.3 of the Archaeological Mitigation Strategy REP4-031 indicates an intention to bury archaeological remains beneath fill. It is our requirement that archaeological sites should not be subject to damage caused by temporary works, even if the Applicant considers that no harm would befall vulnerable archaeological remains. The Councils' advice is to move stockpiles away from archaeological areas or to excavate them in advance for the reason given below.</p>

		<p>The Councils raise attention to the First Iteration Environmental Management Plan Annex E [REP6-007 and REP6-008], 1.5.12k regarding topsoil stripping, specifications and standards for their handling, and also 1.5.17 for the handling of subsoils. While archaeological consideration is welcome at 1.5.10 and 1.5.18d, it appears that sections 1.78-1.79 on soil restoration with regard to ripping and decompaction have not been taken on board by the Applicant when it comes to archaeological sites. The Councils note that stockpiles will avoid trees and root protection zones and be located 10m from watercourse and consider that vulnerable, finite archaeological remains appear to be classed of lower value than these other environmental considerations. This is not acceptable practice. Archaeological sites within the Scheme boundary should be fenced off and not stripped as shown at REP4-031 11.2, or excavated in advance of temporary works (Sections 8-9).</p>
Construction working hours	Annex K: Construction Compound Management Plan, paragraph 1.4	<p>Following discussions with the Applicant on 11 January 2022, the Councils position is now reflected in our comments on the draft Development Consent Order (CLA.D8.dDCO.C). In summary, construction work for the authorised development must only take place between 0700 hours and 1800 hours Monday to Friday, and 0700 hours to 1300 hours on Saturdays, with no activity on Sundays or bank holidays, except as specified in Schedule 2 Part 1 paragraph 19(2). Our amendments in CLA.D8.dDCO.C include the removal of certain previous exceptions that were considered to be potentially noisy activities.</p>
Biodiversity	Annex L: landscape and Ecology Management Plan Paragraph 1.10.16	<p>The Councils welcome further consultation work to consider feasibility of including elm within the mix, to address our concerns with regards to the adverse impact of the Scheme to elm specialist invertebrates. These discussions should be undertaken as soon as possible - clarification is sought as to the timescale.</p>
Biodiversity	Annex L: landscape and Ecology Management Plan paragraph 1.12	<p>The LEMP does not include establishment management for the Great Crested Newt mitigation ponds that have been added to the latest Environment Master Plan [REP6-006]. The management of ponds, including GCN ponds, should be included.</p>
Biodiversity	Annex L: landscape and Ecology Management Plan paragraph 1.13	<p>The LEMP does not include long-term management of Great Crested Newt mitigation ponds that have been added to the latest Environment Master Plan [REP6-006]. The management of ponds, including GCN ponds, should be included.</p>

Biodiversity	Annex L: Landscape and Ecology Management Plan paragraph 1.14.2	The LEMP does not include long-term management of the Great Crested Newt mitigation grassland that has been added to the latest Environment Master Plan [REP6-006]. The management of species-rich grassland (LE 1.3) should be updated to include management of tussock grassland for the benefit of GCN.
Travel Plan	Annex Q: Travel Plan	The additional information in the Travel Plan is welcomed. The Councils rely on our previous comments on the Travel Plan [REP5-016] submitted at Deadline 6 [REP6-058].
Borrow Pits	Appendix R: Borrow Pits Management Plan	<p>The Minerals and Waste Planning Authority (MWPA) has reviewed the EMP 2nd Revision with a specific focus regarding borrow pits and their management, which is mainly set out in Appendix R of the EMP. The additional information provided is welcomed. The MWPA wishes to request the following minor alterations:</p> <p>Page R8 – Paragraph 1.2.2. An additional role is requested to liaise with the relevant MWPA to inform them of any complaints or other issues that the MWPA should be aware of.</p> <p>Page R-9. Paragraph 1.3.2. It is requested that the complaints procedure also include that on receipt of a complaint relating to a borrow pit, that the relevant MWPA is notified that a complaint has been received and the broad nature of the complaint, and on resolution, the nature of the resolution of the complaint.</p> <p>The two requests above would aid in ensuring that complaints are handled appropriately should they be made to Community Relations Manager (CRM) and / or the MWPA. It is also requested that the Applicant provide clarification as to the duration for which the CRM will be appointed for, i.e., will it extend into aftercare?</p> <p>Page R-19. As part of the phasing plans, the MWPA requests that the Applicant notify the MWPA, landowners and any other interested parties of the commencement of site restoration, and completion of site restoration. This is to ensure that all parties are aware of the status of the land.</p> <p>Page R-20. An additional item “Adequate off-road parking facilities for staff”, is requested to ensure that nuisance parking does not occur.</p>

		<p>It is noted that the only reference to aftercare in relation to borrow pits is made on Page R-4, which indicates that it will be delivered through the Second and Third Iteration EMPs. To ensure adequate aftercare, it is requested that the envisioned timescales for aftercare is included within the First Iteration EMP. The timescale proposed should be adequate for ensuring that restoration has been successfully completed, and that the land is returned to the required standard as per Paragraph 50, Reference ID: 27-050-20140306 of the Minerals Planning Guidance and by Policy 19 of the Cambridgeshire and Peterborough Minerals and Waste Local Plan (July 2021). Considering agriculture is the preferred restoration option, the MWPA is of the view that this should by default extend to 5 years.</p> <p>Page R-34 – In relation to Minerals Assets and Waste at Site 3 it is stated “The composition of material proposed to be used as infill will be determined in consultation with the local authority prior to use.” It is noted that this is the only site against which this is stated. It would be appreciated if NH would elaborate on the reasoning for this additional measure at this site, or whether this was intended to be applied to all borrow pit sites. Furthermore, clarification as to which ‘local authority’ and in which capacity it is being consulted, would be appreciated.</p> <p>Pages R-38 and R-39. Limited detail regarding restoration is provided on these pages. It is noted that against Site 11 some phasing is indicated, which does not seem to be present in relation to Site 14, 3 and 4. Additionally, there does not appear to be any statement giving an indication of timescales for restoration, nor a commitment to monitoring arrangements during aftercare (paragraph 1.8.2. indicates restoration will follow completion of construction but does not indicate the time required for restoration). Nor does there appear to be any reference to the soil management plan which the Applicant has referenced elsewhere in the EMP. The Councils would ask the Applicant to include the above information in this section. Furthermore, it is requested that the Applicant includes a commitment that the within the Second and Third iterations of the EMP that the design demonstrates how it complies with local policy, including Policy 19 of the Cambridgeshire and Peterborough Minerals and Waste Local Plan.</p> <p>The MWPA also makes the following observations:</p>
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Landscaping	General	<p>The Councils sought an update to requirement 6 of the DCO [REP3-039] to include reference to the Code of Practice for the Sustainable Use of Soils on Construction Sites published by the Department for Environment, Food and Rural Affairs. The Applicant has responded (see Applicant's Comments on submissions made at Deadline 5 by the Cambridgeshire Authorities at reference REP5-020x [REP6-020] that this reference has instead been included in the updated First Iteration Environmental Management Plan [REP6-007 and REP6-008]. The Councils note that the Code of Practice is only referred to in the section of the FIEMP on soil handling and management, rather than landscaping. Given the updated draft dDCO [REP6-003] only requires the landscaping scheme to be in accordance with mitigation measures applicable to landscaping set out in the First Iteration Environmental Management Plan, the Councils request that the First Iteration Environmental Management Plan is updated to include reference to compliance with the Code of Practice for the Sustainable Use of Soils to ensure that this is appropriately secured.</p>

7.4 Outline Construction Traffic Management Plan - Rev 3 [REP6-009 and REP6-010]

Topic	Paragraph Number	Councils' Comment
Construction traffic routes	3.3.5	The addition of Hilton as a prohibited route is welcomed by the Councils.
Walkers, Cyclists and Equestrians	3.10	<p>The Councils welcome the provision regarding walkers, cyclists and equestrians but in light of poor experience with the A14 scheme, we request the inclusion of the following additional points highlighted in bold, in order to protect NMU needs and support modal shift requirements (see principle 1.2.5 on page 10 of the National Institute for Health and Care Excellence guidance <i>Physical activity and the environment</i>¹):</p> <p>“3.10.3 Temporary diversions will be provided to ensure that they are accessible and safe. The diversion routes will be developed during the detailed design and the construction stages in consultation with the relevant LHA. This will be undertaken as early as possible in order to enable the implementation of appropriate, timely measures and avoid unnecessary inconvenience to NMUs. Survey counts have been completed to identify which routes are used regularly and will be taken into consideration when deciding whether a diversion is required. Permanent diversions and closures are secured within the DCO along with the power to temporarily close or divert Public Rights of Way. Some temporary closures may be required for safety reasons.</p> <p>3.10.4 NMUs will be not be inconvenienced any longer than reasonably practicable by road construction. Routes temporarily closed or diverted will be actively reviewed in consultation with the LHA and reopened as soon as possible, in order to support existing NMU needs and ongoing modal shift policy requirements.</p> <p>3.10.5 Works crossings will be required, but will be minimised as far as possible by combining routes in close proximity via diversions.</p> <p>3.10.6 Where works crossings are required then these will be designed to ensure that the crossing locations are safe and clearly visible to users and to construction vehicles moving</p>

¹ <https://www.nice.org.uk/guidance/ng90/resources/physical-activity-and-the-environment-pdf-1837748441797>. Submitted as CLA.D8.OS.A.C.A2 – Appendix 2.

		within the site through the use of manned crossings, signs, fencing and barriers for example. The details and operation of such crossings will be developed during the detailed design stage in consultation with the relevant LHA.”
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8.1 Draft Statement of Common Ground with the Environment Agency [REP6-011]

Topic	Paragraph Number	Councils' Comment
Road Drainage and the water environment	Table 3-1, Embedded and essential mitigation (page 21)	The LLFA supports the suggestion of the inclusion of penstocks to give ponds and watercourses an added level of protection from any spills.

8.2 Draft Statement of Common Ground with Historic England [REP6-016]

Topic	Paragraph Number	Councils' Comment
Record of Engagement	Table 2-1	Regrettably and contrary to standard practice, an opportunity was missed to inform the principles of archaeological mitigation with expert localised input from County Council archaeologists (although it is noted that Historic England and an academic advisory panel were asked for comments on 31 March 2020), resulting in issues that could have been resolved locally now referred to the examination process.

