

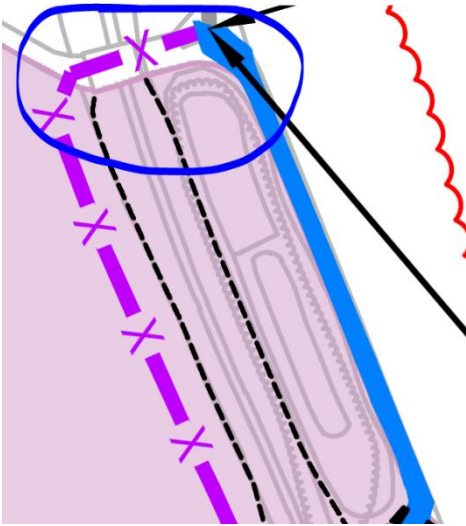
Comments on the Applicant's D8 and D9 submissions

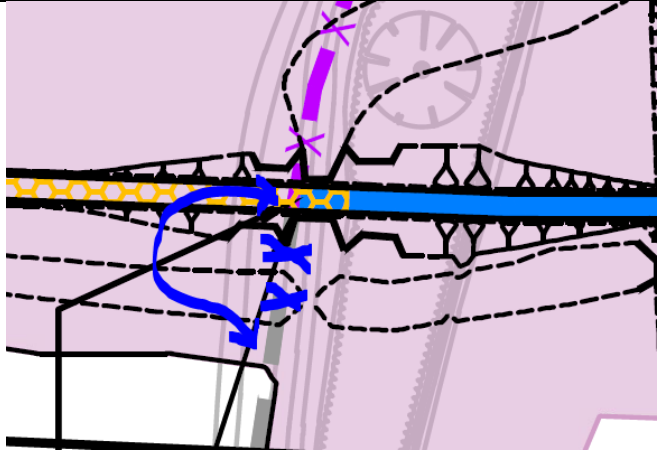
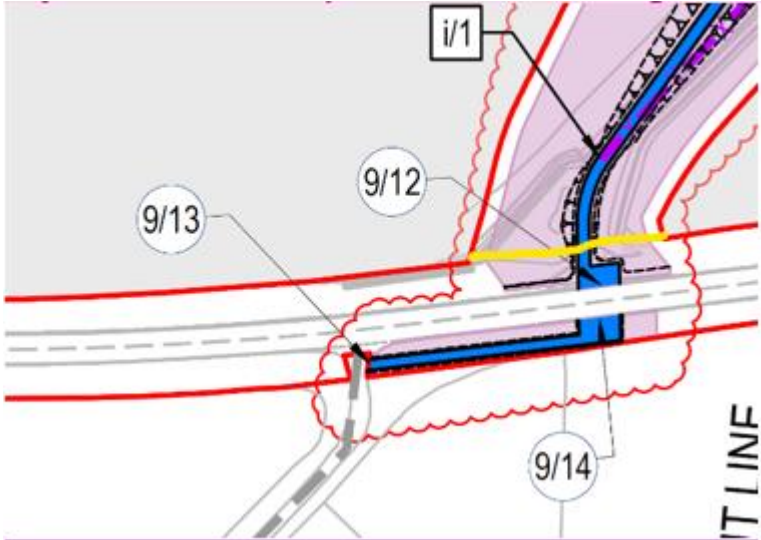
This document sets out the comments on the Applicant's Deadline 8 (D8) and Deadline 9 (D9) submissions by Cambridgeshire County Council (**CCC**), Huntingdonshire District Council (**HDC**) and South Cambridgeshire District Council (**SCDC**) (together, the **Councils**). The tables below set out the document in question that the Councils are commenting on, together with the relevant paragraph or reference number.

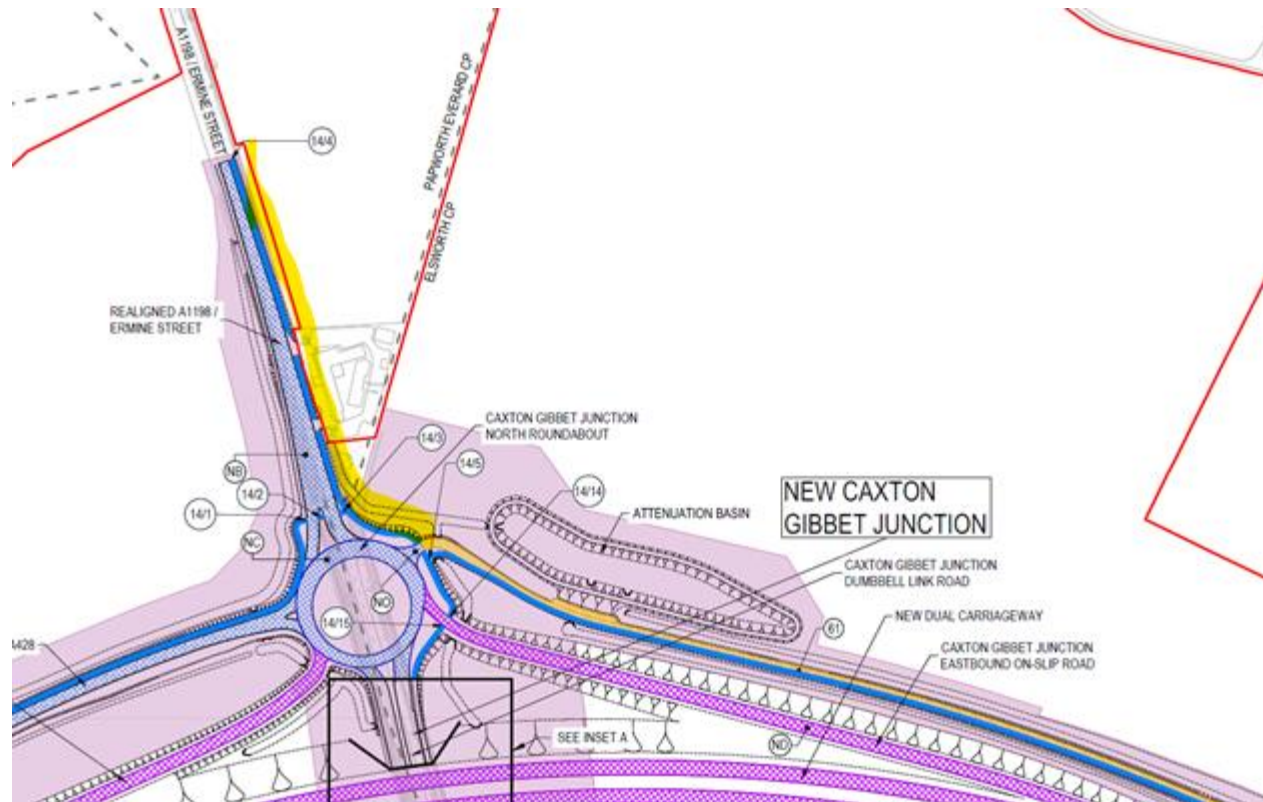
Except where expressly stated otherwise below, the Councils reiterate and rely on their comments submitted to the ExA at previous deadlines.

2.6 Streets, Rights of Way and Access Plans - Rev 4 [REP9-002 and REP9-003]

Topic	Paragraph Number	Councils' Comment
General		The Councils request that roadside NMU routes be shown separately from the public rights of way forming the main carriageway for clarity. It is understood that the Applicant is submitting updated <i>Streets, Rights of Way and Access Plans</i> with this detail specified at Deadline 10.
General	1.1.7 and plans	<p>It does not appear that all comments made by the Councils [REP5-020] (pages 1 and 2) have been actioned.</p> <p>The Councils request that indicative local road boundaries are shown on these plans in a manner similar to the provided for the A14 Cambridge to Huntingdon Improvement Scheme. Separate draft boundary plans were sent to CCC on 24 December 2021, but no further meeting to discuss them has taken place to advance this issue, so they are not agreed.</p> <p>Wide Limits of Deviation are only acceptable for Rights of Way if the Legal Agreement with CCC secures the right for the Council to review and approve the relevant detailed design (within or outwith those limits of deviation.) We understand that this matter is agreed with the Applicant and will be confirmed in the Legal Agreement that is expected to be concluded shortly.</p>
REP9-002 and REP9-003	General	Tighter Limits of Deviation just for PRow have now been identified. However, it is not clear why the purple shading has been removed from some of the areas of the roads (e.g. B1046), but not others (e.g. Cambridge Road junction).

<p>REP9-002 and REP9-003</p>	<p>Sheet 6</p>	<p>At FP1/9 the blue circled area should be within the purple shaded LOD. There also needs to be clarification that the blue line on the Northern edge (right hand side) is within the LOD. We understand that the Applicant is submitting an updated version of Sheet 6 at Deadline 10 which addresses this matter.</p>  <p>Further, at FP1/9 the stopping up and diversion needs to be extended slightly to route around culverts and new ditches (blue arrows and crosses):</p>
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<p>REP9-002 and REP9-003</p>	<p>Sheets 6,8, 9 and 14</p>	<p>The Councils have previously stated that the NMUs here should be created for equestrian usage as well, not just as 'cycle track'. The Councils understand that this point is agreed by the Applicant in respect of Sheets 9 and 14.</p> 

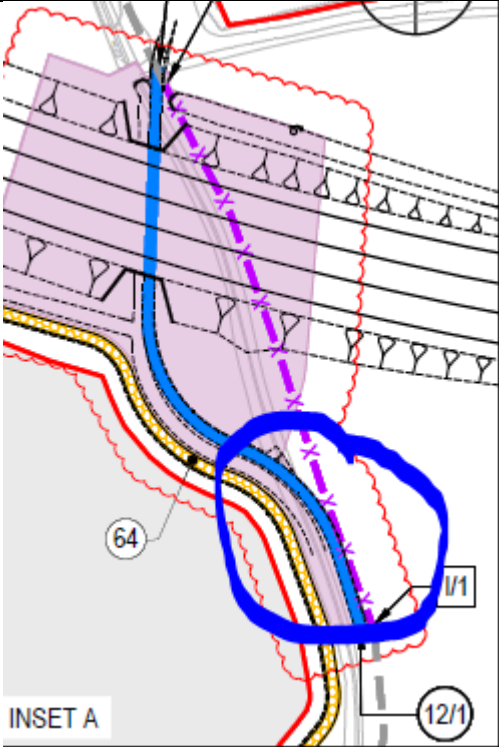


Public Rights of Way cannot be created within the boundary of another class of highway as is currently indicated by the provision 9/13 to 9/14 and from 9/12 to the edge of the highway boundary (indicatively shown by the yellow line on the extract above) and between 14/4 and 14/14 (extracts above for ease).

The Councils are advised by the Applicant that the Applicant intends to update the dDCO at Deadline 10 to include a new definition of “bridlepath” as follows:

		<p><i>"bridlepath" means a way constituting or comprised in a highway over which the public have a right of way on pedal cycles (other than pedal cycles which are motor vehicles within the meaning of the Road Traffic Act 1988), on foot and on horseback or leading a horse, but no other rights of way;</i></p> <p>This definition should be used as follows:</p> <ul style="list-style-type: none"> - Article 14(7) of the dDCO should be updated to refer to bridlepaths as well as footpaths, cycle tracks, footways and bridleways; - Article 14(17) of the dDCO should be updated to refer to bridlepaths as well as footpaths, cycle tracks, footways and bridleways; - Part 7 of Schedule 3 of the dDCO should be updated as follows: <ul style="list-style-type: none"> o the wording <i>"60 metres of bridleway from point 9/13 to 9/14 as shown on Sheet 9 of the streets, rights of way and access plans"</i> should refer to bridlepaths rather than bridleway; o the wording <i>"bridleway from point 9/12 to point 10/1 as shown on Sheets 9 and 10 of the streets, rights of way and access plans"</i> should be updated to refer to bridlepath between point 9/12 and a new reference point at the edge of the highway boundary, with the reference to bridleway retained after this new reference point to 10/1, with consequential updates made to the relevant lengths; and o the wording <i>"cycle track from point 14/4 to point 14/14..."</i> should be updated to refer to bridlepath rather than cycle track in respect of this section, with consequential updates made to the relevant lengths; - the heading of Part 7, Schedule 3 of the dDCO should be updated to refer to bridlepaths as well as footpaths, cycle tracks, footways and bridleways; - the introductory text at (b) in Schedule 4 should be updated to refer to bridlepaths as well as footpaths, cycle tracks, footways and bridleways; - Part 2 of Schedule 4 of the dDCO should be updated as follows: <ul style="list-style-type: none"> o the wording <i>"60 metres of bridleway from point 9/13 to 9/14 as shown on Sheet 9 of the streets, rights of way and access plans"</i> should refer to bridlepaths rather than bridleway; o the wording <i>"bridleway from point 9/12 to point 10/1 as shown on Sheets 9 and 10 of the streets, rights of way and access plans"</i> should be updated to refer to bridlepath between point 9/12 and a new reference point at the edge of the
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		<p>highway boundary, with the reference to bridleway retained after this new reference point to 10/1, with consequential updates made to the relevant lengths; and</p> <ul style="list-style-type: none"> ○ the wording “<i>cycle track from point 14/4 to point 14/14...</i>” should be updated to refer to bridlepath rather than cycle track in respect of this section, with consequential updates made to the relevant lengths; and <p>- Sheets 9 and 14 of the Streets, Rights of Way and Access Plans should be updated to refer to “bridlepath” in respect of the areas noted in the above amendments.</p> <p>The Councils expect that the Applicant would then use its powers under Article 55 of the dDCO so that the legal effect of the new bridlepath classifications (i.e. the prohibition of vehicular traffic) can be enforced under the Road Traffic Regulation Act 1984. The Councils would expect that any costs incurred by the LHA in this regard would be recovered from the Applicant.</p>
<p>REP9-002 and REP9-003</p>	<p>Sheet 12</p>	<p>The circled section of LOD should be wider to allow flexibility for the diverted footpath to be further away from the realigned stream as ground conditions will be poor.</p> <p>In addition, the new bridleway alignment should not be located closer to the watercourse than is necessary; in the blue circles area it appears that the intention is for the new route to be on the same alignment as the old route, and should be shown accordingly.</p>

