

**Appendix A: Draft response to Highways England’s consultation on the A428
Black Cat to Caxton Gibbet proposals**

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Introduction

1. This document represents the response of the following Local Authority partners to Highways England's A428 Black Cat to Caxton Gibbet proposals.
 - Greater Cambridge Partnership
 - Cambridge City Council
 - Cambridgeshire County Council
 - Huntingdonshire District Council
 - South Cambridgeshire District Council
2. The response details the key issues identified by the Authorities that need to be addressed by Highways England as it takes the A428 project forward, based on the consideration of information published in the consultation.
3. The Authorities wish to restate their continued support for the proposals in principle. They should, along with other interventions, provide transport capacity to support the significant levels of growth planned in the Greater Cambridge area and beyond.
4. However, we also wish to emphasise the critical importance of the A428 being considered as part of a coherently planned local and regional transport network, that of necessity should interact and integrate with capacity being provided elsewhere. This includes:
 - The East West Rail Central Section between the Bedford area and Cambridge,
 - The Greater Cambridge Partnership's programme in the Cambridge area, and
 - The Cambridgeshire and Peterborough Combined Authority and Greater Cambridge Partnership's Cambridge Autonomous Metro proposals.
5. While this represents a significant opportunity, if there is not integration between these schemes and programmes, the net result of the additional highway capacity that is planned may ultimately be counterproductive, as it feeds additional traffic into areas that cannot cope with it, exacerbating congestion in those areas and negating the nominal benefits of the A428 scheme.
6. We wish to note that at this stage in the process there are many areas where there is further detail required to enable a full assessment of the impacts of the project and any necessary mitigation, and there are of areas where the Authorities will reserve their position, particularly on the mitigation measures that may be needed. We look forward to working with Highways England to consider these issues and to agree as much as possible prior to submission of the application for a Development Consent Order.
7. The following abbreviations are used throughout the response.

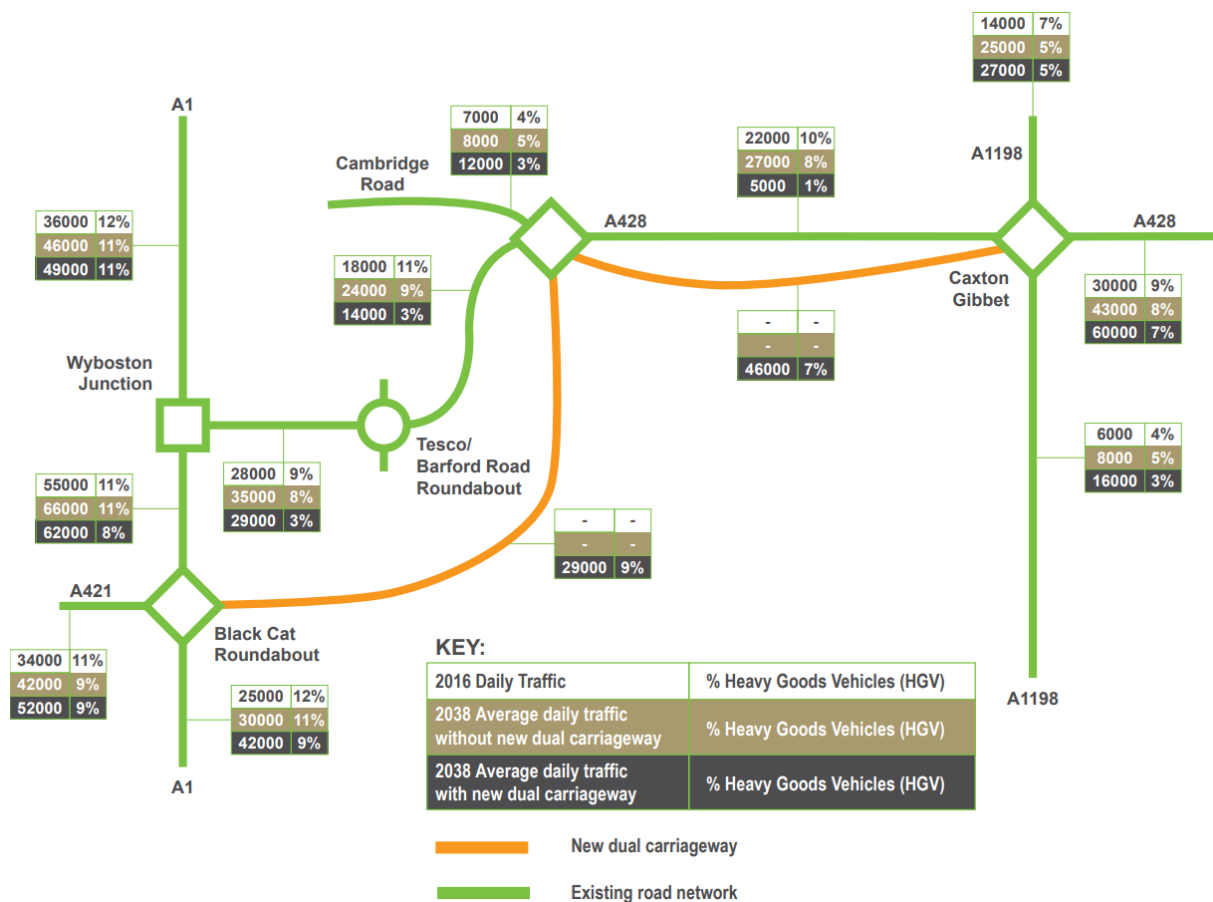
The Authorities: The Greater Cambridge Partnership, Cambridgeshire County Council, Cambridge City Council, Huntingdonshire District Council and South Cambridgeshire District Council

