

# A428 Black Cat to Caxton Gibbet improvements

TR010044

Volume 8

8.5 Statement of Common Ground with Bedford Borough Council

Planning Act 2008

Rule 8(1)(e)

Infrastructure Planning (Examination Procedure) Rules  
2010

February 2022

## Infrastructure Planning

## Planning Act 2008

**The Infrastructure Planning  
(Examination Procedure) Rules 2010****A428 Black Cat to Caxton Gibbet  
improvements  
Development Consent Order 202[ ]**

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**8.5 Statement of Common Ground with  
Bedford Borough Council**

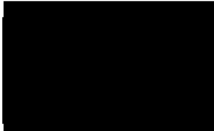
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Rev 5	15 February 2022	Final for Submission – Deadline 10

## STATEMENT OF COMMON GROUND

**This Statement of Common Ground has been prepared and agreed by (1) National Highways Company Limited and (2) Bedford Borough Council.**

Signed...   
Lee Galloway  
Project Director  
on behalf of National Highways  
Date: 15 February 2022

This statement has been approved by the Officers of Bedford Borough Council.

Signed   
Craig Austin  
Director for Environment  
on behalf of Bedford Borough Council  
Date: 15 February 2022

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# 1 Introduction

## 1.1 Purpose of this document

- 1.1.1 This Statement of Common Ground (SoCG) has been prepared in respect of the A428 Black Cat to Caxton Gibbet improvements (the Scheme) made by National Highways Company Limited (National Highways) to the Secretary of State for Transport (Secretary of State) for a Development Consent Order (the Order) under section 37 of the Planning Act 2008 (PA 2008).
- 1.1.2 The Order, if granted, would authorise National Highways to construct a new 10 mile (16km) dual 2-lane carriageway from the Black Cat roundabout to Caxton Gibbet roundabout and in addition approximately 1.8 miles (3km) of tie-in works. The Scheme includes the following components:
- a. A new three-level grade separated junction at Black Cat roundabout, with the A1 at the lower level, the new dual carriageway on the upper level and a roundabout between the two at approximately existing ground level. In addition to slip roads, a new free flowing link between the A421 eastbound carriageway and the A1 northbound carriageway will also be provided.
  - b. A new grade separated all movements junction will be constructed to the east of the existing Cambridge Road roundabout to provide access to the new dual carriageway and maintain access to the existing A428.
  - c. At the Caxton Gibbet roundabout, a new grade separated all movements junction will be constructed, incorporating the existing roundabout on the south side of the new dual carriageway and a new roundabout on the north side. The new dual carriageway will then tie-in to the existing A428 dual carriageway to the east of the new Caxton Gibbet junction.
  - d. In the vicinity of the new Black Cat junction, direct access onto the A1 from some local side roads and private premises will be closed for safety reasons. A new local road will provide an alternative route. The existing Roxton Road bridge will be demolished and replaced with a new structure to the west to accommodate the realigned A421.
  - e. New crossings will be constructed to enable the new dual carriageway to cross the River Great Ouse, East Coast Main Line railway, Barford Road, the B1046/Potton Road, Toseland Road and the existing A428 at Eltisley.
  - f. The existing A428 between St Neots and Caxton Gibbet will be de-trunked and retained for local population.
  - g. The existing A428 between St Neots and Caxton Gibbet will be de-trunked and retained for local traffic and public transport with maintenance responsibility transferred to the local highway authorities.



## 2 Record of Engagement

2.1.1 The parties have been engaged in consultation since the beginning of the proposed development. A summary of the meetings and correspondence that has taken place between National Highways and BBC in relation to the Application is outlined in **Table 2-1**.

**Table 2-1 - Record of Engagement**

Date	Form of correspondence	Key topics discussed and key outcomes
03/03/2017	Email	Notification by Highways England (HE) of non-statutory consultation.
09/06/2017	Email	Ecology survey dates relating to the A428 road improvement scheme at ponds/ditches located east of the Black Cat roundabout in proximity to the Motor Sports circuit shared with BBC.
08/08/2017	Meeting	Meeting with the lead local flood authorities and internal drainage board for a discussion on flood risk.
28/09/2017	Email	Confirmation from BBC regarding land ownership for access required to undertake ecology surveys.
24/01/2018	Meeting	Meeting with BBC to introduce the Scheme, discuss the highways design and how the Scheme will impact roads within the local authority's jurisdiction. The affected side roads, public rights of way and de-trunking were also covered.
06/02/2018	Meeting	Meeting with BBC to discuss the plans for public rights of way that are affected by the Scheme.
10/05/2018	Email	Three draft drawings depicting Representative Viewpoints for LVIA shared with BBC.
24/05/2018	Email	Clarification regarding BBC pavement specification.

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Date	Form of correspondence	Key topics discussed and key outcomes
03/07/2018	Meeting	Meeting with BBC, Cambridgeshire County Council (CCC), Huntingdonshire District Council (HCDC) and South Cambridgeshire District Council (SCDC), A presentation was given on the Landscape visual impact assessment (LVIA) viewpoints to landscape officers. The ongoing nature of consultation was discussed, and HE invited further thoughts on the initial viewpoint selections for LVIA photomontages, so that they could brief surveyors in August 2018.
09/08/2018	Email	Cultural Heritage: Email to BBC and CCC introducing the scheme and requesting a meeting.
13/08/2018	Email	Request to BBC for collision records and location plans for Barford Road, Bedford Road and Roxton Road.
2018	Email	Confirmation from BBC that consultation materials can be deposited at BBC offices.
18/09/2018	Meeting	Cultural Heritage meeting with BBC and CCC introducing the Scheme and an initial discussion on the assessment of significance of heritage assets and the need for a geophysical survey and aerial photographic analysis. Discussed the need for a mitigation strategy within the ES.
24/09/2018	Email	Request for information from BBC Manager for Traffic Operations on any existing assets that have or have a potential for Asbestos.
16/10/2018	Email	Cultural heritage: Email to BBC and CCC requesting a quote to produce the required Design Brief for the geophysical survey,
07/11/2018	Email	Cultural heritage: Email from BBC on charging and quote for initial work.

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Date	Form of correspondence	Key topics discussed and key outcomes
15/11/2018	Meeting	Meeting with BBC to discuss the Roxton Road link and how it had been designed with the local authority. The local authority made requests for what they would like to be changed and HE amended the design accordingly. Stakeholder communications for the area affected were also discussed.
13/12/2018	Email	Cultural heritage: Follow-up for geophysics brief from the councils.
17/12/2018	Meeting	Meeting with BBC to discuss the relocation of two bus lay-bys that are located on the A1 northbound and southbound carriageways between Wyboston and Black Cat junction, the safety of both bus lay-bys was also discussed.
18/12/2018	Meeting	Meeting with BBC and CCC to give an introduction to the Scheme and programme and approach to assessment of significance of heritage assets.
03/01/2019	Email	Cultural heritage: Follow up for geophysics brief from BBC and CCC. Request for the Archaeological Design Brief for the geophysical survey from BBC.
2019	Email	Advance copy of the project update (including consultation findings) shared with BBC.
06/02/2019	Email	First departure application for approval relating to BBC highways that are affected by the scheme.
12/03/2019	Email	Draft Statement of Community Consultation shared with BBC.
14/03/2019	Email	Cultural heritage: Information sent to BBC, CBC, and CCC on preferred route announcement. Update on progress to geophysical survey.
14/03/2019	Email	Request to BBC for information regarding a farm/quarry site adjacent to the existing Black Cat Island, and a request for access for non-intrusive geophysical survey.



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Date	Form of correspondence	Key topics discussed and key outcomes
15/03/2019	Email	Cultural heritage: Link to plans etc sent to BBC, CBC, and CCC.
25/03/2019	Email	Cultural heritage: WSI prepared by MHI for geophysical survey sent to BBC, CBC, and CCC.
25/03/2019	Email	WSI prepared by MoLA Headland Infrastructure shared for review by BBC.
26/03/2019	Email	Joint response by BBC, CBC and CCC on the WSI prepared by MoLA Headland Infrastructure.
05/04/2019	Email	Relocation of bus stops on the A1 northbound and southbound carriageways between Wyboston and Black Cat junction.
10/04/2019	Email	Cultural heritage: Request for additional data for small outlier compounds etc made to BBC, CBC, and CCC.
11/04/2019	Email	Cultural heritage: Confirmation from BBC that proposed study area for compounds is acceptable.
12/04/2019	Email	Cultural Heritage: Request for additional data (BBC, CBC, CCC)
30/04/2019	Meeting	Cultural Heritage meeting with BBC, CBC, and CCC providing an update following geophysical and aerial photography surveys. Discussion on trenching strategy.
20/05/2019	Email	Email from BBC advising that its freehold land at Roxton Quarry is intended to be developed following the end of quarry operations, and a request for the design of the A428 Scheme to support this development proposal.
31/05/2019	Letter	Statutory Consultation Launch Communications.
06/06/2019	Email	Cultural heritage: First draft archaeological trenching layout shared with BBC, CBC, and CCC.

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Date	Form of correspondence	Key topics discussed and key outcomes
06/06/2019	Email	Draft archaeological trenching layout shared with BBC Archaeological Officer.
10/06/2019	Meeting	Cultural heritage: Meeting with BBC and CCC to discuss the trenching strategy and the principles of it.
14/06/2019	Email	Cultural heritage: Meeting minutes from meeting on 10/06/2019 sent out to BBC, CBC, and CCC.
24/06/2019	Email	Cultural heritage: Second draft of Phase 1 trench layout emailed to BBC, CBC, and CCC.
25/06/2019	Email	Cultural heritage: Comments on the phase 1 trench layout received from BBC.
25/06/2019	Email	Cultural heritage: Copy of NMP data received from BBC.
10/07/2019	Email	Request to BBC for information regarding main/minor/awarded watercourses that may be impacted by the A428 Scheme.
22/07/2019	Email	Cultural heritage: Email to BBC, CBC, and CCC asking for final comments on the phase 1 trenching.
26/07/2019	Response to Statutory Consultation	BBC Public Consultation response.
30/07/2019	Email	Correspondence to BBC regarding access to council land for Ground Investigation surveys.
20/08/2019	Email	Structural information from BBC regarding Roxton Culvert.
21/08/2019	Email	Cultural heritage: Email to BBC, CBC, and CCC requesting updated brief. Confirmed that Phase 2 GS results will be targeted in Phase 2 of trenching.
21/08/2019	Email	Cultural heritage: Updated brief received from CCC on behalf of BBC and CBC.
02/10/2019	Meeting	Highways and Planning Technical Working Group.

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Date	Form of correspondence	Key topics discussed and key outcomes
08/10/2019	Meeting	Strategic Road Users Technical Working Group.
08/10/2019	Meeting	Walkers, Cyclists and Horse Riders Technical Working Group.
14/10/2019	Email	Sheets from General Arrangement plans showing the proposed layout of the new Black Cat junction shared with BBC.
14/10/2019	Meeting	Economic and Benefits Technical Working Group.
17/10/2019	Meeting	An inaugural meeting was held with BBC, CCC, CBC, and SCDC to as part of the formation of the Flood Risk/ Water Management group and covered the terms of reference for the working group, the lessons that could be learnt from the A14 and each authorities' areas watercourses and responsibilities. HE gave an overview of the different types of hydraulic modelling of water course crossings and overland runoff for the three main technical notes to be generated (River Ouse Crossing, Bedfordshire Area and Cambridgeshire Area). The Environment Agency and the Bedford Group of Drainage Boards were also in attendance.
22/10/2019	Email	Cultural heritage: Email from CCC (BBC and CBC copied) asking about aerial photographic report and whether contractor on board for trenching.
22/10/2019	Email	Cultural heritage: Information on status of aerial photography report sent to BBC, CBC, and CCC. Responded to query about trenching contractor – TBC.
23/10/2019	Email	Cultural heritage: Email from BBC asking about payment for their time
23/10/2019	Email	Cultural heritage: Email from CCC (BBC copied) asking about payment for their time
23/10/2019	Email	Second and third departure applications for approval relating to BBC highways that are affected by the scheme.



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Date	Form of correspondence	Key topics discussed and key outcomes
28/10/2019	Email	Cultural heritage: Update on charging for consultation time sent to BBC, CBC, and CCC.
30/10/2019	Email	Correspondence regarding potential collaborations with BBC All Age Skills Plan
07/11/2019	Meeting	Meeting held to present the General Arrangement plans used at statutory consultation and explained which PROWs were affected by the Scheme and how each was to be dealt with. The temporary closures were also discussed, and the local authority advised they would like the temporary closures to be temporarily checked.
11/11/2019	Email	Discussions regarding proposed improvements to Public Rights of Way network as part of the A428 Scheme.
21/11/2019	Email	WCH proposals within BBC shared with Public Rights of Way Officer.
05/12/2019	Email	Cultural heritage: Copy of MOLA's WSI for the Phase 1 trenching sent to BBC, CBC, and CCC.
05/12/2019	Email	Cultural Heritage: Phase 1 WSI from MOLA shared with BBC.
09/12/2019	Meeting	Economic and Benefits Technical Working Group.
10/12/2019	Meeting	Strategic Road Users Technical Working Group.
11/12/2019	Meeting	Highways and Planning Technical Working Group.
13/12/2019	Email and file transfer	Cultural heritage: Phase 2 trenching plan sent to BBC, CBC, and CCC.
16/12/2019	Meeting	Walkers, Cyclists and Horse Riders Technical Working Group.
18/12/2019	Email	Cultural heritage: Response confirming AP report was not ready to be sent. Scope of Works sent to BBC and CBC.

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Date	Form of correspondence	Key topics discussed and key outcomes
18/12/2019	Email	Cultural heritage: Screen shot of slight amendment to Phase 2 trenches.
03/01/2020	Email	Drawings shared with BBC showing proposals for the creation of a service road from the BP filling station at Wyboston to the new Black Cat junction.
06/01/2020	Email	Request to BBC for fluvial, pluvial, groundwater, sewer, snowmelt, reservoir and other artificial flood sources.
08/01/2020	Email	Discussions with BBC regarding parking enforcements on the proposed new service road from the BP filling station at Wyboston to the new Black Cat junction.
10/01/2020	Email	Cultural Heritage: Comments received from BBC and CCC on A428 MOLA Evaluation WSI (Phase 1).
14/01/2020	Email	A428 Bedfordshire Watercourse Technical Note shared with BBC.
16/01/2020	Email	Updated Phase 1 WSI prepared by MOLA shared following comments by BBC, CBC, CCC.
24/01/2020	Email	Cultural Heritage: Further comments on Phase 1 WSI received from CCC and BBC.
24/01/2020	Email	Cultural Heritage: Confirmation that comments on WSI will be addressed and asked for any other comments from CCC and BBC. Work will start on site on 28/01/20.
28/01/2020	Email	Cultural Heritage: Email regarding CSCS cards and inductions.

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Date	Form of correspondence	Key topics discussed and key outcomes
28/01/2020	Email	Cultural Heritage: Email to BBC, CBC, and CCC confirming work had started, and that contingency can be accommodated as required. Informed curators of need for minor changes to Phase 1 trenches for safety reasons – info will be sent. Reminder that comments on Phase 2 trench layout were needed.
28/01/2020	Email	Cultural Heritage: Email from CCC (BBC and CBC copied) asking if the aerial photograph layer was available to inform comments.
28/01/2020	Email	Cultural Heritage: Email from CBC (CCC and CBC copied) trying to determine what AP info they have.
29/01/2020	Email	Cultural Heritage: AECOM confirmed AP layer not yet available. Requested info from CBC (BBC and CCC copied).
30/01/2020	Email	Confirmation BBC would like to enter into a Planning Performance Agreement (PPA).
05/02/2020	Email	Cultural heritage: Information from BBC regarding excavation works that have been carried out at the Black Cat Quarry.
06/02/2020	Email	Cultural heritage: Discussions with BBC regarding designating the A1 garage service road as a red route clearway.
06/02/2020	Email	Cultural heritage: Comments from BBC on phase 2 trenching layout received.
10/02/2020	Email	MOLA Report from week 2 of Phase 1 trial trenching shared with BBC.
10/02/2020	Email	Draft PPA shared with BBC.
12/02/2020	Email	Planning data provided by BBC to complete uncertainty log.
17/02/2020	Email	MOLA Report from week 3 of Phase 1 trial trenching shared with BBC.

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Date	Form of correspondence	Key topics discussed and key outcomes
17/02/2020	Email	Cultural heritage: Draft version of the Archaeological Desk Based Assessment shared BBC, CBC. And CCC for information.
17/02/2020	Email	Draft Desk-Based Assessment shared by HE.
24/02/2020	Email	MOLA Report from week 4 of Phase 1 trial trenching shared with BBC.
25/02/2020	Meeting	Economic and Benefits Technical Working Group.
02/03/2020	Email	MOLA Report from week 5 of Phase 1 trial trenching shared with BBC.
02/03/2020	Email	Cultural heritage: Geophysical survey reports sent to BBC, CBC, and CCC for comment.
03/03/2020	Meeting	Walkers, Cyclists and Horse Riders Technical Working Group.
03/03/2020	Email	EWP7 Archaeology WSI work package issued to BBC.
05/03/2020	Meeting	Local Authorities Traffic Meeting with BBC, CCC, and CBC. The project team presented information on the Stage 3 Model, including the model network and area of detailed modelling. The traffic forecasting process was explained and presented to the local authorities as well as the Model Cordon Data.
09/03/2020	Email	MOLA Report from week 6 of Phase 1 trial trenching shared with BBC.
10/03/2020	Email	List of developments provided by BBC for inclusion in the Environmental Impact Assessment (EIA) cumulative effects assessment.
12/03/2020	Meeting	Further to the meeting on 17 October 2019 a second meeting was held for the Flood Risk/ Water Management Technical Working Group. In this meeting each local authorities' watercourse was reviewed and discussed and the terms of reference for the group were finalised and agreed. The Environment Agency

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Date	Form of correspondence	Key topics discussed and key outcomes
		and Bedford Group of Drainage Boards were also in attendance.
16/03/2020	Email	MOLA Report from week 7 of Phase 1 trial trenching shared with BBC.
18/03/2020	Email	Remote sign off for two trenches in F14.
19/03/2020	Email	Geophysical Survey Report for Phases 1 and 2 shared with BBC.
23/03/2020	Email	MOLA Report from week 8 of Phase 1 trial trenching shared with BBC.
25/03/2020	Meeting	Meeting with BBC to discuss the restoration of the gravel pits near the Black Cat with the local authority. It was agreed that HE should assume that this site has been restored in all assessments.
30/03/2020	Email	MOLA Report from week 9 of Phase 1 trial trenching shared with BBC.
02/04/2020	Email	MOLA Report from week 10 of Phase 1 trial trenching shared with BBC.
03/04/2020	Email	Cultural heritage: Info from BBC regarding Covid related site visit requirements.
08/04/2020	Email	Request for further information from BBC regarding Bedford Business Park.
14/04/2020	Meeting	Archaeological Consultation Meeting with Historic England, BBC, CBC, and CCC which included discussion on Statements of Common Ground and how COVID-19 might impact archaeological investigation. An update was also provided on Phase 1 fieldwork and the archaeological potential and land access of various fields were discussed. Historic England were also in attendance.
16/04/2020	Email	MOLA Report from week 11 of Phase 1 trial trenching shared with BBC.
17/04/2020	Email	Remote sign off for trenches in F2, F5 and F29.



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Date	Form of correspondence	Key topics discussed and key outcomes
20/04/2020	Email	MOLA Report from week 12 of Phase 1 trial trenching shared with BBC.
23/04/2020	Email	Cultural heritage: WSI for Phase 2 trenching sent to BBC, CBC, and CCC.
27/04/2020	Email	Cultural heritage: WSI for Phase 2 prepared by MOLA shared with BBC and CBC.
29/04/2020	Email	Confirmation of no additional comments from BBC on WSI for Phase 2 prepared by MOLA.
30/04/2020	Email	Planner for May archaeological information shared.
01/05/2020	Email	MOLA Report from week 1 of Phase 2 trial trenching shared with BBC.
06/05/2020	Email	MOLA Report from week 2 of Phase 2 trial trenching shared with BBC.
07/05/2020	Email	Cultural heritage: Phase 3 geophysics and Phase 3 trench plan sent to BBC, CBC, and CCC.
11/05/2020	Email	Proposed environmental work packages for BBC shared.
11/05/2020	Email	EWP1 Major Developments work package issued to BBC.
11/05/2020	Email	First batch of work packages to BBC comprising: <ul style="list-style-type: none"> <li>• BBEWP1 Major Developments – Future Baseline.</li> <li>• BBEWP4 Public Health Information.</li> <li>• BBEWP7 Archaeology WSI and ATT sign off.</li> <li>• BBEWP12 Brook Cottages.</li> </ul>
13/05/2020	Email	Information from BBC regarding lease expiry date of the Black Cat quarry and updates regarding potential redevelopment of the site.

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Date	Form of correspondence	Key topics discussed and key outcomes
13/05/2020	Email	MOLA Report from week 3 of Phase 2 trial trenching shared with BBC
13/05/2020	Email	Cultural heritage: Comments from BBC on phase 3 trench layout received.
14/05/2020	Email	Cultural heritage: AECOM response to comments on Phase 3 trench layout.
18/05/2020	Email	MOLA Phase 1 Trenching Report shared with BBC.
19/05/2020	Email	Cultural heritage: Copy of phase 1 trenching report sent to BBC, CBC, and CCC.
19/05/2020	Email	Local Model Validation Report shared with BBC.
19/05/2020	Meeting	Traffic and Transport Meeting: LMVR and Modelling.
21/05/2020	Meeting	Cultural heritage: Archaeological Consultation Meeting with Historic England, BBC, CBC, CCC, and MOLA. MOLA gave a presentation on the results of the Phase 1 trenching. Attendees were informed that it was possible that not all trenching results would be available with the submission of the DCO and could be submitted as an addendum.
21/05/2020	Email	Cultural heritage: Slides from presentation earlier in the day sent to Historic England, BBC, CBC, and CCC.
22/05/2020	Email	MOLA Report from week 4 of Phase 2 trial trenching shared with BBC.
01/06/2020	Email	MOLA Report from week 5 of Phase 2 trial trenching shared with BBC.
05/06/2020	Email	Cultural Heritage: Comments from BBC on Phase 1 trenching report received.

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Date	Form of correspondence	Key topics discussed and key outcomes
08/06/2020	Email	The following work packages were issued to BBC: 1) Roxton Road and Bedford Road. 2) Roxton Road Link. 3) Kelpie Marine Access Road. 4) BP Service Road 2-way section. 5) Public Rights of Way.
10/06/2020	Meeting	Cultural Heritage: Meeting with BBC Archaeology & Conservation Officers to update project and discuss Brook Cottages investigation into potential for relocation. Historic England were also in attendance.
10/06/2020	Email	MOLA Report from week 7 of Phase 2 trial trenching shared with BBC.
18/06/2020	Email	MOLA Report from week 8 of Phase 2 trial trenching shared with BBC.
23/06/2020	Email	Cultural heritage: Phase 3 WSI sent to BBC, CBC, and CCC.
23/06/2020	Email	WSI for Phase 3 prepared by MOLA shared.
23/06/2020	Email	Updated uncertainty log assumptions shared with BBC.
23/06/2020	Meeting	Traffic and Transport meeting with BBC– LMVR and Modelling Workshop during which the project team ran through an overview of the Stage 3 Model including an overview of the base year model calibration and validation performance.
24/06/2020	Email	MOLA Report from week 9 of Phase 2 trial trenching shared with BBC.
24/06/2020	Letter	Supplementary Consultation Launch Communications.
24/06/2020	Email	Cultural heritage: Link for online consultation sent to BBC, CBC, and CCC.