		 <p>A technical meeting was held with the Applicant's designers on 7 February 2022 to discuss the LHA's concerns. We understand that, following the receipt of legal advice, the Applicant will be updating the SRoWA Plans to address the LHA's concerns.</p>
<p>REP9-002 and REP9-003</p>	<p>Sheet 13</p>	<p>The Councils have previously commented that Eltisley Link North roundabout needs to facilitate cyclists who wish to continue north up the B1040 with a suitable transition from off to on road and be designed to slow traffic speeds [RR-013]. The Councils had understood that provision of an additional cycleway link on the northern roundabout at Eltisley junction would be provided following evidence from Ted Doherty, Aecom on behalf of National Highways at Issue Specific Hearing 2, session 2 [EV-034] at 44 minutes. This additional link is not shown on the <i>Streets, Rights of Way and Access Plans</i> [REP9-002 and REP9-003].</p>

REP9-002 and REP9-003	Sheet 13 and 14	The Councils have previously stated that all of the NMUs here should be created for equestrian usage as well, not just as 'cycle track'.
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3.1 Updated Draft Development Consent Order- Rev 5 [REP9-004 and REP9-005]

Topic	Paragraph Number	Councils' Comment
General		The Councils are broadly content with the Applicant's dDCO submitted at Deadline 9 [REP9-004 and REP9-005], subject to the points set out below and to satisfactory conclusion of the legal agreement.
Definition of bridlepath		<p>The Councils are advised by the Applicant that the Applicant intends to update the dDCO at Deadline 10 to include a new definition of "bridlepath" as follows:</p> <p><i>"bridlepath" means a way constituting or comprised in a highway over which the public have a right of way on pedal cycles (other than pedal cycles which are motor vehicles within the meaning of the Road Traffic Act 1988), on foot and on horseback or leading a horse, but no other rights of way;</i></p> <p>This definition should be used as follows:</p> <ul style="list-style-type: none"> - Article 14(7) of the dDCO should be updated to refer to bridlepaths as well as footpaths, cycle tracks, footways and bridleways; - Article 14(17) of the dDCO should be updated to refer to bridlepaths as well as footpaths, cycle tracks, footways and bridleways; - Part 7 of Schedule 3 of the dDCO should be updated as follows: <ul style="list-style-type: none"> o the wording "60 metres of bridleway from point 9/13 to 9/14 as shown on Sheet 9 of the streets, rights of way and access plans" should refer to bridlepaths rather than bridleway; o the wording "bridleway from point 9/12 to point 10/1 as shown on Sheets 9 and 10 of the streets, rights of way and access plans" should be updated to refer to bridlepath between point 9/12 and a new reference point at the edge of the highway boundary, with the reference to bridleway retained after this new reference point to 10/1, with consequential updates made to the relevant lengths; and

		<ul style="list-style-type: none"> ○ the wording “<i>cycle track from point 14/4 to point 14/14...</i>” should be updated to refer to bridlepath rather than cycle track in respect of this section, with consequential updates made to the relevant lengths; - the heading of Part 7, Schedule 3 of the dDCO should be updated to refer to bridlepaths as well as footpaths, cycle tracks, footways and bridleways; - the introductory text at (b) in Schedule 4 should be updated to refer to bridlepaths as well as footpaths, cycle tracks, footways and bridleways; - Part 2 of Schedule 4 of the dDCO should be updated as follows: <ul style="list-style-type: none"> ○ the wording “<i>60 metres of bridleway from point 9/13 to 9/14 as shown on Sheet 9 of the streets, rights of way and access plans</i>” should refer to bridlepaths rather than bridleway; ○ the wording “<i>bridleway from point 9/12 to point 10/1 as shown on Sheets 9 and 10 of the streets, rights of way and access plans</i>” should be updated to refer to bridlepath between point 9/12 and a new reference point at the edge of the highway boundary, with the reference to bridleway retained after this new reference point to 10/1, with consequential updates made to the relevant lengths; and ○ the wording “<i>cycle track from point 14/4 to point 14/14...</i>” should be updated to refer to bridlepath rather than cycle track in respect of this section, with consequential updates made to the relevant lengths; and - Sheets 9 and 14 of the Streets, Rights of Way and Access Plans should be updated to refer to “bridlepath” in respect of the areas noted in the above amendments. <p>The Councils expect that the Applicant would then use its powers under Article 55 of the dDCO so that the legal effect of the new bridlepath classifications (i.e. the prohibition of vehicular traffic) can be enforced under the Road Traffic Regulation Act 1984. The Councils would expect that any costs incurred by the LHA in this regard would be recovered from the Applicant.</p>
<p>Definition of pre-commencement works</p>		<p>The Councils understand that the Applicant is to propose an updated definition of pre-commencement works at Deadline 10 which amends the definition from 'including' to read 'comprising' in respect of protection works and adds an additional limb to this definition for activities that are not likely to have significant effects on the environment.</p> <p>The Councils are content with these amendments.</p>

Handover of local roads to CCC	Article 13	<p>The Councils welcome the inclusion of the Councils' suggested amendments in REP8-028.</p> <p>In respect of the obligation for the Councils to act reasonably, the Councils acknowledge the points made by NH that (a) the Councils are public authorities and therefore obliged to act reasonably in any event; and (b) the comparison between the wording of the dDCO with previously made DCOs may create ambiguity as to the obligation on the Councils to act reasonably. Therefore the Councils would not resist the reinsertion of "reasonable" in this context.</p> <p>If the legal agreement between NH and the Councils is concluded satisfactorily and sets out agreed standards for new highways, a process for the approval of the detailed design and a handover process to ensure construction against those standards and approved design, then this article can be considered agreed. Such matters are now agreed in principle for the agreement, subject to final confirmation on the text of the standards.</p>
De-trunking	Article 14	<p>CCC notes the position of NH but given the significance of de-trunking and the importance of ensuring that the assets received are in a fit state, CCC maintains its position that CCC's agreement as LHA must be sought to confirm that the de-trunked road meets the satisfactory standard. If the legal agreement between NH and the Councils provides that the de-trunking date is to be agreed between the parties, that NH cannot propose a de-trunking date to the Secretary of State without the approval of that date by CCC and the agreement is concluded satisfactorily, then CCC is content to accept NH's proposed wording at Article 14. CCC understands that this is acceptable in principle to NH.</p>
Timescales for considering further information	Articles 15 and 17	<p>There must be an acknowledgement that where further information is provided, CCC may need further time to consider that. CCC's position is as per [REP8-028].</p> <p>CCC understands that NH intends to submit an updated draft of the DCO at Deadline 10 which addresses this matter.</p>
Requirement 19 – Construction Hours	Paragraph 19, Part 1, Schedule 2	<p>The Councils require that daily start up and shut down activity is excluded from Requirement 19(2), with start up and shut down activity taking place within the timings</p>

		<p>stated in Requirement 19(1). The Councils understand that this point was agreed in technical meetings.</p> <p>In addition, the Councils understand that the wording of Requirement 19 will be updated at Deadline 10 to amend the activities set out in paragraph 19(2), following discussions with the Councils.</p>
Requirements – monitor and manage		<p>The Councils set out draft requirements for Monitor and Manage in [REP6-074]. Through discussions with the Applicant, we are content that the locations for operational monitoring will be as per the relevant requirement in the latest dDCO [REP9-004] and that we understand that the Applicant is updating the OCTMP with agreed locations for construction monitoring and a methodology to determine any further locations. In all other respects our position remains as in [REP6-074], particularly as regards requirements for mitigation.</p>
Requirements - Biodiversity offsetting	Second and Third EMP Schedule 2	<p>The Applicant has not provided sufficient evidence to demonstrate the scheme will not result in net loss of biodiversity, in relation to hedgerows and high distinctiveness habitat. Further survey work is required to determine the extent of these net losses, as detailed in our response to [REP8-012], below.</p> <p>The Councils seek that the Applicant make uses of biodiversity offsetting in devising compensation proposals to counteract the impacts to these priority habitats, which have not been avoided or mitigated (in accordance with paragraph 5.25 of NPS NN).</p> <p>In the Councils' comments on the responses to ExA's Third Written Questions [REP9-044], the Councils proposed a new Requirement to provide for biodiversity offsetting.</p>

6.8 First Iteration Environmental Management Plan - Rev 3 [REP9-009 and REP9-010]

Topic	Paragraph Number	Councils' Comment
Noise and Vibration	Ref: ESS-NV1 (page 30) Source Ref: Ch11 Noise and vibration [APP-080] First Iteration EMP	Annex B: outline Noise and Vibration Outline Management Plan in the First Iteration EMP [TR010044/APP/6.8v3] needs to be amended to reflect the request that start-up and shut-down are now included within the standard construction hours.

<p>Biodiversity – scarce arable flora</p>	<p>Annex D, 1.4.19</p>	<p>The Councils note that a mitigation strategy for scarce arable flora will be included within the Second Iteration EMP (Annex E: Soil Handling and Management Plan). However, no outline Scarce Arable Flora has been incorporated into the First Iteration EMP [REP9-009] and therefore, the Applicant has provided no evidence to demonstrate that the Scheme will be able to mitigate impact to these important plants and their priority habitat (arable field margins).</p> <p>The Councils require the inclusion of an outline mitigation strategy for scarce arable flora to be contained within the first iteration EMP.</p>
<p>Biodiversity - bats</p>	<p>Table D-1: Proposed monitoring for bats – indicative programme (dates to be confirmed by the PC) Page D-10, Annex D</p>	<p>The Councils do not support the proposed bat monitoring schedule. The purpose of the bat monitoring work is to determine the effectiveness of the proposed mitigation, namely the creation / enhancement of bat crossing points through the scheme.</p> <p>It will take more than the proposed 3 years for the vegetation to have adequately established to create effective bat commuting routes. This is particularly relevant for the crossing points at Hen Brook and West Brook/Pillar Plantation within Cambridgeshire, which are to be designed to “future proof” the scheme, whereby the bat crossing provides a connection that currently does not exist and will require guide planting and the A428 landscape scheme to establish.</p> <p>The Councils require the bat monitoring work to be extended until the vegetation becomes well-established. For areas with woodland, this may be decades. Therefore, it is recommended that the impact of the Scheme on the bat population, including Barbastelles from Eversden and Wimpole Woods SAC, be monitored from the start of construction of the Scheme and the Councils request that surveys are completed every 3-5 years until the expiry of the period of 30 years from the commencement of operation of the Scheme.</p>
<p>Biodiversity - BNG</p>		<p>The First Iteration EMP does not set out how the delivery of BNG, as set out in report [REP3-013] will be delivered as part of the Scheme. The Councils require the inclusion of a BNG Audit report at years 1, 3, 5, 10 and every 5 years afterwards from the start of construction of the Scheme until the expiry of the period of 30 years from the commencement of operation of the Scheme to demonstrate that the Scheme creates the</p>

		BNG habitats and the target condition. Remedial actions, or off-setting, will need to be implemented if the Scheme fails to deliver 'no net loss'.
Cultural Heritage	Annex E: Soil handling and management plan	<p>The Councils continue to object to the proposal to temporarily 'preserve' archaeological remains beneath fill (see paragraph 1.7.5 of Annex E [REP9-010] and paragraph 11.3.8 of the Updated Archaeological Mitigation Strategy [REP4-031]), as paragraphs 1.7.9 and 1.7.13 regarding decompaction of the substrate has not been taken into account. Apart from suffering geochemical and hydrological change resulting from compaction beneath fill or soil stockpiles (see section 1.4 and 1.7.1), so-called 'preserved' sites will be subject to deleterious impacts from amelioration or restoration works to prepare the land fit for cultivation once more. Despite paragraph 1.5.10 providing a welcome alert to the need for advance excavation in these areas, it is contradictory to suggest that burial beneath temporary works provides a sustainable or suitable archaeological mitigation strategy. Burial of sites is likely to distort, damage and degrade archaeological artefacts and substrate restoration will result in the destruction of features that contain them.</p> <p>We object to this and recommend appropriate levels of advance excavation for sites threatened by construction impacts for reasons previously rehearsed (e.g. [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.</p>
Cultural Heritage	Annex J: Archaeological Management Plan	<p>The Councils continue to object to the lack of change to some of the excavation strategies or areas for archaeological site mitigation, as previously indicated in written advice and reviews of submitted documents (see ref REP8-032e and REP8-032bc in [REP9-026]). Therefore, [REP4-031], the Updated Archaeological Mitigation Strategy mentioned at paragraph 1.3.1 of Annex J [REP9-010], is not supported.</p> <p>In particular, paragraph 1.3.2 c. "<i>Targeted excavation (sites that only need further investigation into certain elements, such as structures or for environmental information)</i>" is too selective and misleading in the suggestion that it is possible to identify elements that might suitably aid interpretation at the expense of others. The selection criteria are based on the notion that a feature might be ascribed to a specific period prior to its excavation and therefore able to fulfil an objective to answer questions only relating to that period. In reality, this subjective approach is not appropriate to archaeological sites that cannot be period-</p>

		phased prior to excavation as implied, and which stand to be fully destroyed without record as part of the road construction scheme. We also object to paragraph 1.3.4 c for this reason.
Restoration of compounds	Annex K: Construction Compound Management Plan	The Councils expect that the Second Iteration EMP will update the Construction Compound Management Plan to provide for the restoration of the main construction compounds as set out in paragraph 2.6.285 of chapter 2 of the Environmental Statement [APP-071].
Landscape	Annex L: Landscape and Ecological Management Plan 1.13.2b	The Management Plan has been amended to state " <i>mowing will be carried out twice annually with removal of arisings to an off-site green waste composting facility</i> ". The same paragraph previously prescribed a maintenance regime which left arisings in place for a period of 7 days to allow seeds to set. It is unclear why this has been amended as the 7 day period is necessary to enable the meadow to regenerate annually. We therefore object to this amendment.
Landscape	Annex L: Landscape and Ecological Management Plan 1.13.16	Clarity is requested as to whether it is the Applicant's intention for the detailed pond management plan to be produced as part of the Second Iteration EMP. This management plan should be made available for relevant local authority review prior to completion of the scheme.
Landscape	Annex L: Landscape and Ecological management Plan 1.15.3	Again, it is unclear why the details on leaving arisings in place following the hay cut have been removed from this paragraph. This is an essential element of meadow maintenance. Clarification is requested from the Applicant.
Borrow Pits	Annex R	The Councils notes the Applicant's response to REP8-032p and additional reference to parking has been added into the EMP. However, the Councils are disappointed that the Applicant appears unable to commit to such activities as providing formal notice to interested parties of when there has been a change in the status of the land or informing relevant authorities of any ongoing problems that may be occurring, thus ensuring that the Councils' time is not occupied with the investigation of complaints that may be more easily resolved through frequent communication.