CPCA: Cambridgeshire and Peterborough Combined Authority

DCO:	Development Consent Order
GCP:	Greater Cambridge Partnership
NMU:	Non-Motorised Users
PEIR:	Preliminary Environmental Information Report
PROW:	Public Rights of Way
SRN / MRN:	Strategic Road Network / Main Road Network
SuDS:	Sustainable Drainage Systems
vpd:	Vehicles per Day

Traffic Impacts

8. The consultation booklet quantifies the impacts of the scheme on the A428 and a small number of directly connected roads as shown in the figure below from page 56 of the consultation booklet.



Transport modelling

9. We understand that the future traffic figures shown in the diagram above are from initial strategic modelling undertaken some time ago. Scheme modelling using a transport model validated for the detailed assessment of the A428 project had yet to be completed at the time the consultation commenced, and is still ongoing.
10. This modelling will be needed for the DCO submission. It is the detailed consideration of this modelling that will allow the Authorities to assess whether the scheme is

meeting national and local objectives, and whether there are impacts of the scheme or residual issues that the scheme does not address that require mitigation.

11. The following paragraphs set out areas where further information is needed in order for the Authorities to fully assess the schemes transport impacts. This includes
 - Impacts on the local transport network managed by Cambridgeshire County Council,
 - Impacts on communities that network serves, and
 - Impacts on a range of environmental issues associated with traffic, including, noise and air quality.
12. Transport modelling outputs will also inform the assessment of the impact of the scheme on CO₂ emissions and climate change.
13. The diagram under paragraph 9 above shows the current A428 between St Neots and Caxton Gibbet taking 27,000 vehicles per day in 2038 in a 'without scheme' scenario, and the old and new roads taking a combined 51,000 vehicles per day in a 'with scheme' scenario. The material presented does not quantify how this increase in traffic flows is derived, although it does state that a significant amount of traffic will transfer to the new dual carriageway from the existing A428 and other routes. The Authorities wish to understand in detail how much of this increase:
 - Is due to local housing / economic growth?
 - Is due to assumed background growth?
 - Is due to re-routing traffic
 - from strategic longer distance traffic (for example HCV traffic re-routing away from M4, M25 and A12 to the A421, A428 and A14 for trips to Felixstowe and Harwich)?
 - from local A Roads
 - that was previously rat-running on local (B Road or lower) routes?
 - Is due to suppressed demand in Bedford, Central Bedfordshire, Huntingdonshire, South Cambridgeshire and Cambridge?
 - Is abstracted from the local bus network?
 - Might otherwise be catered for by East West Rail?

Impacts on local roads and rat-running traffic through villages

14. The proposals have potential to reduce rat-running on local roads, and the text on page 57 of the consultation booklet specifically references the opportunity for traffic to reroute from the A505 and A603. The County Council would note that the A505 (and A10 for some onward trips to Cambridge) while not optimal in terms of route for some journeys, are MRN routes and their difference in route status from the A428 as part of the SRN is largely artificial. Their use should not be characterised as rat-running. Similarly, the A603 is a busy A Road, and its use does not generally constitute rat-running.
15. In both of these cases, the re-routing of traffic from these routes may be beneficial overall, but in terms of concern over rat-running, it is the more local routes between

the B1462 / A603 and the A428, and between the A14 and the A428 that see most rat-running as a result of congestion on the A428. The Authorities would welcome quantification of the impact of the project on traffic flows in the following areas:

- the B1042 and A603 between Sandy and Cambridge
- the B1046 between St Neots and the A603
- in villages in the area between the A428 and the B1042 / A603
- in villages in the area between the A428 and the new A14(M) / new A1307

16. The Authorities will wish to consider the information on traffic flows in these areas with and without the scheme to inform any consideration of mitigation needed in villages affected by the scheme.
17. However, we would note that if the scheme is successful in its stated aims, there should not be a significant need for traffic calming to manage traffic flows in the villages. The Authorities would therefore like to see a 'monitor and manage' approach taken to the traffic impacts of the scheme on villages, with a firm commitment to introduce appropriate and necessary mitigation measures should the scheme fail to deliver expected reductions in traffic levels, or if other problems occur.