8.3 Draft Statement of Common Ground with Natural England [REP6-017]

Topic	Paragraph Number	Councils' Comment
Biodiversity Net Gain	Row 1, Table 3-5, page 51	The Councils support Natural England's advice that the "ES should be updated with the findings of the Defra 2.0 metric to inform a revised assessment of the effects of the Proposed Development on biodiversity".

8.4 Draft Statement of Common Ground with Central Bedfordshire Council [REP6-018]

Topic	Paragraph Number	Councils' Comment
Noise and Vibration	Page 82	The Councils agree with CBC's concern that the proposed construction hours may cause unacceptable noise. Please see our comments on 6.8 First Iteration Environmental Management Plan - Rev 2 [REP6-007 and REP6-008] above, on Annex K: Construction Compound Management Plan, paragraph 1.4.

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9.48 Pre-Commencement Plan [REP6-028]

The Councils provided their comments on the previous version of the Pre-Commencement Plan in document **REP6-061**. The Applicant would not have seen those comments before producing **REP6-028** and unfortunately many of the matters raised are not dealt with in **REP6-028**, although the Councils are grateful for the clarification as to the status of the comments in the different sections of the document as set out in the reworded section 1 of **REP6-028**. As such, the Councils reiterate their comments in **REP6-061**. In addition, the Councils make the following comments:

Topic	Paragraph Number	Councils' Comment
Biodiversity Pre-commencement Plan	1.1.5	Paragraph 1.1.5 confirms that pre-commencement requirements for biodiversity are contained within the Biodiversity Pre-commencement Plan [APP-239]. However, the Councils are concerned that neither the Pre-commencement Plan or Biodiversity Pre-Commencement Plan contain pre-commencement requirements for great crested newt, including further survey work. The Councils require the Biodiversity Pre-commencement Plan to be updated to resolve this issue.
Construction hours	2.4.9 and 2.6.8	Please see our comments on 6.8 First Iteration Environmental Management Plan - Rev 2 [REP6-007 and REP6-008] above, on Annex K: Construction Compound Management Plan, paragraph 1.4.

9.54 Barbastelle Bat Surveys and Mitigation Technical Note (Rev 3) [REP6-027]

Topic	Paragraph Number	Councils' Comment
General		The Councils welcome the amended document. We are aware that a final version will be submitted at Deadline 8 to incorporate the final survey results and would welcome the opportunity to comment on it in due course.
Bat crossing points	2.3	Further clarification is sought as to the criteria for how and where the crossing points were selected.

<p>Bat Crossing Points & Environmental Statement</p>	<p>Response to Comment SC6 (pages 37-38 & 169)</p>	<p>The Applicant has confirmed that only two structures, both within Bedfordshire (River Great Ouse and Bat Tunnel/Mammal Underpass), have been specifically provided for safe passage of bats as part of the scheme.</p> <p>However, the Applicant considered three additional structures, including West Brook (Pillar Plantation) and Hen Brook in Cambridgeshire, are suitable for bats and this has been taken into account in the assessment of potential impacts in the ES. Therefore, it is essential that these structures successfully perform as safe bat commuting routes, in order to comply with the assumptions underpinning the assessment of the impact on bats set out in the ES.</p>
<p>Bat Crossing Point 5 – West Brook</p>	<p>Response to Comment SC7 (pages 38 & 169)</p>	<p>The Applicant not provided adequate evidence to demonstrate that the proposed bat crossing 5 [REP6-006] at West Brook will perform as a successful bat corridor. This is particularly concerning given that the ES biodiversity assessment is based on the assumption of the provision of an effective bat crossing point at this location.</p> <p>The primary function of bat crossing point 5 is as an NMU route. It is a long tunnel and as such, the Councils require NMU underpasses to be well lit and open. At this stage, it is still unclear whether artificial lighting will be needed for the NMU route. Artificial lighting will render this structure unsuitable for a bat crossing point.</p> <p>The structure has not been designed for bats, given that it does not meet the standard minimum height (4.5m) for a bat underpass and has not been located within existing bat flight lines. Instead, it is located within an area considered currently unsuitable to support commuting bats (the location was scoped out of any bat surveys for this reason) and isolated from other bat habitat.</p> <p>The Councils are concerned that the proposed landscaping scheme around bat crossing point 5 [REP6-006] will be insufficient to establish a strong bat corridor to areas of known bat activity. For example, it does not provide good connectivity to Pillar Plantation woodland. Opportunities to further enhance the quality of the landscape around the bat crossing point must be secured, if this crossing point is to be effective. This should include enhancement of the route of the West Brook and greater connectivity to Pillar Plantation</p>

		<p>(hedgerow / woodland edge). These features should be planted in advance of construction, wherever possible, to allow establishment of vegetation as soon as possible.</p> <p>If it cannot be demonstrated that the bat crossing will be effective, then the assumptions underpinning the conclusions in the ES will be incorrect.</p> <p>Given the issues outlined above, the Councils consider it would be more appropriate for a separate bat crossing structure be created along the existing bat flight line near known bat activity at Pillar Plantation woodland. Creating a crossing structure within areas of existing bat habitat that is to be retained and enhanced as part of the Scheme would provide an instant enhancement of the landscape for the bat population, rather than having to wait for the new landscape scheme (around West Brook) to be planted and established as bat habitat. It is noted that the surveys confirmed the level of bat activity near Pillar Plantation is relatively low and the hedgerow in this location is currently suboptimal for bat corridor (gappy), however we would suggest enhancement of an existing bat commuting route (strengthening the corridor) would be more effective than creating a new bat crossing point within areas currently unsuitable for bats. Furthermore, the Applicant has already identified a mammal crossing point (for other species, including badger) at this location [REP6-006], which could easily be incorporated into a bat underpass.</p>
Bat crossing points – links to landscape	Response to SC2 (pages 159-165)	The Councils welcome the additional clarification of the proposed bat crossing structures, however there is still insufficient detail to demonstrate that these structures will be adequately linked to the wider landscape and therefore the Councils are concerned about the effectiveness of the proposed bat commuting route through the bat crossing.
Bat crossing point 4 – Hen Brook	Response to SC3 (page 170)	The Councils are concerned that the proposed bat crossing point structure has not been designed adequately for bats and defer to Natural England for their opinion on this matter. The Applicant has not adequately addressed the issue of the design of the structure for NMU route and the requirement for it to be well lit, which is contrary to its function as a bat crossing point (stated as being unlit in previous documentation).

9.70 Applicant response to actions arising from Issue Specific Hearing 4 [REP6-030]

Topic	Paragraph Number	Councils' Comment
Biodiversity Net Gain & NPS NN	Action Point 10	<p>The Councils disagree with the Applicant's position that the calculation of BNG and effects on biodiversity are two separate processes.</p> <p>A BNG assessment provides a quantitative analysis of the losses and gains in biodiversity value of habitats. It provides a standardised approach to identify where a scheme will deliver better or lower quality habitat and whether a scheme will deliver no net loss, as required by NPS NN (paragraph 5.25).</p> <p>The Applicant has failed to interpret the results of the Biodiversity Metric correctly and the Scheme will result in net loss in biodiversity [REP6-062]. The Applicant has provided no evidence to demonstrate how these net losses will be offset as part of the Scheme, in accordance with NPS NN.</p>

9.71 Response to actions arising from Issue Specific Hearing 5 [REP6-031]

Topic	Paragraph Number	Councils' Comment
Road Space reallocation	Action Point 1	This refers to the mitigation testing that is being undertaken at Wyboston and Barford Road junctions to see if reallocation of road space will improve the operation of all arms at these junctions. The Applicant provided CCC with a draft copy of the information to be submitted at Deadline 8. This states that as the junctions are remote from the scheme they are not proposing any mitigation at these junctions. Therefore, CCC are undertaking work to look at possible mitigation at these junctions using the applicant's sensitivity tests models. This work will be submitted at Deadline 9.
M11 J13	Action Point 2	The revised modelling of this junction was supplied to CCC on 22 December 2021 and is due to be formally submitted to examination at D8. The revised model is currently being reviewed and the Councils will comment on it at Deadline 9.
Eltisley Junction	Action Point 2	The retesting of this junction is also due to be submitted to examination at D8. Draft information on the likely traffic flows has been supplied to CCC on 3 January 2022 and the review of the revised modelling will be addressed by the Councils at D9.

Potton Road and Toseland Road	Action Point 2	Revised flows at these junctions are awaited. Nothing further has been received on these junctions as yet.
Network Management Duty	Action Point 4	<p>CCC notes the following comment made by the Applicant: <i>“To fulfil this commitment National Highways extensively monitors the performance of its network using data collected from daily counters, manual counts and feedback from local authorities and its operational teams. The monitoring data and Post Opening Evaluations Data from major schemes is analysed to develop Route Strategies. The outputs of which drive study areas and form a key building block of National Highways’ future works programme.”</i></p> <p>CCC carries out general network-wide monitoring of the local highway network as part of the discharge of its Network Management Duty. However, in order to understand the real-world implications of the construction and operation of this Scheme, monitoring and management of particular areas of the local road network, which are likely to be impacted by the Scheme as shown by the Applicant’s monitoring is required. CCC’s view is that this should be proposed and funded by the Applicant, as is typical of major developments. The Councils have commented further on this in their responses to written questions 3.11.2.1 and 3.11.7.5 (document reference CLA.D8.WQ3.R).</p>
Network Management Duty	Action Point 4	<p>CCC would highlight that the Network Management Duty under section 16 of the Traffic Management Act 2004 contains two limbs:</p> <ul style="list-style-type: none"> (a) securing the expeditious movement of traffic on the authority's road network; and (b) facilitating the expeditious movement of traffic on road networks for which another authority is the traffic authority. <p>CCC is particularly concerned with the Applicant’s ability to meet limb (b) of this duty in light of the concerns raised in relation to (i) the traffic modelling undertaken by the Applicant and therefore whether the impacts of the Scheme can be accurately predicted; and (ii) the absence of a proposal to monitor and mitigate the impacts on the local road network.</p> <p>Further comments on the Monitor and Manage Technical Note [REP6-041] are also set out at 9.81 below.</p>