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Date	Form of correspondence	Key topics discussed and key outcomes
25/06/2020	Meeting	Cultural Heritage Meeting with Historic England, BBC, CBC, and CCC regarding five sites (F9, F34, F44, F59 and F97) that would be targeted early for advanced construction activity including compounds, statutory diversions and borrow pits.
25/06/2020	Section 42 representation email from BBC Corporate Property Management Team Leader	Land matters: No objection to purchase of land for balancing Pond 16. Objection to purchase of land south of Black Cat Junction due to development potential. Purchase terms and access from new island.
01/07/2020	Email	Updated list of developments provided by BBC for inclusion in the EIA cumulative effects assessment.
02/07/2020	Email	Comments from BBC on WSI for Phase 3 prepared by MOLA.
13/07/2020	Email	Remote sign-off for trenches in F47 and F49.
17/07/2020	Email	MOLA Report from week 12 of Phase 2 trial trenching shared with BBC.
20/07/2021	Meeting	Meeting with BBC on the Outline Construction Traffic Management Plan
21/07/2020	Meeting	A meeting was held with BBC, CCC, and CBC to present the methodology adopted for the traffic forecasting and the results of the future forecasts to the local authorities.
24/07/2020	Email	Photos of trenches in F45 shared with BBC.
24/07/2020	Email	MOLA Report from week 13 of Phase 2 trial trenching shared with BBC.
27/07/2020	Meeting	A meeting was held with BBC to present a summary of the assessment of the wider traffic impacts and junction capacity modelling to be contained in the Transport Assessment (TA).

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Date	Form of correspondence	Key topics discussed and key outcomes
28/07/2020	Meeting	Cultural heritage: Joint meeting with Historic England and BBC heritage and archaeology officers to discuss scheme and programme updates.
29/07/2020	Email	MOLA Report from week 14 of Phase 3 trial trenching shared with BBC.
30/07/2020	Meeting	Local Economy Legacy Working Group.
30/07/2020	Email	Work package "CCCHWP15 LTN 1/20" issued to BBC for review and comment.
30/07/2020	Email	Work package "EWP8 ATT sign off" issued to BBC County Archaeologist for review.
03/08/2020	Email	Cultural heritage: Draft WSI for Brook Cottages issued to Historic England for comment with BBC copied in.
03/08/2020	Email	Work Package on Order Plans and Schedules issued to BBC
12/08/2020	Email	MOLA Report from week 16 of Phase 3 trial trenching shared with BBC.
12/08/2020	Email	Work package sent out to BBC for De-trunking plans.
14/08/2020	Email	EWP3 Noise work package issued to BBC EHO/Biodiversity teams
17/08/2020	Email	Cultural heritage: Meeting notes for 25 <sup>th</sup> June meeting sent to Historic England, BBC, CBC, and CCC.
19/08/2020	Email	MOLA Report from week 17 of Phase 3 trial trenching shared with BBC.
27/08/2020	Email	MOLA Report from week 18 of Phase 3 trial trenching shared with BBC.
02/09/2020	Email	MOLA Report from week 19 of Phase 3 trial trenching shared with BBC.

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Date	Form of correspondence	Key topics discussed and key outcomes
10/09/2020	Email	MOLA Report from week 20 of Phase 3 trial trenching shared with BBC.
10/09/2020	Meeting	Meeting with BBC to discuss de-trunking & re-classification of what will be the old A428; A428 between Wyboston and Cambridge Road, St Neots and A428 between Cambridge Road, St Neots and Caxton Gibbet.
16/09/2020	Email	MOLA Report from week 21 of Phase 3 trial trenching shared with BBC.
18/09/2020	Meeting	Cultural heritage: Meeting with Historic England, BBC, CBC, CCC, and MoLA regarding results of Phase 2 trenching – presentation by MoLA. A wider discussion on the evaluations was held, along with an update on the advance works.
22/09/2020	Email	Cultural heritage: Email to Historic England, BBC, CBC, and CCC with slides of phase 2 trenching presentation.
23/09/2020	Email	Cultural heritage: Email to Historic England, BBC, CBC, and CCC sending current draft of the archaeological strategy document prepared by Christopher Evans in advance of the meeting on 24-09-2020.
24/09/2020	Meeting	Cultural heritage - Archaeological Consultation Meeting with Historic England, BBC, CBC, CCC, and MoLA covering: <ul style="list-style-type: none"> <li>• Presentation by Chris Evans on the Rationale and Strategy.</li> <li>• Information on the form of the mitigation strategy.</li> <li>• A wider discussion regarding the mitigation strategy.</li> </ul>
30/09/2020	Email	Water courses work package issued to BBC Biodiversity/Drainage teams.
30/09/2020	Email	Cultural heritage: Email to Historic England, BBC, CBC, and CCC to share minutes of the Phase 2 trenching presentation.

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Date	Form of correspondence	Key topics discussed and key outcomes
30/09/2020	Email	Cultural heritage: Minutes of the meeting on the rational, strategy and mitigation shared with Historic England, BBC, CBC, and CCC.
02/10/2020	File transfer	Cultural heritage: Updated Phase 1 and 2 trenching reports, plus draft mitigation area figures, sent to Historic England, BBC, CBC, and CCC by file transfer.
16/10/2020	Meeting	Cultural Heritage meeting with Historic England, BBC, CBC, CCC, and MoLA discussing the results of Phase 3 trenching – presentation by MoLA.
21/10/2020	Email	Project Management work package “MWP1” issued to BBC for review.
27/10/2020	File transfer	Cultural heritage: Draft Phase 3 report sent to BBC, CBC, and CCC by file transfer.
29/10/2020	Meeting	Cultural heritage: Teams meeting with BBC, CBC, and CCC on archaeological review covering comments on the rational and strategy by BBC and CBC and discussion of mitigation areas proposed.
30/10/2020	Email	EWP3 Noise work package re-issued to BBC EHO/Biodiversity teams.
03/11/2020	Email	Carbon work package “BBCEWP14” issued to BBC for review.
10/11/2020	Meeting	Work Package meeting discussing biodiversity and landscape and visual aspects of the Scheme.
12/11/2020	Email	Work package “EWP2b” (landscaping) issued to BBC.

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Date	Form of correspondence	Key topics discussed and key outcomes
12/11/2020	Briefing	A meeting was held with BBC, CCC, CBC, SCDC, and HDC to provide a briefing on the draft Development Consent Order to highlight the key articles and provide an overview of the requirements. An overview of the structure of the Environmental Management Plan and explanation of the role of local authorities in the post submission process (covering Adequacy of Consultation responses and Local Impact Reports) was also provided.
20/11/2020	File transfer	Cultural heritage: Revised Phase 3 report sent to Historic England, BBC, CBC, and CCC by We Transfer and CCC file share.
25/11/2020	Meeting	Cultural heritage: meeting with BBC, CBC, and CCC.
25/11/2020	Meeting	Cultural Heritage meeting discussing the A428 evaluation reporting process for the A428 evaluation reporting process.
19/01/2021	Workshop	Meeting held with BBC to discuss the details of the de-trunking, including, signage, white lining, lighting. HE operations update was also provided. It was agreed that a draft legal agreement on the terms of the de-trunking would be shared with the local authority in due course
29/01/2021	Meeting	Meeting with BBC, CCC, and CBC to discuss the construction impacts of the Scheme. This included an outline of the construction management plan, local modelling (including details of junction assessments) and strategic modelling
03/02/2021	Briefing	Meeting with BBC, CCC, and CBC. Officers were briefed on a Scheme walk through which included mainline alignment design and reason for changes, junction locations and designs, key structures, public rights of way proposals, borrow pits and key constraints and design considerations. The structure of the DCO application and the key documents within it were also covered. A recap was provided on the role of local authorities in the post



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Date	Form of correspondence	Key topics discussed and key outcomes
		submission period, as well as an update on the draft legal agreements.
05/02/2021	Meeting	Meeting with BBC, CCC, and CBC in which the results of the Sensitivity Test were presented using the updated Uncertainty Log to demonstrate that the current forecasts continue to provide a robust basis for the Scheme assessment.
08/02/2021	Email	Email from HE to attendees of A428 BC to CG scheme walk through & content of application briefing on 3rd February with link to recording of the briefing.
09/02/2021	Meeting	The project team held a meeting with BBC archaeological officer to discuss site F3, an area south west of Black Cat roundabout, between Bedford Road and the A421 (north of Roxton).
15/02/2021	Email	Email from HE to attendees of A428 BC to CG scheme walk through & content of application briefing attaching actions from the briefing, confirming that plans for the Members Briefing will be announced soon.
23/02/2021	Email	Email from HE to attendees of Borrow Pits meeting attaching the draft Borrow Pits Options Report and outlining the agenda for Thursday's (25/02/2021) call.
25/02/2021	Phone call	Referenced in email on 23/02/2021 above.
20/05/2021	Meeting	Biodiversity update meeting covering roles in Examination, navigating the ES, the SoCG and biodiversity impacts, effects and mitigation. Meeting minutes were provided following the meeting on 25/05/2021.
08/06/2021	Meeting	Air quality and noise and vibration update meeting covering roles in Examination, navigating the ES, the SOCG and air quality and noise and vibration impacts, effects and mitigation. Meeting minutes were provided following the meeting on 15/06/2021.

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Date	Form of correspondence	Key topics discussed and key outcomes
15/06/2021	Meeting	Cultural heritage update meeting covering roles in Examination, navigating the ES, the SOCG and cultural heritage impacts, effects and mitigation. Meeting minutes were provided following the meeting on 17/06/2021.
23/06/2021	Meeting	Meeting to discuss the biodiversity elements of the SOCG and update the team on the landscape and visual effects assessment. Meeting minutes were provided following the meeting on 01/07/2021.
23/06/2021	Email	Email to HE asking why borrow pits are not being discussed as part of the Material Assets and Waste Update presentation.
25/06/2021	Email	Email from HE to BBC, CBC and CCC detailing a borrow pit technical note is being prepared and once issued HE will set up a specific meeting to discuss borrow pits.
June 2021	Letter from BBC to HE (via the Planning Inspectorate)	Letter from BBC detailing their Relevant Representation.
01/07/2021	Meeting	Material assets and waste update meeting with BBC, CBC and CCC covering roles in Examination, navigating the ES, the SOCG and material assets and waste impacts, effects and mitigation. Meeting minutes were provided following the meeting on 08/07/2021.
01/07/2021	Meeting	Initial Local Technical Review Group meeting.
01/07/2021	Joint meeting with BBC and CBC	Members Meeting - Construction Impacts on Traffic.
05/07/2021, 08/07/2021 and 27/07/2021	Email	Email to BBC requesting the names of specialist team members from BBC landscape, geology and soils, road drainage and water environment, climate and population and human health with a view to organising future SOCG meetings. No response received.
26/07/2021	Meeting	Meeting to discuss the cultural heritage elements of the SOCG. Meeting minutes were provided following the meeting on 29/07/2021.

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Date	Form of correspondence	Key topics discussed and key outcomes
27/07/2021	Meeting	Meeting to discuss the air quality and noise and vibration elements of the SOCG. Meeting minutes were provided following the meeting on 09/08/2021.
27/07/2021	Email	Email from HE to BBC asking for contact details for the relevant specialists within BBC to discuss landscape, geology and soils, road drainage and the water environment, climate and population and human health matters. No response received.
31/07/2021	Email	Email from HE to BBC sharing draft 1 of the SOCG for their comment.
05/08/2021	Meeting	Meeting to discuss operational noise modelling. HE provided a live demonstration of the operational noise modelling undertaken for the Scheme including model inputs, consideration of mitigation and model outputs. Meeting minutes were provided following the meeting on 11/08/2021.
05/08/2021	Email	Email from HE to BBC asking for availability for a construction noise modelling meeting.
06/08/2021	Email	Email from BBC to HE noting that the near future would be difficult given annual leave arrangements.
09/08/2021	Email	Email from HE to BBC sharing the location of the Borrow Pits Technical Note.
11/08/2021	Email	Email from BBC Archaeologist providing BBC comments on the HE comments on the joint brief.
11/08/2021	Email	Email from HE to BBC attaching minutes and presentation slides from the operational noise modelling meeting on 05/08/2021.



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Date	Form of correspondence	Key topics discussed and key outcomes
11/08/2021	Email	Email from BBC outlining their concern that the Barrister acting for HE told the Inspectors in the initial construction modelling meeting that there were no outstanding matters and no further details awaited by any consultees, as that is incorrect.
12/08/2021	Email	Emails between HE and BBC discussing availability for a meeting to discuss BBC specific matters arising from the forthcoming Senior Technical Review Group Meeting which BBC representatives could not attend.
12/08/2021	Email	Email from HE to BBC Archaeological Officer providing updates on landowner correspondence in relation to the excavation of areas "F9" and "F49".
13/08/2021	Meeting	Meeting between HE, BBC, CBC, the Cambridgeshire authorities on borrow pits and the additional information provided in the Borrow Pit Technical Note. Meeting minutes were provided following the meeting on 23/08/2021.
23/08/2021	Email	Email from National Highways (NH) to members of the Western Area Community Forum (includes BBC) following the meeting on 4 August 2021, attaching minutes and slides from the meeting.
25/08/2021	Email	Email from NH to attendees of meeting held on 23 June 2021, including BBC Conservation Officer, attaching minutes from the meeting which covered Heritage Issues. Historic England were also in attendance.
26/08/2021	Email	Email from NH to BBC asking for input to a position statement regarding Habitats Regulations Assessment (HRA) matters and mitigation following a meeting between NH and Natural England on 23.08.2021. The draft position statement was shared with BBC for input, as was a recording of the meeting between NH and Natural England. No response received regarding input to the position statement.

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Date	Form of correspondence	Key topics discussed and key outcomes
26/08/2021	Email	Email from NH to attendees of JAAB meeting on 12 August 2021(including BBC) attaching the minutes from the meeting.
07/09/2021	Email	Email from NH to BBC and Historic England providing an update on the progress with gaining access to Brook Cottages.
08/09/2021	Email	Email from BBC to NH and Historic England querying the survey for only one of the cottages at Brook Cottages.
08/09/2021	Email	Email from NH to BBC and Historic England confirming that the survey is proposed only for one cottage at Brook Cottages.
08/09/2021	Email	Email from Historic England to NH and BBC detailing Historic England's preference to agree a full program of investigation ahead of the survey.
30/09/2021	Meeting	Meeting with CCC, HDC, SCDC, BBC and CBC in response to Action 2 from the Issue Specific Hearing 3 (24 September 2021). Biodiversity issues discussion on drainage ponds and planting arrangement. Meeting minutes were provided following the meeting on 04 October 2021.
04/10/2021	Email	Position Statement detailing matters related to design principles and planting at attenuation basins circulated to BBC, other host authorities and Natural England for input at Deadline 3 of the Examination. BBC confirmed that they were satisfied with the detail within the Position Statement.
05/10/2021	Meeting	Meeting with BBC on Table 3 6 of the Statement of Common Ground relating to Highways, PRoW and WCH
19/10/2021	Email	Email from BBC to NH asking for the location of the noise monitoring information submitted to the Examination.
19/10/2021	Email	Email from NH to BBC signposting BBC to the noise monitoring information submitted to the Examination.

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Date	Form of correspondence	Key topics discussed and key outcomes
01-11-2021 and 08-11-2021	Email from National Highways to Historic England and Bedford Borough Council	Email from NH to Historic England and Bedford Borough Council issuing the scope for the second stage survey of Brook Cottages for review.
02/11/2021	Meeting	Meeting between National Highways (NH) and BBC to discuss updates to the SOCG for Examination Deadline 4.
02/11/2021	Meeting	Meeting with BBC re landowner consultation.
02/11/2021	Meeting	Meeting with BBC re landowner consultation.
02/11/2021	Email	Email from NH to BBC requesting SoCG meeting with BBC.
02/11/2021	Email	Email from NH to BBC and CCC confirming site visit to F44.
02/11/2021	Email	Email from NH to BBC with an updated D4 SoCG for comments in time for D5.
03/11/2021	Email	Email from NH to BBC with updated SoCG following 02/11/2021 meeting.
03/11/2021	Email	Email from BBC to NH advising they forward updated SoCG to Breedons.
04/11/2021	Email	Email from NH to BBC advising on flood compensation statement to be added to next version of the SoCG.
04/11/2021	Email	Email from BBC to NH seeking clarity of the statement being added to the next version of SoCG.
05/11/2021	Email	Email from CCC to BBC and NH confirming new site visit.
08/11/2021	Email	Email from NH to BBC and CCC following up request for comments Brook Cottages - Investigative Survey Scope.
08/11/2021	Email	Email from NH to BBC with Deadline 4 SoCG.
12/11/2021	Email	Email from NH to BBC on how to edit SoCG.

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Date	Form of correspondence	Key topics discussed and key outcomes
16/11/2021	Email	Email from NH to BBC with a revised SoCG.
16/11/2021	Email	Email from BBC to NH querying where the quarry gas pipeline has been addressed in the SoCG.
16/11/2021	Email	Email from NH to BBC advising on gas pipeline query.
16/11/2021	Email	Email from NH with D5 submitted SoCG and Deadline 6 working version.
16/11/2021	Email	Email from BBC to NH to say they are still available to meet on 18 November 2021 to discuss noise, highways and heritage issues.
16/11/2021	Email	Email from NH to BBC to arrange time for noise, highways and heritage issue meeting.
16/11/2021	Meeting	Meeting between NH and BBC to discuss updates to the SOCG for Examination Deadline 5.
17/11/2021	Email	Email from NH to BBC with tracked version of SoCG that was updated in their meeting.
18/11/2021	Meeting	Meeting between NH and BBC to discuss environmental updates (noise and vibration, air quality and cultural heritage) to the SOCG for Deadline 6.
18/11/2021	Emails	Emails from NH to BBC detailing the documents for BBC to review to update the noise and vibration elements of the SOCG, including the Applicant's response to written questions; Chapter 11, Noise and vibration and associated appendix 11.3; and the borrow pit excavation and restoration report.
18/11/2021	Email	Email from NH to BBC sign posting tracked change version of the AMS.
18/11/2021	Email	Email from NH to BBC to outline the plan for the Deadline 6 SoCG.

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Date	Form of correspondence	Key topics discussed and key outcomes
18/11/2021	Email	Email from NH to BBC signposting construction noise impact reporting and offering construction noise modelling meeting.
18/11/2021	Email	Email from BBC to NH regarding Deadline 6 plan and actions going forward.
22/11/2021	Email	Email from NH to BBC regarding New Kelpie Marina access bridge plans.
22/11/2021	Email	Email from BBC to NH requesting where they can find image included in email regarding Kelpie Marina Plan in DCO documents.
22/11/2021	Email	Email from NH to BBC sign posting where to find images for Kelpie Marina Plan in DCO documents.
22/11/2021	Email	Email from BBC to NH asking for clarification date for Deadline 6.
22/11/2021	Email	Email from NH to BBC detailing the date of Deadline 6 and proposing catch up prior to it
22/11/2021	Email	Email from NH to BBC with a meeting invite for a final check of the SoCG for Deadline 6.
22/11/2021	Email	Email from BBC to NH saying they are unavailable for the date suggested for the final SoCG check for Deadline 6.
22/11/2021	Email	Email from NH to BBC to suggest an alternative date for the final SoCG check for Deadline 6.
22/11/2021	Email	Email from BBC to NH to advise that the alternative date suggested will not be achievable.
22/11/2021	Email	Email from NH to BBC to note they understand issue with dates.
25/11/2021	Email	Email from NH to BBC to regarding A428 Scheme Housing Impacts for Brook Cottages and the hearings.



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Date	Form of correspondence	Key topics discussed and key outcomes
25/11/2021	Email	Email from BBC to NH acknowledging their email regarding A428 Housing Impacts and their attendance for the hearings.
29/11/2021	Meeting	NH and BBC Construction Impacts meeting discussing issues around construction traffic routes and noise and air quality during construction.
29/11/2021	Email	Email from NH to BBC following up on the construction noise information provided on 18 November 2021 and repeating offer a construction noise modelling meeting.
29/11/2021	Email	Email from BBC to NH regarding A428 Scheme Housing Impact with an update on the occupant of Brook Cottages social housing status.
29/11/2021	Email	Email from NH to BBC with an update version of the Deadline 6 SoCG requesting their to review.
30/11/2021	Email	Email from BBC to NH asking if the F44 site visit is going ahead.
30/11/2021	Email	Email from NH to BBC confirming F44 site visit.
30/11/2021	Email	Email from BBC to NH thanking them for confirming the site visit but mentioning an out of office for CBC.
30/11/2021	Email	Email from NH to BBC saying they will speak with CBC the following day and confirming they plan on attending site on the agreed upon date and outlining that visiting the following week instead would be difficult.
30/11/2021	Email	Email from BBC to NH stating that a visit the following week would not be suitable due to annual leave.
01/12/2021	Email	Email from NH to BBC, CCC and CBC advising a colleague is unable to attend the F44 site visit but they will still go ahead with the visit.
02/12/2021	Email	Email from BBC to NH regarding on the day site visit contact arrangements.

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Date	Form of correspondence	Key topics discussed and key outcomes
02/12/2021	Meeting	Meeting between NH and BBC regarding Landowner consultation.
03/12/2021	Email	Email from NH to BBC following up on earlier email regarding construction noise impact reporting, including the additional information provided in the Borrow Pit Excavation and Restoration Report submitted at Deadline 6 and repeating offer a demonstration of the construction noise model.
06/12/2021	Email	Email from NH to BBC with a link to the updated Deadline 6 version of the SoCG.
06/12/2021	Email	Email from NH to BBC issuing the draft Flood Risk Assessment Technical Note for comment.
07/12/2021	Email	Email from BBC to NH with a comment on the draft Flood Risk Assessment Technical Note regarding the location of the drawings within the appendices. National Highways subsequently attached the relevant drawings.
07/12/2021	Email	Email from National Highways to BBC with draft changes to Requirement 16.
08/12/2021	Email	Email from BBC to NH signposting amendments to the Deadline 6 SoCG and stating they will continue to amend when they return from leave.
08/12/2021	Email	Email from NH to BBC confirming they note the amendments.
09/12/2021	Email	Email from BBC to National Highways confirming receipt of draft changes to Requirement 16.
10/12/2021	Email	Email from NH to BBC to make them aware PINS has introduced a new Deadline 7 and that they are updating the SoCG references accordingly.
10/12/2021	Email	Email from BBC to NH advising them of a change they have made in the SoCG and attaching it for it to be added to the live document.

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Date	Form of correspondence	Key topics discussed and key outcomes
10/12/2021	Email	Email from NH to BBC thanking them for the amendment and confirming they will incorporate it into the live document.
13/12/2021	Email	Email from NH to BBC with a collated BBC responses on the Deadline 6 version of the SoCG ready to review in the meeting on 14 December 2021.
13/12/2021	Email	Email from NH to BBC with the latest principal inspection report for the River Ouse Crossing to Bedford Borough.
14/12/2021	Meeting	Meeting between NH and BCC to discuss response on Deadline 6 SoCG.
14/12/2021	Meeting	Meeting between NH and BBC to discuss Air quality and noise and vibration issues.
14/12/2021	Email	Email from BBC to NH with comments on the draft Flood Risk Assessment Technical Note regarding access at South Brook and Rockham Ditch.
15/12/2021	Email	Email from NH to BBC requesting who will represent BBC at the Senior Technical Review Group (STRG) meeting.
15/12/2021	Email	Email from BBC to NH to confirm who to send the invite for the STRG meeting.
15/12/2021	Email	Email from NH to BBC with a copy of the SoCG that was submitted at Deadline 6 and a working Deadline 9 version.
15/12/2021	Email	Email from BBC to NH confirming who could attend STRG meetings for them and asking what the issues may be.
17/12/2021	Email	Email from NH to BBC in response to comments about access in the draft Flood Risk Assessment Technical Note. National Highways asked for a clarification on which side of Rockham Ditch the IDB work from.