Impacts on St Neots and Little Paxton

18. Other than the quantification of traffic flows on Cambridge Road, St Neots, and on the old A428, the information presented does not provide any information on how the scheme will impact upon traffic flows in St Neots.
19. The old A428 between Great North Road and Barford Road is shown as taking 29,000 vpd in the 2038 'with scheme' scenario, which is 1,000 vpd more than 2016 traffic flows on the road, and only 6,000 vpd less than the 'without scheme' scenario. For the 'with scheme' scenario, this implies a very significant re-routing of traffic from within St Neots, or a very significant degree of induced traffic, or both.
20. The Authorities would therefore welcome quantification of the impacts of the scheme on traffic flows on the following routes in St Neots:
 - B1041 Mill Lane, Little Paxton
 - B1043 Huntingdon Road north of Priory Hill Road
 - B1428 Cambridge Road at railway bridge
 - B1046 Potton Road at bridge over railway
 - B1043 Barford Road north of its junction with the old A428
 - B1428 Great North Road north of its junction with the old A428
 - Bushmead Road at bridge over A1
 - Duloe Road at A1 bridge
 - B1048 Crosshall Road east of its junction with Great North Road
 - Great North Road south of its junction with A1 slip roads
 - B1428 St Neots Road at the town bridge over the River Great Ouse

Impacts on Cambridge, and interaction with the Greater Cambridge Partnership's transport programme

21. The presented traffic forecast data presented does not quantify changes in traffic flows from the A428 into Cambridge as a result of the scheme, either on the A1303 Madingley Road, or on other Cambridge radials including the A603 Barton Road, A1309 Hauxton Road, B1049 Histon Road and A1309 Milton Road. It does however show significantly increased levels of traffic on the A428 to the east of the Caxton Gibbet junction.
22. The radial roads into Cambridge and the main road network in the city centre cannot cope with additional peak period traffic, and significant peak spreading is already evident in the city. The transport programme of the Greater Cambridge Partnership is focussed on reducing traffic levels and congestion in Cambridge while at the same time providing new transport capacity to allow for continued economic and housing growth. The Cambridge Autonomous Metro proposals promoted by the Cambridgeshire and Peterborough Combined Authority builds on and enhances the GCP's public transport proposals.
23. It is critically important that the A428 proposals do not simply feed additional traffic into this congested network, but are planned to integrate with the GCP programme, and particularly the Cambourne to Cambridge better public transport project.

Impacts on and opportunities from East West Rail

24. Is the scheme forecasting looking at scenarios with and without the East West Rail Central Section route options between the Bedford area and Cambridge that are currently under consideration? What is the impact of the scheme on projected patronage on the East West Rail Central Section?

Impacts on the SRN, MRN and other A roads

25. A further significant issue for the Authorities is understanding how the scheme will impact on SRN and MRN routes beyond the immediate vicinity of the scheme, many of which are already operating at or over their nominal capacity and suffer from significant levels of congestion. In this context, the Authorities wish to understand how the scheme will impact on:
 - the A14 Cambridge Northern Bypass
 - the A14 between Cambridge and Newmarket
 - the A1303 between the A428 and the M11
 - the M11
 - the new A14(M) between Huntingdon and Cambridge
 - the new A1307 (old A14) between Huntingdon and Cambridge
 - the B1042 and A603 between Sandy and Cambridge
 - the A10 between Royston and Cambridge
 - the A1309 north of the M11
 - the A505 between the A1(M) and the A11
 - the A1198 between Huntingdon and Royston

26. The data presented in the figure under paragraph 9 above shows a doubling in traffic on the A1198 to the south of the Caxton Gibbet junction in 2038 from 8,000 vpd in the 'without scheme' scenario to 16,000 vpd in the 'with scheme' scenario. Where is this additional traffic coming from and going to? Will this result in exacerbated levels of congestion at the junction between the A505 and the A1198 north of Royston?
27. The very high traffic flows shown on the A1198 to the north of the Caxton Gibbet junction in 2038 are also a major concern, as this road is not of a standard that will cope with flows of 25,000 or more vpd. In this context we need to understand the impact of the A428 scheme on the A1198 in Godmanchester and around Papworth Everard and whether the figures presented indicate capacity issues on the old A14 (new A1307) between Huntingdon and the new A14(M) at Fenstanton that are leading to the diversion of trips onto the A1198 and A428 that would more appropriately be on the new A14(M)?
28. We would also note that in the 'with scheme' scenario, the current dual carriageway section of the A428 east of Caxton Gibbet is shown to take 60,000 vpd in 2038. These flows are significantly above the nominal design capacity of the route, and presumably do not take into account traffic that will join the route between Caxton Gibbet and Cambridge from Cambourne and the Bourn Airfield development.