Monitor and Manage	Action Point 5	The Councils comments on the Monitor and Manage Technical Note [REP6-041] are set out at 9.81 below.
Proposed Cross sections of CCC Highways	Action Point 6	<p>Further discussion has now taken place between the Applicant and CCC at a meeting on 14 December 2021. Although no agreement has been reached on proposed cross sections, it was emphasised by CCC that:</p> <ul style="list-style-type: none"> • Although 7.3m plus 1.0m hard strips is DMRB standard, CCC would consider a departure application for a reduced cross section. However 6.0m width is considered too narrow for a 100km/h design speed road. • CCC indicated that for Toseland Road and B1046, a cross section of 6.3m plus 0.5m edge strips would be favourably considered, if backed up with a comprehensive Departure application. • For Potton Road a cross section of 6.0 plus 0.3m edge strips would be similarly considered. <p>CCC awaits the Applicant's response to these suggestions.</p> <p>In addition CCC expects the verge widths on Toseland Road and B1046 to be wide enough for a shared use NMU route.</p> <p>One verge of the B1046 should be wide enough and free of significant obstructions to accommodate future provision of a shared use NMU path of minimum width 3.0m, so the verge needs to be approximately 5m minimum width on embankments tapering to 3.5m minimum width on bridge. The bridge parapet should be equestrian height (1.8m) on NMU side.</p> <p>One verge of Toseland Road should include provision of a shared use NMU path of minimum width 3.0m, so the verge needs to be approximately 5m minimum width on embankments tapering to 3.5m minimum width on bridge. The bridge parapet should be equestrian height (1.8m) on NMU side.</p> <p>The 3.5m proposed verge on Potton Road should be adequate.</p>

Signalised crossings	Action Point 9	<p>CCC accepts that the signalised crossings do not need to be shown on the DCO drawings. CCC re-affirms its position that signalised crossings must be designed appropriately for all NMU users, in line with our position that equestrians should be included on the roadside NMUs. This missed opportunity was set out in the Council's Local Impact Report [REP2-003], paragraph 8.7.17.</p> <p>CCC awaits the outcome of the consideration that the Applicant is giving to provision of a signalised crossing of the A1198 approximately 45m south of the southern roundabout.</p>
HGV movements	Action Point 11	The Councils note National Highways response.
HGV movements through Hilton	Action Point 12	The Councils welcome the addition of Hilton as a restricted route.
Good design	Action Point 16	The Councils welcome the amendment to Requirement 12 of the updated dDCO [REP6-003] to require the detailed design of the Scheme to accord with the design principles set out in the scheme design approach and design principles document. The Councils note that the absence of any further consultation or control over detailed design post-consent would be dependent on the Secretary of State concluding that the design principles document [REP3-014] was sufficiently detailed and robust to justify the absence of further consultation or control. The Councils submit that their proposed amendments set out at REP6-063 are necessary to reach that conclusion.

9.73 Response to actions arising from Issue Specific Hearing 6 on 2 December 2021 [REP6-033]

Topic	Paragraph Number	Councils' Comment
Provision of a copy of the legal agreement	Action Point 7	The Councils disagree with the Applicant's view that the updated dDCO [REP6-003] contains sufficient control to ensure that the Applicant will be unable to handover an unsatisfactory asset to the local highway authority. The Councils' detailed comments on this matter are set out in relation to Articles 13 and 14 of the Councils' comments on the dDCO (document reference CLA.D8.dDCO.C).

9.74 Comments on submissions made by the Cambridgeshire Authorities at Deadline 5 [REP6-034]

Topic	Paragraph Number	Councils' Comment
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Land take	REP5-020a and REP5-020g	The Councils welcome the continued discussion with the Applicant in relation to the maintenance boundary plans. The Councils propose amendments to Article 13 of the dDCO (see document reference CLA.D8.dDCO.C) to ensure that there is a mechanism for the highway boundary to be ascertainable by the public at large. The Councils consider that this detail must be included in the DCO and not only in the legal agreement.
Limits of deviation – Sheets 7 and 13	REP5-020c	The Councils provide the further detail requested as Appendix 1 to this document.
Plans	REP5-020d	The Councils refer to their comments on Sheet 13 at Appendix 1.
Plans	REP5-020e, REP5-020f	The Councils welcome the Applicant's proposals to update the relevant plans and await sight of these following Deadline 8.
Requirements – traffic management	REP5-020x(i)	The Councils agree the Applicant's response.
Requirements – working hours	REP5-020z	The Councils refer to the mark up of requirement 19 of the dDCO (document reference CLA.D8.dDCO.C).
Impact and value of heritage assets	REP5-020af	The assessment method is not in doubt but the value given to individual heritage assets is at variance with our understanding of the contribution that combined assets provide.
Aims of specific intervention types	REP5-020ai	<p>Using Site 17 [REP4-031 Appendix D] as an example of a site where Targeted excavation is shown as an excavation method, the Mitigation strategy is shown as:</p> <ul style="list-style-type: none"> • Excavation of Bronze Age features. • Targeted excavation of Saxon-Norman remains to establish the feature relationships and the association with the Deserted Medieval Village. • Mapping of ridge and furrow. <p>The Councils maintain that it is not possible to identify features of Bronze Age or Saxo-Norman date prior to their excavation. Also, given that Saxo-Norman archaeological remains are rarely excavated in Cambridgeshire, their importance is, therefore, raised and any such remains should be subject to detailed excavation. Furthermore, it is our</p>

		view that other periods of archaeological occupation might be present (undated features excavated in the evaluation trenches in this area could relate to any phase of occupation), owing to the proximity of the Roman Road (Site 35 to the west) and the large Roman settlement site in Site 18 to the north east, which will make this prescriptive approach rather hard to achieve in the field.
Archaeological mitigation requirements 5.1.2 and 5.1.3	REP5-020aj	See the response above to REP5-020ai, using Site 17 as an example. The Archaeological Mitigation Strategy [REP4-031] prescribes that Bronze Age features are to be subject to Excavation and Saxo-Norman remains to Targeted excavation. This is a stated prescribed decision made at the pre-stripping stage, one that we consider impossible to deliver on.
Archaeological mitigation sites	REP5-020ak	<p>The Applicant is reminded that the Councils are responsible for the management of the archaeological resource in the county and the Applicant should seek to comply with pragmatic advice and recommendations from them regarding the management of change to non-designated heritage assets, with particular reference to Site 17).</p> <p>We can confirm that one of these sites listed as '23' should in fact be Site 24.</p> <p>The information on the sites and their recommended strategies was issued on 15 October 2020, 6 November 2020, 30 June 2021 and again on 25 October 2021 with subsequent discussions. They have been shown for the benefit of the Examiners in maplets included in the response to 9.87 Archaeological Mitigation Areas with Evaluation Data [REP6-047, REP6-048, REP6-049 and REP6-050] below. This shows that in many cases the areas required are only slightly larger than the Applicant's proposed areas, but are intended to investigate site relationships to watercourses and to each other where the case can and has been made. The exception sites for considerable expansion are at Sites 23 & 24 (merging these, and Sites 36-39, doing the same for clearly related sites in the proposed Borrow Pit at Caxton Gibbet). Reasons for expansion of these sites is given in the Councils' response to 9.87.</p>
Archaeological mitigation sites	REP5-020al	The multi-period remains established at Site 17 should be subject to excavation. Following the removal of temporary works, the restoration of the substrate where archaeological remains are present is harmful to archaeological remains.

		We refer the Applicant to REP6-007 and REP6-008 , First Iteration Environmental Management Plan Annex E, 1.5.12 for topsoils and 1.5.17 and 1.5.18d for subsoils. Sections 1.78-1.79 have not been taken into account by the Applicant in regard to proposed temporary works on archaeological sites. Archaeological sites in areas of temporary works should be subject to adequate prior investigation.
9.41 Joint Position Statement (Ponds)	REP5-020am	The Councils' request for inclusion of enhancement to pond 83 (to compensate for the loss of two other ponds) has not been incorporated into Annex A of the JPS (LEMP Appendix L) [REP4-034].
Traffic Modelling Methodology	REP5-020an	The modelling set out in 9.68 Junction Model Sensitivity Test Results [REP5-018] has been agreed by the Councils. In respect of the remaining issues arising from ISH5, the Applicant has provided draft CCC with copies of the additional information to be submitted at Deadline8the Councils will provide a formal response to this information at Deadline 9.
Impacts of the scheme on Coton	REP5-020ao	CCC has set out its expectations for the monitor and manage/mitigate methodology and locations in the draft requirement submitted at D6 [REP6-074] and Coton is one of these.
Operation of Caxton Gibbet	REP5-020ap	The modelling set out in the Sensitivity Test Results [REP5-018] at this junction has been agreed by the Councils.
Roadside Non-motorised Users (NMUs) and encouraging modal shift	REP5-020ar	The Councils' position remains unchanged.
Biodiversity Net Gain	REP5-020at	The Councils disagree with the Applicant's position. The scheme will result in net loss in biodiversity value of hedgerows, as shown in the Biodiversity metric 2.0 calculation [REP3-013] and high / medium distinctiveness habitat as explained in detail in the Councils' BNG Technical Note [REP6-062].
Scheme junctions	REP5-020au	The additional modelling will be commented on once it has been submitted.