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Date	Form of correspondence	Key topics discussed and key outcomes
17/12/2021	Email	Email from NH to BBC saying that as there was no BBC representative at the Kelpie Marina Access Road Relocation meeting they will reschedule it for in the new year.
20/12/2021	Email	Email from NH to BBC with a working version of (new) Deadline 10 SoCG.
20/12/2021	Email	Email from NH to BBC requesting that the add all comments to the Deadline 10 working version of the BBC SoCG by 7 January 2022.
20/12/2021	Email	Email from NH to BBC outlining that Cambridgeshire and District have requested certain SoCG issues to be escalated to an STRG and asking if BBC have any SoCG issues they would like included.
21/12/2021	Email	Email from NH to BCC with a link to the borrow pits report submitted at Deadline 6.
21/12/2021	Email	Email from BBC to NH to notify them that meeting a deadline of 7 January 2022 to add comments to the Deadline 10 working version of the SoCG is unlikely due to staff leave.
22/12/2021	Email	Email from NH to BBC to provide an update programme and confirm that the STRG is on 7 January 2022 and that any agreements that come out of this will need to be updated in the SoCG.
23/12/2021	Email	Email from BBC to NH outlining concerns with the principal inspection report for the River Ouse Crossing to Bedford Borough.
05/01/2022	Email	Email from NH to BBC with documents and a link for the STRG meeting.
06/01/2022	Email	Email from NH to BBC asking who is the best person in the BBC LLFA team to contact regarding the A428 drainage.
06/01/2022	Email	Email from BBC to NH with a response to the clarification on the side of Rockham Ditch that the IDB work from.

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Date	Form of correspondence	Key topics discussed and key outcomes
07/01/2022	Meeting	Meeting between NH, Natural England, BBC, CBC and the Cambridgeshire authorities on bat crossing points.
11/01/2022	Email	Email from NH to BBC and Heritage England on the Brook Cottages Joint Position Statement.
12/01/2022	Email	Email from BBC to NH with comments on Brook Cottages Joint Position Statement.
13/01/2022	Email	Email from NH to BBC and Historic England with the results of the Brook Cottages asbestos survey and photographs showing information on the construction of the building.
13/01/2022	Email	Email from NH to BBC, Natural England, CBC and the Cambridgeshire authorities issuing the minutes from the bat crossing points meeting on 07/01/2022.
14/01/2022	Meeting	Meeting between NH, BBC and Historic England on Brook Cottages methodology scope and Requirement 16.
17/01/2022	Email	Email from NH to BBC and Heritage England issuing the version of the Brook Cottages Joint Position Statement and the Brook Cottages Heritage Strategy submitted to PINS at Deadline 8 of the Examination.
17/01/2022	Email	Follow up email from NH to BBC requesting their comments on the SOCG by COP or an update on when they can provide comments.
17/01/2022	Email	Email from BBC to NH advising they are unable to make any updates to the SOCG until the D8 submissions have been published by the ExA.
17/01/2022	Email	Email from NH to BBC advising they will make further updates to the SOCG and send it to them to review.
17/01/2022	Email	Email from BBC to NH asking for clarification that the BBC side of the SOCG will not be altered if they update the SOCG.

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Date	Form of correspondence	Key topics discussed and key outcomes
17/01/2022	Email	Email from NH to BBC advising that any updated to the SOCG at this point would be NH positions and not BBC positions. Also advising they would send the Joint Position Statement to them. Later that day.
17/01/2022	Email	Email from BBC to NH advising them that they have a version of the Joint Position Statement but they need to see NH's version to ensure they are the same.
17/01/2022	Email	Email from NH to BBC regarding the Joint Position Statement advising BBC that if after they've reviewed it there's anything they want to update in the SOCG based on this to let them know.
18/01/2022	Email	Email from BBC to NH advising that the SOCG will need to be signed off at director level and requesting dates NH plans on issuing final versions and when they will need it back.
18/01/2022	Email	Email from NH to BBC with SOCG timeline, programme and requesting details of who they would like invited to the SOCG sign off meeting.
19/01/2022	Meeting	Meeting between NH and BBC to discuss traffic modelling and outstanding points.
20/01/2022	Email	Email from NH to BBC with draft position statement on baseline monitoring requesting them to add their positions to the draft and return.
21/01/2022	Email	Email from NH to BBC with an updated version of the SOCG for review and updating.
24/01/2022	Email	Email from BBC to SOCG confirming receipt of the SOCG and advising they are still waiting to hear back on attendees for the final sign off meeting and they will update NH when they can.
24/01/2022	Email	Email from BBC to NH requesting a link to the Carbon Work Package 'BBCEWP14'

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Date	Form of correspondence	Key topics discussed and key outcomes
25/01/2022	Email	Email from CBC to NH and BBC with an updated construction baseline monitoring position statement draft which includes both CBC's and BBC's positions added.
25/01/2022	Email	Email from NH to BBC and CBC advising them that as they are not in agreement on the construction baseline monitoring positions that it would be more appropriate to change approach and submit separate statements.
27/01/2022	Email	Email from NH to BBC confirming that the Carbon Work Package 'BBCEWP14' was issued to BBC on 11/11/2020 and attaching the information again.
28/01/2022	Email	Email from NH to BCC with updated DCO and legal table extracted from the SOCG.
31/01/2022	Email	Email from NH to BBC requesting comments on the DCO and legal table to be returned with the main SOCG tomorrow (01/02/22).
01/02/2022	Email	Email from BBC to NH returning the SOCG with comments and highlighting a point about noise meetings in the SOCG they didn't agree with. Also advising they did not have time to review the DCO and legal table yet.
01/02/2022	Email	Email from NH to BBC repeating offer a construction noise modelling meeting.
02/02/2022	Email	Email from NH to BBC asking whether it would be possible to get comments back on the DCO and legal table by COP that day.
02/02/2022	Email	Email from BBC to NH confirming availability for a construction noise modelling meeting.
02/02/2022	Email	Email from NH to BBC confirming a construction noise modelling demonstration meeting will take place on 7/2/2022.

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Date	Form of correspondence	Key topics discussed and key outcomes
04/02/2022	Meeting	NH meeting with Cambridgeshire Joint Authorities, BBC and CBC to present revised constructions and operational monitoring results having taken into account a GERT model.
07/02/2022	Meeting	NH meeting with BBC regarding noise and vibration (construction noise model demonstration).
07/02/2022	Email	Email from NH to BBC with the presentation slides from the construction noise model discussion and supporting information on borrow pits.
08/02/22	Email	Email from NH to BBC regarding reinstatement and length of occupation of temporary possession land.

- 2.1.2 It is agreed that this is an accurate record of the key meetings and consultation undertaken between (1) National Highways and (2) BBC in relation to the issues addressed in this SoCG.
- 2.1.3 The issues and matters highlighted in Section 3 of this SoCG summarise the key issues that have been identified in relation to a number of key areas of the DCO application.

### 3 Issues Raised

**Table 3-1 – DCO and Legal Matters**

Issue	Document Reference	National Highways Position	Bedford Borough Council Position	Status	Date
Draft DCO Definitions	Draft Development Consent Order [APP-025]	The draft DCO (dDCO) definitions are appropriate for the Scheme.		Agreed	
Draft DCO Articles/powers sought	Draft Development Consent Order [APP-025]	<p>The articles and schedules in the dDCO contain those powers required by National Highways to deliver the Scheme. The powers sought are appropriate for the Scheme.</p> <p>The requirement to maintain the register for three years after the completion of the authorised development is a standard requirement for development consent orders made. There is precedent for this approach in the A1 Birtley to Coal House Development Consent Order 2021, the A19 Downhill Lane Junction Development Consent Order 2020, the M42 Junction 6 Development Consent Order 2020.</p>	<p>The undertaker is only required to maintain a register for a period of three years following the completion of the authorised development. Local authorities are required to maintain a register of planning applications and decisions with no end date.</p> <p>The aftercare period for maintaining the landscaping may still apply after the requirement to keep a record of the approved details has expired.</p>	Not agreed	



Issue	Document Reference	National Highways Position	Bedford Borough Council Position	Status	Date
Draft DCO Requirements	Draft Development Consent Order [APP-025]	<p>The requirements set out in Part 1 of Schedule 2 of the dDCO are appropriate and provide a suitable framework for securing the necessary and relevant environmental mitigation measures and other environmental control measures.</p> <p>The procedures for discharge requirements as set out in Part 2 of Schedule 2 of the dDCO are appropriate and satisfactorily involves Bedford Borough Council (BBC) as a consultee.</p>	<p>The procedure for the discharge of requirements (Requirement 22) places the authority for approval on the Secretary of State. It is questioned why it is considered that the Secretary of State should be the decision maker in matters of such detail rather than the relevant local authority.</p>	Not agreed.	
Draft DCO Requirements 3 and 4	Draft Development Consent Order [APP-025]	<p>The provisions in Requirements 3 and 4 are sufficient to ensure the appropriate controls are in place in relation to the construction and maintenance of the Scheme.</p> <p>The EMP is a highly detailed document and has been updated throughout the Examination in response to comments by Interested Parties.</p> <p>National Highways has submitted at Deadline 6 and 9 a revised First Iteration EMP which now includes a Borrow Pit Management Plan [REP9-009] [REP9-010].</p>	<p>The Council is concerned that the only control over the borrow pits appears to be through the Environmental Management Plan (EMP). The EMP sets out a list of standard practices that could be applied to any similar development and is not site specific. The EMP contains no assessment of any potential impacts. The DCO contains two requirements for iterations of the EMP. Whilst the second iteration EMP may be expected to contain more detail on the borrow pits proposals, it is not clear what further impact assessments will be provided at this stage. This brings into</p>	Not agreed	

Issue	Document Reference	National Highways Position	Bedford Borough Council Position	Status	Date
		<p>National Highways position regarding borrow pit restoration is contained within National Highways comments on submissions received at deadline 8 [REP9-026].</p> <p>Where the Borrow Pits Excavation and Restoration Report [REP3-011] contains relevant management information, this has been included in the Borrow Pits Management Plan, which is already secured in the DCO through Requirement 3. Accordingly, it is not necessary to secure the Borrow Pits Excavation and Restoration Report.</p> <p>The Applicant's position regarding borrow pit restoration is contained within Applicant's Comments on submissions received at deadline 8 [REP9-026].</p>	<p>question whether the DCO currently contains a sufficient description of the proposal or a proper environmental assessment.</p>		
Draft DCO Requirement 16 – Brook Cottages	Draft Development Consent Order [APP-025]	National Highways has updated Requirement 16 following consultation with BBC to ensure that it reflects the latest information available and the proposed steps to be taken in relation to Brook Cottages after consent is granted. This ensures the appropriate steps are taken with regards to Brook	There remains concern that this should not be a matter reserved for a Requirement, given the great weight afforded to its conservation and the need for clear and convincing justification for harm. Only in exceptional circumstances should a scheme proposing substantial harm to the significance of a designated heritage asset be supported, however in the absence of a detailed	Agreed	

Issue	Document Reference	National Highways Position	Bedford Borough Council Position	Status	Date
		<p>Cottages, the intrusive surveys and its potential relocation.</p> <p>The Joint Position Statement on methodology, practicalities and the value of relocating Brook Cottages <b>[REP8-017]</b> was submitted at Deadline 8.</p> <p>This updated Requirement was included in the dDCO submitted at Deadline 9 <b>[REP9-004]</b>.</p>	<p>survey the actual scale of loss/harm is not known – it is possible that a lower degree of harm may arise. This has potential ramifications for how the application is determined (para 200 or 201 of the NPPF).</p> <p>2(a) potentially suggests a bias towards relocating to a museum (note ‘receptor’). The Requirement should require the applicant to also consider potential sites within the vicinity of its existing location, to allow for its continued use as a dwelling within a context similar to the existing, as this may be more appropriate in terms of the building’s conservation.</p> <p>Given that there is unlikely to be further information submitted within the timeframe of the Examination which will inform of the potential impact of the development on the significance of Brook Cottages, Requirement 16 now appears to be the only option to secure a pathway for the potential relocation of the listed building. As things currently stand, the wording of the Requirement may need to be altered to provide further detail but it is agreed that the wording does provide</p>		

Issue	Document Reference	National Highways Position	Bedford Borough Council Position	Status	Date
			<p>a basic framework for the appropriate steps.</p> <p>15/02/2022 – The Council considers the re-worded Requirement and supporting documents <b>[REP8-017 and REP8- 021]</b> to be acceptable.</p>		
Draft DCO Protective Provisions	Draft Development Consent Order <b>[APP-025]</b>	The protective provisions, as set out in Part 3 of Schedule 9 of the dDCO, that are relevant to BBC relate to its role as the Lead Local Flood Authority (LLFA). The protective provisions are appropriate for the protection of ordinary watercourses.		Agreed	
Draft DCO Associated consents/licenses /permits	Draft Development Consent Order <b>[APP-025]</b>  Consents and Agreements Position Statement <b>[APP-029]</b> as updated <b>[TR010044/APP/3.3]</b>	The Consents and Agreements Position Statement as updated at Deadline 10 <b>[TR010044/APP/3.3]</b> identifies the consents, licences or permits that National Highways will need to obtain outside of the dDCO in order to deliver the Scheme. This document contemplates the disapplication of specific legislation on the basis that those powers are contained within the dDCO and sets out where such disapplication has been consented. This approach is appropriate for the Scheme.		Agreed	

Issue	Document Reference	National Highways Position	Bedford Borough Council Position	Status	Date
Legal agreement with BBC – Detrunking		<p>The draft legal agreement between BBC and National Highways provides a framework for the process of de-trunking the existing A428, part of which will become a local road to be maintained by BBC.</p> <p>The draft legal agreement also provides a mechanism for handing over the local roads constructed as part of the Scheme that are to be maintained by BBC as local highway authority. The measures contained in this agreement are appropriate for the Scheme.</p> <p>BBC has advised on 21 January 2022 it now seeks to adopt the draft legal agreement currently being negotiated with Cambridgeshire County Council. Whilst National Highways does not agree this is the best approach to securing bespoke terms with BBC, National Highways will continue to seek engagement with BBC on this basis. Following the meeting between National Highways and Cambridgeshire County Council (CCC) on 20 January 2022 the timetable to progressing the draft legal agreement to conclude the agreement prior to Deadline 10, and</p>		Agreed subject to ongoing discussions on the legal agreement.	

Issue	Document Reference	National Highways Position	Bedford Borough Council Position	Status	Date
		the draft agreement itself, are with CCC to respond.			
Draft DCO Requirements Traffic Monitoring Construction Phase	Draft Development Consent Order <b>[APP-025]</b>  First Iteration Environmental Management Plan <b>[APP-234]</b> (see also version 2 submitted to Examination at Deadline 6 and version 3 at Deadline 9 <b>[REP9-009]</b> )	National Highways has submitted the Monitor and Manage Technical Note at Deadline 6 <b>[REP6-041]</b> , response to ExA's third written questions <b>[REP8-014]</b> , together with a position statement on construction phase monitoring <b>[REP9-036]</b> which provides further detail in relation to the monitor and manage approach for the Scheme.	BBC support CCC's seeking of a requirement within the DCO requiring, prior to the commencement of the works, the agreement of a Construction Phase monitor and manage plan. Draft joint wording from the local highway authorities (LHAs) has been sent to NH and was submitted at Deadline 6.	Not agreed	



Issue	Document Reference	National Highways Position	Bedford Borough Council Position	Status	Date
Draft DCO Requirements Traffic Monitoring Operational Phase	Draft Development Consent Order <b>[APP-025]</b>  First Iteration Environmental Management Plan <b>[APP-234]</b> (see also version 2 submitted to Examination at Deadline 6 and version 3 at Deadline 9 <b>[REP9-009]</b> )	National Highways has submitted the Monitor and Manage Technical Note at Deadline 6 <b>[REP6-041]</b> , response to ExA's third written questions <b>[REP8-014]</b> , together with a position statement on operational phase monitoring <b>[REP9-034]</b> which provides further detail in relation to the monitor and manage approach for the Scheme.	BBC support CCC's seeking of a requirement within the DCO requiring, prior to the commencement of the works, the agreement of an Operational Phase monitor and manage plan. Draft joint wording from the local highway authorities (LHAs) has been sent to NH and was submitted at Deadline 6.	Not agreed	

**Table 3-2 – Compulsory Acquisition and Property Matters**

Issue	Document Reference	National Highways Position	Bedford Borough Council Position	Status	Date
Compulsory Acquisition and Temporary Possession	The Statement of Reasons (SoR) [APP-030] and Book of Reference [APP-032].	<p>In order to deliver the Scheme, should the Development Consent Order be made, it would be necessary to temporarily possess and/or acquire land and/or rights owned by Bedford Borough Council. Land Plots in which BBC has an interest, that would be subject to the compulsory acquisition (CA) of land and/or rights are identified in the Book of Reference [APP-032] and Schedule 2 of the Statement of Reasons (SoR) [APP-030]. The extent of the land take identified is required for the Scheme or is required to facilitate or is incidental to the Scheme.</p> <p>National Highways is currently awaiting a response from BBC with regards to a draft option agreement and an acquisition value for the permanent land take. Additionally, we will continue discussions to acquire rights affected through negotiation, outside the CA process.</p> <p>Due to existing tenancies on the land BBC have confirmed that they are unable to enter into a voluntary agreement in respect of the temporary</p>	BBC have requested to enter into an agreement on the terms of National Highway’s temporary possession of plot 1/8q in order to provide BBC with certainty pursuant to their employment use development aspirations for this land. The land is tenanted however an agreement which does not create an interest in land is a practicable solution. National Highways have undertaken to respond by 2 February 2022.	Not Agreed	

Issue	Document Reference	National Highways Position	Bedford Borough Council Position	Status	Date
		<p>possession areas at a meeting on 19/01/22.</p> <p>National Highways wrote to BBC on 08/02/22 stating it was obliged under the dDCO to reinstate temporary possession land to the reasonable satisfaction of the landowner. This would require programme engagement but any reinstate would be subject to any obligations or requirements set out in the dDCO.</p> <p>National Highways also confirmed the dDCO required the land to handed back within 12 months of the completion of the works.</p>			
Flood Compensation	BBC Relevant Representation [RR-008]	<p>The Environmental Statement, Appendix 13.4 (Flood Risk Assessment (FRA)) [APP-220], in paragraph 4.7.8 (and Section 5.3) explains that the floodplain storage compensation assessment is based upon the Environment Agency's climate change guidance. Paragraph 7.2.4 of the FRA explains that the River Great Ouse floodplain compensation area is designed to compensate for the displacement of the floodplain as a result of the raised embankment. The compensatory</p>	<p>Approximately 12 hectares identified for permanent acquisition. The Council objects to the detail of the Scheme proposals because the permanent acquisition of the Land for flood compensation is not reasonably necessary in the circumstances. The case of 'R(oao FCC Environment (UK) Ltd) v Secretary of State for Energy &amp; Climate Change [2015] EWCA Civ 55' considered, among other things, the statutory requirement in S.122(3) of the 2008 Act. In the decision in that case the example was provided that a compelling</p>	Agreed	

Issue	Document Reference	National Highways Position	Bedford Borough Council Position	Status	Date
		<p>flood storage areas are shown on Figures 8.1 and 8.2 of the FRA.</p> <p>All land required for floodplain compensation has been included in the Order limits and is set out in the Book of Reference (BoR) [APP-032], over which compulsory acquisition powers are sought. The area being proposed for flood storage has been derived from modelling results.</p> <p>National Highways does not agree with Bedford Borough Council's (BBC's) assertion that the area identified for flood mitigation appears excessive. It is stated in paragraph 5.3.3 of the Statement of Reason (SoR) [APP-030] that the land included in the draft Development Consent Order (DCO) is the minimum land-take necessary to achieve the objectives of the Scheme. National Highways has sought to achieve a balance between minimising land-take and securing sufficient land to deliver the Scheme, noting that the detailed design of the Scheme has yet to be undertaken. The limits of the Land subject to compulsory acquisition have been drawn as tightly as possible in order to avoid unnecessary land take. National Highways has ensured that only land</p>	<p>case in the public interest may not be demonstrated where acquisition of a right over the land, rather than its acquisition, would suffice. The temporary acquisition of this part of the Land by agreement would be sufficient and the Council is ready to negotiate with the Applicant to enter into covenants or management agreements necessary to satisfy the Applicant's requirements here in the long term.</p> <p>At a meeting between the Council's agent and the Applicant (11 August 2020) the possibility of the flood compensation requirement being satisfied by temporary possession and rights was discussed. It was agreed that the Applicant would provide details of requirements for flood compensation management as required in order to progress negotiations for the provision of land and rights needed for the Scheme by agreement. To date these details are still awaited.</p> <p>Generally, the area identified for Flood compensation appears excessive and the Council seeks this be reduced or to see evidence that this is fully justified.</p>		

Issue	Document Reference	National Highways Position	Bedford Borough Council Position	Status	Date
		<p>that is essential to construct and deliver the Scheme has been included in the Book of Reference (BoR). The BoR explains in paragraph 2.5.6 that all of the land in the Order limits is required in order to deliver the Scheme. However, should it transpire that any part of the Land within the Order limits is not required for the Scheme, for example during the detailed design stage, National Highways would only seek to acquire that part of the land required, and in all events, will seek to minimise the effects on land interests.</p> <p>As the land required for flood compensation would be required in perpetuity, the rights that would be available through temporary possession would not be sufficient to guarantee that the land remains as flood compensation land in the long term. In addition, National Highways needs clean title of the land that is to be incorporated into the Scheme. Temporary Possession would not provide certainty to National Highways that the land is not encumbered by any historic rights on or over the land.</p>			

Issue	Document Reference	National Highways Position	Bedford Borough Council Position	Status	Date
		<p>Further discussed at a meeting with BBC on 02/11/21.</p> <p>National Highways has considered the request of BBC to retain ownership of the Flood Compensation Area and has concluded that as essential mitigation land, any disposal or changes would expose the company to potential criminal sanction for breach of the terms of the planning consent, if the landowner failed to maintain our obligations. At a meeting of 19 January 2022 BBC confirmed they would not maintain an objection to the permanent acquisition of this land.</p>			
Quarry Reinstatement		<p>National Highways has investigated potential options to work with Breedons (quarry operators) to vary the planning conditions in terms of reinstatement post quarry operations. However, engagement with the Environment Agency has concluded that if quarry reinstatement does not happen the Scheme would be required to undertake additional assessment and provide additional flood compensation. As a result, National Highways will not be seeking to vary the existing planning consent.</p>		Agreed	Email 02/11/21



Issue	Document Reference	National Highways Position	Bedford Borough Council Position	Status	Date
		<p>The Scheme does not prevent the restoration of the quarry in accordance with existing planning conditions.</p> <p>National Highways has confirmed that BBC will be invited to future meetings with Breedons.</p> <p>National Highways has reached agreement with Breedons that quarry levels will be restored in accordance with existing planning conditions.</p>			
Access from Black Cat Junction	BBC Relevant Representation [RR-008]	<p>This issue was discussed on a Teams meeting on 25 June 2021 with Carter Jonas where it was confirmed the extent of the public highway runs from the junction at 1/9c through the blue area at 1/8p to plot 1/8q, all shown on Sheet 1 of the Land Plans [APP-008], owned by Bedford Borough Council. Once the works are finished the Applicant will ensure that the Council owned access abuts public highway, thus providing the continued ownership as requested.</p> <p>The Scheme proposals do not preclude development of the land in question. However, with no development proposal in place or included within the approved Local Plan, the Scheme is not able to take</p>	<p>The Council seeks commitments from the Applicant to safeguard delivery of the full potential of the Land (in particular in respect of plot 1/8q) for a sustainable strategic employment development. To date there has been engagement between the parties, but no tangible commitments from the Applicant to safeguard suitable access to the Land from the new junction. The Council, in its capacity as a directly affected landowner, therefore objects to the detail of the Scheme including any recourse to the use compulsory purchase powers until such safeguards are agreed.</p>	Not agreed	