Summary of modelling and traffic concerns

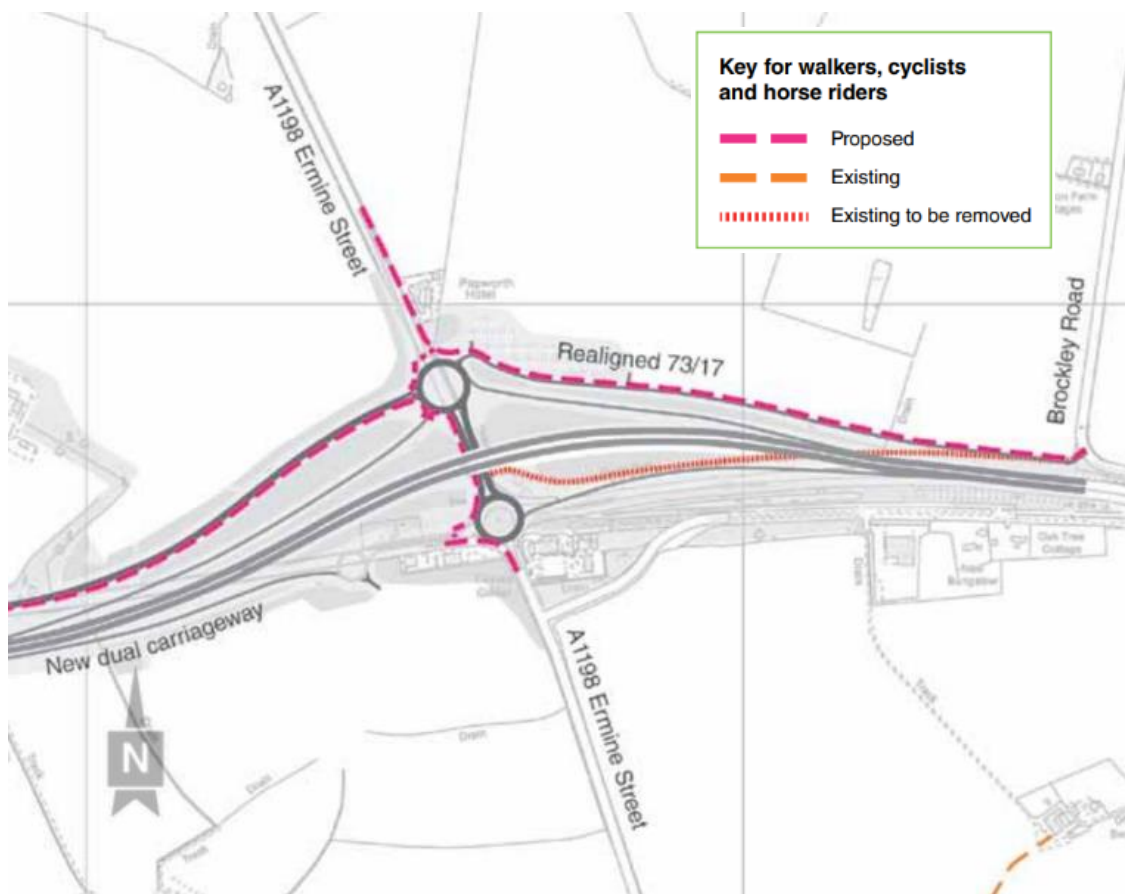
29. The Authorities support the A428 Black Cat to Caxton Gibbet scheme as part of the solution to the provision of new transport capacity to support growth and address the critical housing cost issues in the Greater Cambridge area. However, while we appreciate that modelling of the scheme is ongoing, the information on traffic flows presented in the consultation booklet raise many more questions than answers, and lead to very significant concerns that the local road network may suffer major adverse impacts as a result of the A428 scheme.
30. This in turn leads to concerns that the intervention proposed on the A428 has not yet been robustly considered in terms of the transport patterns that are needed in the Greater Cambridge area, and that are being planned for at a local and national level through the transport programmes of the GCP and CPCA, and by East West Rail. With the levels of growth that are planned, travel patterns need to change if we are to avoid major impacts for users and for the environment, and to provide residents, workers and visitors with reliable and efficient alternative transport options into and within what will otherwise be increasingly congested urban areas.
31. This need does not appear to be reflected in the model outputs that are reported in the consultation booklet. The Authorities do not wish to see a situation where improvements on one part of the SRN / MRN release capacity that then results in additional congestion and delay on other parts of those networks or elsewhere on the local transport network, negating the benefits that are sought from the project.
32. While it is possible that the revised and updated modelling will resolve some of these concerns, the information presented highlights the critical need to see changes in travel behaviour if the local and strategic road networks are not to see increasingly

damaging levels of congestion and delay, to the detriment of users and the environment. The A428 project needs to be framed in this context and should look to feed traffic into the public transport network to ensure that it does not lead to negative impacts elsewhere on the strategic road network, and in Cambridge, St Neots and other settlements served by and impacted by the route.