		This comment has been submitted in relation to both [REP9-009 and REP9-010], and [REP9-026].
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6.13 Biodiversity pre-commencement plan - Rev 2 [REP8-004]

Topic	Paragraph Number	Councils' Comment
Biodiversity Net Gain	1.4.2	The Councils welcome the proposed update of habitat condition assessment as part of pre-commencement surveys to inform an updated biodiversity net gain calculation. The Councils seek confirmation that the survey will meet UKHAB classification standards, and that the latest Defra Biodiversity Metric calculator will be utilised.
Great Crested Newts	1.5.38 – 1.5.42	The proposed Great Crested Newt mitigation, including pre-commencement surveys during construction, addresses the Councils previous concerns with regards this protected species.
Protected Road Verges	1.5.43	The proposed Protected Road Verge mitigation during construction addresses the Councils previous concerns regarding PRVs.

7.4 Outline Construction Traffic Management Plan - Rev 4 [REP9-011 and REP9-012]

Topic	Paragraph Number	Councils' Comment
Traffic monitoring	3.6	The criteria for selecting the sites to be monitored through construction appear very limited in scope. CCC set out the areas that we required monitoring during construction in [REP6-074]. The locations listed in this note were identified using the Applicant's construction modelling. The Applicant has submitted a revised list of locations where baseline data is to be collected prior to construction, whilst not covering all the locations requested by CCC the list give good coverage and should provide sufficient information to be confident that the impact of self-diverting traffic during construction of the scheme can be monitored. The fact remains however that the Applicant is not proposing to carry out any monitoring during construction instead passing the responsibility and cost on to CCC. This is not appropriate the Applicant should be monitoring the impact of self-diverting traffic during the construction phase of the scheme.

9.26 Scheme Design Approach and Design Principles - Rev 3 [REP9-015]

Topic	Paragraph Number	Councils' Comment
General		<p>The Councils are concerned that the document doesn't reflect the Councils' suggested amendments to the original version of the document [REP6-063].</p> <p>Please see the Council's detailed response to Appendix B of [REP8-010] below.</p>
NMUs – Requirement 12 Detailed Design	1.2.1	The Councils note that there appear to have been no changes with respect to PROW/NMU routes since their last comments on the Applicants D3 Submissions [REP3-014]. The Councils maintain their objections and comments, particularly with regard to S19 and S37 underbridges shown in Appendix C.
NMU Design	2.2.4 and 2.2.5b	CCC welcomes the inclusive design principle but as stated in their response to REP3-019, the Councils do not consider that the scheme design is currently inclusive; the proposed provisions only meet minimal requirements. Whilst providing motorised users with a new well-connected route, NMU users are left with fragmented pieces of infrastructure which do not connect sufficiently to encourage active travel and meet the design standards of being environmentally sustainable. Whilst the Councils are aware that the Applicant is making applications for Designated Funds to address some of the NMU gaps the Councils have raised, this is inadequate because of the uncertainty as to whether funding will be obtained for all the necessary stages to ensure delivery; the issues around the need for separate legal mechanisms; and the problem that will face the Councils of having to match-fund specialist resources that they do not have.
NMU design – underbridges co-functionality with bat passes	Appendix B	As previously represented, human functionality of the PROW, now and future, needs to be considered in its own right, and thus whether it is appropriate or possible for the underpasses to be assigned to the different ecological and human purposes. The Scheme Design Approach and Design Principles document should set out how conflicting principles should be resolved.

9.41 Joint Position Statement with Natural England and the Local Authorities on Drainage Ponds - Rev 3 [REP9-016]

Topic	Paragraph Number	Councils' Comment
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		The Councils welcome the update to the Joint Position Statement. It is considered an accurate reflection of the Council's position.
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9.48 Pre-commencement Plan - Rev 3 [REP8-008]

Topic	Paragraph Number	Councils' Comment
General		The Councils cannot see that our amendments suggested in [REP6-061] have been addressed and therefore our concerns remain as appropriate.

9.54 Barbastelle Bat Surveys and Mitigation Technical Note - Rev 4 [REP8-009]

Topic	Paragraph Number	Councils' Comment
General		The Councils note the submission of the revised Technical Note.

9.93 Applicant's Comments on Deadline 6 Submissions [REP8-010]

Topic	Paragraph Number	Councils' Comment
Biodiversity - Protected Road Verges	REP6-058o & REP6-058cd	The Applicant has adequately resolved our outstanding issues with protection of the Protected Road Verge.
Biodiversity - Arable Field Margins	REP6-058p	The Councils welcome clarification of the location of the notable arable plant species. The Councils are concerned that although the First Iteration EMP [REP9-009] refers to a mitigation strategy for scarce arable flora within Annex D, no outline strategy has been provided.
Biodiversity Net Gain	REP6-058s	The Councils welcome the inclusion of BNG assessment as part of pre-commencement work. However, the Councils are concerned that no information is provided as to how the scheme will monitor whether or not the proposed 'net gains / losses' will be delivered at the detailed design stage, during construction and management of the habitats.
Transport modelling Q1.11.1 (REP1-051)	REP6-058y	a) CCC note the Applicant's assertion that the Cambourne to Cambridge (C2C) busway is considered unlikely to impact on the benefits of the scheme. However, as the Applicant demonstrated in the M11 Junction 13 VISSIM model sensitivity test reported in "9.102

		<p>Results of additional VISSIM modelling at M11 Junction 13" [REP8-019], impacts of C2C need to be accounted for to assess more accurately the performance of M11 Junction 13 and A1303 Madingley Road. Without the effects of C2C, the Applicant has showed that M11 Junction 13 is so over-capacity with the scheme in 2040 that queues stretch westwards in the morning and evening peak hours on to the mainline A428, a distance of some 3.5km.</p> <p>b) CCC agree that all sensitivity testing discussed at the meeting held on 29 November 2021 has been completed and reported, with the exception of the Girton Interchange modelling which has not been submitted to CCC. The SoCG has been updated based on results and conclusions drawn from these sensitivity tests.</p> <p>c) CCC confirm receipt of additional information about performance of the principal scheme junctions and the SoCG has been updated based on this information.</p>
<p>Methodology, inputs and outputs Q1.11.2 (REP1-051)</p>	<p>REP6-058z</p>	<p>a) The SoCG has been updated to state CCC's current position regarding the Eltisley, Cambourne, A428/Toseland Road and B1046/Potton Road junctions.</p> <p>b) The SoCG has been updated to state CCC's current position on further junction assessments on Great North Road and Cambridge Road in St Neots.</p> <p>c) The SoCG has been updated to state CCC's current position on further junction assessments on Great North Road and Cambridge Road in St Neots.</p> <p>d) CCC set out draft requirements for Monitor and Manage in [REP6-074]. Through discussions with the Applicant, we are content that the locations for operational monitoring will be as per the relevant requirement in the latest dDCO [REP9-004] and that we understand that the Applicant is updating the OCTMP with agreed locations for construction monitoring and a methodology to determine any further locations. In all other respects our position remains as in [REP6-074].</p> <p>e) See paragraph d) above.</p>

Cambridgeshire traffic impacts Q1.11.1.1. (Rep1-051)	REP6-058aa	e) CCC note the Applicant's assertion that the Cambourne to Cambridge (C2C) busway is considered unlikely to impact on the benefits of the scheme. However, as the Applicant demonstrated in the M11 Junction 13 VISSIM model sensitivity test reported in "9.102 Results of additional VISSIM modelling at M11 Junction 13" [REP8-019], impacts of C2C need to be accounted for to assess more accurately the performance of M11 Junction 13 and A1303 Madingley Road. Without the effects of C2C, NH have showed that M11 Junction 13 is so over capacity with the scheme in 2040 that queues stretch westwards in the morning and evening peak hours on to the mainline A428, a distance of some 3.5km.
De-Trunking	REP6-058ac	The Councils reiterate previous comments [REP6-058] regarding the proposals to consult with the Secretary of State. The ExA's proposed changes to Articles 13 and 14 of the dDCO are welcomed in this regard.
Cultural Heritage Area for Site 18	REP6-058af	The Applicant's view that "there is no further knowledge to be gained" from excavation within the Councils' prescribed area for Site 18 in Field 74 is noted but not accepted as correct. See [REP8-032] Sheet 18/41 (pages 37-38) for our recommended area.
Cultural Heritage Category c – Targeted Excavation	REP6-058ag	<p>The Councils continue to emphasise the need to follow the excavation methods provided in section 6 the Joint Authorities' Archaeology Brief shown in Appendix B of [REP4-031], for consistency of approach with other similar excavations in Cambridgeshire. We do not accept the mitigation strategy for 'Targeted Excavation, Category c of the Updated Archaeological Mitigation Strategy put forward in [REP4-031], Section 9, as is too selective, as previously outlined in our Written Representation [REP1-048] and [REP4-060] (responding to REP1-048cf 12.2.3a).</p> <p>[REP4-031] section 9.2.9 is acceptable as it is consistent with the requirement of the local authority brief (see [REP4-031] Appendix B 6.1-6.5), however sections 9.1.2 and 9.1.3 and relevant sites in Table 5-1 as identified from these sections are not acceptable.</p> <p>Furthermore, the Table of Contents identifies section 9 of [REP4-031] as 'Excavation and Sampling', whereas the title to this section within the document is for 'Excavation and Targeted Excavation'. The Applicant is also advised to make the necessary corrections.</p>

Local Impacts REP2-003b – REP4-058a	REP6-058ak	<p>a) CCC are not happy with the way the Applicant has dealt with Wyboston junction as they have declined to set out any measures designed to mitigate the impact of the scheme at this junction specifically on the Great North Road Northern Arm. Due to this ongoing situation CCC has prepared a Technical Note (CLA.10.TN), submitted at Deadline 10, that sets out the mitigation required at this junction to ensure adequate operation of the junction including Great North Road which removes the need for further modelling on Great North Road.</p> <p>b) The modelling of Cambridge Road St Neots is no longer needed as the performance of Cambridge Road roundabout has been agreed. the Applicant has included this site in the latest list of sites to be monitored in year one and five after opening of the scheme. This is welcomed by CCC.</p>
Impact on Toseland	REP6-058al	<p>the Applicant has included Toseland on the list of sites where baseline data is to be collected for use in the monitoring of Construction traffic but there are no plans to undertake any monitoring of this location in the operational phase as the modelling predicts that the scheme will reduce traffic through Toseland. CCC require monitoring of predicted traffic reductions as well as increases. The applicant has said that it is possible that this site will be included in the POPE but as this is not secure via the DCO CCC do not have confidence that the impact of the scheme in Toseland will be monitored.</p>
Impact in Dry Drayton, Madingley and Coton	REP6-058an	<p>CCC set out draft requirements for Monitor and Manage in [REP6-074]. Through discussions with the Applicant, we are content that the locations for operational monitoring will be as per the relevant requirement in the latest dDCO [REP9-004] and that we understand that the Applicant is updating the OCTMP with agreed locations for construction monitoring and a methodology to determine any further locations. In all other respects our position remains as in [REP6-074].</p>
Construction traffic	REP6-058ap	<p>CCC set out draft requirements for Monitor and Manage in [REP6-074]. Through discussions with the Applicant, we are content that the locations for operational monitoring will be as per the relevant requirement in the latest dDCO [REP9-004] and that we understand that the Applicant is updating the OCTMP with agreed locations for construction monitoring and a methodology to determine any further locations. In all other respects our position remains as in [REP6-074].</p>