Issue	Document Reference	National Highways Position	Bedford Borough Council Position	Status	Date
		<p>into account the Council's aspirations until further definition is available. National Highways routinely manages new development in proximity to the Strategic Road network and the Council has been advised of the statutory process to be observed which will enable development to be considered.</p> <p>National Highways understands that BBC are nearing a position where they can submit a development proposal. This will be reviewed alongside the Proposals Business Case, in collaboration with National Highways Operational Division when received.</p> <p>National Highways A428 team has held a joint meeting with the Council and the Operational Division to enable direct engagement with the team who will review any planning application. We expect this engagement to be ongoing as the proposals develop.</p>			

Issue	Document Reference	National Highways Position	Bedford Borough Council Position	Status	Date
Landlocked Land Plots 3/3b & 3/3c		<p>National Highways have offered BBC acquisition of the landlocked land or permanent rights to access it.</p> <p>The route of the Right of Access is open for discussion.</p> <p>National Highways and BBC are exploring acquisition of the land and assigning a right of pre-emption or an option agreement for BBC.</p> <p>National Highways have not had a response on this issue from BBC so presume the matter is not agreed.</p>	BBC are currently considering their position.	Not agreed.	Meeting 02/11/21
Land required for Highways		<p>National Highways has confirmed that BBC owned land will directly adjoin the Highway.</p> <p>National Highways sent through a Heads of Terms for BBC to review by 05/11/21. National Highways requests BBC to provide estimated value of land with evidence to support valuation.</p> <p>National Highways and BBC are also considering agreement of compensation within Heads of Terms and acquisition through GVD.</p>		Agreed	Meeting 02/11/21

Issue	Document Reference	National Highways Position	Bedford Borough Council Position	Status	Date
Land required for Highways		<p>National Highways and BBC are considering agreement of compensation within Heads of Terms and acquisition through GVD.</p> <p>On 19 January 2022 BBC agreed that a voluntary agreement could not be entered into due to the tenancies currently in place on the land, and have no objection to the use of CA powers by NH.</p>		Agreed.	<p>14/02/22            Meeting            02/11/21</p>

**Table 3-3 – Transport Matters**

<b>Issue</b>	<b>Document Reference</b>	<b>National Highways Position</b>	<b>Bedford Borough Council Position</b>	<b>Status</b>	<b>Date</b>
Base Year Traffic Model – Data	Transport Assessment Report – Part 1 [APP-241] Transport Assessment – Part 2 [APP-242]	The Base Year model is underpinned by good quality data that provides a sound basis for model calibration and validation.	BBC has been kept informed of the development of the traffic model for the scheme and is in agreement with how it reflects the situation in Bedford Borough in current and future years.	Agreed	Confirmed in BBC Relevant Representation – 23 June 2021
Base Year Traffic Model – Fit for Purpose	Transport Assessment Report – Part 1 [APP-241] Transport Assessment – Part 2 [APP-242]	The Base Year has been developed in accordance with DfT TAG procedures and meets the required TAG standards for validation. It gives a reliable representation of base year conditions within the study area. It therefore provides a sound foundation for the development of future traffic flows for assessment of the Scheme.	BBC has been kept informed of the development of the traffic model for the scheme and is in agreement with how it reflects the situation in Bedford Borough in current and future years.	Agreed	Confirmed in BBC Relevant Representation – 23 June 2021
Future Year Traffic Models – Fit for purpose	Transport Assessment Report – Part 1 [APP-241] Transport Assessment – Part 2 [APP-242]	The future year models fully comply with DfT TAG methods. They provide a reliable forecast of future traffic flows and the impact of the Scheme as reported in the Transport Assessment and Transport Assessment Annex.	BBC has been kept informed of the development of the traffic model for the scheme and is in agreement with how it reflects the situation in Bedford Borough in current and future years.	Agreed	Confirmed in BBC Relevant Representation – 23 June 2021

Issue	Document Reference	National Highways Position	Bedford Borough Council Position	Status	Date
Future Year Traffic Model – Sensitivity Test	Transport Assessment Report – Part 1 [APP-241] Transport Assessment – Part 2 [APP-242]	The sensitivity test carried out using the updated 2020 Uncertainty Log does not result in any significant differences in forecasts flows when compared to the results using the 2018 Uncertainty Log data. This demonstrates that the assessments for the Scheme using the 2018 Uncertainty Log data as submitted are robust and it is appropriate for the Scheme to continue to rely on the 2018 UL Data forecasts.	BBC has been kept informed of the development of the traffic model for the scheme and is in agreement with how it reflects the situation in Bedford Borough in current and future years.	Agreed	Confirmed in BBC Relevant Representation – 23 June 2021
Transport Assessment Methodology	Transport Assessment Report – Part 1 [APP-241] Transport Assessment – Part 2 [APP-242]	The Transport Assessment methodology adopted follows best practice and provides a reasonable indication of the outcomes arising from the Scheme.  National Highways consider this matter to be agreed as confirmed by BBC during ISH 3.	BBC is satisfied that the Transport Assessment methodology as set out in APP-241 and APP-242 follows best practice and provides a reasonable indication of the outcomes arising from the scheme	Agreed	05.10.21
Transport Assessment Data collection methods	Transport Assessment Report – Part 1 [APP-241] Transport Assessment – Part 2 [APP-242]	Sufficient data has been collected in order to inform the Transport Assessment and the Transport Assessment Annex in relation to the Scheme.  National Highways consider this matter to be agreed as confirmed by BBC during ISH 3.	BBC is satisfied that sufficient data has been collected to inform the Transport Assessment and the Transport Assessment Annex in relation to the scheme.	Agreed	05.10.21



Issue	Document Reference	National Highways Position	Bedford Borough Council Position	Status	Date
Transport Assessment Baseline Data	Transport Assessment Report – Part 1 [APP-241] Transport Assessment – Part 2 [APP-242]	Where applicable, the Base Year junctions models are underpinned by good quality data that provides a sound basis for model calibration and validation.  (Where Baseline Data is not utilised the assessment is based on outputs from the strategic model).  National Highways consider this matter to be agreed as confirmed by BBC during ISH 3.	BBC is satisfied that the Base Year junction models within Bedford Borough are underpinned by good quality data and provide a sound basis for model calibration and validation.	Agreed	05.10.21
Transport Assessment Approach to modelling	Transport Assessment Report – Part 1 [APP-241] Transport Assessment – Part 2 [APP-242]	The Transport Assessment approach to modelling follows best practice and provides a reasonable indication of the outcomes arising from the Scheme.  National Highways consider this matter to be agreed as confirmed by BBC during ISH 3.	BBC has been kept informed of the development of the traffic model for the scheme and is in agreement with how it reflects the situation in Bedford Borough in current and future years.	Agreed	05.10.21
Transport Assessment Assumptions	Transport Assessment Report – Part 1 [APP-241] Transport Assessment – Part 2 [APP-242]	The assumptions adopted within the Transport Assessment follows best practice and provides a reasonable indication of the impacts arising from the Scheme.  National Highways consider this matter to be agreed as confirmed by BBC during ISH 3.	BBC has been kept informed of the development of the traffic model for the scheme and the adopted assumptions, and is in agreement with how it reflects the situation in Bedford Borough in current and future years.	Agreed	05.10.21

Issue	Document Reference	National Highways Position	Bedford Borough Council Position	Status	Date
Transport Assessment Presentation of results	Transport Assessment Report – Part 1 [APP-241] Transport Assessment – Part 2 [APP-242]	The Transport Assessment results presented are a fair reflection of the results obtained from the modelling undertaken.  National Highways consider this matter to be agreed as confirmed by BBC during ISH 3.	BBC is satisfied that the Transport Assessment results presented for Bedford Borough are a fair reflection of the results obtained from the modelling undertaken.	Agreed	05.10.21
Transport Assessment Quantification of impacts	Transport Assessment Report – Part 1 [APP-241] Transport Assessment – Part 2 [APP-242]	The quantification of impacts presented within the Transport Assessment is a reliable indication of the impacts arising from the Scheme.  National Highways consider this matter to be agreed as confirmed by BBC during ISH 3.	BBC is satisfied that the quantification of impacts presented within the Transport Assessment is a reliable indication of the impacts arising from the Scheme within Bedford Borough.	Agreed	05.10.21
Transport Assessment Construction impacts general	Transport Assessment Report – Part 1 [APP-241] Transport Assessment – Part 2 [APP-242]	The Transport Assessment methodology adopted with regard to impacts predicted to arise during the construction phases provides a reasonable indication of the impacts arising from the Scheme.  National Highways consider this matter to be agreed as confirmed by BBC during ISH 3.	BBC is satisfied that the Transport Assessment methodology adopted with regard to impacts predicted to arise during the construction phases provides a reasonable indication of the impacts arising from the Scheme.	Agreed	05.10.21

Issue	Document Reference	National Highways Position	Bedford Borough Council Position	Status	Date
Transport Assessment Construction impacts approach to modelling	Transport Assessment Report – Part 1 [APP-241] Transport Assessment – Part 2 [APP-242]	The modelling presented in the Transport Assessment with regard to impacts during the construction phases provides a reasonable indication of the impacts predicted to arise from the Scheme.  National Highways consider this matter to be agreed as confirmed by BBC during ISH 3.	BBC is satisfied that the modelling presented in the Transport Assessment with regard to impacts during the construction phases provides a reasonable indication of the impacts predicted to arise from the Scheme within Bedford Borough.	Agreed	05.10.21
Transport Assessment Junction Operational Assessments at: Black Cat Cambridge Road Caxton Gibbet	Transport Assessment Report – Part 1 [APP-241] Transport Assessment – Part 2 [APP-242]	The operational assessment modelling presented within Transport Assessment with regard to new or modified junctions provides a reasonable indication of the predicted operation of individual junctions.  National Highways consider this matter to be agreed as confirmed by BBC during ISH 3.	BBC is satisfied that the operational assessment modelling presented within Transport Assessment with regard to new or modified junctions provides a reasonable indication of the predicted operation of the Black Cat junction.	Agreed	05.10.21
Transport Assessment Wider impacts Quantification of impacts: A428 Wyboston Roundabout	Transport Assessment Annex [APP-243]	The quantification of impacts presented within the Transport Assessment Annex is a reliable indication of the impacts arising from the Scheme.  National Highways consider this matter to be agreed as confirmed by BBC during ISH 3.	BBC is satisfied that the quantification of impacts presented within the Transport Assessment Annex is a reliable indication of the impacts arising from the Scheme.	Agreed	05.10.21

Issue	Document Reference	National Highways Position	Bedford Borough Council Position	Status	Date
A428 Barford Road Roundabout					
Transport Assessment Wider impacts: A428 Wyboston Roundabout A428 Barford Road Roundabout	Transport Assessment Annex [APP-243]	<p>The operational assessment modelling presented within the Transport Assessment Annex with regard to existing junctions provides a reasonable comparison of the predicted operation of individual junctions without and with the Scheme.</p> <p>National Highways consider this matter to be agreed as confirmed by BBC during ISH 3.</p>	<p>BBC is satisfied that the operational assessment modelling presented within the Transport Assessment Annex with regard to existing junctions provides a reasonable comparison of the predicted operation of individual junctions without and with the Scheme.</p>	Agreed	05.10.21

**Table 3-4 – Environment Matters**

Issue	Document Reference	National Highways Position	Bedford Borough Council Position	Status	Date
<p><b>General</b> Description of the Scheme</p>	<p>Chapter 2, The Scheme <b>[APP-071]</b></p>	<p>An Environmental Impact Assessment (EIA) has been undertaken to identify the likely significant effects of the Scheme on the environment.</p> <p>The western part of the Scheme is located within BBC. A description of the Scheme and its location is reported in Chapter 2, The Scheme <b>[APP-071]</b>.</p> <p>This is considered an appropriate description of the Scheme.</p>	<p>BBC is content that the Scheme is adequately described in the ES.</p>	<p>Agreed</p>	<p>November 2021</p>
<p><b>General</b> Legislation and policy</p>	<p>Chapter 5, Air quality <b>[APP-074]</b> Chapter 6, Cultural heritage <b>[APP-075]</b> Chapter 7, Landscape and visual effects <b>[APP-076]</b> Chapter 8, Biodiversity <b>[APP-077]</b> Chapter 9, Geology and soils <b>[APP-078]</b> Chapter 10, Material assets and waste <b>[APP-079]</b></p>	<p>National Highways considers that the ES has identified and appropriately considered all applicable legislation and policy pertaining to the following assessments undertaken as part of the EIA of the Scheme:</p> <ul style="list-style-type: none"> <li>• Air quality.</li> <li>• Cultural heritage.</li> <li>• Landscape and visual effects.</li> <li>• Biodiversity.</li> <li>• Geology and soils.</li> <li>• Material assets and waste.</li> <li>• Noise and vibration.</li> </ul>	<p>BBC is content that the assessments have recognised the appropriate legislation but not that all necessary assessments under said legislation (relating to noise and vibration specifically) have at this date been passed to BBC.</p>	<p>Agreed for all topics except noise and vibration which is Not Agreed</p>	<p>November 2021</p>



Issue	Document Reference	National Highways Position	Bedford Borough Council Position	Status	Date
	<p>Chapter 11, Noise and vibration [APP-080]</p> <p>Chapter 12, Population and human health [APP-081]</p> <p>Chapter 13, Road drainage and the water environment [APP-082]</p> <p>Chapter 14, Climate [APP-083]</p> <p>Chapter 15, Assessment of cumulative effects [APP-084]</p> <p>Borrow Pits Excavation and Restoration Report [REP3-011]</p> <p>Appendix 11.3, Construction Phase Noise Predictions of the Environmental Statement [APP-212]</p>	<ul style="list-style-type: none"> <li>• Population and human health.</li> <li>• Road drainage and the water.</li> <li>• Climate.</li> <li>• Assessment of cumulative effects.</li> </ul> <p>Note: BBC does not have matter specialist to comment on items shaded grey</p> <p>National Highways consider matters relating to Noise and Vibration to be agreed with BBC as at a meeting with BBC's Noise and Vibration team on 27.07.2021.</p> <p>Further to the meeting on 18.11.21 the following, noise and vibration information was sent:</p> <ul style="list-style-type: none"> <li>• Chapter 11, Noise and vibration of the Environmental Statement [APP-080] including the relevant references to the construction noise and vibration assessment.</li> <li>• Borrow Pits Excavation and Restoration Report [REP3-011] with references to noise levels at receptors.</li> </ul>			



Issue	Document Reference	National Highways Position	Bedford Borough Council Position	Status	Date
		<ul style="list-style-type: none"> <li>Appendix 11.3, Construction Phase Noise Predictions of the Environmental Statement [APP-212].</li> <li>Deadline 5 submission: Applicant's comments on other parties' responses to second round of written questions [REP5-015]. This includes signposting to responses to Q2.16.1.2.</li> </ul>			
<p><b>General</b> Study area definition and extents</p>	<p>Chapter 5, Air quality [APP-074] Chapter 6, Cultural heritage [APP-075] Chapter 7, Landscape and visual effects [APP-076] Chapter 8, Biodiversity [APP-077] Chapter 9, Geology and soils [APP-078] Chapter 10, Material assets and waste [APP-079] Chapter 11, Noise and vibration [APP-080]</p>	<p>The study areas adopted by National Highways within the following assessments are considered to reflect current best practice and standards:</p> <ul style="list-style-type: none"> <li>Air quality.</li> <li>Cultural heritage.</li> <li>Landscape and visual effects.</li> <li>Biodiversity.</li> <li>Geology and soils.</li> <li>Material assets and waste.</li> <li>Noise and vibration.</li> <li>Population and human health.</li> <li>Road drainage and the water environment.</li> <li>Climate.</li> <li>Assessment of cumulative effects.</li> </ul>	<p>BBC is content that the geographical extents of the adopted study areas cover the area over which direct and indirect effects of the Scheme are likely to occur.</p>	<p>Agreed</p>	<p>November 2021</p>

Issue	Document Reference	National Highways Position	Bedford Borough Council Position	Status	Date
	<p>Chapter 12, Population and human health [APP-081]</p> <p>Chapter 13, Road drainage and the water environment [APP-082]</p> <p>Chapter 14, Climate [APP-083]</p> <p>Chapter 15, Assessment of cumulative effects [APP-084]</p>	<p>National Highways considers that the geographical extents of the adopted study areas are appropriate to identify the likely direct and indirect effects of the Scheme on sensitive features and receptors.</p> <p>National Highways consider matters for vibration and operational noise to be agreed as at meeting with BBC's Noise and Vibration team on 27.07.21. Discussions for construction noise are ongoing. National Highways offered a meeting to discuss the construction noise model with BBC in November and December 2021 (emails of 18/11/21, 29/11/21 and 03/12/21). This meeting took place on 7 February 2022.</p> <p>National Highways considers matters for Cultural Heritage to be agreed as at meeting with BBCs Cultural Heritage team on 26.07.21.</p>			
<p><b>General</b></p> <p>Application of expert / professional judgements</p>	<p>Chapter 5, Air quality [APP-074]</p> <p>Chapter 6, Cultural heritage [APP-075]</p> <p>Chapter 7, Landscape and visual effects [APP-076]</p>	<p>The identification of likely significant effects on sensitive features and receptors has been informed by professional judgement and the views of relevant technical specialists, where necessary.</p> <p>National Highways considers the application of professional judgement by its specialists within the following</p>	<p>11.02.22 – The position below outlines BBC's previous position. As at 11.02.22, BBC is content that all outstanding matters have been addressed and the position is agreed.</p> <p>BBC is content with how National Highways has applied professional judgement in the</p>	<p>Agreed</p>	<p>February 2022</p>

Issue	Document Reference	National Highways Position	Bedford Borough Council Position	Status	Date
	<p>Chapter 8, Biodiversity [APP-077]</p> <p>Chapter 9, Geology and soils [APP-078]</p> <p>Chapter 10, Material assets and waste [APP-079]</p> <p>Chapter 11, Noise and vibration [APP-080]</p> <p>Chapter 12, Population and human health [APP-081]</p> <p>Chapter 13, Road drainage and the water environment [APP-082]</p> <p>Chapter 14, Climate [APP-083]</p> <p>Chapter 15, Assessment of cumulative effects [APP-084]</p> <p>First Iteration EMP v2 [REP6-008]</p> <p>v3 [REP9-009]</p>	<p>assessments to be appropriate and robust:</p> <ul style="list-style-type: none"> <li>• Air quality.</li> <li>• Cultural heritage.</li> <li>• Landscape and visual effects.</li> <li>• Biodiversity.</li> <li>• Geology and soils.</li> <li>• Material assets and waste.</li> <li>• Noise and vibration.</li> <li>• Population and human health.</li> <li>• Road drainage and the water environment.</li> <li>• Climate.</li> <li>• Assessment of cumulative effects.</li> </ul> <p>National Highways consider matters agreed for cultural heritage with the caveat that the survey of Brook Cottages has not yet been undertaken. (Meeting with BBC's Cultural Heritage team on 26.07.21).</p> <p>National Highways consider matters agreed for dust, noise and vibration with the caveat for borrow pits. (Meeting with BBC's Air Quality and Noise and Vibration teams 27.07.21). National Highways offered a meeting to discuss</p>	<p>assessments of effects on sensitive features and receptors undertaken and reported. Without information on dust and noise impacts on residents with regard to the borrow pits how can we be satisfied that the application of judgement is robust.</p> <p>Given that no structural survey appears to be forthcoming in the Examination process, the Council will advise the ExA that the development should be considered to result in 'substantial harm' to the significance of Brook Cottages. There remains a number of issues in which there is disagreement, but based on the information submitted the Council must advise that the Scheme will result in 'substantial harm'. This principle issue and there is now agreement (subject to the submission of a structural survey etc. within the timeframe of the Examination, which would provide clarity on the specific impact).</p>		

Issue	Document Reference	National Highways Position	Bedford Borough Council Position	Status	Date
	<p>[TR010044/APP/6.8v4] Joint Position Statement for Brook Cottages [REP8-017] Brook Cottage Heritage Strategy [REP8-021]</p>	<p>the construction noise model with BBC in November and December 2021 (emails of 18/11/21, 29/11/21 and 03/12/21). This meeting took place on 7 February 2022.</p> <p>A Borrow Pits Management Plan was submitted to the Examination at Deadline 6 within Annex R of the updated First Iteration EMP v2 [REP6-008].</p> <p>A Joint Position Statement for Brook Cottages was submitted at Deadline 8 of the Examination [REP8-017].</p> <p>The Brook Cottage Heritage Strategy was submitted to the Examination at Deadline 8 [REP8-021].</p>	<p>The Council does not agree that matter surrounding Brook Cottages have been agreed (subject to a survey). For example, the following issues are disagreed upon:</p> <p>That justification for the removal of the asset has been demonstrated.</p> <p>That total loss will occur through removal and that there is justification for total loss.</p> <p>That assertions made in APP:240 A5.6 are reasonable or based on sound evidence.</p>		
<p><b>General</b> Assessment assumptions and limitations</p>	<p>Chapter 5, Air quality [APP-074] Chapter 6, Cultural heritage [APP-075] Chapter 7, Landscape and visual effects [APP-076] Chapter 8, Biodiversity [APP-077] Chapter 9, Geology and soils [APP-078]</p>	<p>The following assessments record the assumptions applied and the approaches taken by National Highways to reduce any uncertainty resulting from any limitations encountered:</p> <ul style="list-style-type: none"> <li>• Air quality.</li> <li>• Cultural heritage.</li> <li>• Landscape and visual effects.</li> <li>• Biodiversity.</li> <li>• Geology and soils.</li> <li>• Material assets and waste.</li> </ul>	<p>11.02.22 – The position below outlines BBC's previous position. As at 11.02.22, BBC is content that all outstanding matters have been addressed and the position is agreed.</p> <p>BBC is content that the assumptions recorded within these assessments are reasonable and accepts that the limitations encountered do not impact upon the validity of the reported findings.</p>	<p>Agreed</p>	<p>February 2022</p>

Issue	Document Reference	National Highways Position	Bedford Borough Council Position	Status	Date
	<p>Chapter 10, Material assets and waste [APP-079]</p> <p>Chapter 11, Noise and vibration [APP-080]</p> <p>Chapter 12, Population and human health [APP-081]</p> <p>Chapter 13, Road drainage and the water environment [APP-082]</p> <p>Chapter 14, Climate [APP-083]</p> <p>Chapter 15, Assessment of cumulative effects [APP-084]</p> <p>Joint Position Statement for Brook Cottages [REP8-017]</p> <p>Brook Cottage Heritage Strategy [REP8-021]</p>	<ul style="list-style-type: none"> <li>• Noise and vibration.</li> <li>• Population and human health.</li> <li>• Road drainage and the water environment.</li> <li>• Climate.</li> <li>• Assessment of cumulative effects.</li> </ul> <p>National Highways considers the assumptions adopted in these assessments to be reasonable and appropriate.</p> <p>National Highways consider matters agreed for Archaeology as at meeting with BBC's Cultural Heritage team on 26.07.21.</p> <p>National Highways consider matters agreed for built heritage (with the caveat that the survey for Brook Cottages has not been undertaken yet) as per meeting with BBC's Cultural Heritage team on 26.07.21.</p> <p>National Highways considers matters agreed for dust, noise and vibration (with a caveat for noise monitoring) as at a meeting with BBC's Air Quality and Noise and Vibration team on 27.07.2021.</p> <p>A Joint Position Statement for Brook Cottages [REP8-017] was submitted to the ExA at Deadline 8.</p>	<p>Given that no structural survey appears to be forthcoming in the Examination process, the Council will advise the ExA that the development should be considered to result in 'substantial harm' to the significance of Brook Cottages. There remains a number of issues in which there is disagreement, but based on the information submitted the Council must advise that the scheme will result in 'substantial harm'. This is the principle issue and there is now agreement (subject to the submission of a structural survey etc. within the timeframe of the Examination, which would provide clarity on the specific impact).</p>		