Wyboston and Barford Road junctions	REP5-020av, REP5-020aw and REP5-020az	<p>Following the Applicant's sensitivity test modelling of Wyboston and Barford Road roundabouts, the traffic flows used in the modelling of these two junctions are now agreed. A draft technical note outlining the Applicant's position on the potential reallocation of road space at Wyboston and Barford Road roundabouts was provided to CCC on 5 January 2022. We understand that the Applicant intends to submit this to examination at Deadline 8. The draft note falls short of CCC's expectations because the Applicant has not undertaken any modelling of potential options to demonstrate their effect on junction capacity. Instead, the Applicant has reported desktop exercises, explaining why various options will not work, and stating it is not their intention to mitigate the impacts of their scheme at these locations. This is not acceptable to CCC.</p> <p>The Councils welcome the opportunity to comment formally on this document when submitted to examination.</p>
Madingley Mulch Junction	REP5-020av	<p>Results of the M11 Junction 13 sensitivity test modelling, which now includes the Madingley Mulch junction, were shared with CCC on 22 December 2021. In addition, a draft Technical Note was shared on 23 December 2021. CCC are still reviewing this modelling and will respond at Deadline 9.</p>
Cambourne and Scotland Road, Hardwick Junctions	REP5-020ax	<p>The Applicant provided initial results on sensitivity testing at the Cambourne junction to CCC on 4 January 2022. CCC is reviewing the modelling and will provide a response at Deadline 9.</p> <p>CCC confirms that no further work is required on the Scotland road junction.</p>
Traffic flows used in the sensitivity tests	REP5-020ay	<p>The Councils agree that this point has been adequately addressed.</p>
B1046/Potton Road Junction and Eltisley Link junctions	REP5-020ba	<p>Use of SATURN model flows to assess junction capacity for the proposed Eltisley Link junctions has now been agreed by CCC. CCC is still waiting for a technical note setting out the Applicant's rationale in choice of junction design and road layout around Eltisley.</p> <p>CCC is still waiting for the Potton Road alternative flow assessment.</p>

Junction Sensitivity Testing	REP5-020bb and REP5-020bc	See the response to REP5-020av.
B1046/Potton Road Junction and Eltisley Link junctions	REP5-020bd	See the response to REP5-020ba. CCC is still waiting for the Potton Road alternative flow assessment.
B1046/Potton Road Junction and Eltisley Link junctions	REP5-020be to REP5-020bi	See the response to REP5-020bd.
Wyboston and Barford Road Junctions	REP5-020bj	See the response to REP5-020av.
Madingley Mulch Junction	REP5-020bk	See the response to REP5-020av.
Wyboston Junction	REP5-020bl	See the response to REP5-020av.
Barford Road Junction	REP5-020bm	See the response to REP5-020av.
Junction Sensitivity Testing	REP5-020bn	CCC welcomes the sensitivity testing carried out by the Applicant at Eltisley Link and at the Cambourne junctions. CCC further welcomes the flow analysis to be provided for the B1046/Potton Road and A428/Toseland Road/Abbotsley Road junctions. The use of SATURN flows for Eltisley Link junctions is now agreed and CCC is currently reviewing the latest Cambourne junction modelling and will respond at Deadline 9. CCC awaits flow analysis results for Potton Road and Toseland Road.
Junction Sensitivity Testing	REP5-020bo	All the additional junction sensitivity testing requested has either been completed or is in hand and due to be submitted by the Applicant at Deadline 8.
Monitor and Manage	REP5-020bp to REP5-020bs	See the response to REP5-020ao.
Construction hours	REP5-020by	See the response to REP5-020z.

Emissions	REP5-020cb	It is noted that it is not yet possible for the Applicant to set out precise means by which residual emissions associated with the scheme will be offset. However, the Councils still consider it important that the Applicant sets out a clear commitment to addressing residual emissions and we are discussing a Legacy Monitoring Framework as the preferred means of delivering this.
Permits and road space bookings	REP5-020ce	The Councils agree with the Applicant's response.
The handover process for de-trunked assets.	REP5-020ch	The Councils refer to their comments on the dDCO (document reference CLA.D8.dDCO.C).
Strategic Model Test at Girton: Network Issues – 2.1.1	REP5-020ci	The Councils note the explanation given.
Strategic Model Test at Girton: Assessment – 3.1.7	REP5-020ck	The Councils note the explanation given.
Impact in Dry Drayton	REP5-020cl	CCC has set out its expectations for monitor and manage/mitigate methodology and locations in the draft requirement submitted at D6 [REP6-074] and Dry Drayton is one of these locations.
Girton interchange	REP5-020cn	The Councils note the Applicant's response.
Network Coding Issues in the model	REP5-020co	<p>CCC does not dispute use of the strategic model for assessing the strategic impacts of the proposed A428 scheme. CCC notes that the number of coding errors coming to light are increasing and therefore, if the A428 model were to be used for any other schemes, careful checks of the coding within the relevant study area should be undertaken.</p> <p>This is important because network coding on the strategic and local roads in the area of detailed modelling needs to be accurate, otherwise this gives rise to unrealistic routing patterns as demonstrated in the Coton area.</p>
Cambourne Roundabout	REP5-020cp	CCC is currently reviewing the latest Cambourne junction modelling and will respond at Deadline 9.

Model Coding Errors	REP5-020cq	The Councils note the Applicant's response.			
Impact on A1198 Southern arm	REP5-020cr	The Councils note the Applicant's response.			
Construction phase emissions	REP5-020ct	The Councils note that the calculations of land change have been based on Biodiversity Metric Gain: Metric 2 [REP3-012] report, however the figures do not match the BNG calculations set out in Appendix G of this document [REP3-013]. See our response to REP5-020df and REP5-020de, below.			
Archaeological mitigation with reference to Site 23	REP5-020da	Appropriate areas for archaeological excavation should be designed to enable the anticipated dispersed feature content of unenclosed occupation sites, including but not restricted to burial grounds and satellite burials, to be subject to controlled archaeological excavation led by professionals prior to destruction by construction works. Recognition of this type of archaeological evidence is not straightforward and the mitigation scheme should not rely on such evidence being recognised by construction teams who are unlikely to have the appropriate expertise.			
Archaeological mitigation with reference to Site 18	REP5-020dc	The Applicant's response to the limits of Site 18 is unacceptable to the Councils as known archaeological assets will be subject to unrecorded loss along with as yet unknown, predicted associated remains. We continue to advise that the area for Site 18 is extended to that required by the Councils as shown on the maplet given in response to Sheet 18/41, REP6-048, Fig 9.87.			
Updates to TAG	REP5-020dd	The Councils note the Applicant's response.			
Land use carbon calculations	REP5-020df and REP5-020de	The Applicant has not addressed the Councils' previous comments. Further clarity is required as to why the pre-works and post-works habitat areas set out in columns 2 & 3 of the Land Use Carbon Calculations [REP4-048] do not match the values within the Biodiversity Net Gain Metric calculations, Appendix G [REP3-013], as follows: <table border="1" data-bbox="875 1289 2024 1358"> <tr> <td></td> <td>Land Use Carbon Calculations [REP4-048]</td> <td>Biodiversity Net Gain calculations [REP3-013]</td> </tr> </table>		Land Use Carbon Calculations [REP4-048]	Biodiversity Net Gain calculations [REP3-013]
	Land Use Carbon Calculations [REP4-048]	Biodiversity Net Gain calculations [REP3-013]			

Phase 1 Habitat Category	Pre-works habitat (column 2), hectares	Pre-works habitat (page 9), hectares
A3.1 Parkland and scattered trees – Broadleaved Urban Street Trees	0.14	0.09
A.3.1 Parkland and scattered trees - broadleaved parkland scattered trees	0.96	-

Phase 1 Habitat Category	Land Use Carbon Calculations [REP4-048] Post-works habitat (column 3), hectares	Biodiversity Net Gain calculations [REP3-013] Post-works habitat (pages 9/10), hectares
A1.1.1 Woodland – Broadleaved-semi-natural	0	5.85
A.1.1.2 - Woodland – Broadleaved – Plantation	82.15	76.3
A3.1 Parkland and scattered trees – Broadleaved Urban Street Trees	0.114	1.14
A.3.1 Parkland and scattered trees - broadleaved parkland scattered trees	0.76	0
B6 Poor semi-improved grassland	9.7	7
J2.6 Dry Ditch	0	0.04

The Land Use Calculations document should be updated accordingly.

<p>Historic England: The dating of archaeological remains prior to excavation</p>	<p>REP5-022a (page 86)</p>	<p>To clarify this point on dating for the Applicant with reference to Site 17, for example, the Archaeological Mitigation Strategy [REP4-031] states in Appendix D that Bronze Age features will be excavated and Saxo-Norman remains will receive targeted excavation to establish the feature relationships and association of the Deserted Medieval Village of Wintringham (this is partly scheduled, where the best earthworks survive under pasture and is to the east and southeast of Site 17). The Councils contend that this strategy cannot be followed as, prior to excavation, one cannot know which features are Bronze Age and which are Saxo-Norman/Medieval. Given that fact and also that the Saxo-Norman village remains are rarely excavated in Cambridgeshire, we require the multi-period remains to be subject to the excavation methods of section 6 in the Joint Authorities' Archaeological Brief at Appendix B in the same document so that suitable decisions can be made during the post-excavation assessment and analysis stages regarding the contribution of these rare sites to the archaeological record and regional syntheses. We are resistant to attempts to reduce the excavation of these important remains in recognition of the value of excavation as a process that enables knowledge gain to occur at the appropriate stage: once sufficient evidence has been amassed from a site prior to damage or destruction. National Policy Statement for National Networks [REP4-031 REF 6] paragraph 140 refers.</p>
<p>Sensitivity testing of Wyboston and Barford Road Junctions</p>	<p>REP5-022e</p>	<p>See the response to REP5-020av above.</p>
<p>Further testing of Madingley Mulch Junction</p>	<p>REP5-022e</p>	<p>See the response to REP5-020av above.</p>
<p>Sensitivity Testing of the Eltisley Junction</p>	<p>REP5-022e</p>	<p>See response to REP5-020ba above.</p>
<p>Sensitivity Testing of Potton Road and Toseland Road</p>	<p>REP5-022e</p>	<p>CCC awaits flow analysis results for Potton Road and Toseland Road junctions, due to be submitted to examination by the Applicant at Deadline 8.</p>

Wyboston and Barford Road Junctions	REP5-022f	The Councils note the Applicant's response.
M11 J13	REP5-022f	The Councils note the Applicant's response.
De-trunking Q2.11.5.1	REP5-022h	It is not accepted that the revised provisions in the dDCO stating that any de-trunking date must be consented to by the Secretary of State after consultation with the relevant local highway authority affords sufficient protection for the Authority. CCC requires specific provisions within the DCO regarding the de-trunking date(s) being agreed between the Applicant and the LHA.
Non-motorised Users (NMUs): fragmented provision	REP5-022i Q2.11.6.1 a)	The Councils would welcome the Applicant carrying out detailed design work along the current A428 with regard to providing roadside NMU provision. However, CCC's position regarding provision from Eltisley to Caxton Gibbet remains unchanged, and is further supported by the Councils comments made under REP5-022I.
Non-motorised Users (NMUs): future demand	REP5-022j Q2.11.6.1 b)	<p>CCC's position remains unchanged. Information on the journey to work by bike which shows that, when one compares the number of people travelling from Cambourne to Cambridge with those travelling from a similar distance to Cambridge from other villages where there are cycle facilities, the numbers are measurably higher where off-road cycle routes are provided.</p> <p>The Councils' position is supported by the National Institute for Health and Clinical Excellence's 2018 guidance NG90 'Physical activity and the environment'², particularly Rationale 1.2.3 on page 57. The research demonstrates the importance of delivering change to NMU infrastructure at the same time as major environmental changes such as a new transport scheme in order to engender desired behavioural and cultural change and achieve modal shift for optimum benefit to population health and well-being and wider cost benefits to the NHS. Such benefits will also have a positive impact on climate change.</p>

² [REDACTED] Submitted as CLA.D8.OS.A.C.A2 – Appendix 2.