Ecology – negative impacts during construction - Lighting	REP6-058ar	The Councils note that lighting type and details will be designed at the detailed design stage, in accordance with the Scheme Design Approach and Design Principles document.
Ecology – negative impacts during construction – Great Crested Newt	REP6-058ar	The Councils welcome confirmation that no GCN breeding ponds will be lost to the scheme, and that pond 37 will be retained, even though it is shown identified as being potentially lost within Chapter 13 of the ES [APP-082]. The Councils request that Chapter 13 of the ES is updated to reflect this confirmation.
Ecology – missed opportunities	REP6-058as	<p>The Councils do not agree that the BNG metric and EIA process are two separate processes.</p> <p>The ecological assessment of the EIA set out in Chapter 8, ES [APP-077] is based on the CIEEM (2018) Guidelines for Ecological impact Assessment. This guidance (submitted to Examination as CLA.D10.OS.A.C.A1) sets out the industry standard for assessing ecology impacts as part of an EIA. It highlights the need to ensure biodiversity data is suitable for potential use in biodiversity metrics for assessment of ‘net gain’ of biodiversity. The guidance also clarifies that, with regards to compensation, utilising an off-set metric provides <i>“transparency of outcomes and enables explicit demonstration of no net loss”</i>.</p> <p>Given the metric is integral to the EclA process, the Councils are still unclear why it hasn’t been fully incorporated into the ES chapter. Furthermore, the Applicant has not adequately justified the discrepancies between the metric and the EclA assessment for priority habitats, as set out in our response [REP6-058] and [REP6-063].</p>
Climate negative impacts	REP6-058au	<p>With regards to wider climate impacts and the significance of effects, while the emissions associated with the Sixth Carbon Budget appear small when presented against a national budget, they still represent an increase in emissions. As the Scheme will be in operation beyond 2050, the Councils remain of the view that residual emissions should be dealt with, for example via carbon offset.</p> <p>The Applicant now confirmed that they will not be seeking to offset emissions for the construction of the Scheme. We remain of the view that following the application of mitigation measures, residual emissions related to both construction and operation should</p>

		be dealt with via offsetting, providing an opportunity to test and monitor approaches to offsetting in advance of the Applicant's target of net zero for maintenance and construction by 2040. The next 10 years are critical for reducing emissions in order not to exceed legally binding carbon budgets, so we would encourage an approach that seeks to inform the Applicant's policy on offsetting far sooner than 2040.
Pedestrian, Cyclists and equestrians	REP6-058ax	The Councils are not asking for the prioritisation of rights of way over the main road Scheme, but it is unreasonable for rights of way users to be impacted for disproportionately longer time compared to road users.
Traffic Modelling	REP6-085bc	The final SoCG submitted at D10 details all issues not agreed between the Applicant and the Councils.
Traffic Modelling	REP6-085be	CCC set out draft requirements for Monitor and Manage in [REP6-074]. Through discussions with the Applicant, we are content that the locations for operational monitoring will be as per the relevant requirement in the latest dDCO [REP9-004] and that we understand that the Applicant is updating the OCTMP with agreed locations for construction monitoring and a methodology to determine any further locations. In all other respects our position remains as in [REP6-074].
Traffic Modelling	REP6-085bg	CCC's position on Cambridge Road and Great North Road north in St Neots is set out in the SoCG to be submitted at D10. CCC do not consider the Great North Road northern arm issue to be closed; we have outlined mitigation measures required from the Applicant at the junction in the Wyboston Technical Note submitted at Deadline 10 (CLA.D10.TN). CCC welcome inclusion of both Great North Road and Cambridge Road St Neots in the list of sites to be monitored post opening of the scheme.
Monitoring of Girton Interchange	REP6-058bh	The Applicant has suggested that the impact of the scheme on this junction will be assessed by monitor and manage. This is acceptable to CCC.
Monitoring through Coton	REP6-058bi	CCC set out draft requirements for Monitor and Manage in [REP6-074]. Through discussions with the Applicant, we are content that the locations for operational monitoring will be as per the relevant requirement in the latest dDCO [REP9-004] and that we understand that the Applicant is updating the OCTMP with agreed locations for construction

		monitoring and a methodology to determine any further locations. In all other respects our position remains as in [REP6-074].
Monitoring of impact through Dry Drayton	REP6-085bk	CCC set out draft requirements for Monitor and Manage in [REP6-074]. Through discussions with the Applicant, we are content that the locations for operational monitoring will be as per the relevant requirement in the latest dDCO [REP9-004] and that we understand that the Applicant is updating the OCTMP with agreed locations for construction monitoring and a methodology to determine any further locations. In all other respects our position remains as in [REP6-074].
Monitoring of impact through Madingley	REP6-085bl	CCC set out draft requirements for Monitor and Manage in [REP6-074]. Through discussions with the Applicant, we are content that the locations for operational monitoring will be as per the relevant requirement in the latest dDCO [REP9-004] and that we understand that the Applicant is updating the OCTMP with agreed locations for construction monitoring and a methodology to determine any further locations. In all other respects our position remains as in [REP6-074].
Sensitivity testing of Cambourne Junction	REP6-085bn	Cambourne junction modelling is now accepted by CCC and this issue is closed. The SoCG has been updated accordingly.
Modelling of the Madingley Mulch junction	REP6-085bo	The M11 Junction 13 VISSIM model sensitivity test reported in "9.102 Results of additional VISSIM modelling at M11 Junction 13" [REP8-019], shows that M11 Junction 13 is so over capacity with the scheme in 2040 that queues stretch westwards in the morning and evening peak hours on to the mainline A428, a distance of some 3.5km. This indicates that the scheme has an adverse impact at this junction that requires the Applicant to monitor the actual impact and provide mitigation if required. The TA and TAAA suggest that this junction will be subject to monitor and manage.
Wyboston Junction	REP6-058bp	CCC does not agree with the way the Applicant has dealt with Wyboston junction. The Applicant has declined to set out any measures designed to mitigate the impact of the scheme at this junction specifically on the Great North Road Northern Arm.

		CCC has submitted a Technical Note at Deadline 10 (CLA.D10.TN) setting out the mitigation required at this junction to ensure adequate operation of the junction including great North Road which removes the need for further modelling on Great North Road.
Traffic Modelling	REP6-05bs	CCC set out draft requirements for Monitor and Manage in [REP6-074]. Through discussions with the Applicant, we are content that the locations for operational monitoring will be as per the relevant requirement in the latest dDCO [REP9-004] and that we understand that the Applicant is updating the OCTMP with agreed locations for construction monitoring and a methodology to determine any further locations. In all other respects our position remains as in [REP6-074].
NMU & PRoW	REP6-058bz	6.5.7b): No further comment. The Councils maintain their position. 6.5.7k): No further comment. 6.5.8: The Designated Funds budget was not sufficient to deliver both sections of the route and so only the Papworth to Caxton Gibbet section is being constructed. The Applicant was kept informed of progress on the A14 scheme.
Ecology – Biodiversity Net Gain	REP6-058cc	The Councils are still unclear why the net losses in biodiversity for habitat areas and hedgerows have not been integrated into the Applicant’s ecological assessment. See our response above to REP6-058as, and our response to [REP8-012] within this submission.
Cultural Heritage – Applicant consultation over the Archaeological Mitigation Strategy	REP6-058cf	The Councils acknowledge that there had been discussion about the archaeology of the A428 scheme throughout the evaluation phases in 2020 and subsequently but are clear about their lack of involvement in developing the Archaeological Mitigation Strategy [APP-238], despite advice to do so in April 2020. Our position remains as set out in [REP6-058].
Impact on Dry Drayton and Madingley	REP6-058co	CCC set out draft requirements for Monitor and Manage in [REP6-074]. Through discussions with the Applicant, we are content that the locations for operational monitoring will be as per the relevant requirement in the latest dDCO [REP9-004] and that we understand that the Applicant is updating the OCTMP with agreed locations for construction

		monitoring and a methodology to determine any further locations. In all other respects our position remains as in [REP6-074].
Sensitivity Testing of Eltisley and Cambourne junctions	REP6-058cp	<p>The flows used in both these junctions are deemed to be reasonable. In relation to Eltisley, justification is still needed relating to the choice of the junction form as the proposed junction is predicted to be operating with significant spare capacity in the future year which indicates that the proposed junction is larger than is required to accommodate the predicted level of traffic.</p> <p>The modelling of the Cambourne junction is agreed as suitable and CCC now have confidence that the junction will work within capacity in 2040.</p>
Modelling of additional junctions in St Neots	REP6-058cq	CCC do not agree with the way the Applicant has dealt with Wyboston junction. The Applicant has declined to set out any measures designed to mitigate the impact of the scheme at this junction specifically on the Great North Road Northern Arm. Due to this ongoing situation CCC has submitted a Technical Note at Deadline 10 (CLA.D10.TN) setting out the mitigation required at this junction to ensure adequate operation of the junction including great North Road which removes the need for further modelling on Great North Road.
Flows used in VISSIM Sensitivity tests	REP6-058cr	The flows used in the junction sensitivity tests have been agreed as broadly appropriate by CCC.
Parameters used in VISSIM Models	REP6-058cs	The parameters used in the VISSIM models are largely agreed.
Sensitivity Testing of A428 Toseland Road Junction	REP6-058ct	CCC agree that the differences between observed and modelled base year flows at this junction will not cause the junction to operate over capacity with the introduction of the proposed scheme. No further action required.
Sensitivity Testing of Potton Road/B1046 Junction	REP6-058cu	CCC agree that the re-positioned, newly designed B1040/Potton Road junction is likely to operate below capacity in the DS scenario. CCC's concerns arise not from the capacity of the junction but the type of junction proposed by the Applicant. Analysis of design year AADT flows produced by the Applicant and comparison with DMRB guidance suggest this

		junction should be a ghost island priority junction rather than a simple priority junction. CCC are concerned the junction has therefore been under- rather than over-designed.
Eltisley Link junction	REP6-058cv	The flows used in the assessment of this junction are deemed to be reasonable. However, justification is still needed relating to the choice of the junction form as the proposed junction is predicted to be operating with significant spare capacity in the future year which indicates that the proposed junction is larger than is required to accommodate the predicted level of traffic.
Cambourne Junction	REP6-058cw	CCC are broadly content with the modelling done to assess the impact of the Scheme at this junction and conclude that the Cambourne junction should operate within capacity post scheme construction.
Madingley mulch Junction	REP6-058cy	The revised modelling of the Madingley Mulch Junction indicates that the scheme results in a significant increase in delay and queues that extend back to and onto the main line A428.
Wyboston Junction	REP6-058cz	The modelling undertaken by the Applicant indicates that the junction will operate over capacity in the future year with the introduction of the Scheme. CCC requires mitigation at this junction, but the Applicant has refused to test meaningful mitigation. CCC has prepared a Technical Note (CLA.D10.TN) setting out the mitigation needed at this junction to ensure reasonable performance of all arms at this junction.
A428 Barford Road Junction	REP6-058da	The modelling undertaken by the Applicant indicates that the junction will operate over capacity in the future year with the introduction of the Scheme. CCC requires mitigation at this junction, but the Applicant set out reasons why mitigation would not work without actually testing any of the possible solutions. CCC has prepared a Technical Note (CLA.D10.TN) setting out the mitigation needed at this junction to ensure reasonable performance of all arms at this junction.
M11 J13 and Buckden Roundabout	REP6-058db	The modelling of M11 J13 indicates that the introduction of the Scheme results in significant increases in queues and delays and therefore mitigation is required as part of this Scheme.
Ecology - bats	REP6-058dc	The Applicant's response is noted. Please refer to our comments below in response to the Barbastelle Technical Note [REP8-009] included in this submission.

		The Applicant continues to state that the bat crossing points will remain unlit. This is not consistent with the Applicant's comments at 1.1.4 of Appendix B [REP8-010].
Ecology - bats	REP6-05dd	The Councils disagree. Although the updated First Iteration Environmental Management Plan [REP9-009] mentions enhancement to existing ponds, no details have been provided to demonstrate how the existing ponds will be enhanced for Great Crested Newt and aquatic flora & invertebrates.
Modelling of Eltisley Link Junction	REP6-058di	The flows used in the assessment of this junction are deemed to be reasonable. However, justification is still needed relating to the choice of the junction form as the proposed junction is predicted to be operating with significant spare capacity in the future year which indicates that the proposed junction is larger than is required to accommodate the predicted level of traffic.
De-Trunking Proposals	REP6-058dk	The Applicant has previously suggested that CCC has been provided with information regarding the condition of the assets to be detrunked. This information has not been received.
Highway Condition	REP6-058dl	CCC reiterates its stance regarding the applicability of Section 59 of the Highways Act.
Highway Design Standards	REP6-058dw	Discussions with the Applicant on highway design standards are ongoing. CCC is hopeful that they will be concluded shortly. The only remaining point of contention is the provision for NMUs in verges. The standards are to be secured in the Legal Agreement with the Applicant.
Scope of junction sensitivity testing	REP6-058dx	The junctions to be tested have been agreed with the Applicant and CCC has received the majority of the additional information required. The remaining information relates to the mitigation of scheme impacts and the justification for the junction form chosen for the Eltisley link junction.
Outcomes of sensitivity test - Wyboston junction	REP6-058ef to REP6-058ei	CCC do not agree with the interpretation of the results at this junction. CCC has submitted a Technical Note (CLA.D10.TN) setting out the mitigation needed at this junction at Deadline 10.