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		<p>Brook Cottage Heritage Strategy [REP8-021] was submitted to the ExA at Deadline 8.</p>			
<p><b>General</b> Worst-case scenario: limits of deviation</p>	<p>Works Plans [APP-009] [APP-010] Engineering Sections [APP-017 to APP 022] Chapter 5, Air quality [APP-074] Chapter 6, Cultural heritage [APP-075] Chapter 7, Landscape and visual effects [APP-076] Chapter 8, Biodiversity [APP-077] Chapter 9, Geology and soils [APP-078] Chapter 10, Material assets and waste [APP-079] Chapter 11, Noise and vibration [APP-080]</p>	<p>The following assessments have taken into account the lateral limits of deviation forming part of the Scheme design, as defined on the Works Plans [APP-009] [APP-010], and the vertical limits of deviation defined on the Engineering Sections [APP-017 to APP 022]:</p> <ul style="list-style-type: none"> <li>• Air quality.</li> <li>• Cultural heritage.</li> <li>• Landscape and visual effects.</li> <li>• Biodiversity.</li> <li>• Geology and soils.</li> <li>• Material assets and waste.</li> <li>• Noise and vibration.</li> <li>• Population and human health.</li> <li>• Road drainage and the water environment.</li> <li>• Climate.</li> <li>• Assessment of cumulative effects.</li> </ul> <p>National Highways considers that the maximum extents of possible deviation accounted for in these assessments</p>	<p>BBC is content that these assessments have appropriately considered the worst-case scenario in relation to the potential for the Scheme design and/or its construction to deviate within the lateral and vertical extents defined on the Works Plans and Engineering Sections.</p>	<p>Agreed</p>	<p>November 2021</p>



Issue	Document Reference	National Highways Position	Bedford Borough Council Position	Status	Date
	<p>Chapter 12, Population and human health [APP-081]</p> <p>Chapter 13, Road drainage and the water environment [APP-082]</p> <p>Chapter 14, Climate [APP-083]</p> <p>Chapter 15, Assessment of cumulative effects [APP-084]</p>	<p>represent the realistic worst-case assessment scenario.</p> <p>National Highways considers this matter agreed.</p>			
<p><b>General</b></p> <p>Presentation of results</p>	<p>Chapter 5, Air quality [APP-074]</p> <p>Chapter 6, Cultural heritage [APP-075]</p> <p>Chapter 7, Landscape and visual effects [APP-076]</p> <p>Chapter 8, Biodiversity [APP-077]</p> <p>Chapter 9, Geology and soils [APP-078]</p>	<p>The following application documents present the approaches to, and outcomes of, assessments undertaken to identify the likely significant effects of the construction, operational and (where relevant) the maintenance phases of the Scheme:</p> <ul style="list-style-type: none"> <li>• Air quality.</li> <li>• Cultural heritage.</li> <li>• Landscape and visual effects.</li> <li>• Biodiversity.</li> <li>• Geology and soils.</li> <li>• Material assets and waste.</li> </ul>	<p>BBC is content with the formats and styles adopted by National Highways in presenting the details of the assessments undertaken.</p>	<p>Agreed</p>	<p>January 2022</p>

Issue	Document Reference	National Highways Position	Bedford Borough Council Position	Status	Date
	<p>Chapter 10, Material assets and waste [APP-079]</p> <p>Chapter 11, Noise and vibration [APP-080]</p> <p>Chapter 12, Population and human health [APP-081]</p> <p>Chapter 13, Road drainage and the water environment [APP-082]</p> <p>Chapter 14, Climate [APP-083]</p> <p>Chapter 15, Assessment of cumulative effects APP-084]</p>	<ul style="list-style-type: none"> <li>• Noise and vibration.</li> <li>• Population and human health.</li> <li>• Road drainage and the water environment.</li> <li>• Climate.</li> <li>• Assessment of cumulative effects.</li> </ul> <p>National Highways considers that the format and methods used to present the assessments undertake are clear and unambiguous.</p> <p>National Highways considers matters agreed for dust (with caveat for levels in gardens vs building facades) and agreed for noise and vibration. Confirmed at a meeting with BBC's Air Quality and Noise and Vibration teams on 27.07.2021.</p>			
<p><b>General</b></p> <p>Route/junction design selection</p>	<p>Chapter 2, The Scheme [APP-071]</p> <p>Chapter 3, Assessment of Alternatives [APP-072]</p>	<p>National Highways has undertaken thorough and comprehensive route studies, junction appraisals and optioneering studies during the design-development of the Scheme, in pursuit of establishing its preferred design solution, as described in Chapter 2, The Scheme [APP-071] and Chapter 3, Assessment of</p>	<p>BBC is content that the studies, optioneering exercises and appraisals undertaken by National Highways are appropriate from a design perspective.</p>	<p>Agreed</p>	<p>December 2021</p>

Issue	Document Reference	National Highways Position	Bedford Borough Council Position	Status	Date
		<p>Alternatives [APP-072] of the Environmental Statement.</p> <p>In considering, evaluating and balancing constraints and opportunities, National Highways considers that the preliminary design of the new dual carriageway represents the optimum solution to meet the Scheme objectives.</p> <p>National Highways considers this matter agreed.</p>			
<p><b>General</b> Approach to modelling</p>	<p>Chapter 5, Air quality [APP-074]</p> <p>Chapter 11, Noise and vibration [APP-080]</p> <p>Chapter 13, Road drainage and the water environment [APP-082]</p>	<p>Modelling of existing and future conditions and changes, and the effects and risks of the Scheme, has been undertaken as part of the Air quality, Noise and vibration and Road drainage and the water environment assessments.</p> <p>National Highways considers that the approaches to modelling are appropriate. National Highways offered a meeting to discuss the construction noise model with BBC in November and December 2021 (emails of 18/11/21, 29/11/21 and 03/12/21). This meeting took place on 7 February 2022.</p> <p>National Highways considers this matter agreed.</p>	<p>BBC is content with the approaches applied to modelling existing and future conditions and changes, and the effects and risks of the Scheme, and that the parameters included/ considered in the modelling are appropriate.</p>	<p>Agreed</p>	<p>January 2022</p>

Issue	Document Reference	National Highways Position	Bedford Borough Council Position	Status	Date
<b>Air Quality</b> Data collection methods, baseline data and the identification and sensitivity of relevant features and receptors	Chapter 5, Air quality <b>[APP-074]</b>	<p>The baseline conditions have been collated using desk-based and field-based techniques, and through consultation with stakeholders.</p> <p>National Highways considers the scope, coverage and timing of surveys undertaken to establish the baseline conditions and sensitive features and receptors are in line with best practice and appropriate to inform the assessment of direct and indirect effects reported in the Chapter 5, Air quality assessment <b>[APP-074]</b>.</p> <p>National Highways consider matters agreed for dust as at a meeting with BBC's Air Quality team on 27.07.2021.</p>	BBC is content that the scope and coverage of surveys undertaken to inform the assessment of air quality effects are sufficiently comprehensive.	Agreed	November 2021
<b>Air Quality</b> Construction and operational effects	Chapter 5, Air quality <b>[APP-074]</b>  Borrow Pits Excavation and Restoration Report <b>[REP3-011]</b>  First Iteration EMP v2 <b>[REP6-008]</b>  v3 <b>[REP9-009]</b>  V4 <b>[TR010044/APP/6.8v4]</b>	<p>The assessment has concluded that no significant effects associated with air pollution would occur through construction activities or as a consequence of traffic movements (emissions) on the road network.</p> <p>Information regarding borrow pits is reported in the Borrow Pits Excavation and Restoration Report <b>[REP3-011]</b> submitted at Deadline 3 of the Examination. A Borrow Pits Management Plan was submitted to the Examination at</p>	<p>11.02.22 – The position below outlines BBC's previous position. As at 11.02.22, BBC is content that all outstanding matters have been addressed and the position is agreed.</p> <p>The Council is concerned that the only control over the borrow pits appears to be through the Environmental Management Plan (EMP). The EMP sets out a list of standard practices that could be applied to any similar development and is not site</p>	Agreed	Feb 2022

Issue	Document Reference	National Highways Position	Bedford Borough Council Position	Status	Date
		Deadline 6 within Annex R of the updated First Iteration EMP <b>[REP6-008]</b> .	specific. The EMP contains no assessment of any potential impacts. The DCO contains two requirements for iterations of the EMP. Whilst the second iteration EMP may be expected to contain more detail on the borrow pits proposals, it is not clear what further impact assessments will be provided at this stage. This brings into question whether the DCO currently contains a sufficient description of the proposal or a proper environmental assessment.		
<b>Air Quality</b> Embedded and essential mitigation	Chapter 2, The Scheme <b>[APP-071]</b> Chapter 5, Air quality <b>[APP-074]</b> Environmental Masterplan <b>[APP-091]</b> <b>[REP9-037]</b> First Iteration EMP <b>[APP-234]</b> v3 <b>[REP9-009]</b>	National Highways considers that: <ul style="list-style-type: none"> <li>• The embedded mitigation measures mentioned in Chapter 2, The Scheme <b>[APP-071]</b>.</li> <li>• The essential mitigation measures set out in the First Iteration EMP <b>[TR010044/APP/6.8v4]</b>.</li> </ul> are appropriate to avoid, prevent, reduce, manage, control and (where necessary) monitor the adverse effects of the Scheme.  Information regarding borrow pits is reported in the Borrow Pits Excavation and Restoration Report <b>[REP3-011]</b>	11.02.22 – The position below outlines BBC's previous position. As at 11.02.22, BBC is content that all outstanding matters have been addressed and the position is agreed.  The Council is concerned that the only control over the borrow pits appears to be through the Environmental Management Plan (EMP). The EMP sets out a list of standard practices that could be applied to any similar development and is not site specific. The EMP contains no	Agreed	Feb 2022



Issue	Document Reference	National Highways Position	Bedford Borough Council Position	Status	Date
	V4 <b>[TR010044/APP/6.8v4]</b>  Schedule of mitigation <b>[APP-235]</b>	submitted at Deadline 3 of the Examination. A Borrow Pits Management Plan was submitted to the Examination at Deadline 6 within Annex R of the updated First Iteration EMP <b>[REP6-008]</b> .	assessment of any potential impacts. The DCO contains two requirements for iterations of the EMP. Whilst the second iteration EMP may be expected to contain more detail on the borrow pits proposals, it is not clear what further impact assessments will be provided at this stage. This brings into question whether the DCO currently contains a sufficient description of the proposal or a proper environmental assessment.		
<b>Cultural Heritage</b>  Data collection methods, baseline data and the identification and sensitivity of relevant features and receptors	Chapter 6, Cultural heritage <b>[APP-075]</b>	<p>The baseline conditions have been collated using desk-based and field-based techniques, and through consultation with stakeholders.</p> <p>National Highways considers the scope, coverage and timing of surveys undertaken to establish the baseline conditions and sensitive features and receptors are in line with best practice and appropriate to inform the assessment of direct and indirect effects reported in the Cultural heritage assessment <b>[APP-075]</b>.</p>	<p><u>Matters raised within BBC's Relevant Representation</u></p> <p>The BBC Heritage Team are satisfied that the pre-submission archaeological evaluation work comprising desk-based assessment, aerial photographic analysis, geophysical survey, and trial trenching provide an adequate baseline assessment of the archaeological potential within the proposed route.</p> <p>The assessment allows likely impacts on the archaeological remains to be predicted and a</p>	Agreed	June 2021



Issue	Document Reference	National Highways Position	Bedford Borough Council Position	Status	Date
			programme of archaeological mitigation work to be formulated.		
<b>Cultural Heritage</b> Construction and operational effects	Chapter 6, Cultural heritage [APP-075] Joint Position Statement for Brook Cottages [REP8-017] Brook Cottage Heritage Strategy [REP8-021]	<p>The cultural heritage assessment has concluded that construction of the Scheme would result in significant adverse effects of either moderate or large significance on the assets listed in Table 6-6 of Chapter 6, Cultural heritage [APP-075].</p> <p>All other assets identified and assessed would experience either:</p> <ul style="list-style-type: none"> <li>• Slight adverse effects (not significant).</li> <li>• Neutral effects (not significant).</li> <li>• Slight beneficial effects (not significant).</li> </ul> <p>The construction assessment has predicted substantial harm on Brook Cottages.</p> <p>The operation assessment would not result in any significant adverse effects on the assets identified within Chapter 6, Cultural heritage [APP-075]. The assessment was completed in line with DMRB.</p>	<p><u>Matters raised within BBC's Relevant Representation</u></p> <p>The BBC Heritage Team are not in agreement with the terminology used in assessing the impacts on below ground archaeological remains, i.e. it seems somewhat misleading to describe the effect on remains which will be permanently destroyed as being of 'slight adverse effect (not significant).'</p> <p>The issue comes from assessing the level of the effect of the scheme on the basis of the significance of the individual asset. Regardless of the significance of the individual asset our view is that in most cases the effect caused by the Scheme will be the loss of any remains which survive.</p>	Not agreed	18/11/2021
			<p>The specific impact of the Scheme on Brook Cottages cannot be accurately gauged in the absence of a detailed survey and method statement. However, in the absence of</p>	Agreed (subject to no further information)	18/11/2021

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		<p>A Joint Position Statement for Brook Cottages [REP8-017] was submitted to the ExA at Deadline 8.</p> <p>Brook Cottage Heritage Strategy [REP8-021] was submitted to the ExA at Deadline 8.</p>	<p>further information, the Council will advise the ExA that the application should be determined on the basis that the development will result in substantial harm to Brook Cottages, but not necessarily its total loss (hence the need for Requirement 16).</p>	<p>being submitted)</p>	
<p><b>Cultural Heritage</b> Setting impact assessment</p>	<p>Chapter 6, Cultural heritage [APP-075] Additional Submission - 9.19 Historic England and Bedford Borough Council Clarification Note - Accepted at the discretion of the Examining Authority [AS-010]</p>	<p>Chapter 6, Cultural heritage [APP-075] records that the setting of the listed buildings within Roxton village would not individually be impacted by the Scheme, but that construction of the Scheme would result in a slight adverse effect (not significant) on Roxton Conservation Area.</p> <p>The assessment has taken into consideration the temporary impacts from the construction and operation of the Scheme on the setting of heritage assets.</p> <p>The effects on the setting of the Grade II* listed Parish Church of St Mary Magdalen (1114927) in Roxton have been considered within the cultural heritage assessment.</p> <p>Further information was submitted at Deadline 2 [AS-010] of the Examination.</p>	<p>Following the submission of AS-010 the Heritage Team are content that the effects on the setting of St Mary Magdalen has been considered and agree with the assessment therein.</p> <p>An additional assessment of assets with new photographic viewpoints has been submitted to BBC following a meeting with National Highways. This has been reviewed and the conclusions with regards to the level of potential harm caused by development within the setting of the affected designated heritage assets are agreed.</p>	<p>Agreed</p>	<p>18/11/2021</p>

Issue	Document Reference	National Highways Position	Bedford Borough Council Position	Status	Date
<p><b>Cultural Heritage</b> Embedded and essential mitigation</p>	<p>Chapter 2, The Scheme <b>[APP-071]</b> Archaeological Mitigation Strategy <b>[APP-238]</b> First Iteration EMP <b>[APP-234]</b> v3 <b>[REP9-009]</b> V4 <b>[TR010044/APP/6.8v4]</b> Schedule of mitigation <b>[APP-235]</b> Updated Archaeological Mitigation Strategy <b>[REP3-010]</b> <b>[REP4-030]</b> <b>[REP4-031]</b> <b>[TR010044/EXAM/9.23v4]</b></p>	<p>National Highways considers that:</p> <ul style="list-style-type: none"> <li>The embedded mitigation measures within Chapter 2, The Scheme <b>[APP-075]</b>.</li> <li>the essential mitigation measures set out in the First Iteration EMP <b>[TR010044/APP/6.8v4]</b> and the Archaeological Mitigation Strategy <b>[TR010044/EXAM/9.23v4]</b></li> </ul> <p>are appropriate to avoid, prevent, reduce, manage, control and (where necessary) monitor the adverse effects of the Scheme during its construction and operation.</p> <p>National Highways' Archaeological Mitigation Strategy <b>[TR010044/EXAM/9.23v4]</b> sets out the mitigation measures that would be implemented to reduce the adverse effects of the Scheme on archaeological and built heritage resources.</p> <p>An Archaeological Mitigation Strategy <b>[TR010044/EXAM/9.23v4]</b> was requested, to form an appendix to the ES, at the first consultation meeting held with CCC and BBC on 18th September 2018. Section 2.2 of the Brief from the councils also requires the DCO to identify a 'robust mitigation strategy'.</p>	<p>11.02.22 – The position below outlines BBC's previous position. As at 11.02.22, BBC is content that all outstanding matters have been addressed and the position is agreed.</p> <p>BBC met with National Highways, CCC, and CBC on 12/08/2021. A revised Design Brief has been drafted and sent to National Highways for agreement.</p> <p>The updated Archaeological Mitigation Strategy (AMS) has been reviewed, it is noted that the document is much improved from the first draft. Detailed comments have been provided in the BBC Heritage Team response to the ExA WQ2 questions. The BBC Heritage Team are of the opinion that agreement on a final version of the AMS should be possible.</p> <p>The AMS submitted at Deadline 4 has been reviewed by BBC. There are still some concerns regarding the seeming lack of addressing research aims in the targeted</p>	<p>Agreed</p>	<p>February 2022</p>

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		<p>The Archaeological Mitigation Strategy [TR010044/EXAM/9.23v4], and in particular the mitigation areas, have been discussed with BBC and the mitigation areas have been agreed at a meeting held on 10 December 2020.</p> <p>This approach is considered acceptable in order to provide the appropriate mitigation for the archaeological and built heritage resources.</p> <p>The Joint Cambridgeshire/Bedfordshire Brief for a Programme of Archaeological Investigation has been incorporated as Appendix B of the Updated Archaeological Mitigation Strategy [REP3-010] submitted at Deadline 3 of the Examination. The AMS was also updated at Deadline 4 of the Examination [REP4-030] [REP4-031] and has been updated and submitted at Deadline 10 [TR010044/EXAM/9.23v4].</p> <p>The response to comments raised by BBC can be found in REP5-015.</p>	<p>excavation sites noted within the aims of Paragraph 2.3.6. Additionally, we feel that Paragraph 2.1.2 should note that the exact level of excavation for each site will be agreed with the curators in the SSWSIs for each site. Finally, further clarity on the arbitration noted in paragraph 7.2.6 would be welcome. However, we feel these issues can likely be addressed in each SSWSI as required.</p>		
<b>Cultural Heritage</b> Mitigation – Milestones	Chapter 6, Cultural heritage [APP-075] Archaeological Mitigation Strategy [APP-238]	The non-designated milestone impacted by the Scheme would be stored and reinstated as close as possible to its original location, with all works undertaken in accordance with a Method Statement to be prepared by the	BBC's Heritage Team is content with the mitigation approach with regard to non-designated_milestones.	Agreed.	November 2021



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	<p>[TR010044/EXAM/9.23v4]</p> <p>First Iteration EMP [APP-234]</p> <p>v3 [REP9-009]</p> <p>V4 [TR010044/APP/6.8v4]</p> <p>Draft DCO [APP-025]</p> <p>Schedule of mitigation [APP-235]</p>	<p>Archaeological Contractor and agreed with the relevant local authorities.</p> <p>This is secured through the Archaeological Mitigation Strategy [TR010044/EXAM/9.23v4] and Requirement 15 (Safeguarding of milestones) of the draft DCO [APP-025].</p> <p>These measures are appropriate for this Scheme.</p> <p>National Highways has noted BBC's agreement with the methodology for milestones being appropriate as at a meeting with BBC's Cultural Heritage team on 26.07.2021.</p>			
<p><b>Cultural Heritage</b></p> <p>Brook Cottages – Assessment of harm</p>	<p>Chapter 6, Cultural heritage [APP-075]</p> <p>Case for the Scheme [APP-240]</p> <p>Joint Position Statement for Brook Cottages [REP8-017]</p> <p>Brook Cottage Heritage Strategy [REP8-021]</p>	<p>As Brook Cottages are located within the Order Limits of the Scheme and would require demolition, Chapter 6, Cultural heritage assessment [APP-075] has identified that there would be a total loss of the significance of this asset.</p> <p>Accordingly, National Highways has concluded that the loss of Brook Cottages would amount to substantial harm to the asset.</p> <p>National Highways acknowledges that a detailed survey has not been undertaken for Brook Cottages. It has not been possible to enter the premises to undertake the survey as access has not</p>	<p>BBC Heritage Team agree that demolishing without rebuilding Brook Cottages would constitute 'substantial harm' to its significance for the purposes of the National Planning Policy Framework (NPPF). The Team disagree that there is sufficient justification for its total loss, and await confirmation regarding alternative routes before confirming that removal can be justified. As previously stated the Team would encourage the Applicant to undertake a structural survey</p>	<p>Not agreed</p>	<p>February 2022</p>

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		<p>been granted to the property. National Highways has continued to request access for the purposes of undertaking the survey.</p> <p>The information provided within Appendix E of the Case for the Scheme [APP-240] is based on a reasonable assumption given the evidence collected to date. National Highways has stated that the dismantling and relocation of Brook Cottages, either for continued residential use or reconstruction at a museum would result in substantial harm to its significance.</p> <p>It is acknowledged that the ultimate decision regarding the listed status of the building should it be relocated is a matter for the Secretary of State for Digital Media, Culture and Sport through their advisors Historic England. However, National Highways has applied the tests for designation as set out by Historic England.</p> <p>As set out in Paragraph A5.1.5 in Appendix E of the Case for the Scheme [APP-240], National Highways has considered whether the substantial harm to Brook Cottages as a result of its demolition can be reduced to less than substantial harm by either relocating Brook Cottages for its continued</p>	<p>and condition survey of the building within the timeframe of the Examination.</p> <p>The Heritage Team are not in a position to specify if dismantling and relocating Brook Cottages would amount to substantial harm, but in the absence of further information, will advise the ExA to assume substantial harm will occur in this instance.</p> <p>It is agreed that the listing status of the building post-relocation would be a matter for the SoS to consider once the facts are established.</p> <p>The Council could not comment on which of the two outcomes proposed: either residential use or as an exhibit in a museum, would be the most appropriate without further information. It is understood that the Museum have submitted only an expression of interest at this stage. However, the Council are encouraged by the Applicant's discussions with the Museum, but advise this should</p>		



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		<p>residential use, or by relocating Brook Cottages to a museum. National Highways considers that neither option will reduce the substantial harm to Brook Cottages to less than substantial harm.</p> <p>Paragraph A5.7.2 in Appendix E of the Case for the Scheme [APP-240], sets out that relocating Brook Cottages and retaining its existing residential use would retain elements of the historic fabric, however, the extent of works required to make it habitable and viable for residential use on the open market would erode its historic interest to such an extent that it would not meet the criteria for listing. It is considered that the loss of heritage significance described above would result in substantial harm to Brook Cottages even if it was possible to relocate it and bring it back into use as a residential dwelling. Paragraph A5.7.2 further sets out that whilst there are benefits to reconstruction of the cottages in a museum, it is not considered sufficient to reduce the level of harm to less than substantial.</p> <p>Notwithstanding this, National Highways has continued to engage with the Museum of East Anglia Life with a view to offering the elements of the cottages that are capable of reconstruction.</p>	<p>take place alongside an investigation into its possible residential reuse.</p>		