		It is also important not to underestimate the impact of the COVID-19 pandemic on changing behaviour. There has been a sustained drop in use of public transport, with people shifting to private car or non-motorised modes of transport. It is critical to capture, encourage and support the shift to active travel modes of transport, and the new A428 scheme has the prime opportunity to do so.
Damage to local roads at plant crossings – Q2.11.7.4	REP5-022m	This matter remains at issue between the parties as part of the discussions on the legal agreement.

9.77 Written submission of oral case Issue Specific Hearing 5 on 1 December 2021 [REP6-037]

Topic	Paragraph Number	Councils' Comment
Agenda item 3(a)(iii) – Anticipated operational traffic effects on the local highway network.	3	Paragraph 3 of the Applicant's summary notes that the Applicant used traffic data from 2016, 2017 and 2018, however the Councils understand that the correct dates should be 2016, 2017 and 2019 (see paragraph 3.1.2(b) of the Junction Model Sensitivity Test Results [REP5-018]).

9.81 Monitor and Manage Technical Note [REP6-041]

Topic	Paragraph Number	Councils' Comment
Operational impacts and benefits	1.1.3	<p>The Councils disagree with the statement that the Scheme has no significant residual traffic impacts which require mitigation. In particular, the Councils have raised concerns relating to the impact of the Scheme on Great North Road St. Neots where the Scheme adds significant levels of traffic as a result of rerouting traffic on to a route that experienced significant delays at the time the baseline data was collected.</p> <p>In addition, the Applicant has acknowledged that the modelling has resulted in the identification of several significant adverse impacts which arise as a result of errors in the model coding. Monitoring of these locations so that the actual impact of the Scheme can be fully understood is therefore required in the absence of an updated model.</p> <p>The Scheme also claims a significant proportion of its predicted benefits because of self-diverting traffic rerouting back to the SRN as a result of the Scheme. Much of the self-</p>

		diverting traffic uses the LRN therefore, CCC is of the view that the impacts of the Scheme need to be monitored to ensure that the predicted benefits are achieved. CCC queries how this is to be proved if the Applicant is not monitoring the impact of the Scheme through a dedicated programme of Scheme-specific monitoring.
Operational impacts and benefits	1.1.4	<p>The Technical Note states that the Scheme is in accordance with NPSNN and is not required to mitigate all impacts. As with any development, the Scheme cannot be required to mitigate existing issues, or provide betterment, only mitigation for impacts of the Scheme. To reiterate, CCC is not looking for mitigation of all impacts, instead CCC requires certainty as to how traffic patterns in the study area and wider County change because of the Scheme and this requires monitoring of the predicted impacts.</p> <p>Paragraph 5.215 of the NPS NN requires mitigation measures for schemes to be proportionate and reasonable, focussed on promoting sustainable development. CCC considers that its request that predicted impacts on the local road network as a direct result of the Scheme are monitored and mitigated is proportionate and reasonable.</p>
Operational impacts and benefits	1.1.5	<p>The Applicant is proposing to undertake monitor and manage of the Scheme as part of the on-going monitoring of the operation of the SRN with any necessary interventions determined and funded in line with existing DFT processes. This is not acceptable to CCC as there is no certainty as to what mitigation might be required and there is no defined funding to implement any identified need. This means that were there a need for mitigation it would go into the “pot” with all the other schemes and might not be implemented. CCC requires the Scheme to show how its impact is to be mitigated as with any other development and therefore the Applicant needs set out the areas to be monitored, what mitigation might be required and how this is to be funded either during the Examination or as part of the discharge of a Requirement as proposed by CCC [REP6-074]. In addition, there are a number of areas where the model predicts impacts but on further investigation it has been shown that this is due to errors in the coding of the model and therefore CCC require monitoring in these areas to prove that the model was wrong, the predicted impact has not occurred and in order to obtain clarity as to the level of actual observed impact. This is specifically needed in Coton, Dry Drayton and Madingley.</p>

Operational impacts and benefits	1.1.6	<p>The Technical Note also states: “<i>Local Highway Authorities (LHAs) also have a duty to monitor and manage their local network, and separate funding streams are available to LHAs if unforeseen impacts arise post opening, subject to securing relevant consents.</i>” Without Scheme-specific monitoring, CCC queries how CCC would have the required data to know whether a change is due to the Scheme or some other change.</p> <p>All major developments must monitor the impact of their Scheme through an agreed scheme of monitoring which should be based on agreed base data. This approach was adopted for the A14, which collected traffic data in an agreed set of locations prior to any work commencing on the Scheme. This data set the baseline against which the Scheme monitoring was to be assessed.</p>
Operational impacts and benefits	1.1.7	<p>The Technical Note states: “<i>Should a LHA consider it meets the criteria, they may apply to the Department for Transport for Local Road Network funding. It is the responsibility of the LHA to make this application.</i>”</p> <p>If a direct impact of a Scheme is identified, it ought to be for the Applicant to resolve not for the LHA to try and apply for funding. This would be the position with any other identified Scheme impact and CCC sees no reason why a different approach should be adopted in relation to traffic monitoring and mitigation. The A14 was accompanied by a defined set of locations that needed monitoring, data was collected in April 2016 prior to any works or advanced signing being implemented to give a base situation against which to assess the impact of the scheme.</p>
Construction Impacts Mitigation	1.1.8	<p>The points set out in the Technical Note in relation to the measures taken to minimise the impacts of construction traffic are noted and are not disputed, however, the modelling of construction impacts shows a significant level of self-diverting traffic over a wide area affecting many settlements in the County. This impact needs to be monitored and mitigated where possible to minimise the impact of the construction phase on communities in the County.</p>
Policy position	1.3.4	<p>The Applicant states that: “<i>National Highways also monitor key locations within the Local Road Network for the purposes of evaluating scheme benefits. These locations must be expected to experience significant change and be quantitatively justified within the results</i></p>

		<p><i>of the traffic forecasting or pertain to a sensitive location. The monitoring results will be shared with the Local Highway Authorities (LHAs)."</i></p> <p>No discussions on the proposed locations on the local road network have yet taken place between the Applicant and CCC. CCC request that the scope of the monitoring on the local road network be agreed during the Examination so that the scope is agreed, documented and secured during the DCO process. Failing which, the scope of the monitoring could be agreed and documented pursuant to a Requirement of the DCO, such as that proposed by the Councils [REP6-074].</p>
Policy position	1.3.5 and 1.6	<p>The Applicant sets out a number of factors limiting the Applicant's interventions to the strategic road network and clarifies its interpretation of its Network Management Duty.</p> <p>CCC would highlight that this list appears to omit the second limb of the Applicant's Network Management duty under section 16 of the Traffic Management Act 2004, i.e. the management of the SRN to facilitate the expeditious movement of traffic on road networks for which another authority is the traffic authority. The Applicant cannot therefore limit its attention to the boundary of the SRN.</p> <p>CCC would also highlight that the monitoring and management of traffic impacts on the local road network has been undertaken on the A14 Cambridge to Huntingdon Improvement Scheme and is required under the A303 Sparkford to Ilchester Dualling DCO. The factors listed at 1.3.5 do not appear to have been limiting factors in either circumstance.</p>
Local impacts within the Scheme	1.4.1 and 1.4.2	<p>The comments relating to the situation without the Scheme are however, as set out above, the Councils have identified a number of locations where the impact of the Scheme needs to be monitored and the Councils are not looking for excessive monitoring or mitigation.</p> <p>The Councils are still waiting for formal submission of some of the sensitivity tests and mitigation tests at Wyboston and Barford Road Junctions until this information is received these locations remain on the monitoring list.</p>

		<p>1.4.2a) The junction modelling used in the original TA [APP-241 and APP-242] and the TAA [APP-243] were undertaken using a non-standard method for deriving the Traffic flows. The sensitivity tests included in the sensitivity tests report [REP5-018] used an agreed methodology to generate the traffic flows and therefore the flows used in these tests are agreed.</p> <p>1.4.2b) The model results indicate that the scheme has a range of impacts on the surrounding road network both negative and positive. The Councils require monitoring of the impacts in a number of locations as set out in the Local Impact report and SoCG.</p> <p>1.4.2c) The Councils acknowledge that the modelling predicts significant benefits of the scheme on certain areas. These areas need monitoring to prove that the level of benefits is achieved.</p> <p>1.4.2d) The junction modelling used in the original TA [APP-241 and APP-242] and the TAA [APP-243] were undertaken using a non-standard method for deriving the Traffic flows. The sensitivity tests included in the sensitivity tests report [REP5-018] used an agreed methodology to generate the traffic flows and therefore the flows used in these tests are agreed. However, additional tests have been requested to understand if small scale local mitigation would aid the operation of the existing A428 junctions.</p>
Local impacts within the Scheme	1.4.3	<p>The Technical Note states: “<i>Monitoring of Scheme benefits will take place through Post Opening Project Evaluation (POPE) after the Scheme is open to traffic. Whilst the exact scope of the POPE monitoring is still to be defined, it will, in general, cover the Scheme itself and sections of the Local Road Network where significant forecast traffic flow changes are seen as critical to evaluating the benefits of the Scheme. Whilst the locations of these have not yet been determined, locations such as Yelling, Toseland and the B1428 across St Neots Town Bridge are under consideration for inclusion within the POPE.</i>”</p> <p>The use of the POPE to monitor the impact of the scheme is reasonable but the Councils would prefer that the scope of the POPE be agreed during the Examination so that the scope is agreed, documented and secured during the DCO process. Failing which, the scope of the monitoring could be agreed and documented pursuant to a Requirement of the DCO, such as that proposed by the Councils [REP6-074].</p>