Direct impacts on the transport network managed by Cambridgeshire County Council

Caxton Gibbet area

33. While the consultation material provides details of daily traffic flows on the new A428, old A428 and the A1198 as they approach Caxton Gibbet, a detailed assessment of the proposed junction layout will require detail of all turning movements and a detailed breakdown of traffic flows by time of day. The County Council is not therefore in a position to comment on the appropriateness of the proposed junction arrangements to cater for the traffic flows shown at this time.
34. As noted in paragraph 25 above, we also need to establish the reason for the very significant increase in traffic on the A1198 in the 2038 with and without scheme scenarios.
35. With reference to the traffic information that has been provided, the County Council has significant concerns relating to the provision for pedestrians, cyclists and horse riders at Caxton Gibbet shown on page 43 of the consultation booklet and reproduced below.



36. The 'with scheme' scenario shows the A1198 taking 27,000 vpd to the north of Caxton Gibbet in 2038, compared to 14,000 vpd that used the route in 2016. The proposals show the cycle route from Cambourne to Eltisley crossing this link, and the cycle route south towards Caxton also crosses the two west facing A428 slip roads at grade.
37. To the south of Caxton Gibbet, flows on the A1198 in the 'with scheme' scenario rise from 6,000 vpd in 2016 to 16,000 vpd in 2038.
38. The provision of pedestrian and cycle facilities linking Cambourne with Papworth Everard, Eltisley and Croxton through this area needs to be fundamentally rethought in this context. At grade pedestrian and cycle crossings of high speed routes taking the volumes of traffic on the A1198 noted above are not acceptable. Detail on traffic flows on the slip roads will also need to be considered in detail, as there is an established north south demand from NMU between Caxton and Papworth Everard that needs to be safely provided for.

Eltisley area

39. The consultation material does not provide details of residual traffic flows on the B1040 in the Eltisley area so it is not possible at this time to comment in detail on the new local road and junction arrangements shown at this time

St Neots area

40. The lack of detail provided on traffic flows in the St Neots area other than for the old A428 and Cambridge Road (as noted in paragraphs 19 to 21 above) means that it is not possible at this stage to provide comments in detail on the impacts of the proposals in St Neots.
41. The County Council will require detailed traffic information quantifying all future movements at the proposed Cambridge Road junction with the new A428 in order to assess the appropriateness of the proposed junction arrangements and pedestrian and cycle infrastructure.

Strategic provision for Non-Motorised Users

42. The County Council wishes to see provision made as part of the A428 scheme for a segregated cycle route between St Neots and Cambourne.

Local road and PROW crossings of the new A428

43. *Comments awaited on PROW. Note comments on 1km or 5km threshold for cycle trips in health comments below*
44. There is a significant risk that the new road will be a barrier for many walking and cycling trips, or will add significant distance to many trips. In terms of cycle facilities, the Authorities wish to ensure that high quality routes are provided or enhanced between:
 - Papworth Everard and Cambourne
 - Croxton / Eltisley to Cambourne
 - Croxton / Eltisley to Papworth Everard
 - Caxton to Papworth Everard
45. In terms of the new road it will be a barrier for lots of walking and cycling trips. The most important links in this are Papworth to Cambourne and villages south of St Neots into St Neots.

Standard of new local transport assets and assets to be passed to the County Council

46. The acceptable standard of new assets, or of assets to be transferred to the County Council will of necessity be the subject of detailed consideration through the period up to the DCO submission, and the Council would hope to be in a position by that time to be able to have broad agreement in this area.
47. As a general principle, we will seek to keep new assets or assets transferred to the County Council to a minimum with the following qualifiers:
 - New or transferred assets should comply to relevant design standards
 - New or transferred assets should be capable of safely providing for the demand that is forecast to use it from all user classes / modes of transport.