Barford Road Junction	REP6-058ek	CCC do not agree with the interpretation of the results at this junction. CCC has submitted a Technical Note (CLA.D10.TN) setting out the mitigation needed at this junction at Deadline 10.
Network management Duty	REP6-060a to REP6-060c	<p>CCC are not asking the Applicant to manage the LRN but instead are asking the Applicant to mitigate the direct impact of Scheme on both the local and strategic road networks.</p> <p>CCC has set out draft requirements for Monitor and Manage [REP6-074]. CCC's welcome the revised list of sites where baseline data is to be collected prior to construction but note that the applicant is not proposing to undertake any monitoring during construction instead passing the responsibility to CCC. In addition CCC does not have confidence that all the operational impacts of the scheme will be monitored as much of this is to be carried out via the POPE and this is not secured through the DCO.</p>
Carbon budgets	95-96 REP6-071e	We maintain our position in relation to this matter, that local carbon budgets should be used to assess the significance of effects in line with relevant guidance on undertaking environmental impact assessment.
Traffic Modelling	REP6-071g	Please see our comments on [REP8-022] below in this document.
Cultural Heritage – Pre-commencement Plan	Appendix A, 1.1.5 (page 219)	The Applicant's view is noted and is acceptable for the securing of archaeological areas to be fenced off at 11.2 of [REP4-031]. The Councils strongly recommend that the areas for this treatment are shown on all relevant maps/map layers that are to be used by contractors to avoid accidental transgressions.
Pre-commencement Plan Comments - Scope	Appendix A, 2.2.1	<p>It should be noted that the system for managing and mitigating ecology for the A14 Scheme was not implemented entirely successfully, with a number of issues relating to impact on ground nesting birds report during construction.</p> <p>We hope the A428 system will be more effective and take on board any 'learning outcomes' from the A14 scheme to prevent similar incidences occurring.</p>

		One major issue was reporting. Both residents and professional ecologists were unable to find contact details for the Applicant (then Highways England) to report their concerns, instead coming to the County Council's Ecology Officer. It would be beneficial for the A428 system to be more accessible with a key contact email / phone number (instead of trying to contact ever changing ECoWs or 'regulator' ecologist).
Pre-commencement Plan Comments – Bird nest boxes	Appendix A, 2.1.2 (temporary fencing) 2.15 (bird nest boxes) 2.7.2 (ground nesting birds) 2.7.c (vegetation protection) 3.1.20 (Great Crested Newts)	The Councils are satisfied our concerns have been addressed in [REP8-008] .
Pre-commencement Plan Comments – bat mitigation	Appendix A, 2.1.4	Comment not addressed. The Councils seek inclusion of specific bat mitigation measures, including veteranisation of trees and protection of existing flight-lines within the Pre-Commencement Plan.
Pre-commencement Plan Comments - Ecology	Appendix A, 3.1.19	The proposed changes do not address the Councils comments. The Permits only relate to vegetation clearance works. Our concerns remain with areas that have already been cleared and become suitable for ground nesting birds. If these sites remain inactive for a period of time, they could have started to be utilised for ground nesting birds that nest on bare earth.
Comments on Scheme Design Approach and Design Principles - Introductions	Appendix B, 1.2.2 (mammal crossings) (page 248)	The Councils are concerned that the Applicant is not willing to provide the Councils further opportunities for consultation on the design of key structures, particularly given our previous concerns have not been fully addressed through the Examination Period.

<p>Comments on Scheme Design Approach and Design Principles – Design Principles</p>	<p>Appendix B, 3.3.3</p>	<p>The Councils can confirm there was no early engagement on the proposed bat crossing structures for the route and how these could effectively combine multifunctional usage.</p>
<p>Comments on Scheme Design Approach and Design Principles – Design Principles</p>	<p>Appendix B, 3.3.6</p>	<p>The Councils' concerns have not been addressed.</p>
<p>Comments on Scheme Design Approach and Design Principles – Appearance</p>	<p>Appendix B, 3.3.7</p>	<p>The Councils' concerns have not been addressed. The Councils have not seen evidence that green bridges were considered as part of the feasibility study.</p>
<p>Comments on Scheme Design Approach and Design Principles – Appearance</p>	<p>Appendix B, 3.3.21</p>	<p>The Councils' concerns for lighting and impact to wildlife across the Scheme have not been addressed.</p> <p>There appears to be conflicting information from the Applicant as to whether the NMU underpasses will be lit (as stated here) or unlit. Further evidence is required to demonstrate how lighting will not impact wildlife, including bats and otter.</p> <p>As previously represented, human functionality of the PRow, now and in the future, needs to be considered in its own right, and thus whether it is appropriate for the underpasses to be assigned to the different ecological and human purposes.</p> <p>There has been no detail about how the lighting of the wider Scheme, through good design, will minimise impact on light-sensitive species. The Councils seek the Applicant to engage with the LPAs about the lighting for the whole scheme and how measures to minimise impact to wildlife will be incorporated.</p>
<p>Comments on Scheme Design Approach and Design Principles – Appearance</p>	<p>Appendix B (page 256), page 61 of marked up version, S19 – Hen Brook Culvert and</p>	<p>The Councils suggest that lighting has not been raised as a concern by Natural England, given that the Applicant has continued to state there will be no lighting of these structures.</p>

	underpass – underbridge.	The Councils seek further engagement with the Applicant and Natural England on this scheme to understand what proposals National Highways will devise for an appropriate lighting scheme that will be adequate for both NMU users and wildlife.
Comments on Scheme Design Approach and Design Principles – Appearance	Appendix B (page 262), page 66 of marked up version, S37 – Pillar Plantation Culver and underpass – underbridge.	The Councils seek further engagement with the Applicant and Natural England on this scheme to understand what proposals National Highways will devise for an appropriate lighting scheme that will be adequate for both NMU users and wildlife.

9.94 Applicant's comments on the submissions made at Deadline 6 by the British Horse Society [REP8-011]

Topic	Paragraph Number	Councils' Comment
NMU links	REP6-101c	<p>The Councils notes the statement “<i>The Applicant does not consider it is appropriate or safe for horses to be ridden or taken through the proposed Caxton Gibbet Junction due to the high volumes of traffic that will be passing through the junction and the associated risk that the horse being spooked</i>”. <i>The applicant has therefore not considered making any specific provisions for equestrians through the proposed Caxton Gibbet junction</i>”.</p> <p>The Councils consider that specific provision for equestrians should apply to all junctions.</p> <p>The Councils refer the Applicant to their A428 Design Principles [REP9-015], paragraph 2.2.5 “<i>Connecting People – [design] is inclusive</i>”.</p> <p>The junction should be designed with vulnerable users in mind and the Applicant's proposed solution of diverting equestrians on to other roads, instead of allowing them onto a roadside NMU that is already planned to be constructed, is unsatisfactory.</p> <p>The Councils request, as a minimum, that the roadside path proposed in the east verge of A1198 (14/4 to 14/14) is constructed for all NMUs including equestrians, to link up with new bridleway 14/5 to 15/1. The Councils understand that this point has been accepted by the Applicant, with revised proposals to be submitted at Deadline 10.</p>

9.95 Applicant's comments on the Biodiversity Net Gain Technical Note [REP8-012]

Topic	Paragraph Number	Councils' Comment
Lowland Mixed Deciduous Woodland	4.1.14	<p>The Councils do not accept the Applicant's justification that <i>"on the basis that some of the woodlands are relatively new and that all are very small, it is highly likely that none of these woodlands are priority lowland mixed deciduous woodland"</i> and that <i>"trading rules for lowland mixed deciduous woodland would not apply"</i>.</p> <p>We refer the Applicant to the Priority Habitat Description for Lowland Mixed Deciduous Woodland (Maddock, 2008 – submitted to Examination as CLA.D10.OS.A.C.A2). This confirms that all semi-natural woodland in the south and east are included, most are small (<20ha) and include secondary woodland. It does not exclude woodlands that are 'very small'.</p> <p>The Applicant has already confirmed eight lowland mixed deciduous woodlands (LMDW) within the scheme / surrounding area [APP-190]. This includes three LMDW that will be lost / partially lost to the scheme, namely W10, W11 and W13.</p> <p>In light of the above, the Councils consider that the scheme will still result in the net loss of priority habitat, namely lowland mixed deciduous woodland. Therefore the trading down rule still applies.</p> <p>Currently there is an approximate loss of -98.77 habitat units of lowland mixed deciduous woodland priority habitat. This figure may be reduced, as a result of additional survey work for woodland that was not previously surveyed, but it will not be zero.</p>
Wood-pasture and parkland	4.1.16	<p>The Councils require a UK Habitat assessment to be undertaken to support the Applicant's justification as to why this no longer meets 'wood-pasture and parkland' criteria. The BNG assessment should be updated, in accordance with the First LEMP [REP9-009].</p>
Hedgerows	4.1.21	<p>The Councils' position remains that the scheme will result in net loss in biodiversity value of hedgerows.</p> <p>The Applicant has not confirmed the length of hedgerow that they are proposing to retain at detailed design and therefore, it is not possible to determine whether it will result in net loss.</p>

		In light of the above, the Councils consider that the scheme will still result in net loss in biodiversity value of hedgerows and therefore off-setting is required, in accordance with NPS NN, to address this uncompensated loss of priority habitat.
	6.1.6	The Applicant has not adequately addressed the Councils' previous comment of BNG at paragraphs 6.7 to 6.13 in [REP6-062] given that the Councils do not accept the Applicant's justification for net losses of habitat, particularly lowland deciduous mixed woodland and hedgerows, as discussed above.
Update of BNG assessment	6.1.9	<p>The Councils welcome the proposed update of the BNG calculations at the detailed design stage when pre-construction habitat survey has been concluded. This should inform what level of biodiversity off-setting is required to compensate for outstanding losses, particularly for lowland mixed deciduous woodland and hedgerows.</p> <p>The Councils are concerned that is no mechanism to monitor the success of the establishment of BNG habitat to their target condition. The Councils request that a BNG audit report is provided at year 1, 3, 5, 10 and every 5 years onwards from the start of construction of the Scheme until the expiry of the period of 30 years from the commencement of operation of the Scheme as part of the Landscape and Ecological Management Plan, with any remedial actions undertaken within 12 months.</p>

9.96 Applicants comments on the Joint Authorities' Brief Feasibility Study for a new NMU link between St Neots and Cambourne [REP8-013]

Topic	Paragraph Number	Councils' Comment
	General	The Councils' Report does not claim to be a comprehensive feasibility report covering in detail all of the topics mentioned. It is not intended, by itself, to be able to justify compulsory land acquisition, for example. It would not have been possible to carry out a full feasibility study of the type described within the Examination, between ISH5 and now. The Report is a brief study to provide a 'first sift' on viability; and as such it identified that such a route was possible, albeit with constraints.

		The Applicant has now agreed to commit to funding of a feasibility study of up to £500,000 for four schemes including this one. The parties will then work together to implement any schemes identified as feasible, including providing joint funding or contribution.
	2.1.5	The Applicant states that 5.3m is needed to provide an NMU route. This does not accord with DMRB standards CD143 which states that a minimum of 3.8m or 4.8m where there are 200 users or more per hour should be provided. LTN 1/20 states that a minimum of 3m plus setbacks of between 0.5m - 2m is needed depending on the speed limit.
	2.26	[REP6-065] paragraph 1.1.2 sets out evidence in the form of research on the effect of providing active travel infrastructure and comparative data provided from the census. The Applicant does not outline what form of documentary evidence they would expect to see.
	3.1.6	In order to meet the Design Standards 3.3.27 b) <i>Enable more sustainable travel choices</i> , we would expect the Applicant to work with the developer of the Cambourne West development to ensure there is a sustainable choice for the new residents to access the services and the route the Applicant is providing on towards Papworth. Leaving a short gap in provision may also lead to dangerous behaviour. The location of the proposed path on the west side and the lack of an NMU path on the east side of the A1198 south of the junction will lead to pedestrians from Cambourne West having to cross the road at inappropriate/hazardous locations. There should be a continuous path on the east side of the A1198 south.
	3.3.2	The bridleway is an unsurfaced and unlit path that would be unsuitable in the winter months and likely to be more expensive to provide as an all-weather route than if the Applicant were to provide an NMU route alongside the A428, particularly on the new section of road. Re-routing users through Eltisely and along the bridleway would also not allow for an onward connection to the route to Papworth.
	4.1.5	This had not been communicated previously, as set out in our response to WQ3 3.11.2.2 & 3.11.6.1 [REP8-035] .

9.101 Applicant's responses to actions arising from Issue Specific Hearing 4 on 30 November 2021, Issue Specific Hearing 5 on 1 December 2021 and Issue Specific Hearing 6 on 2 December 2021 where a response is required at Deadline 8 [REP8-018]

Topic	Paragraph Number	Councils' Comment
Road space reallocation	ISH5 AP1	The Applicant's response is contained within [REP8-022]. Please refer to the Councils' comments on that document below in this submission.
Further modelling at M11 Junction 13 and Eltisley Junction. Flow checks for Potton Road and Toseland Road	ISH5 AP2	The Applicant's response is contained within [REP8-022]. Please refer to the Councils' comments on that document below in this submission.

9.102 Results of additional VISSIM modelling at M11 Junction 13 [REP8-019]

Topic	Paragraph Number	Councils' Comment
Model coding	1.1.6	CCC welcomes the changes made by the Applicant to the loading point in the VISSIM model of the Northwest Cambridge development traffic. CCC also raised concerns about the vehicle standstill headway distance used in the model (1.2m) and that HGVs were not further sub-divided into OGV1 and OGV2 vehicle classes. The Applicant has not addressed these latter two points but CCC accepts that the model results would be unlikely to change significantly if they were addressed.
Base model results	4.1.1	The model used ten random seeds. This is acceptable to CCC as this is the minimum number suggested by guidance.
	4.1.4	It is agreed that the modelled flows match the observed data. The flows used in this model are therefore deemed to be reasonable.
Peak hour 2040 (Scheme Design Year) Scheme impact	5.2.12 and 5.2.17	The Applicant states <i>"The queues in the 2040 DS scenario extend back to the edge of the network resulting in latent demand which indicates that the eastbound congestion is likely to extend past the edge of the model at the Scotland Road/St Neots Road junction. The latent demand information from the error logs of the DS 2040 Vissim models was reviewed which indicate that the maximum queue lengths will extend back on the A428 by approximately 520m beyond the edge of the model"</i> .