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		<p>A Joint Position Statement for Brook Cottages [REP8-017] was submitted to the ExA at Deadline 8.</p> <p>Brook Cottage Heritage Strategy [REP8-021] was submitted to the ExA at Deadline 8.</p>			
<p><b>Cultural Heritage</b> Brook Cottages – Retention in its existing location</p>	<p>Black Cat Junction Design Options [APP-247]</p>	<p>Based on the thorough evaluation of potential junction design options [APP-247], National Highways has concluded that Brook Cottages would have to be demolished to facilitate progression of the proposed improvements to Black Cat roundabout. This is because no acceptable design solution exists that would enable the building to be retained in its current location.</p>	<p><u>Matters raised within BBC's Relevant Representation</u></p> <p>BBC Heritage Team accept that there is no safe or viable way of retaining Brook Cottages (a grade II listed building proposed for demolition) in its current position whilst delivering the objectives of the Scheme.</p>	<p>Agreed</p>	<p>June 2021</p>
<p><b>Cultural Heritage</b> Brook Cottages – Relocation options</p>	<p>Chapter 6, Cultural heritage [APP-075] Case for the Scheme [APP-240] Draft DCO [APP-025] Joint Position Statement for Brook Cottages [REP8-017] Brook Cottage Heritage Strategy [REP8-021]</p>	<p>Based on the conclusion that the loss of Brook Cottages would result in substantial harm to the asset [APP-075], National Highways has identified and evaluated options for relocating the building to an alternative location, comprising either:</p> <ul style="list-style-type: none"> <li>Relocation of the building to a location that would enable its continued use as a private dwelling.</li> <li>Relocation of the building to a museum.</li> </ul>	<p><u>Matters raised within BBC's Relevant Representation</u></p> <p>The BBC Heritage Team remain seriously concerned regarding the applicant's approach of seeking to offer the building to the Museum of East Anglian Life (A.5.6.1), which is put forward as the only alternative to its total loss (A.5.5.1). No contract has been produced, and therefore such plans can be afforded no</p>	<p>Not Agreed</p>	<p>February 2022</p>

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		<p>Following evaluation of these options within the Case for the Scheme [APP-240], National Highways has concluded that the relocation of Brook Cottages and future use as a private dwelling would remain as substantial harm to the asset due to the loss of building's historic fabric (when moving the property) and the extent of change that would be necessary to ensure the building conforms to the prevailing building regulations.</p> <p>National Highways considers although that reconstructing the structural elements of Brook Cottages in a museum would not be sufficient to reduce the substantial harm of demolition to less than substantial harm, this outcome affords greater opportunity to retain more of the building's heritage significance than relocating it for continued residential use. This option also presents a greater opportunity to secure the building's future and provides additional public benefits,</p> <p>Accordingly, National Highways is investigating relocating the structural elements of the building that are capable of being reconstructed to a museum. We are in discussions with possible receptors which may be willing to accept Brook Cottages, subject to:</p>	<p>weight at this stage. However, if as the Case for the Scheme asserts its reconstruction will result in substantial harm it is unlikely to prove an attractive proposition for any museum. The application does not demonstrate that an alternative approach has been sought, such as relocating the building within the vicinity of its current position within the Borough (an approach recommended by Officers).</p> <p>BBC Heritage Team cannot comment on which option would be most favourable given the limited information that has been provided. This would likely become apparent during the process of the Requirement.</p> <p>Whether the building would lose its designation post-relocation will be for the SoS and Historic England to determine, but accept the reconstructed building would not possess the same degree of heritage significance.</p>		

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		<ul style="list-style-type: none"> <li>• A structural survey concluding that this is feasible.</li> <li>• Further discussions and terms to be agreed.</li> </ul> <p>National Highways acknowledges that relocation of the building to a museum would mean that its Grade II listed status would be lost, as the rebuilt cottages would not have the same heritage interests as the current building.</p> <p>The Case for the Scheme <b>[APP-240]</b> also explains that in accordance with the NPSNN, National Highways would properly record the asset prior to its removal, as secured through Requirement 16 on the draft DCO <b>[APP-025]</b>.</p> <p>A Joint Position Statement for Brook Cottages <b>[REP8-017]</b> was submitted to the ExA at Deadline 8.</p> <p>Brook Cottage Heritage Strategy <b>[REP8-021]</b> was submitted to the ExA at Deadline 8.</p>			
<b>Landscape and Visual Effects</b>  Data collection methods, baseline data and the identification and	Chapter 7, Landscape and visual effects <b>[APP-076]</b>	<p>The baseline conditions have been collated using desk-based and field-based techniques, and through consultation with stakeholders.</p> <p>National Highways considers the scope, coverage and timing of surveys</p>	BBC do not have a landscape and visual specialist to comment on this matter.	N/A	November 2021

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sensitivity of relevant features and receptors		<p>undertaken to establish the baseline conditions and sensitive features and receptors are in line with best practice and appropriate to inform the assessment of direct and indirect effects reported in the Chapter 7, Landscape and visual effects assessment [APP-076].</p> <p>National Highways considers this matter agreed.</p>			
<p><b>Landscape and Visual Effects</b></p> <p>Construction and operational effects</p>	Chapter 7, Landscape and visual effects [APP-076]	<p>The assessment has concluded that the Scheme would result in significant adverse effects on areas of local landscape character, and on visual receptors afforded views of the landscape from locations including residential properties, local roads and PRow.</p> <p>The assessment has concluded that the Scheme would not result in significant adverse effects on sites designated for the landscape value or importance.</p> <p>National Highways considers this matter agreed.</p>	BBC do not have a landscape and visual specialist to comment on this matter.	N/A	November 2021
<p><b>Landscape and Visual Effects</b></p> <p>Embedded and essential mitigation</p>	Chapter 2, The Scheme [APP-071] Chapter 7, Landscape and visual effects [APP-076]	<p>National Highways considers that:</p> <ul style="list-style-type: none"> <li>The embedded mitigation measures illustrated on the Environmental Masterplan [APP-091] [REP9-037].</li> </ul>	BBC do not have a landscape and visual specialist to comment on this matter.	N/A	November 2021



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	Environmental Masterplan [APP-091] [REP9-037] First Iteration EMP [APP-234] V4 [TR010044/APP/6.8v 4] Schedule of Mitigation [APP-235]	<ul style="list-style-type: none"> <li>The essential mitigation measures set out in the First Iteration EMP [APP-234] are appropriate to avoid, prevent, reduce, manage, control and (where necessary) monitor the adverse effects of the Scheme during its construction and operation.</li> </ul> National Highways considers this matter agreed.			
<b>Biodiversity</b> Data collection methods, baseline data and the identification and sensitivity of relevant features and receptors	Chapter 8, Biodiversity [APP-077]	<p>The baseline conditions have been collated using desk-based and field-based techniques, and through consultation with stakeholders.</p> <p>National Highways considers the scope, coverage and timing of surveys undertaken to establish the baseline conditions and sensitive features and receptors are in line with best practice and appropriate to inform the assessment of direct and indirect effects reported in Chapter 8, Biodiversity assessment [APP-077].</p> <p>As certain surveys undertaken within the assessment were constrained or limited by factors including land access restrictions, National Highways has shared information with BBC regarding</p>	<p><u>Matters raised within BBC's Relevant Representation</u></p> <p>BBC is content that a suitable range of up-to-date ecological surveys which are based on evidence from the Bedfordshire &amp; Luton Biodiversity Recording and Monitoring Centre and pre-application discussions have been completed.</p>	Agreed	June 2021



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		the scope, timing and coverage of surveys undertaken during 2021, and prior to the commencement of construction of the Scheme.			
<b>Biodiversity</b> Construction and operational effects	Chapter 8, Biodiversity [APP-077] First Iteration EMP v2 [REP6-008] v3 [REP9-009] V4 [TR010044/APP/6.8v4]	<p>The biodiversity assessment [APP-077] has identified that adverse and beneficial effects on habitats, species and designated sites would result from construction and operation of the Scheme; however, none of these effects would be significant.</p> <p>National Highways considers that the assessment findings accurately reflect the likely effects of the Scheme.</p> <p>The Applicant and the Principal Contractor will explore opportunities to deliver early planting where construction sequencing and land acquisition allows.</p> <p>The First Iteration EMP v2 [REP6-008] was updated as part of Deadline 6 of the Examination and has been updated again at Deadline 9 [REP9-009] and again at Deadline 10 [TR010044/APP/6.8v4].</p>	<p><u>Matters raised in a meeting with BBC's Biodiversity team on 23.06.2021</u></p> <p>BBC shared queries regarding assessment findings in terms of the timings of implementation of mitigation e.g. planting will take time to mature.</p> <p>10/12/21 – Whilst we welcome the update that opportunities to deliver early planting will be explored, it does not give any commitment to implement measures necessary to maintain key commuting routes for bats and badgers or provide adequate barn owl mitigation once the Scheme became operational.</p>	Not Agreed	February 2022
<b>Biodiversity</b> Embedded and essential mitigation	Chapter 2, The Scheme [APP-071] Chapter 8, Biodiversity [APP-077]	<p>National Highways considers that:</p> <ul style="list-style-type: none"> <li>The embedded mitigation measures illustrated on the Environmental Masterplan [APP-091] [REP9-037].</li> </ul>	<p><u>Matters raised in a meeting with BBC's Biodiversity team on 23.06.2021</u></p> <p>BBC note that some mitigation would be required ahead of the Scheme and in some cases a</p>	Not Agreed	February 2022

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	<p>Environmental Masterplan [APP-091] [REP9-037]</p> <p>Biodiversity Pre-commencement Plan [APP-239] [REP8-004]</p> <p>Schedule of Mitigation [APP-235]</p> <p>Structures General Arrangements [APP-019]</p> <p>First Iteration EMP v2 [REP6-008]</p> <p>v3 [REP9-009]</p> <p>V4 [TR010044/APP/6.8v4]</p>	<ul style="list-style-type: none"> <li>The essential mitigation measures set out in the First Iteration EMP [TR010044/APP/6.8v4] and Biodiversity Pre-commencement Plan [REP8-004] are appropriate to avoid, prevent, reduce, manage, control and (where necessary) monitor the adverse effects of the Scheme on habitats, species and designated sites during its construction and operation.</li> </ul> <p>A tunnel has been designed specifically for use by a range of mammals and other vertebrates including Badger.</p> <p>The fencing arrangement shown in Engineering Section – Structures General Arrangements [APP-019] for the mammal underpass has been reviewed in light of this comment. The current fencing arrangement has been included for safety, security of the structure and to allow passage of mammals. The height of the underpass will be increased by 5cm to allow more space whilst not compromising safety and security. National Highways discussed bat crossing points with BBC at a meeting on 07/01/2022.</p> <p>Monitoring has been specified as a requirement for bat crossing structures, the detail will be forthcoming as part of</p>	<p>process of coming up with strategies of creating alternative roost site/nest sites/putting up nest boxes, in excess of a year, in the case of some species needing time to settle in.</p> <p>10/12/21 – no new information has been provided to alter this position.</p> <p>BBC notes that the entrances to the bat tunnel are fenced with a mammal entry point in the corner. It is recommended that this hole is slightly taller than the dimensions included on the current structure diagram.</p> <p>10/12/21 – this element of concern has been resolved.</p> <p>Monitoring the use of the bat tunnel during the operational phase will be vital for evaluating the success of this mitigation feature within the Scheme and for future bat mitigation elsewhere. The monitoring plans should be part of the Biodiversity Management Plan.</p>		

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		<p>the detailed design and implementation of these structures.</p> <p>National Highways and the Principal Contractor will explore opportunities to deliver early planting where construction sequencing and land acquisition allows.</p> <p>The First Iteration EMP v2 [REP6-008] was updated as part of Deadline 6 of the Examination and has been updated again at Deadline 9 [REP9-009] and again at Deadline 10 [TR010044/APP/6.8v4].</p>	<p>10/12/21 – no new information has been provided to alter this position.</p> <p><u>Matters raised within BBC's Relevant Representation</u></p> <p>BBC note that the eastern agricultural area of Bedfordshire has previously been recognized for its farmland bird assemblages and for raptors. The surveys for this Scheme confirmed this and highlighted the presence of barn owls, red kite, hobby and other farmland birds. The Scheme includes woodland planting along the embankments in this section to try and reduce road casualties, particularly for barn owls. It is important to note that this would only become effective once the planting has matured and we would encourage early planting where possible.</p> <p>10/12/21 – No new information has been provided to alter this position. Although mitigation for a range of protected species (badgers, bats, barn owl and other birds) could work the lack</p>		

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			<p>of detail regarding timings and monitoring may mean they are unsuccessful. For example, if the bat and badger commuting route along which the bat tunnel is located is removed prior to construction and then the bat tunnel is left unconnected to the surrounding landscape for years whilst hedgerows mature the mitigation will not have been adequate.</p>		
<p><b>Biodiversity</b> Biodiversity net gain</p>	<p>Appendix 8.19 <b>[APP-206]</b> Biodiversity Net Gain Defra metric 2.0 <b>[REP3-012]</b> <b>[REP3-013]</b></p>	<p>Although the achievement of a net gain in biodiversity is not a requirement for nationally significant infrastructure projects, National Highways has sought to achieve an increase in biodiversity through the environmental measures incorporated into the design of the Scheme, as set out in Natural England's advice appended to the Scoping Opinion <b>[APP-231]</b>.</p> <p>Using National Highways' Biodiversity Net Gain metric, a net gain of 20.5% across the Scheme has been calculated, when compared to the baseline conditions, as reported in Appendix 8.19 <b>[APP-206]</b>.</p> <p>The calculation of biodiversity net gain also took account of Breedon Quarry</p>	<p><u>Matters raised in a meeting with BBC's Biodiversity team on 23.06.2021</u></p> <p>BBC agree with the conclusions of the biodiversity net gain assessment but suggest re-running the metric at subsequent iterations of the Scheme design.</p>	<p>Agreed</p>	<p>June 2021</p>

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		<p>being fully restored by the time of Scheme construction commencing.</p> <p>National Highways recalculated the Biodiversity Net Gain for the Scheme at Deadline 3 using Defra metric 2.0 [REP3-012] [REP3-013].</p> <p>National Highways considers that the methods used to calculate biodiversity net gain are appropriate for the Scheme.</p>			
<p><b>Geology and Soils</b></p> <p>Data collection methods, baseline data and the identification and sensitivity of relevant features and receptors</p>	<p>Chapter 9, Geology and soils [APP-078]</p>	<p>The baseline conditions relating to geology and soils have been collated using desk-based information sources, and through consultation with stakeholders.</p> <p>National Highways considers the scope, coverage and timing of surveys undertaken to establish the baseline conditions and sensitive features and receptors are in line with best practice, and are appropriate to inform the assessment of direct and indirect effects reported in Chapter 9, Geology and Soils assessment [APP-078].</p> <p>Due to Covid-19 restrictions in 2020/2021, it was not possible for National Highways to undertake sampling in the field to verify existing soil grades and profiles. Accordingly, the assessment has relied upon published information</p>	<p>BBC do not have a geology and soils specialist to comment on this matter.</p>	<p>N/A</p>	<p>November 2021</p>



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		<p>regarding soil grades and their distribution at a regional scale.</p> <p>National Highways carried out this sampling to confirm existing soil conditions in mid-2021 (subject to Covid-19 restrictions being relaxed), and will use the information gathered to verify the conclusions of its assessment of the likely effects on best and most versatile agricultural soils and its proposed mitigation measures.</p> <p>National Highways considers this matter agreed.</p>			
<p><b>Geology and Soils</b> Construction and operational effects</p>	<p>Chapter 9, Geology and soils [APP-078]</p>	<p>The assessment has concluded that the Scheme would not result in any significant adverse effects on locally or regionally important geological sites.</p> <p>Construction of the Scheme would result in significant adverse effects on areas of land mapped as best and most versatile at a regional scale, these being associated with the permanent loss of agricultural land.</p> <p>National Highways considers this matter agreed.</p>	<p>BBC do not have a geology and soils specialist to comment on this matter.</p>	<p>N/A</p>	<p>November 2021</p>

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<p><b>Geology and Soils</b> Embedded and essential mitigation</p>	<p>Chapter 2, The Scheme <b>[APP-071]</b> Chapter 9, Geology and soils <b>[APP-078]</b> Environmental Masterplan <b>[APP-091]</b> <b>[REP9-037]</b> First Iteration EMP <b>[APP-234]</b> V4 <b>[TR010044/APP/6.8v4]</b> Schedule of mitigation <b>[APP-235]</b></p>	<p>National Highways considers that:</p> <ul style="list-style-type: none"> <li>The embedded mitigation measures illustrated on the Environmental Masterplan <b>[APP-091]</b> <b>[REP9-037]</b> and in Chapter 2, The Scheme <b>[APP-071]</b>.</li> <li>The essential mitigation measures set out in the First Iteration EMP <b>[TR010044/APP/6.8v4]</b></li> </ul> <p>are appropriate to avoid, prevent, reduce, manage, control and (where necessary) monitor the adverse effects of the Scheme during its construction and operation.</p> <p>National Highways considers this matter agreed.</p>	<p>BBC do not have a geology and soils specialist to comment on this matter.</p>	<p>N/A</p>	<p>November 2021</p>
<p><b>Material Assets and Waste</b> Data collection methods, baseline data and the identification and sensitivity of relevant features and receptors</p>	<p>Chapter 10, Material assets and waste <b>[APP-079]</b> Borrow Pits Excavation and Restoration Report <b>[REP3-011]</b> First Iteration EMP v2 <b>[REP6-008]</b> v3 <b>[REP9-009]</b></p>	<p>The baseline conditions have been collated from a variety of sources including desk-based and input from consultees, and are reported in Chapter 10, Material assets and waste <b>[APP-079]</b>.</p> <p>The baseline information collected is appropriate for this Scheme.</p> <p>Information regarding borrow pits is reported in the Borrow Pits Excavation and Restoration Report <b>[REP3-011]</b> submitted at Deadline 3 of the</p>	<p>Details of how the borrow pits will be worked for minerals and then backfilled with waste have not yet been provided and therefore the baseline information is deficient.</p>	<p>Not agreed</p>	<p>February 2022</p>

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	V4 [TR010044/APP/6.8v4]	Examination. A Borrow Pits Management Plan was submitted to the Examination at Deadline 6 within Annex R of the updated First Iteration EMP v2 [REP6-008].			
<b>Material Assets and Waste</b> Construction and operational effects	Chapter 10, Material assets and waste [APP-079] Borrow Pits Excavation and Restoration Report [REP3-011] First Iteration EMP v2 [REP6-008] v3 [REP9-009] V4 [TR010044/APP/6.8v4]	The material assets and waste assessment concluded no significant effects in the construction and operation of the Scheme.  Information regarding borrow pits is reported in the Borrow Pits Excavation and Restoration Report [REP3-011] submitted at Deadline 3 of the Examination. A Borrow Pits Management Plan has been submitted to the Examination at Deadline 6 within Annex R of the updated First Iteration EMP v2 [REP6-008].	The assessment is not accepted until the details of how the borrow pits will be worked and restored have been made clear.	Not agreed	February 2022
<b>Material Assets and Waste</b> Embedded and essential mitigation	Chapter 2, The Scheme [APP-071] Chapter 10, Material assets and waste [APP-079] Environmental Masterplan [APP-091] [REP9-037]	National Highways considers that: <ul style="list-style-type: none"> <li>The embedded mitigation measures illustrated on the Environmental Masterplan [APP-091] [REP9-037] and in Chapter 2, The Scheme [APP-071].</li> <li>The essential mitigation measures set out in the First Iteration EMP [TR010044/APP/6.8v4]</li> </ul>	Mitigation cannot be considered until an adequate assessment has been made.	Not agreed	February 2022

Issue	Document Reference	National Highways Position	Bedford Borough Council Position	Status	Date
	<p>First Iteration EMP [APP-234]</p> <p>v3 [REP9-009]</p> <p>V4 [TR010044/APP/6.8v4]</p> <p>Schedule of mitigation [APP-235]</p> <p>Borrow Pits Excavation and Restoration Report [REP3-011]</p> <p>First Iteration EMP v2 [REP6-008]</p>	<p>are appropriate to avoid, prevent, reduce, manage, control and (where necessary) monitor the adverse effects of the Scheme during its construction and operation.</p> <p>Information regarding borrow pits is reported in the Borrow Pits Excavation and Restoration Report [REP3-011] submitted at Deadline 3 of the Examination [REP3-011]. A Borrow Pits Management Plan has been submitted to the Examination at Deadline 6 within Annex R of the updated First Iteration EMP v2 [REP6-008].</p>			
<p><b>Noise and Vibration</b></p> <p>Data collection methods, baseline data and the identification and sensitivity of relevant features and receptors</p>	<p>Chapter 11, Noise and vibration [APP-080]</p> <p>Applicant response to actions arising from Issue Specific Hearing 2 [REP3-019]</p> <p>Applicant's comments on other parties' responses to second round of written</p>	<p>The baseline conditions have been collated using desk-based and field-based techniques, and through consultation with stakeholders.</p> <p>National Highways considers the scope, coverage and timing of surveys undertaken to establish the baseline conditions and sensitive features and receptors are in line with best practice and appropriate to inform the assessment of direct and indirect effects reported in Chapter 11, Noise and vibration assessment [APP-080].</p>	<p>The Scoping assessment was undertaken in mid-2019 and no further baseline monitoring has been undertaken despite agreement with Local Authorities due to COVID.</p> <p>Areas are of concern with the information supplied at this time are that the noise monitoring was undertaken in 2017, more than three years ago which raises the concern that it is no longer reliable.</p>	Not agreed	December 2021

Issue	Document Reference	National Highways Position	Bedford Borough Council Position	Status	Date
	<p>questions [REP5-015].</p>	<p>National Highways undertook a baseline noise monitoring survey during November and December 2017 to both provide information on the existing noise climate in the vicinity of the Scheme and provide data to validate the noise model from which the traffic noise impacts of the Scheme would be derived.</p> <p>This monitoring confirmed that road traffic noise was the dominant noise source at a majority of the locations, with other non-road traffic sources contributing to the acoustic environment in more rural locations. Overall, there was a reasonable correlation between the noise levels measured in the 2017 survey and those predicted using 2016 traffic data at those locations close to roads. This provided confidence that the noise model developed to estimate the traffic noise impacts of the Scheme is a reasonable approximation.</p> <p>The results of the baseline noise survey have been used to support a validation exercise for the traffic noise prediction modelling.</p> <p>National Highways considers that the noise monitoring data presented in Chapter 11 of the ES is reliable and representative of pre-Covid-19 traffic conditions on the road network.</p>	<p>As has been noted at the previous stage BBC still has outstanding concerns over the traffic noise level predictions. Specifically, that previously assured up to date monitoring data for road traffic to show confidence of modelling data is still outstanding.</p>		



Issue	Document Reference	National Highways Position	Bedford Borough Council Position	Status	Date
		<p>National Highways refers BBC to Appendix B of the Applicant response to actions arising from Issue Specific Hearing 2 [REP3-019] held on 23 September 2021. This provides further details of the baseline noise data review, which concluded that the 2017 data used in the assessment of Noise and vibration [APP-080] is sufficient.</p> <p>National Highways refers BBC to its response to Q2.16.1.2 of the Applicants comments on other parties response to second round written questions [REP5-015] submitted at Deadline 5.</p>			
<p><b>Noise and Vibration</b> Construction and operational effects</p>	<p>Chapter 11, Noise and vibration [APP-080] Borrow Pits Excavation and Restoration Report [REP3-011] Applicant's comments on other parties' responses to second round of written questions [REP5-015] First Iteration EMP v2 [REP6-008]</p>	<p>A thorough noise and vibration assessment has been undertaken for the construction and operation of the Scheme. The noise and vibration assessment concluded several significant effects in the construction and operational periods of the Scheme as described in Chapter 11, Noise and vibration [APP-080].</p> <p>National Highways consider that there is general agreement for noise and vibration, with the caveat of monitoring data mentioned in the previous row and borrow pits. As confirmed in a meeting with BBC's Noise and Vibration team on 27.07.2021.</p>	<p><u>Matters raised within BBC's Relevant Representation</u></p> <p>BBC note that there is very little data to consider for the construction phase and borrow pits. Most of the assessment considers that this will be in further detail at the more detailed design stage but this does not allow Environmental Health to consider viability.</p> <p>Meeting held 29/11/2021 to discuss this matter further details promised by NH on noise readings taken at site but</p>	<p>Not agreed</p>	<p>27.07.21</p>

Issue	Document Reference	National Highways Position	Bedford Borough Council Position	Status	Date
	v3 [REP9-009] V4 [TR010044/APP/6.8v4]	<p>Additional information regarding borrow pits is reported in the Borrow Pits Excavation and Restoration Report submitted at Deadline 3 of the Examination [REP3-011]. A Borrow Pits Management Plan was submitted to the Examination at Deadline 6 within Annex R of the updated First Iteration EMP v2 [REP6-008]. This included additional construction noise predictions at the closest receptors to the borrow pits, which were supplementary to the overall construction noise predictions reported in the ES [APP-080].</p> <p>National Highways refers BBC to its response to Q2.16.1.1 of the Applicants comments on other parties' response to second round written questions [REP5-015] submitted at Deadline 5.</p> <p>National Highways offered a meeting to demonstrate the construction noise model with BBC in November and December 2021 (emails of 18/11/2021, 29/11/2021 and 03/12/2021). This meeting took place on 7 February 2022. In this meeting, National Highways confirmed that the construction noise assessment is based on BS5228 and ambient noise levels, which have been derived using Do Minimum 2025 traffic data, as set out in paragraph 11.6.25 of [APP-080]. In response to the</p>	requested information not provided.		