48. Any existing assets that are not required by the County Council after the date of handover must be decommissioned.

Black Cat junction

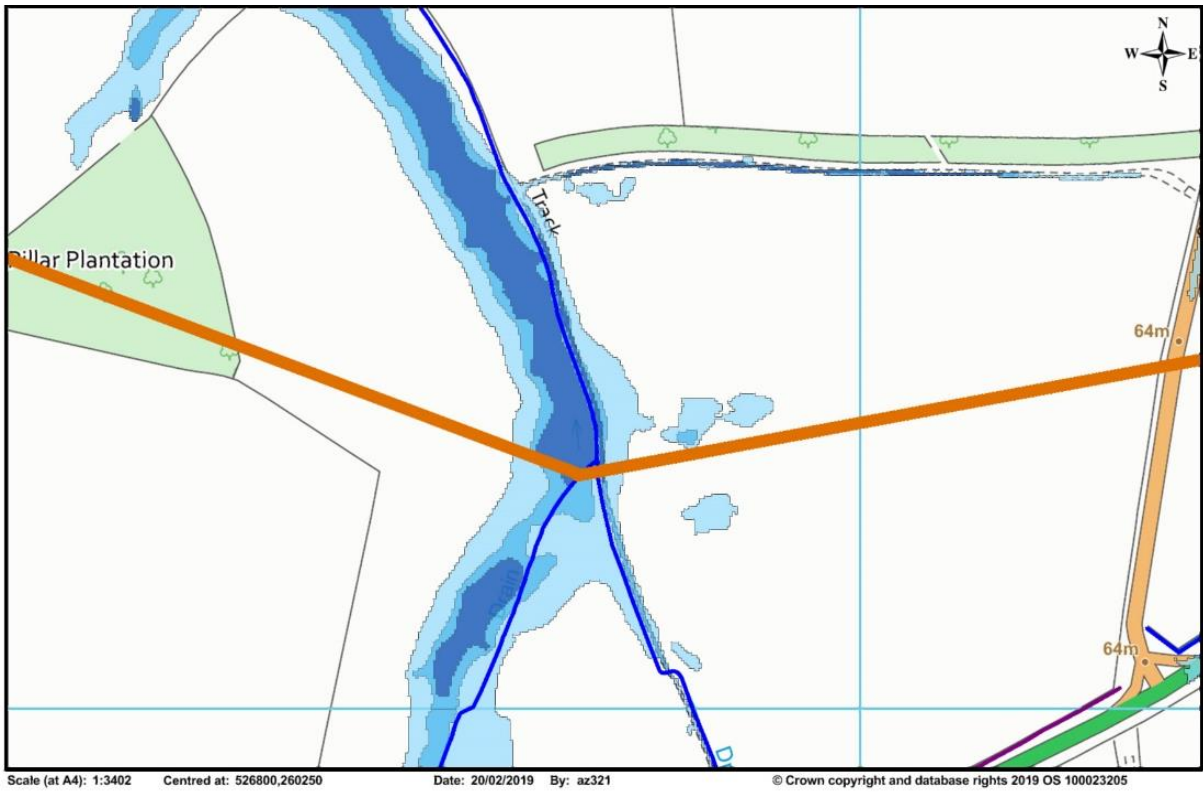
49. *While the Black Cat junction is in Bedford Borough, Cambridgeshire Authorities may want to comment, or to support BBC's comments.*