		This is not acceptable to CCC as the development assumptions are the same in DM and DS, so these queues are as a direct result of the A428 scheme in this particular model.
The inclusion of the Cambourne to Cambridge Better Public Transport (C2C) project	6.2.7	<p>The Applicant states that <i>“the beneficial impact on traffic flows in the A1303 corridor likely to arise from the C2C scheme has not been accounted for in the Vissim model of M11 Junction 13/A1303. The A1303/M11 Junction 13 Vissim modelling therefore represents a worst-case scenario.”</i></p> <p>CCC agrees with this statement, but the Applicant has not attempted to model any likely reduction in traffic using the A1303 as a result of Cambourne to Cambridge.</p>
Summary	Section 7	<p>The Applicant states that <i>“There are factors which the Applicant considers will reduce the effect of impacts set out in this report. These have not been quantified as part of the assessment undertaken. The results quoted above should therefore be considered as being an extreme ‘worst-case”.</i></p> <p>While CCC agrees with the Applicant’s conclusion that the sensitivity test modelling represents a 'worst case' scenario in terms of the likely performance of A1303 Madingley Road (and the junctions along it) because the modelling does not account for the impact of the Cambourne to Cambridge (C2C) Better Public Transport scheme, the Applicant has not attempted to model the impact of the C2C scheme to show what benefits it would offer. The key junction on A1303 Madingley Road that is the main throttle on capacity is the M11 Jn 13/A1303 Madingley Road traffic signals that the Applicant controls.</p> <p>Given the Applicant have not demonstrated any beneficial impact of C2C on A1303 Madingley Road, CCC requires the Applicant to monitor the impact of A428 scheme on the corridor and commit to providing mitigation if the modelled worst-case scenario becomes reality.</p>

9.105 Applicant’s Responses to issues raised at Issue Specific Hearing 5 on 1 December 2021 [REP8-022]

Topic	Paragraph Number	Councils’ Comment
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<p>A428/B1040 Eltisley Junction</p>	<p>Section 2</p>	<p>The methodology used in undertaking the checks of the flows at this junction are largely agreed but it is clear that the Applicant did not collect all the data necessary to fully understand the operation of the existing road network and the resulting impact of the scheme.</p> <p>The flows from the SATURN model do not fully represent the turn proportions indicated by the observed data. The Applicant argues that there is more traffic than indicated by the observed counts, but the movements made at this junction are not accurately reflected by the Saturn model.</p> <p>The Applicant also argues that it is not reasonable to expect the strategic model to accurately reflect the full range of routing suggested by the counts but given that this junction is located on the Scheme it is not unreasonable to expect that the strategic model would realistically reflect the performance of this junction.</p> <p>CCC accepts the use of strategic SATURN model flows for the assessment of the impacts of the proposed A428 scheme on the Eltisley junctions. Results from this modelling show the new Eltisley junctions should operate well within capacity and should continue to do so even if the forecast traffic flows increase by a reasonable margin.</p> <p>However, CCC is concerned that the road layout chosen by the Applicant could encourage new 'rat-running' traffic behaviour through the centre of Eltisley on Potton Road and Cambridge Road. The Applicant acknowledges it is unreasonable for a strategic model to accurately predict any 'rat running' behaviour, so CCC requires monitoring of the situation post scheme opening. CCC has set out their expectations for monitor and manage/mitigate methodology and locations [REP6-074]. Through discussions with the Applicant, we are content that the locations for operational monitoring will be as per the relevant requirement in the latest dDCO [REP9-004] and that we understand that the Applicant is updating the OCTMP with agreed locations for construction monitoring and a methodology to determine any further locations. In all other respects our position remains as in [REP6-074].</p>
<p>A428/Cambourne Junction</p>	<p>Section 3</p>	<p>CCC is broadly content with the modelling done to assess the impact of the Scheme at this junction and concludes that the Cambourne junction should operate within capacity post scheme construction.</p>

A428/Toseland Road/Abbotsley Road junction	Section 4	CCC agrees that the differences between observed and modelled base year flows at this junction should not cause the junction to operate over capacity with the introduction of the proposed Scheme. No further action required.
B1046/Potton Road Junction	Section 5	CCC agrees that the re-positioned, newly designed B1040/Potton Road junction is likely to operate below capacity in the DS scenario. CCC's concern arises not from the capacity of the junction but the type of junction proposed by the Applicant. Analysis of design year AADT flows produced by the Applicant, and comparison with DMRB guidance suggest this junction should be a ghost island priority junction rather than a simple priority junction. CCC is concerned the junction has therefore been under rather than over designed.
A428/Wyboston and Barford Road Roundabouts	Section 6	<p>Both Wyboston and Barford Road roundabouts are currently National Highways assets, that, following de-trunking, would become the responsibility of Bedford Borough Council. However the boundary to Cambridgeshire is immediately north of both roundabouts, including the northern legs of both; the satisfactory operation of both roundabouts therefore directly affects Cambridgeshire roads. Indeed the claimed benefits of a general reduction of 'through' traffic in St Neots will not happen if the roundabouts at the junctions with the relieved old A428 are heavily congested as traffic will not choose to reroute this way.</p> <p>While it is also a matter for BBC, it seems appropriate that the Applicant does not, as part of de-trunking, leave a roundabout with little or no future reserve capacity, and require the local highway authorities to fund the required future works. It would appear that in a 'do minimum' scenario, the Applicant would be required to upgrade both of these junctions within a short time frame. Therefore, the works required to provide adequate capacity for future years (options for which are described in this document [REP8-022]) should be an integral part of the de-trunking proposals for the old A428, every bit as much as (for example) replacing life expired surfacing on the A428, or structural repairs to damaged culverts under the A428.</p> <p>It is not satisfactory that the package of works that might be required for the de-trunking element of the current DCO is so poorly defined, let alone agreed by the relevant Highway Authorities.</p>

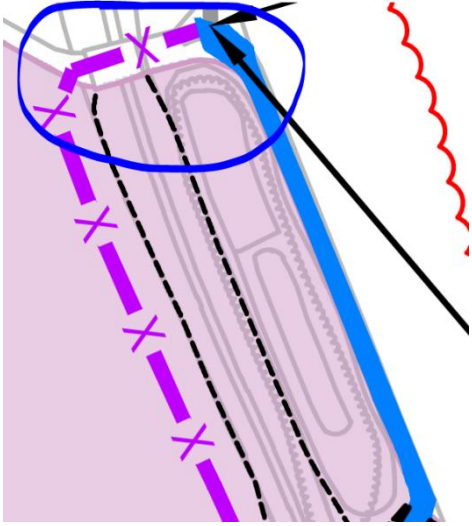
A428/Barford Road Roundabout	Section 6 - 6.1.21	The assumption that traffic exiting Barford Road Northern arm towards Barford Road Southern Arm will use both lanes at the northern arm is false as there is a single lane exit on to Barford Road South.
Conclusion	6.1.32	<p>The Applicant states that <i>“After considering the various options of reallocation of the road space on the Wyboston and Barford Road junctions, the Applicant has concluded that by solely adjusting the lane markings, the benefits in traffic operations will be negligible or marginal. More substantive widening or improvements could bring in some potential benefits but they are beyond the scope of the Scheme. Hence, the Applicant does not propose to undertake any further sensitivity tests of any alternative schemes for these junctions, which remain unaltered from their current forms as presented in the DCO application for the Scheme”</i>.</p> <p>This approach is not acceptable to CCC and therefore we have set out the mitigation required at the Wyboston and Barford Road Junctions. This is submitted to Examination at Deadline 10 in document CLA.D10.TN.</p>

9.107 Applicant's Comments on Other Parties' Responses to the Third Round of Written Questions [REP9-023]

Topic	Paragraph Number	Councils' Comment
Operational phase monitoring and evaluation	Q3.11.2.1	CCC set out draft requirements for Monitor and Manage in [REP6-074]. Through discussions with the Applicant, we are content that the locations for operational monitoring will be as per the relevant requirement in the latest dDCO [REP9-004] and that we understand that the Applicant is updating the OCTMP with agreed locations for construction monitoring and a methodology to determine any further locations. In all other respects our position remains as in [REP6-074].
Local impacts of construction traffic	Q3.11.7.4	CCC set out draft requirements for Monitor and Manage in [REP6-074]. Through discussions with the Applicant, we are content that the locations for operational monitoring will be as per the relevant requirement in the latest dDCO [REP9-004] and that we understand that the Applicant is updating the OCTMP with agreed locations for construction monitoring and a methodology to determine any further locations. In all other respects our position remains as in [REP6-074].

Noise and vibration	Q3.16.2.1 - Operational Noise Monitoring	The Applicant has not offered any new information to justify their unwillingness to monitor operational road noise. The Councils requested operational noise monitoring to confirm computer noise modelling predictions and to provide evidence to help assess future noise complaints.
Protective provisions for EWR	Q3.5.2.2	The councils agree with the Applicant that since the EWR has not reached Preferred Route Announcement stage, the best option would be to have a co-operation agreement rather than agreeing full protective provisions.

9.108 Applicant's Comments on the ExA's Proposed Schedule of Changes to the draft Development Consent Order [REP9-024]

Topic	Paragraph Number	Councils' Comment
Limits of Deviation	Q4.3.5.1 (b)	<p>At FP1/9 on Sheet 6, the blue circled area should be within the purple shaded LOD to allow the extent of stopping up to flex with the use of the LOD. There also needs to be clarification that the blue line on the Northern edge (right hand side) is within the LOD.</p> 

		This matter has been discussed with the Applicant and the Council understands that the Applicant is to submit updated Streets, Rights of Way and Access Plans at Deadline 10.
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9.110 Applicant's Comments on Submissions Received at Deadline 8 [REP9-026]

Topic	Paragraph Number	Councils' Comment
Non-motorised users (NMU) – Adequacy of provision - 5a (i) 47 – 51, 53, 55- 56, 58, 61.	REP8-029a	The Councils maintain their view that the NMU provision is inadequate.
Non-motorised users (NMU) – potential for Designated Funds schemes - 5b 62-67.	REP8-029b	The Councils maintain their position on this matter.
Cultural Heritage Table 3-4	REP8-032e	The Applicant indicates that the Councils' comments were previously addressed. However, they have not been answered to the satisfaction of the Councils. See further comments from the Councils to [REP9-010] Annex E and Annex J. There are areas of [REP4-031] (Updated Archaeological Mitigation Strategy) that remain disagreed owing to inconsistencies across the Applicant's documents and that the Councils consider will damage and destroy archaeological evidence that will not have been sufficiently recorded, if at all in some cases. Please see 9.23 and 9.55 of [REP5-020], and [REP8-032] regarding the First Iteration Environmental Management Plan.
Annex J: Archaeological management plan	REP8-032i	<p>The Applicant continues to present unacceptable aspects of the Updated Archaeological Mitigation Strategy [REP4-031] in this response. They have not considered restoration aspects of soils and substrates in their own document library. Please see our response to [REP9-010]: Annex E Soil handling and management plan and Annex J Archaeological Management Plan.</p> <p>There is no assurance that future decisions will be appropriate and based on the needs of archaeology in areas in which the Applicant proposes to place temporary works. We maintain that the Applicant is misguided in the supposition that Bronze Age remains will be obvious – including house ring ditches. These features have a currency over 2,400 years of prehistoric and Roman periods. If a round house is found to be Iron Age or Roman date</p>

		<p>during excavation, given that a variety of sites of these dates predominate in this road corridor, rather than Bronze Age in date, it is unclear what then would transpire regarding investigating the associated remains. The Councils query whether these sites would be dropped because they are not Bronze Age or Saxo-Norman in date as per [REP4-031] 5.1.2c but not Site 17's Site strategy [REP4-031 Appendix D], which offers no specific research objectives for the Saxo-Norman remains beyond titles: 'Rural settlement' and 'Landscape'.</p> <p>The strategy for 'Targeted Excavation' is flawed and not acceptable. Please also see our response to REP8-032az below. Either a re-write is recommended or the strategy is fully and simply led by the local authority archaeology brief shown in [REP4-031] Appendix B.</p>
Borrow Pits	REP8-032p	The Councils notes the Applicant's response to REP8-032p and additional reference to parking has been added into the EMP. However, the Councils are disappointed that the Applicant appears unable to commit to such activities as providing formal notice to interested parties of when there has been a change in the status of the land or informing relevant authorities of any ongoing problems that may be occurring, thus ensuring that the Councils' time is not occupied with the investigation of complaints that may be more easily resolved through frequent communication.
Walkers, Cyclists and Equestrians	REP8-032s	The Councils welcome the commitments made and accept the proposed changes made to the wording.
Record of Engagement with Historic England	REP8-032u	It is unfortunate that advice given by the Councils at the meeting on 14 April 2020 was not heeded. Please note that the discussions surrounded only the principles of mitigation as, crucially, they could not be specific to sites as their evaluation was still underway at that time. No further input from the Councils was sought and the opportunity to form a robust and suitable mitigation strategy was lost.
Road Space reallocation - Action Point 1	REP8-032af	The Councils disagree with the conclusions drawn by the Applicant in relation to Wyboston Junction and have submitted a Technical Note at Deadline 10 (reference CLA.D10.TN) addressing this matter.