		The statement that the 7 locations on the SRN will be covered by National Highways' Network Licence duty rather than separately through the DCO process appears to be inconsistent with the idea set out regarding the POPE.
POPE Process	1.5	The POPE process is not secured and therefore cannot be a substitute for a requirement to monitor the impacts of the Scheme on the local road network. Furthermore, the POPE process does not contain a threshold of impacts, above which mitigation measures may be put in place to address the impacts of the Scheme nor require any mitigation measures to be funded and delivered.
Local Highway Authority Duty to Monitor and Manage	1.7	<p>The issue that the Councils have raised relates to the impact of the Scheme on Great North Road St Neots where the Scheme adds significant level of traffic as a result of rerouting traffic on to a route that experienced significant delays at the time the baseline data was collected. The mitigation requested for the Wyboston junction might have an impact on the operation of the Great North Road.</p> <p>As there are significant impacts predicted as a result of the Scheme, the Councils request that these are monitored and, if impacts found to be significant, mitigated. The Councils consider it unreasonable that the Councils are expected to fund mitigation for the predicted and foreseeable effects of the Applicant's Scheme.</p>
Network Management Duty	1.8	<p>The Councils require monitoring at certain locations to show the impact of the proposed Scheme and mitigation where those impacts are considered to be significant. The Councils do not require (i) the mitigation of matters having an insignificant effect on the movement of traffic; (ii) the mitigation of existing issues; or (iii) betterment.</p> <p>The requests made by the Councils relating to monitoring and management are proportionate and reasonable, in line with the requirements of the NPS NN.</p>
Managing Construction Traffic Impacts	1.9	The modelling of the construction phases indicated wide ranging re-routing of traffic away from the SRN and the impact of this traffic needs to be monitored and understood.

<p>Managing construction traffic impacts – general traffic</p>	<p>1.9.3</p>	<p>If there is no agreement to fund monitoring on the local road network it may be difficult to establish a relationship between network performance on the SRN and self-diverting traffic. CCC will not have comprehensive monitoring data on the local network that may be impacted by self-diverting traffic, therefore reports of problems are likely to be based on complaints, feedback from councillors, parish councils, community. These can be compared with details on when closures of the SRN and diversions routes are in place for example. These reports can be raised at the Traffic Management meetings.</p> <p>In the absence of Scheme-specific monitoring data, these more qualitative sources would need to be relied on in order to develop suitable mitigation measures. As a result it may be more difficult to establish a relationship between network performance and self-diverting traffic. The funding and delivery of mitigation measures arising as a direct impact of the Scheme ought to be carried out by the Applicant.</p>
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9.82 Flood Risk Assessment Technical Note [REP6-042]

Topic	Paragraph Number	Councils' Comment
<p>General</p>		<p>The LLFA have no comments to make.</p>

9.83 Groundwater Risk Assessment Technical Note [REP6-043]

Topic	Paragraph Number	Councils' Comment
<p>General</p>		<p>The LLFA have no comments to make.</p>

9.84 Assessing the Potential Impacts of COVID -19 - the implications for traffic forecasts for the Scheme - Supplementary Data [REP6-044]

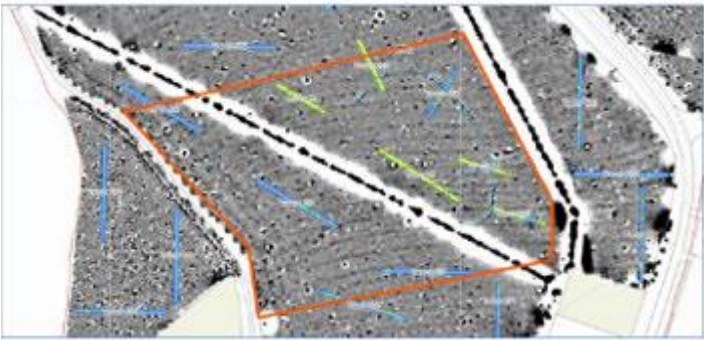
Topic	Paragraph Number	Councils' Comment
<p>Impact of Covid 19</p>	<p>4.1.7</p>	<p>While the latest Technical Note on the impact of COVID-19 on the proposed Scheme [REP6-044] has added analysis of traffic flow data on the strategic network between June and September 2021, CCC's conclusions from reviewing the original Technical Note [REP1-029] are unchanged. These were:</p>

		<ul style="list-style-type: none"> the data presented focusses only on the strategic road network with no analysis of flows on the local road network, meaning no reliable conclusions about the impact on the local road network can be drawn. CCC recommends the impact of the proposed Scheme should be reassessed once the DfT Uncertainty Toolkit is available, expected to be later this year. <p>CCC's conclusions are supported further by the introduction of 'Plan B' COVID-19 restrictions in December 2021 in response to the omicron variant of the virus. These include the recommendation for workers to work from home if possible. Therefore, it is not yet possible to confirm the operation the road network has returned to a steady state. It would also be useful to consider the journey purpose as well as origins and destinations of trips and how this might impact the Scheme.</p>
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9.85 Departures from Standard for the A428 Black Cat to Caxton Gibbet Scheme [REP6-045]


Topic	Paragraph Number	Councils' Comment
Scheme Departures from Standard		<p>This document does not list or acknowledge the unapproved (rejected) Departures relating to Cambridgeshire County roads for carriageway and verge widths. In that respect it is somewhat misleading, and it may be inferred by the reader that all relevant and necessary Departures for the scheme are approved, which is not the case.</p> <p>For the avoidance of doubt:</p> <ul style="list-style-type: none"> The applications made by the Applicant for reduced standard cross sections on Cambridgeshire County roads are not approved. Applications for more acceptable cross section widths have not been made by the Applicant CCC has indicated the minimum dimensions that would be favourably considered in a Departure application (refer to 9.71 Response to actions arising from Issue Specific Hearing 5 [REP6-031]), above). As it stands the necessary Departures from Standard for the satisfactory construction and adoption of these roads are not in place.

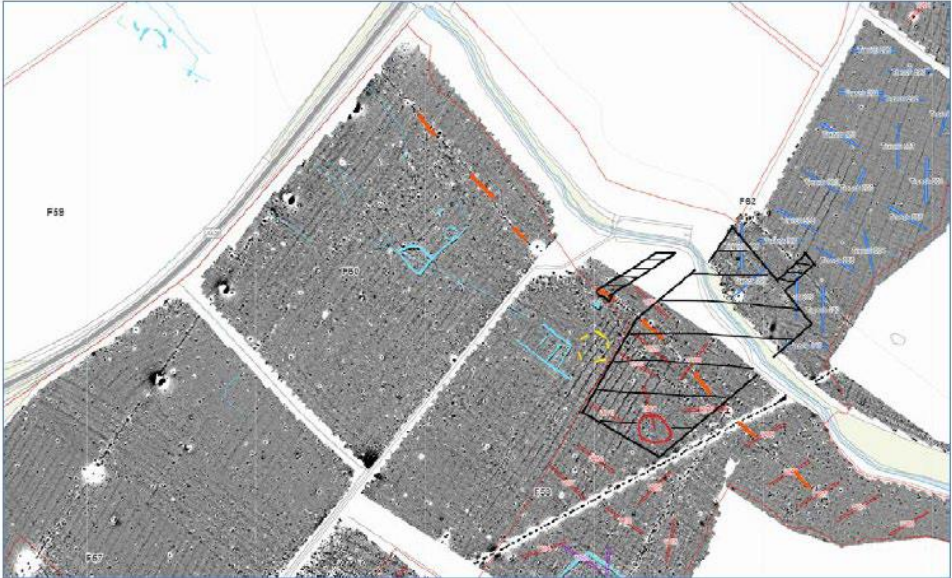
9.87 Archaeological Mitigation Areas with Evaluation Data [REP6-047, REP6-048, REP6-049 and REP6-050]

Topic	Paragraph Number	Councils' Comment
<p>REP6-047 Fig 9.87</p>	<p>Sheet 10/41</p>	<p>The excavation boundary is too tight to Iron Age enclosure boundary and the limit of excavation does not reach the brook south of Trenches 538 and TR284. This proposal does not conform with the requirements of the LA archaeology brief and the area should be expanded to that advised by CCC below.</p> <p>Site 10 CCC area:</p> 
<p>REP6-048 Fig 9.87</p>	<p>Sheet 11/41</p>	<p>CCC had advised the Applicant to expand the excavation area within the Orders Limits to include anticipated remains associated with broader series of enclosures (shown as blue lines) that occur to the immediate north west of but within the Orders Limits and that might extend into the Scheme area. This would provide an adequate zone for investigation around the enclosures where unenclosed occupation tasks were carried out. The investigation should allow connectivity of the known sites and investigate areas where no survey data is present (white zones).</p> <p>Site 11 CCC area below:</p>