Environmental impacts

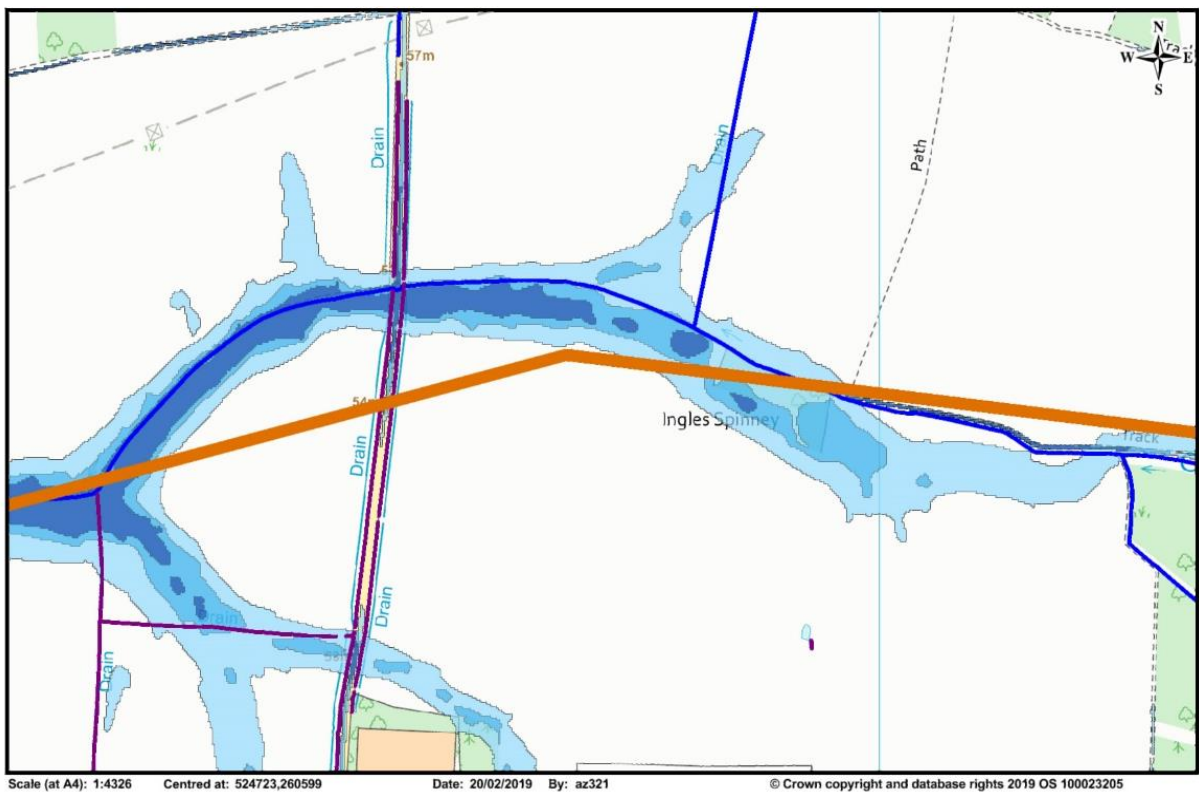
Flood Risk

50. After reviewing the potential impact of the A428 Road Upgrade on flood risk and drainage, it is clear that the new road may potentially cross over 20 watercourses and a number of areas at risk to flooding.
51. Whilst we have no objection to the proposed scheme, we would like to highlight the following:
- Any alterations to ordinary watercourses that aren't located within an Internal Drainage Board area will require consent from the Lead Local Flood Authority (LLFA) under the Land Drainage Act 1991.
 - In areas with known existing flood risk, measures should be implemented wherever possible to reduce the risk to existing communities. This could include incorporating Sustainable Drainage Systems (SuDS) into the development.
 - Floodplain compensation may be required on some ordinary watercourses. As outlined in the report, this will need to be agreed with the LLFA and will need to be on a level for level and volume for volume basis.
 - As with other Highways England road schemes, we would expect drainage from the new road to be limited to greenfield runoff rates through the use of SuDS features.
 - The latest climate change allowances will need to be applied to the design of the drainage network for the road.
52. Sections of the proposed road upgrade which are likely to be at particular risk to flooding and drainage are detailed in the maps below.
- Map 1: The new road is to cross an ordinary watercourse (possibly at two points) and an area of High Risk to surface water flooding around 450 metres west of the existing B1040.
 - Map 2: The proposed route may cross Gallow Brook in two places and again an area of High Risk to surface water flooding.
 - Maps 3 and 4: The road is to cross a main drain (blue) and the Hen Brook (red) in St Neots, which are both associated with high surface water flood risk. The road will also cross an area of Flood Zone 3, meaning floodplain compensation will likely be required.

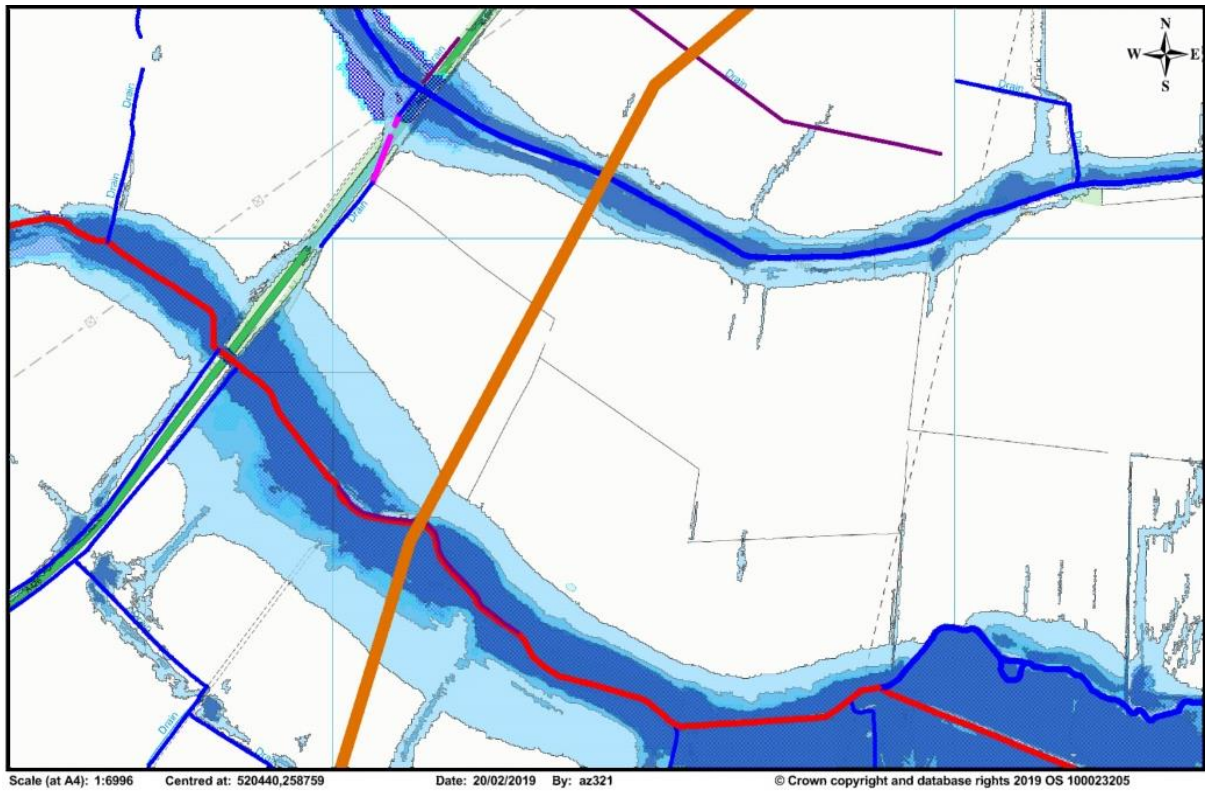
Map 1: Ordinary Watercourse west of B1040 – areas of surface water flood risk