M11 J13 - Action Point 2	REP8-032ag	The Councils note the submission of [REP8-019] and our comments are provided on this above, in the table headed '9.102 Results of additional VISSIM modelling at M11 Junction 13'. In summary, the note suggests that the Scheme will increase queues and delays on the A1303 and on the mainline A428 but the Applicant is not proposing any mitigation. This is not acceptable to the Councils.
Eltisley Junction - Action Point 2	REP8-032ah	The Councils note the submission of [REP8-022] and our comments are provided on this document within this submission. In essence, the flows used in this test are agreed but the Councils require information setting out why the proposed junction form was chosen given the levels of traffic predicted to use this junction meaning that the junction will operate with significant reserve capacity.
Potton Road and Toseland Road - Action Point 2	REP8-032ai	The Councils note the submission of [REP8-022] and our comments are provided on this document within this submission. In essence, the flows used in the testing of the A428/Toseland Road are agreed and no further action is needed. With regard to Potton Road, the Councils agree the flows but disagree with the assertion that the junction form is acceptable and believe that this junction should be a ghost island right turn priority junction.
Network Management Duty - Action Point 4	REP8-032aj	CCC set out draft requirements for Monitor and Manage in [REP6-074] . Through discussions with the Applicant, we are content that the locations for operational monitoring will be as per the relevant requirement in the latest dDCO [REP9-004] and that we understand that the Applicant is updating the OCTMP with agreed locations for construction monitoring and a methodology to determine any further locations. In all other respects our position remains as in [REP6-074] .
Monitor and Manage - Action Point 5	REP8-032al	No further comment.
Proposed Cross sections of CCC Highways - NMUs	REP8-32am	The Councils welcome the Applicant's agreement to the principles.

<p>Signalised crossings - Action Point 9</p>	<p>REP8-32an</p>	<p>The Councils welcome the Applicant's confirmation that a signalised crossing of the A1198 south of the Caxton Gibbet Roundabout will be provided to enable safe pedestrian access to the services.</p> <p>The Councils continue to maintain their 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.</p>
<p>Limits of deviation on the Streets, Rights of Way and Access Plans</p>	<p>REP8-032at</p>	<p>CCC is unclear on how the Applicant's proposal would operate in practice. The handover processes are bilateral processes between CCC and NH and BBC and NH respectively. In the event that neither CCC nor BBC wishes to adopt maintenance responsibility for a particular section, it is unclear to CCC how this would be resolved and where maintenance responsibility would rest.</p>
<p>Archaeological mitigation sites - REP5- 020ak</p>	<p>REP8-032bb</p>	<p>The Councils consultation advice has not always been heeded. For some sites, the Applicant's alternative proposals are not acceptable. See our response to REP8-032e above.</p> <p>The Applicant uses the concept of 'public benefit' incorrectly, basing this solely on financial saving (Project Speed was discussed in meetings) rather than the increase in 'knowledge gain' that the Councils argue would ensure that sites are adequately scoped in both in terms of area and investigation strategy. Very little knowledge will come from a very pared down approach to known and anticipated archaeological site evidence (with reference to Site 18, Field 74 and Sites 36-39, Field 97). The Councils are concerned that the Applicant does not understand the character of the local archaeological resource sufficiently nor wishes to deal with the East of England's Research Agenda (see [REP4-031] Chapter 16 REF 48) when it comes to unenclosed occupation evidence.</p> <p>The Applicant is incorrect: the Councils have not ever asked for the entirety of the Caxton Gibbet borrow pit in Field 97 (Sites 36-39) to be subject to controlled stripping for archaeology and supplied a plan showing the areas of interest (see maplet with orange outlined area at [REP9-026] in relation to REP8-032es). These areas buffer known sites and include elements of undated features that we suggest are associated unenclosed elements of settlement in this area west of Ermine Street Roman Road. The Councils did,</p>

		however, recommend that the entirety of Field 95 be subject to fully controlled archaeological stripping (as opposed to rough stripping conducted for road construction) as a multi-period archaeological site fills the field.
Archaeological mitigation sites - REP5-020al	REP8-032bc	The Applicant's comments to REP8-032az do not address the issue. Archaeological site evidence should not be covered by temporary works and this has been repeatedly indicated in meetings. Please refer to our response to [REP9-010] Annex J and Annex E.
Traffic Modelling Methodology - REP5-020an	REP8-032be	No further comment.
Impacts of the scheme on Coton - REP5-020ao	REP8-032bf	The Applicant's note on monitoring includes monitoring of Coton. CCC welcomes this commitment.
Scheme junctions - REP5-020au	REP8-032bi	CCC notes the submission of the information at Deadline 8 [REP8-019] and [REP8-022] and our comments on this information are set out above, in tables headed '9.102 Results of additional VISSIM modelling at M11 Junction 13' and '9.105 Applicant's Responses to issues raised at Issue Specific Hearing 5 on 1 December 2021'. In summary, the modelling of M11 J13 indicates that the scheme adds significantly to queues and delays that will impact on the mainline A428.
Wyboston and Barford Road junctions - REP5-020av, REP5-020aw and REP5-020az	REP8-032bj	CCC does not agree with the approach taken by the Applicant in relation to these junctions and has submitted a Technical Note at Deadline 10 setting out what is needed at these junctions (see CLA.D10.TN).
REP8-032bk Madingley Mulch Junction - REP5-020av	REP8-032bk	The Councils note the submission of [REP8-019] and our comments are provided on this document in this submission. In summary, the note suggests that the Scheme will increase queues and delays on the A1303 and on the mainline A428 but are not proposing any mitigation. This is not acceptable to the Councils.
B1046/Potton Road Junction and Eltisley Link junctions - REP5-020ba	REP8-032bn	The Councils note the submission of [REP8-022] and our comments are provided in this submission. In essence, the flows used in the Eltisley link test are agreed but the Councils require information setting out why the proposed junction form was chosen given the levels

		<p>of traffic predicted to use this junction meaning that the junction will operate with significant reserve capacity.</p> <p>The Councils note the submission of [REP8-022] and our comments are provided in this submission. In essence, the flows used in the testing of the Potton Road junction are agreed but disagree with the assertion that the junction form is acceptable and believe that this junction should be a ghost island right turn priority junction.</p>
Junction Sensitivity Testing - REP5-020bb and REP5- 020bc	REP8-032bo	The Councils note the submission of [REP8-019] and our comments are provided on this document in this submission. In summary, the note suggests that the scheme will increase queues and delays on the A1303 and on the mainline A428 but are not proposing any mitigation. This is not acceptable to the Councils.
B1046/Potton Road Junction and Eltisley Link junctions - REP5-020ba	REP8-032bq	The Councils note the submission of [REP8-022] and our comments are provided in this submission. In essence, the flows used in the Eltisley link test are agreed but the Councils require information setting out why the proposed junction form was chosen given the levels of traffic predicted to use this junction meaning that the junction will operate with significant reserve capacity.
Wyboston and Barford Road junctions - REP5-020av, REP5- 020aw and REP5-020az	REP8-032br	CCC does not agree with the approach taken by the Applicant in relation to these junctions and has submitted a Technical Note at Deadline 10 setting out what is needed at these junctions (see CLA.D10.TN).
Madingley Mulch Junction - REP5-020bk	REP8-032bs	The Councils note the submission of [REP8-019] and comments are provided on this document in this submission. In summary, the note suggests that the Scheme will increase queues and delays on the A1303 and on the mainline A428 but are not proposing any mitigation. This is not acceptable to the Councils.
Wyboston REP5-020bl	REP8-032bt	CCC does not agree with the approach taken by the Applicant in relation to these junctions and has submitted a Technical Note at Deadline 10 setting out what is needed at these junctions (see CLA.D10.TN).

Barford Road Junction - REP5-020bm	REP8-032bu	CCC does not agree with the approach taken by the Applicant in relation to these junctions and has submitted a Technical Note at Deadline 10 setting out what is needed at these junctions (see CLA.D10.TN).
Junction Sensitivity Testing - REP5-020bn	REP8-032bv	The Councils note the submission of [REP8-022] and our comments are provided above in table headed '9.105 Applicant's Responses to issues raised at Issue Specific Hearing 5 on 1 December 2021'.
Junction Sensitivity Testing - REP5-020bo	REP8-032bw	The Councils note the submission of [REP8-019] and [REP8-022] and our comments are provided above in tables headed '9.102 Results of additional VISSIM modelling at M11 Junction 13' and '9.105 Applicant's Responses to issues raised at Issue Specific Hearing 5 on 1 December 2021'.
Monitor and Manage - REP5-020bp to REP5-020bs	REP8-032bx	CCC set out draft requirements for Monitor and Manage in [REP6-074] . Through discussions with the Applicant, we are content that the locations for operational monitoring will be as per the relevant requirement in the latest dDCO [REP9-004] and that we understand that the Applicant is updating the OCTMP with agreed locations for construction monitoring and a methodology to determine any further locations. In all other respects our position remains as in [REP6-074] .
Impact in Dry Drayton - REP5-020cl	REP8-032ce	CCC set out draft requirements for Monitor and Manage in [REP6-074] . Through discussions with the Applicant, we are content that the locations for operational monitoring will be as per the relevant requirement in the latest dDCO [REP9-004] and that we understand that the Applicant is updating the OCTMP with agreed locations for construction monitoring and a methodology to determine any further locations. In all other respects our position remains as in [REP6-074] .
Archaeological mitigation with reference to - Site 23 REP5-020da	REP8-032cl	The excavation area for Site 23 is too small. The Councils provided maplets in the response to REP8-032bb 9.87 Archaeological Mitigation Areas with Evaluation Data, which are also shown in [REP9-026] for the Applicant's responses to 9.87.

Archaeological mitigation with reference to Site - 18 REP5-020dc	REP8-032cm	The Applicant's statement effectively consigns known archaeological evidence to unrecorded loss. The Councils object to this position.
Historic England: The dating of archaeological remains prior to excavation - REP5-022a (page 86)	REP8-032cp	The Councils recommend use of the levels of excavation presented in the Joint Authorities' Archaeological Brief at [REP4-031] Appendix B section 6.3, and remind the Applicant that in-field decisions are routinely made to increase and decrease excavation intensity as a site is progressing.
Sensitivity testing of Wyboston and Barford Road Junctions - REP5-022e	REP8-032cq	CCC does not agree with the approach taken by the Applicant in relation to these junctions and has submitted a Technical Note at Deadline 10 setting out what is needed at these junctions (see CLA.D10.TN).
Further testing of Madingley Mulch Junction - REP5-022e	REP8-032cr	The Councils note the submission of [REP8-019] and comments are provided on this document in this submission. In summary, the note suggests that the Scheme will increase queues and delays on the A1303 and on the mainline A428 but are not proposing any mitigation. This is not acceptable to the Councils.
Sensitivity Testing of the Eltisley Junction - REP5-022e	REP8-032cs	The flows used in this assessment are agreed but clarification is needed as to the justification for the junction chosen as the level of reserve capacity indicates that the junction is significantly larger than needed to cater for traffic in the future years.
Sensitivity Testing of Potton Road and Toseland Road - REP5-022e	REP8-032ct	The Councils note the submission of [REP8-022] and our comments are provided above in table headed '9.105 Applicant's Responses to issues raised at Issue Specific Hearing 5 on 1 December 2021'. In essence, CCC is of the opinion that the flows at this junction indicate that the junction should be a Ghost Right turn and not a simple priority junction.
Non-motorised Users (NMUs): fragmented provision	REP8-032cx	The Councils' position is unchanged.
Non-motorised Users (NMUs): future demand	REP8-032cy	The Applicant has provided anecdotal evidence that road traffic incidents are likely to decrease but not that the speed of vehicles will decrease. On the contrary, speed levels are likely to increase which will deter NMUs. Whilst the volume of traffic on the old A428 may have decreased, helping to reduce road traffic incidents, there is no evidence that the

		<p>speeds of vehicles has decreased. Equally, there is no evidence that the number of vulnerable users on the old A428 has increased since the dual carriageway was constructed. There is a strong, local demand for safe, segregated provision along the old A428 for those on foot and travelling by bike precisely because it does not feel safe to be on the carriageway. The sections of the existing A428 where there is no provision proposed for vulnerable users will not feel safe enough to encourage active travel and the Applicant's stated aim of connecting communities will fail.</p>
Operational impacts and benefits - 1.1.3	REP8-032da	<p>The scheme needs to monitor the impacts of the scheme, both negative and positive, and the locations that CCC has identified after interrogation of the Applicant's model need to be monitored to assess the extent to which the predicted benefits and disbenefits of the scheme have been achieved.</p>
Operational impacts and benefits – 1.1.4	REP8-032db	<p>CCC set out draft requirements for Monitor and Manage in [REP6-074]. Through discussions with the Applicant, we are content that the locations for operational monitoring will be as per the relevant requirement in the latest dDCO [REP9-004] and that we understand that the Applicant is updating the OCTMP with agreed locations for construction monitoring and a methodology to determine any further locations. In all other respects our position remains as in [REP6-074].</p>
Operational impacts and benefits – 1.1.5	REP8-032dc	<p>CCC set out draft requirements for Monitor and Manage in [REP6-074]. Through discussions with the Applicant, we are content that the locations for operational monitoring will be as per the relevant requirement in the latest dDCO [REP9-004] and that we understand that the Applicant is updating the OCTMP with agreed locations for construction monitoring and a methodology to determine any further locations. In all other respects our position remains as in [REP6-074].</p>
Operational impacts and benefits – 1.1.6	REP8-032dd	<p>CCC set out draft requirements for Monitor and Manage in [REP6-074]. Through discussions with the Applicant, we are content that the locations for operational monitoring will be as per the relevant requirement in the latest dDCO [REP9-004] and that we understand that the Applicant is updating the OCTMP with agreed locations for construction monitoring and a methodology to determine any further locations. In all other respects our position remains as in [REP6-074].</p>