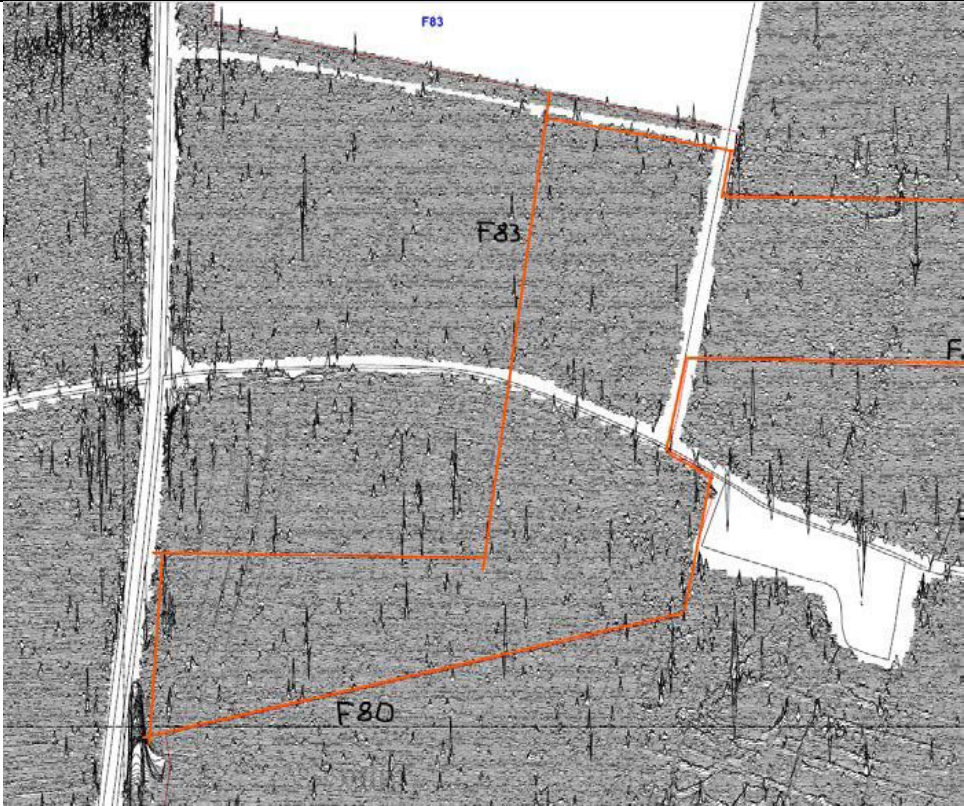
<p>REP6-048 Fig 9.87</p>	<p>Sheet 12/41</p>	<p>The box around Tr122 is the minimal area of exclusion. CCC had recommended extension to just north of Tr129, to exclude the boundary and anticipated associated features of the Iron Age site lying mostly to the east of the Orders Limit.</p>	
<p>REP6-048 Fig 9.87</p>	<p>Sheet 13/41</p>	<p>This area suitably buffers the square Iron Age enclosure and is agreed.</p>	
<p>REP6-048 Fig 9.87</p>	<p>Sheet 14/41</p>	<p>This area is in the A428 compound in the Wintringham Park development area and has been excavated by archaeologists appointed by Urban and Civic (the developer). A Late Bronze Age cemetery was found - unexpected as there are no known contemporary settlements in the area, extending the occupation on the clay here back in time. As Site 14 has been excavated under the remit of another development, it does not need to be</p>	

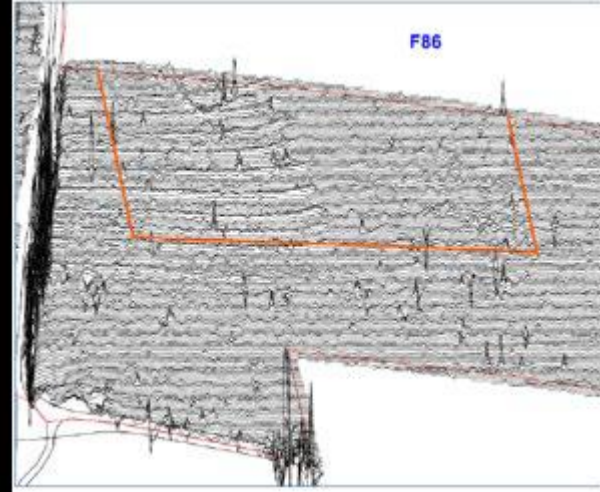
		included in the list of A428 sites and could be removed, thereby reducing the number of sites that the Applicant is directly responsible for.
REP6-048 Fig 9.87	Sheet 15/41	This is the agreed minimum area for excavation of this Roman site related to a villa immediately west of the Orders limits.
REP6-048 Fig 9.87	Sheet 16/41	Two mitigation types are shown: the yellow-edged box on the new track is the agreed minimum area for excavation of Iron Age and Roman remains at Site 16, the majority of which (purple dashed box) will be fenced off and protected within the Orders Limits as agreed.
REP6-048 Fig 9.87	Sheet 17/41	<p>This excavation area of this multi-period site is agreed, but has been assigned by the Councils for detailed excavation, not that which is outlined by the Applicant. Rarely are elements of Saxo-Norman settlement excavated in Cambridgeshire and they form a focus of the Regional Research Agenda (shown as REF 19 in [REP4-031, 1.7.3 a]), and see REP4-031 4.4.22 a asserting the importance of investigation of settlement from this date.</p> <p>We do not accept the mitigation strategy put forward in REP4-031 p.189. It is too selective and impossible to implement as previously outlined in our Written Representation REP1-048 and REP4-060 (responding to REP1-048cf 12.2.3a). We emphasise the need to follow the excavation methods provided in section 6 the Joint Authorities' Archaeology Brief shown in Appendix B of REP4-031.</p> <p>The site occurs to the east of Site 35 (REP6-050 Fig 9.87 Sheet 35/41).</p>
REP6-048 Fig 9.87	Sheet 18/41	The area lies to the north of Wintringham Deserted Medieval Village (Historic Environment Record ref MCB1642), the southern part of which is scheduled (NHLE ref 1006815). The area shown on the west of the plan, for Field 73 is agreed, along with the strategy for excavation for this multi-period site. We emphasise the need to follow the excavation methods provided in section 6 the Joint Authorities' Archaeology Brief shown in Appendix B of REP4-031.

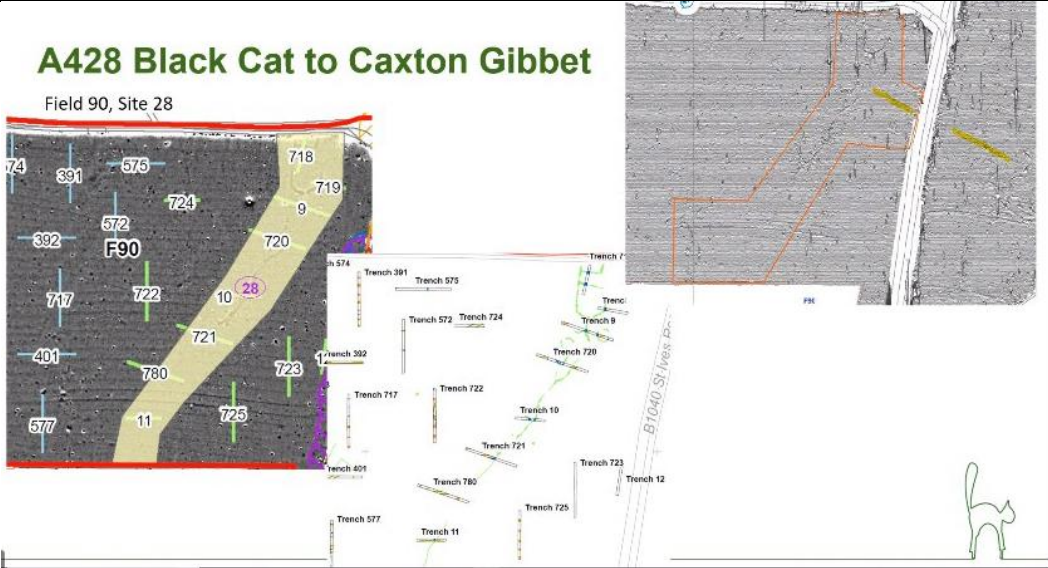
		<p>The Councils do not agree with the area for excavation shown in Field 74 to the east of F73 as this excludes known archaeological remains outside archaeological enclosure boundaries in this zone (unenclosed activity).</p> <p>Site 18 CCC area is shown outlined in orange below:</p>  <p>The Councils have taken a pragmatic approach to this area by reducing their orange outline to the minimum area buffer around the known remains, rather than requiring all of Field 74 to be excavated. This advice has been consistent since initial discussions on the mitigation strategy held in September 2020.</p>
<p>REP6-048 Fig 9.87</p>	<p>Sheet 19/41</p>	<p>This excavation area is not agreed as it fails to adequately incorporate the northwest-southeast zone of archaeological sites south of Hen Brook where they extend into the Scheme (shown as blue lines outside the Orders Limits to the west). The excavation area should include the ring ditch of a building (unenclosed activity) shown in red below and at the east end of Tr1214 on the Applicant's map. We emphasise the need to follow the excavation methods provided in section 6 the Joint Authorities' Archaeology Brief shown in Appendix B of REP4-031.</p> <p>Since last presenting this map to the Applicant on 30 June 2021 for a SoCG meeting, we note that the area along Hen Brook to the northwest will be included in the DCO for</p>

		<p>probable temporary access and ecology work. This will have an impact on the archaeological resource and it should be included in the excavation strategy.</p> <p>Site 19 CCC maplet below can be altered in the field north of Hen Brook to omit the narrow extension trench, a new map showing how the Applicant will include observations along the brook will be welcome as this has not been supplied to date.</p> 
<p>REP6-049 Fig 9.87</p>	<p>Sheet 20/41</p>	<p>The area is agreed for Site 20, but we emphasise the need to follow the excavation methods provided in section 6 the Joint Authorities' Archaeology Brief shown in Appendix B of REP4-031.</p>
<p>REP6-049 Fig 9.87</p>	<p>Sheet 21/41</p>	<p>Not clear from this map, this is A428 Site 21. It a major prehistoric and Roman settlement at the southwest end of the A428 compound area within Urban and Civic's development area at Wintringham Park (Site 1). It will be fenced off and marked as an Archaeological Protection Area preventing any damage from A428 construction activities of any kind.</p>