Issue	Document Reference	National Highways Position	Bedford Borough Council Position	Status	Date
		<p>clarification provided by BBC at this meeting that it was seeking information on background sound level data, National Highways also confirmed that the collection of background sound levels are not required for a construction noise assessment in accordance with BS5228, nor is an assessment in accordance with BS4142 required.</p>			
<p><b>Noise and Vibration</b>  Embedded and essential mitigation</p>	<p>Chapter 2, The Scheme [APP-071]  Chapter 11, Noise and vibration [APP-080]  Environmental Masterplan [APP-091] [REP9-037]  First Iteration EMP [APP-234]  First Iteration EMP v2 [REP6-008]  v3 [REP9-009]  V4 [TR010044/APP/6.8v4]</p>	<p>National Highways considers that:</p> <ul style="list-style-type: none"> <li>The embedded mitigation measures illustrated on the Environmental Masterplan [APP-091] [REP9-037] and in Chapter 2, The Scheme [APP-071].</li> <li>The essential mitigation measures set out in the First Iteration EMP [TR010044/APP/6.8v4]</li> </ul> <p>are appropriate to avoid, prevent, reduce, manage, control and (where necessary) monitor the adverse effects of the Scheme relating to noise and vibration during its construction and operation.</p> <p>The working hours as defined within Requirement 19 of the draft DCO [APP-025], will be adhered to throughout the Scheme construction. The following amendments to Requirement 19 (2) have been proposed following a meeting held</p>	<p><u>Matters raised within BBC's Relevant Representation</u></p> <p>BBC note that with respect to the operation of the road once construction has completed, the information supplied suggests that with suitable mitigation road level noise increases would not be a cause for concern. However, it should be noted that the exact mitigation is again proposed at the detailed design stage.</p> <p>BBC note in relation to noise and vibration that whilst proposed mitigation systems are suggested, these do not include re-siting of borrow pits and if the impact of those pits are unacceptable then this cannot be overcome other than</p>	<p>Not agreed</p>	<p>27.07.21</p>

Issue	Document Reference	National Highways Position	Bedford Borough Council Position	Status	Date
	<p>Schedule of Mitigation [APP-235]</p> <p>Borrow Pits Optioneering Report [APP-246]</p> <p>Draft DCO [APP-025]</p> <p>Borrow Pits Excavation and Restoration Report [REP3-011]</p> <p>Applicant's comments on other parties' responses to second round of written questions [REP5-015]</p> <p>Applicant's Comments on Deadline 6 Submissions [REP8-010]</p>	<p>with Cambridgeshire authorities on 11 January 2022:</p> <p>(i) deleting 'including but not' from Requirement 19 (2)</p> <p>(ii) sub clauses (k), (m), (n), and (o) would require agreement with the relevant local authority in advance of works described in these sub clauses taking place</p> <p>These proposals are set out in response to REP6-058ai on page 38 of REP8-010. These changes were incorporated into '3.1 Updated Draft Development Consent Order (Tracked) - Rev 5' [REP9-005] submitted at Deadline 9.</p> <p>No mitigation is proposed regarding the possible re-siting of the borrow pits; this is because National Highways has undertaken a thorough and comprehensive site selection, appraisal and evaluation process to inform the selection of its preferred locations for these features. The process included noise and vibration as an appraisal criterion, based on the relationships between each identified site and noise-sensitive receptors, and the possible effects associated with site preparation, operational works and restoration works. Full details of this process are reported in</p>	<p>potentially with the "temporary re-housing policy"</p> <p>The DCO should contain a detailed description of how each will be worked based upon a worst case scenario of extraction to the maximum depth identified for each of them. This would include:</p> <ul style="list-style-type: none"> <li>• Identifying the area, height and location of soil stockpiles.</li> <li>• Method of extraction and numbers of plant and machinery on site.</li> <li>• The method of delivery to the road scheme.</li> <li>• Maximum daily numbers of HGV/material moving vehicles using haul routes.</li> <li>• Any processing of material on site.</li> <li>• Any phasing of the site.</li> <li>• How waste materials will be backfilled.</li> <li>• Operating times.</li> </ul>		

Issue	Document Reference	National Highways Position	Bedford Borough Council Position	Status	Date
		<p>the Borrow Pits Optioneering Report [APP-246].</p> <p>The First Iteration EMP requires the Principal Contractor to implement a noise management plan which will include procedures for installation of noise insulation and temporary re-housing if required.</p> <p>Information regarding borrow pits is reported in the Borrow Pits Excavation and Restoration Report submitted at Deadline 3 of the Examination [REP3-011]. A Borrow Pits Management Plan has been submitted to the Examination at Deadline 6 within Annex R of the updated First Iteration EMP v2 [REP6-008].</p> <p>National Highways refers BBC to its response to Q2.16.1.1 of the Applicants comments on other parties' response to second round written questions [REP5-015] submitted at Deadline 5.</p> <p>National Highways consider matters generally agreed for noise and vibration, noting that BBC would like to work with National Highways on Section 61 requirements where needed. Confirmed in a meeting with BBC's Noise and Vibration team on 27.07.2021.</p>	<ul style="list-style-type: none"> <li>• What happens if the amount of material extracted does not equal the amount of material to be backfilled.</li> <li>• Appropriate plans and cross sections to support the above.</li> <li>• Each section of the ES to be updated to assess the impact of the proposals</li> <li>• Meeting held 29/11/2021 to discuss this matter further details promised by NH on noise readings taken at site but requested information not provided.</li> </ul>		



Issue	Document Reference	National Highways Position	Bedford Borough Council Position	Status	Date
		<p>National Highways offered a meeting to demonstrate the construction noise model with BBC in November and December 2021 (emails of 18/11/2021, 29/11/2021 and 03/12/2021). This meeting took place on 7 February 2022.</p> <p>In this meeting, National Highways confirmed that the construction noise assessment is based on BS5228 and ambient noise levels, which have been derived using Do Minimum 2025 traffic data, as set out in paragraph 11.6.25 of [APP-080]. In response to the clarification provided by BBC at this meeting that it was seeking information on background sound level data, National Highways also confirmed that the collection of background sound levels are not required for a construction noise assessment in accordance with BS5228, nor is an assessment in accordance with BS4142 required.</p>			
<p><b>Population and Human Health</b></p> <p>Data collection methods, baseline data and the identification and sensitivity of</p>	<p>Chapter 12, Population and human health [APP-081]</p> <p>Equality Impact Assessment [APP-245]</p>	<p>The baseline conditions have been collated using desk-based and field-based techniques, and through consultation with stakeholders.</p> <p>National Highways considers the scope, coverage and timing of surveys undertaken to establish the baseline conditions and sensitive features and receptors (e.g. effects on users of the</p>	<p>BBC is content that the scope and coverage of surveys undertaken as part of the assessment are sufficiently comprehensive to identify the likely effects of the Scheme on PRoW and recreational users.</p>	<p>Agreed</p>	<p>January 2022</p>

Issue	Document Reference	National Highways Position	Bedford Borough Council Position	Status	Date
relevant features and receptors		<p>existing PRow network, and recreational users of the River Great Ouse) are in line with best practice and appropriate to inform the assessment of direct and indirect effects reported in Chapter 12, Population and human health assessment [APP-081].</p> <p>The Equality Impact Assessment [APP-245] covers impacts to vulnerable groups in line with the Equality Act, 2010.</p> <p>National Highways considers this matter agreed.</p>			
<b>Population and Human Health</b>  Construction and operational effects	Chapter 12, Population and human health [APP-081]  Equality Impact Assessment [APP-245]	<p>The population and human health assessment concluded one significant effect in the construction period as a result of the Scheme within BBC. This relates to a temporary moderate adverse effect upon recreational users of the River Great Ouse due to closure during construction. This is reported in Chapter 12, Population and human health [APP-081].</p> <p>No significant effects were reported for the operation of the Scheme.</p> <p>The Equality Impact Assessment [APP-245] covers impacts to vulnerable groups in line with the Equality Act, 2010.</p> <p>National Highways considers this matter agreed.</p>	BBC is content with the conclusions of the assessment and the significance of the reported effects.	Agreed	January 2022

Issue	Document Reference	National Highways Position	Bedford Borough Council Position	Status	Date
<p><b>Population and Human Health</b></p> <p>Embedded and essential mitigation</p>	<p>Chapter 2, The Scheme <b>[APP-071]</b></p> <p>Chapter 12, Population and human health <b>[APP-081]</b></p> <p>Environmental Masterplan <b>[APP-091]</b></p> <p><b>[REP9-037]</b></p> <p>First Iteration EMP <b>[APP-234]</b></p> <p>v3 <b>[REP9-009]</b></p> <p>V4 <b>[TR010044/APP/6.8v4]</b> Schedule of Mitigation <b>[APP-235]</b></p> <p>Equality Impact Assessment <b>[APP-245]</b></p>	<p>The embedded mitigation measures illustrated on the Environmental Masterplan <b>[APP-091]</b> <b>[REP9-037]</b> are considered appropriate to avoid, prevent or reduce the adverse effects of the Scheme on PRow and recreational users in relation to:</p> <ul style="list-style-type: none"> <li>• Maintaining connectivity between existing routes, roads and communities.</li> <li>• Providing safe crossing provision over the new dual carriageway.</li> </ul> <p>The essential mitigation measures set out in the First Iteration EMP <b>[TR010044/APP/6.8v4]</b> are considered appropriate to manage and control the adverse effects of the Scheme on recreational users of the River Great Ouse and PRow temporarily affected by construction of the Scheme.</p> <p>The Equality Impact Assessment <b>[APP-245]</b> covers impacts to vulnerable groups in line with the Equality Act, 2010.</p> <p>National Highways considers this matter agreed.</p>	<p>BBC is content with the form, nature and extent of the embedded mitigation measures incorporated into the design of the Scheme, and the essential mitigation measures that would be implemented during construction of the Scheme.</p>	<p>Agreed</p>	<p>November 2021</p>

Issue	Document Reference	National Highways Position	Bedford Borough Council Position	Status	Date
<p><b>Road Drainage and the Water Environment</b></p> <p>Data collection methods, baseline data and the identification and sensitivity of relevant features and receptors</p>	<p>Chapter 13, Road drainage and the water environment [APP-082]</p>	<p>The baseline conditions have been collated using desk-based and field-based techniques, and through consultation with stakeholders.</p> <p>National Highways considers the scope, coverage and timing of surveys undertaken to establish the baseline conditions and sensitive features and receptors are in line with best practice and appropriate to inform the assessment of direct and indirect effects reported in Chapter 13, Road drainage and the water environment assessment [APP-082]. The baseline information collected is appropriate for this Scheme.</p> <p>National Highways considers this matter agreed.</p>	<p>BBC is content that the scope and coverage of surveys undertaken as part of the assessment are sufficiently comprehensive to identify the likely effects of the Scheme on road drainage and the water environment.</p>	<p>Agreed</p>	<p>November 2021</p>
<p><b>Road Drainage and the Water Environment</b></p> <p>Construction and operational effects</p>	<p>Chapter 13, Road drainage and the water environment [APP-082]</p>	<p>The road drainage and the water environment assessment [APP-077] has identified that adverse and beneficial effects on water quality, hydromorphology, groundwater and drainage would result from construction and operation of the Scheme; however, none of these effects would be significant.</p> <p>National Highways considers that the assessment findings accurately reflect the likely effects of the Scheme.</p>	<p>BBC is content with the conclusions of the assessment and the significance of the reported effects.</p>	<p>Agreed</p>	<p>November 2021</p>

Issue	Document Reference	National Highways Position	Bedford Borough Council Position	Status	Date
		National Highways considers this matter agreed.			
<b>Road Drainage and the Water Environment</b> Flood risk assessment	Chapter 13, Road drainage and the water environment <b>[APP-082]</b> Flood Risk Assessment <b>[APP-220]</b>	The assessment has concluded that flood risk to and from the construction and operational stages of the Scheme from fluvial, surface water, groundwater and sewer flooding would be low, and accordingly there would be no significant flooding-related effects.  National Highways consider this matter agreed due to no objections raised by BBC's flood officer in response to the ExA's first Written Question 1.9.4.2.	BBC are content with the findings of the flood risk assessment.	Agreed	November 2021
<b>Road Drainage and the Water Environment</b> Embedded and essential mitigation	Chapter 2, The Scheme <b>[APP-071]</b> Chapter 13, Road drainage and the water environment <b>[APP-082]</b> Environmental Masterplan <b>[APP-091]</b> <b>[REP9-037]</b> First Iteration EMP <b>[APP-234]</b> v3 <b>[REP9-009]</b>	National Highways considers that: <ul style="list-style-type: none"> <li>The embedded mitigation measures illustrated on the Environmental Masterplan <b>[APP-091]</b> <b>[REP9-037]</b>.</li> <li>The essential mitigation measures set out in the First Iteration EMP <b>[TR010044/APP/6.8v4]</b></li> </ul> are appropriate to avoid, prevent, reduce, manage, control and (where necessary) monitor the adverse effects of the Scheme in relation to water quality, hydromorphology, groundwater, drainage and flood risk during its construction and operation.	BBC is content with the form, nature and extent of the embedded mitigation measures incorporated into the design of the Scheme, and the essential mitigation measures that would be implemented during construction of the Scheme.	Agreed	November 2021



Issue	Document Reference	National Highways Position	Bedford Borough Council Position	Status	Date
	V4 [TR010044/APP/6.8v 4]  Schedule of Mitigation [APP-235]				
<b>Climate</b> Data collection methods, baseline data and the identification and sensitivity of relevant features and receptors	Chapter 14, Climate [APP-083]	The baseline conditions have been collated using desk-based techniques and through consultation with stakeholders.  National Highways considers the scope, coverage and timing of surveys undertaken to establish the baseline conditions and sensitive features and receptors are in line with best practice and appropriate to inform the assessment of direct and indirect effects reported in Chapter 14, Climate assessment [APP-083].	BBC do not have a climate specialist to comment on this matter.	N/A	November 2021
<b>Climate</b> Construction and operational effects	Chapter 14, Climate [APP-083]	The assessment has concluded that no significant effects associated with greenhouse gas emissions and climate change would result from the Scheme.	BBC do not have a climate specialist to comment on this matter.	N/A	November 2021
<b>Climate</b> Embedded and essential mitigation	Chapter 2, The Scheme [APP-071]  Chapter 14, Climate [APP-083]	National Highways considers that: <ul style="list-style-type: none"> <li>The embedded mitigation measures illustrated on the Environmental Masterplan [APP-091] [REP9-037] and within Chapter 2, The Scheme [APP-071].</li> </ul>	BBC do not have a climate specialist to comment on this matter.	N/A	November 2021

Issue	Document Reference	National Highways Position	Bedford Borough Council Position	Status	Date
	Environmental Masterplan [APP-091] [REP9-037] First Iteration EMP [APP-234] V4 [TR010044/APP/6.8v4] Schedule of mitigation [APP-235]	<ul style="list-style-type: none"> <li>The essential mitigation measures set out in the First Iteration EMP [TR010044/APP/6.8v4] are appropriate to reduce the temporary effects of greenhouse gas emissions, during construction of the Scheme.</li> </ul> National Highways consider this matter agreed given no objections were raised by BBC's flood officer in relation to climate change in response to the ExA's first Written Question 1.9.4.2.			
<b>Assessment of Cumulative Effects</b>  Baseline data	Chapter 15, Assessment of cumulative effects [APP-084] Appendix 15.1 Long list of other developments [APP-228] Appendix 15.2 Assessment matrix [APP-229]	National Highways has undertaken an assessment of the likely significant cumulative effects of the Scheme on the environment resulting from the cumulation of effects with other existing and/or approved developments and projects. The assessment has considered: <ul style="list-style-type: none"> <li>Existing completed projects.</li> <li>Approved but uncompleted projects.</li> <li>Ongoing activities.</li> <li>Plans or projects for which an application has been made and which are under consideration by consenting authorities.</li> </ul>	BBC is content with the developments and projects identified within both the long list and shortlist, and how these have been categorized within the assessment.	Agreed	January 2022

Issue	Document Reference	National Highways Position	Bedford Borough Council Position	Status	Date
		<ul style="list-style-type: none"> <li>Plans and projects which are reasonably foreseeable.</li> </ul> <p>Cumulative developments and projects were initially identified through a long list [APP-228], with qualifying developments subsequently shortlisted [APP-229] for consideration in the assessment.</p> <p>National Highways considers that its approach to identifying other development projects, their shortlisting and subsequent inclusion in the cumulative effects assessment is robust and appropriate.</p>			
<p><b>Assessment of Cumulative Effects</b></p> <p>Construction and operational effects</p>	<p>Chapter 15, Assessment of cumulative effects [APP-084]</p> <p>Appendix 15.1 Long list of other developments [APP-228]</p> <p>Appendix 15.2 Assessment matrix [APP-229]</p>	<p>The cumulative effects assessment has concluded that significant adverse cumulative effects would occur in relation to the effects of the following topics interacting cumulatively with the effects of other planned projects and developments:</p> <ul style="list-style-type: none"> <li>Landscape and visual effects [APP-076].</li> <li>Noise and vibration [APP-080].</li> </ul> <p>No significant cumulative effects have been identified in relation to other environmental topics.</p> <p>National Highways considers that the outcomes of the cumulative effects</p>	<p>BBC is content with the conclusions of the assessment and the significance of the reported effects.</p>	<p>Agreed</p>	<p>January 2022</p>

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Issue	Document Reference	National Highways Position	Bedford Borough Council Position	Status	Date
		assessment (in relation to development interactions) are accurate.			

**Table 3-5 – Archaeological Matters**

Issue	Document Reference	National Highways Position	Bedford Borough Council Position	Status	Date
<b>Archaeology mitigation areas</b>	Archaeological Mitigation Strategy [APP-238] [TR010044/EXAM/9.23v4]	<p>The extent and methodology of the all the mitigation areas within Bedford Borough have been agreed and are listed below:</p> <ul style="list-style-type: none"> <li>• Site 1, Field 3</li> <li>• Site 2, Field 5</li> <li>• Site 3, Field 9</li> <li>• Site 8, Fields 47 and 48</li> <li>• Site 9, Field 49</li> <li>• Site 41, Field 26</li> </ul>	<p>The BBC Heritage Team agree with the extent of the archaeology mitigation areas. The overarching Archaeological Mitigation Strategy has been revised and further comments have been made on the revision. BBC are of the opinion that agreement on a final version of the AMS should be achievable. The detailed methodology for each mitigation area will be set out in a Site Specific Written Scheme of Investigation to be approved by BBC ahead of work commencing at a site.</p>	Agreed	26.07.2021
<b>Council archaeology brief</b>	Archaeological Mitigation Strategy [APP-238] [TR010044/EXAM/9.23v4]	<p>A brief has been prepared by the Curators at the councils. This is designed to facilitate the production of the Site Specific Written Schemes of Investigation (SSWSIs) by the Archaeological Contractor. The contents of this brief have been taken into account when detailing the overarching scope of works in Part Two of the Archaeological Mitigation Strategy. The Joint Cambridgeshire / Bedfordshire Brief for a Programme of Archaeological Investigation has been incorporated as Appendix B of the Updated Archaeological Mitigation</p>	<p>BBC note that a brief must be in place. A revised Design brief has been sent to National Highways following a meeting on 12/08/2021.</p> <p>BBC agree that the Joint Cambridgeshire/Bedfordshire Archaeological Design Brief is included in the Updated Archaeological Mitigation Strategy as Appendix B, Further comments on the updated AMS have been provided as part of the response to the ExA WQ2.</p>	Agreed	December 2021



Issue	Document Reference	National Highways Position	Bedford Borough Council Position	Status	Date
		Strategy <b>[REP3-010]</b> submitted at Deadline 3 of the Examination.			
Archaeology requirement 9	Archaeological Mitigation Strategy <b>[APP-238]</b> V3 <b>[REP3-010]</b> <b>[TR010044/EXAM /9.23v4]</b>	Requirement 9 states: "9. The authorised development must be carried out, operated and maintained in accordance with the archaeological mitigation strategy." The detail of the requirement for Site Specific WSIs, fieldwork methodology and post-excavation assessment is detailed in that document. The Joint Cambridgeshire/ Bedfordshire Brief for a Programme of Archaeological Investigation has been incorporated as Appendix B of the Updated Archaeological Mitigation Strategy <b>[REP3-010]</b> submitted at Deadline 3 of the Examination.	<p>18.11.21 – The position below outlines BBC's previous position. As at 11.02.22, BBC is content that all outstanding matters have been addressed and the position is agreed.</p> <p>The Heritage Team do not believe requirement 9 (Archaeology) within the draft DCO provides sufficient detail on the nature of the archaeological work. Alternative wording detailing the programme of work to include preparation of Site Specific WSI's, fieldwork, post-excavation assessment and analysis, and publication and archiving should be agreed. Clear reference also needs to be made to the archaeological work following an Archaeological Mitigation Strategy and Site Specific WSI's approved by the relevant LPA's and prepared in accordance with the Archaeological Design Brief.</p> <p>BBC welcome further discussion on this but accept that National Highways' acceptance of the Joint Cambridgeshire/Bedfordshire Archaeological Design Brief and its</p>	Agreed	18/11/21

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Issue	Document Reference	National Highways Position	Bedford Borough Council Position	Status	Date
			inclusion in the Updated Archaeological Mitigation Strategy overcomes most of our concerns with Requirement 9 as worded.		