Operational impacts and benefits - 1.1.7	REP8-032de	CCC set out draft requirements for Monitor and Manage in [REP6-074]. Through discussions with the Applicant, we are content that the locations for operational monitoring will be as per the relevant requirement in the latest dDCO [REP9-004] and that we understand that the Applicant is updating the OCTMP with agreed locations for construction monitoring and a methodology to determine any further locations. In all other respects our position remains as in [REP6-074].
Construction Impacts Mitigation - 1.1.8	REP8-032df	CCC set out draft requirements for Monitor and Manage in [REP6-074]. Through discussions with the Applicant, we are content that the locations for operational monitoring will be as per the relevant requirement in the latest dDCO [REP9-004] and that we understand that the Applicant is updating the OCTMP with agreed locations for construction monitoring and a methodology to determine any further locations. In all other respects our position remains as in [REP6-074].
Policy position - 1.3.4	REP8-032dg	CCC set out draft requirements for Monitor and Manage in [REP6-074]. Through discussions with the Applicant, we are content that the locations for operational monitoring will be as per the relevant requirement in the latest dDCO [REP9-004] and that we understand that the Applicant is updating the OCTMP with agreed locations for construction monitoring and a methodology to determine any further locations. In all other respects our position remains as in [REP6-074].
Policy position - 1.3.5 and 1.6	REP8-032dh	CCC set out draft requirements for Monitor and Manage in [REP6-074]. Through discussions with the Applicant, we are content that the locations for operational monitoring will be as per the relevant requirement in the latest dDCO [REP9-004] and that we understand that the Applicant is updating the OCTMP with agreed locations for construction monitoring and a methodology to determine any further locations. In all other respects our position remains as in [REP6-074].
Local impacts within the Scheme - 1.4.1 and 1.4.2	REP8-032di	CCC set out draft requirements for Monitor and Manage in [REP6-074]. Through discussions with the Applicant, we are content that the locations for operational monitoring will be as per the relevant requirement in the latest dDCO [REP9-004] and that we understand that the Applicant is updating the OCTMP with agreed locations for construction monitoring and a methodology to determine any further locations. In all other respects our position remains as in [REP6-074].

Local impacts within the Scheme - 1.4.3	REP8-032dj	CCC set out draft requirements for Monitor and Manage in [REP6-074]. Through discussions with the Applicant, we are content that the locations for operational monitoring will be as per the relevant requirement in the latest dDCO [REP9-004] and that we understand that the Applicant is updating the OCTMP with agreed locations for construction monitoring and a methodology to determine any further locations. In all other respects our position remains as in [REP6-074].
POPE Process - 1.5	REP8-032dk	CCC set out draft requirements for Monitor and Manage in [REP6-074]. Through discussions with the Applicant, we are content that the locations for operational monitoring will be as per the relevant requirement in the latest dDCO [REP9-004] and that we understand that the Applicant is updating the OCTMP with agreed locations for construction monitoring and a methodology to determine any further locations. In all other respects our position remains as in [REP6-074].
Local Highway Authority Duty to Monitor and Manage - 1.7	REP8-032dl	CCC set out draft requirements for Monitor and Manage in [REP6-074]. Through discussions with the Applicant, we are content that the locations for operational monitoring will be as per the relevant requirement in the latest dDCO [REP9-004] and that we understand that the Applicant is updating the OCTMP with agreed locations for construction monitoring and a methodology to determine any further locations. In all other respects our position remains as in [REP6-074].
Network Management Duty - 1.8	REP8-032dn	CCC set out draft requirements for Monitor and Manage in [REP6-074]. Through discussions with the Applicant, we are content that the locations for operational monitoring will be as per the relevant requirement in the latest dDCO [REP9-004] and that we understand that the Applicant is updating the OCTMP with agreed locations for construction monitoring and a methodology to determine any further locations. In all other respects our position remains as in [REP6-074].
Managing Construction Traffic Impacts - 1.9	REP8-032dm	The method used to deter construction traffic from using unacceptable routes is largely agreed and the exact routes will be secured via the OCMP.

Managing construction traffic impacts – general traffic - 1.9.3	REP8-032do	CCC set out draft requirements for Monitor and Manage in [REP6-074]. Through discussions with the Applicant, we are content that the locations for operational monitoring will be as per the relevant requirement in the latest dDCO [REP9-004] and that we understand that the Applicant is updating the OCTMP with agreed locations for construction monitoring and a methodology to determine any further locations. In all other respects our position remains as in [REP6-074].
Archaeological Mitigation Areas with Evaluation Data	REP8-032dt	The Councils stand by the comments made for each site. Specific sites are further discussed below.
Archaeological Mitigation Areas with Evaluation Data	REP8-032dx	The Councils hope that many adjacent archaeological sites to the Scheme (Loves Farm and other Wintringham Park sites 1, 3 and 4 at St Neots, and Cambourne West, Swansley Wood at Cambourne) will inform excavations and provide knowledge gain within the rest of the Scheme, but they are not listed on the A428 site list. Only A428 sites that the Applicant has direct responsibility for should be included in the strategy [REP4-031].
Archaeological Mitigation Areas with Evaluation Data	REP8-032eb	The Councils stand by their requirement for this site area to include all the known archaeological evidence in order to acquire knowledge gain for the unenclosed occupation present in the area.
Archaeological Mitigation Areas with Evaluation Data	REP8-032ec	New information is provided by the Applicant but they have not addressed the evidence shown in the maplet of the fragmentary remains of a linear zone of brookside settlement on the south side. This is not acceptable.
Archaeological Mitigation Areas with Evaluation Data	REP8-032ee	The Councils understand from this statement that the Applicant does not intend to expand the St Neots compound area on the south side (over Site 21).
Archaeological Mitigation Areas with Evaluation Data	REP8-032eq	<p>The Applicant indicates in their response: <i>“Note that the area of Field 95 was extended to match the area requested by CCC on 15 October 2020. CCC later asked for a further amendment to cover the entire field on 4 November 2020 without clear reasoning.”</i></p> <p>This is incorrect. Please note that the evaluation reports for Phases 2 and 3 were only just being received in October 2020, and discussions on 15 October 2020 were preliminary,</p>

		without benefitting from report and evidence reviews. The Councils have since given clear advice about the mitigation requirements for the suite of Cambridgeshire archaeological sites on many listed occasions, which have not been incorporated into the Applicant's strategy.
Sheet 7, Streets, Rights of Way and Access Plans	REP8-032ez	<p>The Applicant's rationale appears odd to the Councils as nothing on the Streets, Rights of Way and Access Plans [REP9-002] specifies the elevation at which the new road is created and therefore it would be impossible for a person viewing the plans to make this distinction.</p> <p>This approach leaves the potential anomaly of two highways existing at the same location as the old one has not been stopped up, but a new one created on top of it. This may be present an issue if, for instance, there was a desire to implement a speed limit on that section of highway as it may require the speed limit to be implemented on both highways. The Councils are of the view that it would be much cleaner to stop up the old road in its entirety and recreate the new highway.</p> <p>In addition, it means that roads such as Cambridge Road at Eltisley cannot be adopted by CCC until the de-trunking of the old A428 has happened, as there will be a section of (non-stopped up) trunk road crossing it preventing adoption.</p>

9.113 Cumulative Effects of Greenhouse Gas Emissions from the Proposed Development [REP9-029]

Topic	Paragraph Number	Councils' Comment
Climate change	1.1.21	The Councils are content with the methodology used to assess the cumulative effects of greenhouse gas emissions when considered against national carbon budgets. However, we remain of the view that an assessment against local carbon budgets should be undertaken, and do not agree with the statement made at paragraph 1.1.21 that carbon budgets are not produced at a local or regional level. We remain of the view that the local authority carbon budgets produced by the Tyndall Centre provide an appropriate baseline against which the significance of effects can be assessed, and do not consider that the Applicant has produced a justified reason as to why these are not appropriate.

9.114 Complete Bat Survey Results for the A428 Black Cat Scheme - Parts 1, 2 and 3 - Confidential [REP9-030, REP9-031 and REP9-032]

Topic	Paragraph Number	Councils' Comment
General		The Councils welcome the submission of these documents.
9.54 Barbastelle Bat Surveys and Mitigation Technical Note (Rev 4)	5.1.2c	<p>The Councils are concerned that the Applicant has not provided an update on the progress of the actions from the meeting of 7 January 2022 between the Applicant, Natural England and the Local Authorities.</p> <p>Action (c) "Applicant to investigate the West Brook underpass advanced planting".</p> <p>The Councils, during the meeting, and Natural England [REP9-056] have emphasised the importance of advance planting to ensure that bats are sufficiently and robustly guided to use the crossing point structure, particularly where this is a lack of detailed survey information. The habitat creation will need to be sufficiently mature early in the pre-construction phase to provide suitable habitat.</p> <p>The Councils are unclear how the advance planting will come forward, particularly given it is not contained within the First Iteration EMP [REP9-009].</p>
9.54 Barbastelle Bat Surveys and Mitigation Technical Note (Rev 4)	5.1.2 d	<p>The Councils are concerned that the Applicant has not provided an update on the progress of the actions from the meeting of 7 January 2022 between the Applicant, Natural England and the Local Authorities.</p> <p>Action (d) "Applicant to provide further information of the existing landscape at Pillar Plantation and West Brook and how this will be improved in the future".</p> <p>The Councils query how the landscape will be enhanced to improve its function as a bat commuting route. The Councils are still concerned about the success of the proposed bat crossing point, if it is not well linked into the wider landscape.</p>

9.116 National Highways Position Statement on Operational Phase Monitoring [REP9-034]

Topic	Paragraph Number	Councils' Comment
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		CCC set out draft requirements for Monitor and Manage in [REP6-074]. Through discussions with the Applicant, we are content that the locations for operational monitoring will be as per the relevant requirement in the latest dDCO [REP9-004] and that we understand that the Applicant is updating the OCTMP with agreed locations for construction monitoring and a methodology to determine any further locations. In all other respects our position remains as in [REP6-074].
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9.117 HGV Construction Traffic Flows [REP9-035]

Topic	Paragraph Number	Councils' Comment
		The methodology used in deriving the HGV flows and the inputs used within the model are acceptable to CCC.

9.118 National Highways Position Statement on Construction Phase Monitoring [REP9-036]

Topic	Paragraph Number	Councils' Comment
		CCC set out draft requirements for Monitor and Manage in [REP6-074]. Through discussions with the Applicant, we are content that the locations for operational monitoring will be as per the relevant requirement in the latest dDCO [REP9-004] and that we understand that the Applicant is updating the OCTMP with agreed locations for construction monitoring and a methodology to determine any further locations. In all other respects our position remains as in [REP6-074].

Cover Letter and responses to Deadline 7 [REP8-001]

Topic	Paragraph Number	Councils' Comment
Update on Departures	Page 2	<p>CCC's position remains that the currently proposed 6.0m side roads (B1046, Potton Road and Toseland Road) have not been properly justified and therefore we will not approve those Departures from Standards.</p> <p>CCC has indicated to the Applicant dimensions which it believes would be satisfactory, and looks forward to receiving a fully justified Departure application which it can review and accept.</p>

Protected Species Licence		The Council note that Natural England sees no impediment to a licence being issued for Great Crested Newt.
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Environmental Master Plan [REP9-037]

Topic	Paragraph Number	Councils' Comment
Biodiversity – Great Crested Newt pond	Sheet 5	The Councils welcome the relocation of Great Crested Newt mitigation ponds within appropriate terrestrial habitat. This addresses our previous concerns.
Cultural Heritage	Sheet 6	<p>It is not clear why the Environmental Management Plan (EMP) does present all matters of the natural and historic environment that require protection.</p> <p>There are five archaeological site area in Cambridgeshire for which agreed area fencing has been designed to prevent construction impacts on sites that will not be excavated or that are needed for construction. These are shown on plans in the Updated Mitigation Strategy at Appendix D [REP4-031] and include:</p> <ul style="list-style-type: none"> • Site 12: this is shown on [REP9-037] Sheet 6 (EFF) but not in the Masterplan Key Plan; • Site 16: [REP9-037] Sheet 8; • Site 21: [REP9-037] Sheet 7; • Site 25: [REP9-037] Sheet 11; and • Site 40: [REP9-037] Sheet 14. <p>The plans in the EMP show construction compounds, soil storage areas and Borrow Pits extending across these Archaeological Protection Areas. The plans should be amended to show these protection areas and a new shading included in the key.</p>
Cultural Heritage	Sheet 9	As the Archaeological Mitigation Strategy has not been agreed for the archaeological site, Site 17, west of Wintringham Farm and the unscheduled area of contemporary Deserted Medieval Village remains where a Proposed Multiple Use Construction Area is showing in the key (with an unexplained white area at the eastern border), we cannot agree with this plan. See the Councils' response to [REP9-026] (with reference to REP8-032i Cultural Heritage - Annex J: Archaeological management plan). See also Table 3-3-5 –

		<p>Archaeological Matters, reference 5.1 and 5.2, of the Statement of Common Ground to be submitted at D10.</p> <p>There will also be a variable cutting in the area of Site 18 at the east end of the plan on the south side of the roadbed. Archaeological features that are present here will be subject to destruction without record, according to the Archaeological Mitigation Strategy. The Councils object to this (please see [REP8-032] responses for Sheets 17 and 18/41).</p>
<p>Biodiversity – Great Crested Newt pond</p>	<p>Sheet 9</p>	<p>The Councils welcome the creation of a bespoke GCN pond, instead of using an attenuation basin.</p>