		Should the Applicant wish to bring forward excavation at this site in order to use the land within the area defined for their compound during the road's construction phase, Urban and Civic's appointed archaeologists should undertake the work according to their archaeological investigation programme already negotiated and agreed with Urban and Civic and the Councils.
REP6-049 Fig 9.87	Sheet 22/41	The area and strategy for this site is agreed.
REP6-049 Fig 9.87	Sheet 23 and Sheet 24/41	<p>The isolated excavation boxes of Sites 23 and 24 fragment the dispersed aspect of unenclosed settlement, which includes at least one cremation burial and is not well understood from the evaluation work. It excludes known archaeological site evidence and prevents an understanding of the relationship with contemporary evidence to be understood – such as the curving string boundary and enclosures to the east to be seen against other archaeological evidence on the west and south sides. We emphasise the need to follow the excavation methods provided in section 6 the Joint Authorities' Archaeology Brief shown in Appendix B of REP4-031.</p> <p>CCC's Site 23 and 24 combined excavation area is shown below and prefers a landscape archaeology approach to be used when dealing with unenclosed, dispersed occupation remains that can be anticipated in this area.</p>

		
<p>REP6-049 Fig 9.87</p>	<p>Sheet 25/41</p>	<p>This Archaeological Protection Area around High Hayden Farm is agreed.</p>
<p>REP6-049 Fig 9.87</p>	<p>Sheet 26/41</p>	<p>The archaeological features found in this area are obscured by the ridge and furrow remains and the deeper soils of an ancient plough headland.</p> <p>CCC advise that the excavation area is expanded to the east to address this.</p> <p>Site 26:</p>

		
<p>REP6-049 Fig 9.87</p>	<p>Sheet 27/41</p>	<p>The small area of excavation and its investigation strategy are agreed.</p>
<p>REP6-049 Fig 9.87</p>	<p>Sheet 28/41</p>	<p>The excavation area shown in the Applicant's area for excavation of this Middle Iron Age string boundary with off-set enclosures prevents a meaningful link with the known archaeological evidence in the adjacent field to the east of St Ives Road and does not incorporate a NW-SE aligned linear feature (highlighted yellow below) heading into that site. Geophysical anomalies showing on the survey data plot to the east of Trench 577 have been excluded, but need incorporation in the excavation scheme and be subject to the methods prescribed in the Joint Authorities' Archaeology Brief (Appendix B REP4-031).</p> <p>CCC site 28 area for excavation is shown in orange in the right hand maplet below:</p>

		<p>A428 Black Cat to Caxton Gibbet</p> <p>Field 90, Site 28</p> 
<p>REP6-049 Fig 9.87</p>	<p>Sheet 28/41</p>	<p>This area is agreed as is the Applicant's investigation strategy.</p>
<p>REP6-050 Fig 9.87</p>	<p>Sheet 30/41</p>	<p>This area is agreed as is the Applicant's investigation strategy.</p>
<p>REP6-050 Fig 9.87</p>	<p>Sheet 31/41</p>	<p>This area is agreed as is the Applicant's investigation strategy.</p>
<p>REP6-050 Fig 9.87</p>	<p>Sheet 32/42</p>	<p>This area is agreed, though the strategy for investigation should adhere to the methods prescribed in the Joint Authorities' Archaeology Brief (Appendix B REP4-031).</p>
<p>REP6-050 Fig 9.87</p>	<p>Sheet 33/43</p>	<p>The Applicant's excavation box (yellow) is too tight to the enclosure. The area should be expanded to properly buffer around the enclosure and to pick up hinterland/unenclosed activity.</p> <p>The strategy for investigation should adhere to the methods prescribed in the Joint Authorities' Archaeology Brief (Appendix B REP4-031).</p> <p>CCC site 33 excavation area. See orange box below.</p>

<p>REP6-050 Fig 9.87</p>	<p>Sheet 34/41</p>	<p>The archaeological site found in this field to the northwest of Pastures Farm and Caxton Gibbet fills the entirety of Field 95 and extends west of the western field boundary into Field 94 (shown as pink features in trenches), especially in the NE corner. There are a number of Iron Age settlement enclosures with external activity area between this part of the road scheme and Caxton Gibbet roundabout and constitute a settlement landscape.</p> <p>The whole scheme area in this field should be stripped (in stages if necessary for spoil management), and subject to archaeological investigation prescribed in Section 6 of the</p>

Joint Authorities' Archaeological Brief (Appendix B, REP4-031), in part to address the need to establish the antiquity of the road to St Neots – believed to be a Roman Road and therefore likely to have had a junction with Ermine St to the east of that and also formed a hundred boundary and line of Cambridge Road. The entirety of this field should be excavated up to the current road and extend west into Field 94 and the northwest corner of F96.

CCC Site 34 recommended area is outlined in orange below:

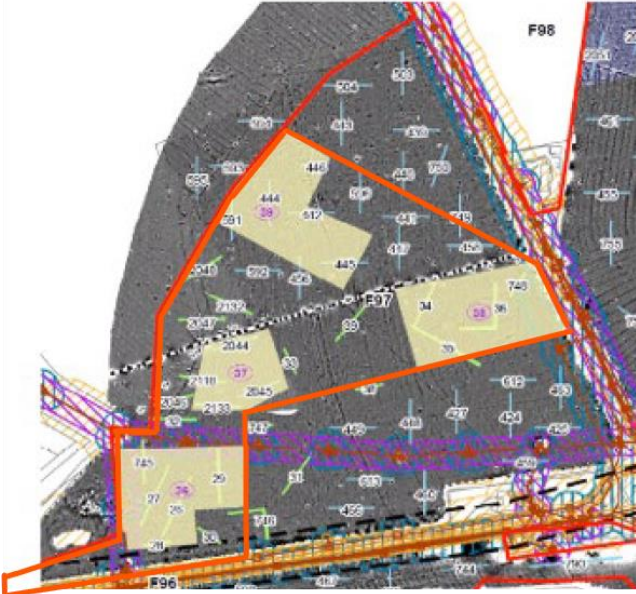


REP6-050
Fig 9.87

Sheet 35/41

This area is west of Wintringham Deserted Medieval Village, where the Sandy to Godmanchester Roman Road (HER reference MCB17569) crosses Wintringham Brook. Saxo-Norman features were also present in the landscape east of the crossing. It is directly west of Site 17.

		<p>The Applicant's area is agreed but the excavation strategy should follow that prescribed in Section 6 of the Joint Authorities' Archaeological Brief (Appendix B, REP4-031).</p>
<p>REP6-050 Fig 9.87</p>	<p>Sheets 36-39/41</p>	<p>This site is to the immediate west of the principal Roman Road, Ermine Street (A1198). The four Iron Age settlement enclosures are the focus of the Applicant's Archaeological Mitigation Strategy in Field 97. There is no regard given to the areas around the enclosures in which other tasks will have occurred. Anticipated remains include individual burials or cemeteries, pottery production areas, metalworking sites, animal processing areas, retting and storage pits/structures and other aspects of occupation that is typically unenclosed. The character of Roman utilisation of this prehistoric settlement area remains unknown. The major adverse effect that the borrow pit in this location will have on archaeological evidence of this and other periods requires suitable mitigation.</p> <p>The Cambridgeshire Authorities consider that Sites 36-39 should be excavated in a landscape style archaeological scheme common to borrow pits and quarries, shown in the orange outline below. Here, the focus of detailed excavation should be on the four sites coloured yellow by the Applicant, with a lighter excavation strategy used evidence found (and proven through evaluation) for the landscape in between.</p> <p>Excavation can be phased to accommodate service removals and other logistical arrangements.</p>

		<p style="text-align: center;">Field 97, Site 36-39</p> 
REP6-050 Fig 9.87	Sheet 40/41	The purple area for archaeological protection by fencing off this site is agreed.

9.88 Schedule of Changes to the Environmental Masterplan [REP6-051]

Topic	Paragraph Number	Councils' Comment
		The Councils welcome the submission of the scheme, which helpfully confirms changes to the Environmental Masterplan, including mitigation for Great Crested Newts and bat crossings.

9.89 Appropriate Assessment Note [REP6-052]

Topic	Paragraph Number	Councils' Comment
	1.1.4	The document has not been shared with Natural England and therefore, it is unclear whether Natural England's position has been accurately reflected in the document.

Surveys (incomplete)	2.1.11	Bat survey work is still continuing and therefore, at this stage, the Applicant has provided insufficient evidence to demonstrate that there will be no impact on the barbastelle bat population of Eversden and Wimpole Woods SAC.
	2.1.12	The proposed update of the HRA at Deadline 8 (Jan 14), to take into account the completed survey work, is welcomed.

9.90 East West Rail 2020 Bat Survey [REP6-053]

Topic	Paragraph Number	Councils' Comment
General		The Councils welcome the submission of the East West Rail bat data.

Appendix 1 – Clarification of comments by the Councils on the Streets, Rights of Way and Access Plans [REP4-003]

Plan	Councils' Comment
Sheet 7, Streets, Rights of Way and Access Plans [REP4-003]	Part of the existing A428 highway boundary to be de-trunked pass into CCC's administrative area, for example, the very small section to the north side of Little Barford roundabout. CCC request clarification on whether it is the Applicant's intention for these areas to be stopped up or whether these sections are to be maintained by Bedford Borough Council.
Sheet 11, Streets, Rights of Way and Access Plans [REP4-003]	<p>The Councils had previously commented as follows: "<i>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</i>", following which the Applicant has undertaken to update the relevant plans at Deadline 8.</p> <p>Following on from the discussions in relation to NMU provision, the Councils wish to update their position on this matter. In light of the need for a strategic NMU route along the line of the old A428, the Councils consider it preferable to retain control of this land as highway and for the surplus area to be stopped up once the NMU route is in place and it is established that the excess land designated as highway is no longer required. CCC requests support from the Applicant in facilitating the stopping up of the surplus highway area in due course.</p>
Sheet 13, Streets, Rights of Way and Access Plans [REP4-003]	The treatment of the old A428 trunk road at Eltisley junction appears to be inconsistent with the approach taken where other new assets cross existing assets to be de-trunked. The section of the old A428, where new Cambridge Road (coloured blue) crosses it, is not stopped up; just de-trunked, even though Cambridge Road is created as a new road in its own right, and so does not rely on the existing right of way. This is inconsistent with the approach taken on the same Sheet where the old B1040 crosses the new trunk road. At this location both the purple colouring (denoting the new road) and the hatched section (denoting the section to be stopped up) are visible and it is suggested that the same approach is taken at Cambridge Road for consistency.