**Table 3-6 – Highways, Design, Public Rights of Way and WCH**

Issue	Document Reference	National Highways Position	Bedford Borough Council Position	Status	Date
Highways Design General Matters					
Closure of accesses onto the A1 and reprovision of Local Road Access	Bedford Borough Council Relevant Representation [RR-008]	<p>As part of the Scheme, the Applicant is committed to improving the safety standards of existing conditions. The Scheme proposes closure of four direct accesses onto the A1 at (School Lane, Chawston Lane, Nags Head Lane and The Lane) and has agreed with Bedford Borough Council preliminary designs for a new link road accessed from a new roundabout junction on Roxton Road, which allows access to all affected properties. The Scheme has also agreed with the local authority preliminary designs for the reconstruction and slight realignment of Roxton Road overbridge, and for new access arrangements to Kelpie Marina.</p> <p>The proposals are included within the General Arrangement Plans [APP-011].</p>	The Traffic Operations team has agreed to the closure of four direct accesses onto the A1 (School Lane, Chawston Lane, Nags Head Lane and The Lane) and has agreed preliminary designs for a new link road accessed from a new roundabout junction on Roxton Road, which allows access to all affected properties. The team has also agreed preliminary designs for the reconstruction and slight realignment of Roxton Road overbridge, and for new access arrangements to Kelpie Marina.	Agreed	5/10/2021

Issue	Document Reference	National Highways Position	Bedford Borough Council Position	Status	Date
Impact on Public Transport Services	Bedford Borough Council Relevant Representation [RR-008p]	<p>Transport Assessment Report [APP-241]</p> <p>The Applicant proposes permanent relocation of the existing bus stop located on the northbound carriageway of the A1 (Wyboston Footbridge) 180m to the north to improve safety.</p> <p>The applicant further proposes to permanently relocate the existing bus stop, located on the southbound carriageway of the A1 (Wyboston Footbridge) approximately 400m north to improve safety.</p> <p><b>Table 8-2</b> of the Transport Assessment Report [APP-241] shows that there are seven routes which do not pass through the Scheme but which are within the surrounding local highway network which may be indirectly impacted during the Scheme construction. It is expected that the impact of the Scheme construction on this group of bus services will be minimal.</p>	Discussions have taken place between National Highways and the Transport Policy team on the impact of the scheme for bus users. However, further discussions will be required on the implications of detailed design during and after construction on the location of bus stops on the A1, and the impact on local bus services in adjacent villages.	Agreed	11/02/22
Impact on Sustainable Development	Bedford Borough Council Relevant Representation [RR-008q]	East West Rail has now completed their non-statutory consultation. However, until East West Rail has determined the route and locations of the proposed stations, it is not	The Council wishes to ensure that potential sustainable development in the area is not compromised by the design	Not Agreed	11/02/22

Issue	Document Reference	National Highways Position	Bedford Borough Council Position	Status	Date
		<p>appropriate for the Applicant to make or coordinate any specific provision for any new infrastructure which may be required as part of the East West Rail scheme.</p> <p>The design of Barford Road is a replacement of the existing infrastructure. The existing infrastructure does not include provision for walkers, cyclists and/or horse-riders and therefore this is not proposed in the design of the Barford Road side road diversion or over bridge.</p> <p>Furthermore, there are no public rights of way connecting to the existing Barford Road in close proximity to the Scheme. The preliminary design for Barford Road including the bridge crossing has been developed and agreed in consultation with Central Bedfordshire Council as the maintaining highway authority.</p> <p>The proposed structure over the East Coast Main Line includes vehicular access through the side spans for landowners. No separate provision has been made for pedestrians and cyclists alongside the East Coast Main Line as there are no existing rights of way within the area. It is envisaged that there</p>	<p>of the new road. It therefore wishes to be reassured that:</p> <ul style="list-style-type: none"> <li>• A junction on the new road to serve the proposed East West Railway stations in the area is deliverable.</li> <li>• Sufficient space to accommodate sustainable modes of travel is provided on the Barford Road over bridge.</li> <li>• Sufficient space for north-south pedestrian and cycle paths adjacent to the East Coast Main Line under the new road is maintained.</li> </ul>		



Issue	Document Reference	National Highways Position	Bedford Borough Council Position	Status	Date
		<p>will be sufficient space for WCH through the shared use of the vehicular access through the side span.</p> <p>Details of the proposals are included within the General Arrangement Plans <b>[APP-011]</b> and the WCH provisions are included within the Streets, Rights of Way and Access Plans <b>[APP-013]</b></p>			
Impact of Construction Phase upon the Highway Network	Transport Assessment <b>[APP-241]</b> and <b>[APP-242]</b> and the Transport Assessment Annex <b>[APP-243]</b> .	<p>The Applicant has provided comprehensive construction traffic flow impacts in the Transport Assessment <b>[APP-241]</b> and <b>[APP-242]</b> and the Transport Assessment Annex <b>[APP-243]</b>. Results from the assessments undertaken have been presented to local councillors, officers and local forums of all the local authorities.</p> <p>National Highways have submitted a Technical Note on construction phase monitoring at Deadline 9 <b>[REP9-036]</b>.</p>	BBC is satisfied that the applicant has provided comprehensive construction traffic flow impacts in the Transport Assessment documents, and that results from the assessments undertaken have been presented to local councillors, offices and local forums of Bedford Borough Council. BBC welcomes the opportunity for further discussions on the local impact of construction traffic as the scheme progresses.	Agreed	5/10/2021
The Outline Construction Management Plan <b>[APP-244]</b>	The Outline Construction Traffic Management Plan (OCTMP) <b>[APP-244]</b>	The Outline Construction Traffic Management Plan (OCTMP) <b>[APP-244]</b> sets out the temporary traffic management processes that will be followed for the safe and efficient construction phases of the Scheme. The development of the	BBC is satisfied that the temporary traffic management processes set out in the Outline Construction Traffic Management Plan have been developed in discussion with the Strategic Road Users TWG.	Agreed	February 2022

Issue	Document Reference	National Highways Position	Bedford Borough Council Position	Status	Date
		<p>OCTMP has been informed through discussions with the Strategic Road Users Technical Working Group which includes representatives from local authorities.</p> <p>Following a grant of development consent for the Scheme, relevant local highway authorities will have the opportunity to comment on a Traffic Management Plan, which must accord with the OCTMP [APP-244]. Requirement 11 of the draft Development Consent Order (dDCO) [APP-025] makes provision for the preparation of a Traffic Management Plan, that must be consulted upon with the relevant local highway authority before being submitted to the Secretary of State for approval. In making an application to discharge the requirement, a summary report is required to be prepared which must include the written responses from any parties consulted with.</p> <p>The Applicant is committed to continuing engagement with the local authority on matters relating to the outline construction traffic management plan.</p>	<p>BBC welcomes the opportunity for further discussions on the local impact of construction traffic as the scheme progresses with reference to how traffic management will affect local highway network.</p>		

Issue	Document Reference	National Highways Position	Bedford Borough Council Position	Status	Date
		<p>National Highways consider this matter to be agreed following a meeting on 05/10/21.</p> <p>National Highways have submitted a Technical Note on construction phase monitoring at Deadline 9 <b>[REP9-036]</b>.</p>			
<p>The Outline Construction Traffic Management Plan <b>[APP-244]</b></p>	<p>Bedford Borough Council Relevant Representation <b>[RR-008n]</b></p>	<p>The restrictions sought are sufficiently set out in the Outline Construction Traffic Management Plan as noted below.</p> <p>Chapter 3 of the Outline Construction Traffic Management Plan <b>[APP-244]</b> sets out a number of restrictions as follows:</p> <ul style="list-style-type: none"> <li>• Construction traffic will not be permitted to use a number of specifically identified side roads for the duration of the Scheme construction phase. Appendix C of the Outline Construction Traffic Management Plan <b>[APP-244]</b> sets out the restricted routes.</li> <li>• Carriageway and lane restrictions will be used to create safe working spaces. Indicative closure times are set out in Table 3.1 within the Outline Construction Traffic</li> </ul>	<p>With regards to traffic management, diversions and construction management plans, the Traffic Operations team will continue to engage with the relevant National Highways technical teams on the proposed plans and will continue to review these as the details emerge.</p>	<p>Agreed</p>	<p>February 2022</p>

Issue	Document Reference	National Highways Position	Bedford Borough Council Position	Status	Date
		<p>Management Plan <b>[APP-244]</b>. The indicative closures are shown as being operational for overnight periods.</p> <ul style="list-style-type: none"> <li>• Strategic diversion routes will be in place when there are closures on sections of the A428, A421 and the A1. Appendix D of the Outline Construction Traffic Management Plan <b>[APP-244]</b> sets out drawings showing the diversion routes.</li> <li>• The number of operating lanes approaching the Black Cat junction on the A1 and A421 will only be reduced (from the existing two lanes in each direction) during off peak hours. Full carriageway closures will only be implemented at night or at weekends, with narrow lane working during daytime. Para 3.6.2 of the Outline Construction Traffic Management Plan <b>[APP-244]</b> Speed restrictions and temporary speed limits (to be dealt with by temporary traffic regulation orders).</li> </ul>			

Issue	Document Reference	National Highways Position	Bedford Borough Council Position	Status	Date
		<p>Following the grant of development consent for the Scheme, relevant local highway authorities will have the opportunity to comment on the Traffic Management Plan, which must substantially accord with the Outline Construction Traffic Management Plan [APP-244]. Requirement 11 of the draft Development Consent Order (dDCO) [APP-025] makes provision for the preparation of a Traffic Management Plan, that must be consulted upon with the relevant local highway authority before being submitted to the Secretary of State for approval. In making an application to discharge the requirement, a summary report is required to be prepared which must include the written responses from any parties consulted with.</p> <p>National Highways consider this matter to be agreed following a meeting on 05/10/21.</p>			
The Construction Programme	Outline Construction Traffic Management Plan [APP-244]	Sufficient information regarding the construction programme is contained within the Applicant in Chapter 2, The Scheme of the Environmental Statement [APP-071]. Further detailed construction works information will	With regards to the OCTMP, the Traffic Operations team will continue to engage with the relevant National Highways technical teams on the proposed detailed designs for construction works and timings of road closures, and will	Agreed	05/10/2021



Issue	Document Reference	National Highways Position	Bedford Borough Council Position	Status	Date
		<p>be provided at the detailed design stage of the Scheme.</p> <p>Sufficient information for this stage is provided within the Application about the timings of closures with indicative timings for closures set out in the Outline Construction Traffic Management Plan <b>[APP-244]</b>.</p> <p>The relevant local highway authorities will have the opportunity to comment on a Traffic Management Plan, which must accord with the Outline Construction Traffic Management Plan <b>[APP-244]</b>. Requirement 11 of the draft Development Consent Order (dDCO) <b>[APP-025]</b> makes provision for the preparation of a Traffic Management Plan, that must be consulted upon with the relevant local highway authority before being submitted to the Secretary of State for approval. In making an application to discharge the requirement, a summary report is required to be prepared which must include the written responses from any parties consulted with.</p> <p>National Highways consider this matter to be agreed following a meeting on 05/10/21.</p>	<p>continue to review these as the details emerge.</p>		

Issue	Document Reference	National Highways Position	Bedford Borough Council Position	Status	Date
<b>Geometry and Design Standards</b>					
Design Standards for Junctions and Roads in Bedford Borough Council (BBC) area		<p>National Highways has designed sections of non-trunk roads to suit the nature of the existing road, which in some cases are old roads that have not been designed to any standard.</p> <p>Design guides or standards such as the Design Manual for Roads and Bridges (DMRB) or Manual for Streets (MfS) have been used to facilitate this.</p> <p>The Applicant developed local road design proposals in collaboration with Bedford Borough Council during early engagement with the local authority.</p> <p>National Highways consider this matter to be agreed following a meeting on 05/10/21.</p>	Bedford Borough Council agrees in principle with the applicant's position.	Agreed	05/10/2021
Design Standards for Junctions and Roads in Bedford Borough		<p>National Highways has designed Roxton Link Road to suit the nature of the existing road, which in some cases are old roads that have not been designed to any standard.</p> <p>Design guides or standards such as the Design Manual for Roads</p>	<p>BBC is satisfied that Roxton Road link is designed to the appropriate standard for its proposed use as a link road for access to the properties which have had their direct access to the A1 removed.</p> <p>BBC notes that the applicant is proposing to install equestrian height</p>	Agreed	February 2022

Issue	Document Reference	National Highways Position	Bedford Borough Council Position	Status	Date
Council (BBC) area		<p>and Bridges (DMRB) or Manual for Streets (MfS) have been used to facilitate this.</p> <p>The Applicant developed local road design proposals in collaboration with Bedford Borough Council during early engagement with the local authority.</p>	parapets on the overbridge, as set out at ISH5 (01/12/21).		
Design Standards for Junctions and Roads in Bedford Borough Council (BBC) area	Works Plans <b>[APP-009]</b> to <b>[APP-010]</b> ; General Arrangement Plans <b>[APP-011]</b> and Permanent Speed Limit Plans <b>[APP-015]</b> .	<p>For:</p> <ul style="list-style-type: none"> <li>• The Lane.</li> <li>• Kelpie Marina Access Road.</li> <li>• Bedford Road.</li> <li>• Nags Head Lane Link.</li> <li>• Chawston Lane.</li> <li>• A1 Services Link.</li> </ul> <p>matters including the width of the verges; design speeds; locations of drainage ditches and vertical clearances for power cables are shown in the relevant Works Plans <b>[APP-009]</b> to <b>[APP-010]</b>; General Arrangement Plans <b>[APP-011]</b> and Permanent Speed Limit Plans <b>[APP-015]</b> and have been agreed in principle with the local authorities.</p> <p>Some matters, including road junction drainage collection</p>	Bedford Borough Council agrees in principle with the applicant's position.	Agreed	05/10/2021

Issue	Document Reference	National Highways Position	Bedford Borough Council Position	Status	Date
		<p>systems design will not be finalised until detailed design stage, (as addressed within Requirement 12 of the Draft DCO), when the host authorities will be consulted.</p> <p>Further information on this is within the legal Agreement relating to the A428 Black Cat to Caxton Gibbet Improvements Scheme Development Consent Order).</p> <p>National Highways consider this matter to be agreed following a meeting on 05/10/21.</p>			
<p>Design Standards for Junctions and Roads in Bedford Borough Council (BBC) area</p>	<p>Works Plans <b>[APP-009]</b> to <b>[APP-010]</b>; General Arrangement Plans <b>[APP-011]</b> and Permanent Speed Limit Plans <b>[APP-015]</b>.</p>	<p>For Roxton Link Road, matters including the width of the verges; design speeds; locations of drainage ditches and vertical clearances for power cables are shown in the relevant Works Plans <b>[APP-009]</b> to <b>[APP-010]</b>; General Arrangement Plans <b>[APP-011]</b> and Permanent Speed Limit Plans <b>[APP-015]</b> and have been agreed in principle with the local authorities.</p> <p>Some matters, including road junction drainage collection systems design will not be finalised until detailed design stage (as addressed within Requirement 13</p>		<p>Agreed</p>	<p>11/02/22</p>

Issue	Document Reference	National Highways Position	Bedford Borough Council Position	Status	Date
		<p>of the Draft DCO), when the host authorities will be consulted.</p> <p>Further information on this can be set out within the legal Agreement between the parties.</p>			
Lighting Strategy	General Arrangement Plans [APP-011]	<p>A detailed lighting strategy will be developed at the detailed design stage. However, the proposed extent of lighting is shown on the General Arrangement Plans [APP-011]. Requirement 17 of the dDCO [APP-025] sets out that no part of the authorised development may be brought into use until a written scheme of the proposed highway lighting for that part has been approved by the Secretary of State, following consultation with the relevant local highway authority on matters relating to its function.</p> <p>National Highways consider this matter to be agreed following a meeting on 05/10/21.</p>	BBC is satisfied with this approach to the lighting strategy.	Agreed	05/10/2021
Management and Maintenance Responsibilities		<p><b>Highways</b></p> <p>The links and junctions as defined in the draft DCO [APP-025] Schedule 3 and within the area of Bedford Borough Council will be the responsibility of Bedford Borough Council highways authority.</p>	BBC will continue to discuss the details for management and maintenance responsibilities for the detrunked highways, structures, drainage and landscaping features set out in APP-025.	Agreed	13/12/2021 3/12/2021



Issue	Document Reference	National Highways Position	Bedford Borough Council Position	Status	Date
		<p>Bedford Borough Council will maintain the Kelpie Marina road from Bedford Road heading south to Rockham Ditch (including culvert) and the 2 way section of the A1 Services Link.</p> <p>National Highways will maintain the one way section of the A1 Services Link, but the road will be adopted by the Bedford Borough Council. Bedford Borough Council will be responsible for the traffic enforcements along the entire link (Red Route).</p> <p><b>Structures</b></p> <p>National Highways will maintain Roxton Road Bridge, (overbridge).</p> <p>Bedford Borough Council will be responsible for the maintenance of the carriageway construction above the waterproofing for the bridge structures that pass 'over' the trunk road.</p> <p><b>Drainage</b></p> <p>Bedford Borough Council will be the maintaining authority for the drainage assets servicing the proposed local highway network, including but not limited to the attenuation basins, Sustainable</p>			

Issue	Document Reference	National Highways Position	Bedford Borough Council Position	Status	Date
		<p>Drainage Systems (SuDS) and culverts.</p> <p><b>Landscaping</b></p> <p>The extent of maintenance responsibility for landscape will be determined at detailed design in collaboration with Bedford Borough Council.</p> <p>National Highways will continue to engage with BBC on detailed design matters following the Examination.</p> <p>National Highways will continue to engage with BBC on detailed design matters following the Examination.</p>			
<b>Existing A428</b>					
Detrunking Process	Bedford Borough Council Relevant Representation [RR-008m]	<p>The Applicant is committed to continuing engagement with the local authority on the matters relating to de-trunking the existing A428 and handover of assets.</p> <p>A side agreement is currently being negotiated between the parties which will, when agreed, contain an acceptable process for the handover of the de-trunked A428. This will ensure that the highway is</p>	The Traffic Operations team has agreed to the scope and basic principles of the proposed de-trunking scheme, and will continue to work with National Highways on the detail of these proposals, particularly with reference to the viaduct over the River Great Ouse to the south of St Neots.	Agreed	5/10/2021

Issue	Document Reference	National Highways Position	Bedford Borough Council Position	Status	Date
		at a reasonable standard as agreed with the Highway Authority.			
De-trunking: Maintenance responsibility		<p>The existing A428 will be de-trunked from the Wyboston Roundabout through to Caxton Gibbet junction. Maintenance responsibility for the section of the existing A428 within Bedford Borough Council will be transferred to Bedford Borough Council highway authority.</p> <p>National Highways agrees that conversation will continue post examination through the legal agreement.</p>	BBC will continue to discuss the details for management and maintenance responsibilities for the detrunked section and features, including transfer of assets to Bedford Borough Council.	Agreed	February 2022
De-trunking: Name of road		<p>The existing A428 will be renamed A1428 and B1428 as per the extents shown on the Classification of Road Plans <b>[APP-016]</b> and contained within the draft DCO <b>[APP-025]</b> Schedule 3, Part 2 – Classified Roads.</p> <p>National Highways consider this matter to be agreed following a meeting on 05/10/21.</p>	BBC will continue to engage in discussions with National Highways on renaming the A428, in association with Central Bedfordshire Council and Cambridgeshire County Council.	Agreed	05/10/2021

Issue	Document Reference	National Highways Position	Bedford Borough Council Position	Status	Date
Land Ownership: Restoring of stopped up land		<p>The land required for, or affected by, the proposed development is shown on the Land Plans <b>[APP-008]</b>. Further reduction/refinement may be developed during detailed design.</p> <p>Where highways are being stopped up and there is no existing title plot associated, the half-width of the road will be returned to the adjacent landowners, unless National Highways are seeking permanent acquisition.</p>	BBC is willing to enter into further discussions on this matter where necessary.	Agreed	January 2022
<b>PROW and WCH Matters</b>					
Impact of the Scheme upon Walkers, Cyclists and Horse riders (WCH)	Bedford Borough Council Relevant Representation <b>[RR-008p]</b>	<p>The design of the proposed WCH routes is acceptable and are identified in the DCO Application, specifically shown in the General Arrangement Plans <b>[APP-011]</b>, the Streets, Rights of Way and Access Plans <b>[APP-013]</b> and within the draft DCO <b>[APP-025]</b>.</p> <p>In the delivery of the Scheme, the Applicant is required to re-provide Public Rights of Way and designated routes that are severed or disrupted as a result of the Scheme. Wider interventions outside of the Scheme area (such</p>	<p>For cyclists, pedestrians and other non-motorised users, further discussion is required on local network access to and around the Black Cat junction.</p> <p>BBC understands that National Highways has agreed to provide equestrian height parapets on Roxton Road overbridge.</p>	Agreed	February 2022

Issue	Document Reference	National Highways Position	Bedford Borough Council Position	Status	Date
		<p>as links to the wider network) are outside of the scope of the Scheme.</p> <p>The Roxton Road bridge has been provided to maintain connectivity across the Scheme.</p> <p>Correspondence received during the consultation highlighted that this route is used by horse riders. However, since the supplementary consultation, survey counts were undertaken on the existing bridge to understand the current level of usage by walkers, cyclists and horse riders. On the days counts were undertaken no horse riders were observed on the existing bridge, and therefore the barriers on each side of the new Roxton road bridge have not been designed to comply with DMRB standards for horse riders.</p> <p>Furthermore, the bridge does not connect to official bridleways, hence there is no requirement to provide higher parapets as for a bridleway bridge. More information on the results of the walkers, cyclists and horse rider counts can be found within Chapter 12, Population and Health within volume 1 of the Environmental Statement [APP-081] which</p>			



Issue	Document Reference	National Highways Position	Bedford Borough Council Position	Status	Date
		describes the assessment on Population and Health.			
Walkers, Cyclists and Horse riders (WCH) Provision in Application	Bedford Borough Council Relevant Representation [RR-008r]	<p>Appendix A of the Case for the Scheme [APP-240] sets out an assessment of the Scheme against the paragraphs contained within the National Networks National Policy Statement (NNNPS). In response to paragraph 5.216 of the NNNPS, which expects that impacts on accessibility for non-motorised users will be mitigated, it is stated that as part of development of the Scheme, a Walking, Cycling and Horse Riding Assessment and Review was undertaken [APP-242]. It further states that the requirements of these users have been identified and appropriate mitigation measures have been incorporated into the design of the Scheme.</p> <p>The Scheme will provide new and diverted footpaths, cycleways and bridleways which will provide many benefits to the local population such as increased access to community facilities, improved safety while travelling, encouragement to take part in recreational activity and the increased opportunity to travel using sustainable transport modes.</p>	No significant objections to the proposal however it must be ensured appropriate linkages for pedestrians and cyclists are maintained and created particularly where the new road crosses the railway lines.	Not agreed	5/10/2021

Issue	Document Reference	National Highways Position	Bedford Borough Council Position	Status	Date
		<p>This includes a new 2m wide section of footway next to a new bus shelter on the A1 Great North Road as well as a new bridleway which will be established along the length of School Lane.</p> <p>No provision has been made for pedestrians and cyclists over the East Coast Main Line as there are no existing rights of way within the area.</p>			
Cycling Provision		<p>The Applicant has proposed unsegregated shared footway/ cycleway in accordance with the Design Manual for Roads and Bridges - 'CD 143 Designing for walking, cycling and horse-riding' at the following locations:</p> <ul style="list-style-type: none"> <li>• Roxton Road.</li> <li>• Roxton Link Road.</li> <li>• Kelpie Marina Access Road.</li> <li>• Bedford Road.</li> </ul> <p>Furthermore, A footway has been provided for the A1 Services Link.</p> <p>The Applicant acknowledges BBC's comments regarding LTN 1/20 and would like to confirm that although proposals for the above locations where designed in accordance with</p>	<p>BBC notes the standards for cycling provision which are set out in LTN 1/20, particularly at the locations listed where DMRB CD 143 may not be the appropriate standards, and would welcome further discussion on this as the scheme progresses.</p>	Agreed (subject to further discussion)	13/12/2021

A428 Black Cat to Caxton Gibbet improvements  
Draft Statement of Common Ground with Bedford Borough Council

Issue	Document Reference	National Highways Position	Bedford Borough Council Position	Status	Date
		CD 143, conform to the guidance within LTN 1/20.  National Highways will continue to consult BBC on this matter during the post examination phases of the project.			