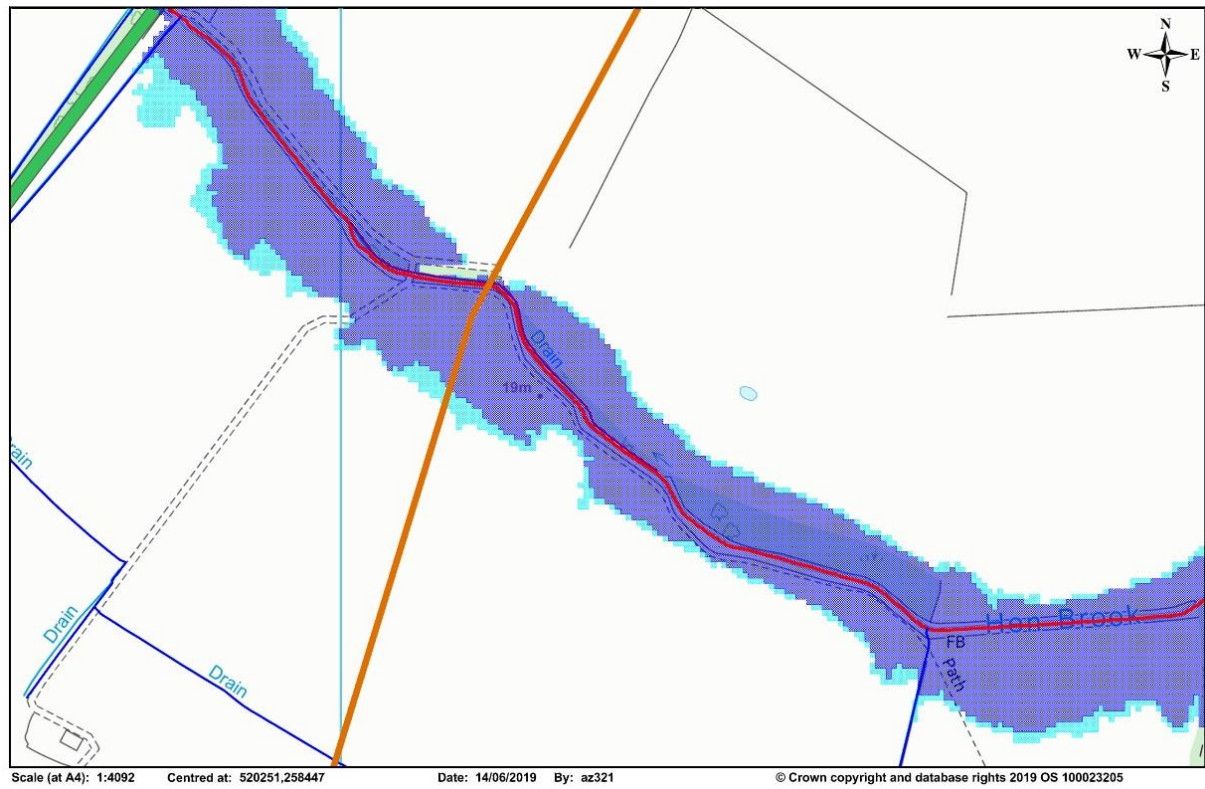
Map 2: Gallow Brook – areas of surface water flood risk



Map 3: Main Drain (blue) and Hen Brook (red) – areas of surface water flood risk



Map 4: Hen Brook – areas in Flood Zone 3 (purple)



Biodiversity

53. Is it disappointing that Highway's England is only expecting to "maintain existing levels of biodiversity" (consultation booklet, page 63, column 2) as part of the scheme. This conflicts with the National Planning Policy Framework that seeks development to deliver a measurable biodiversity net gain.
54. The A428 scheme should be an exemplar with a commitment by Highways England to achieve significant biodiversity net gain (minimum of 20% utilising a suitable appropriate Biodiversity Net Gain metric). This is particularly important given the cumulative impact of this and other major transport schemes (either in progress or delivery, including the A428 & A14 improvements, East West Rail, and the Greater Cambridge Partnership's Cambourne to Cambridge better public transport scheme) on the fragmentation of the landscape.
55. It is important there is collaboration between this project and others within the area and should fit into the work on Oxford-Cambridge Arc Local Natural Capital Plan, which looks at the growth agenda across the region.
56. The A428 project also provides excellent opportunities to deliver objectives of Cambridgeshire Green Infrastructure Strategy and the Cambridgeshire and Peterborough Habitat Opportunity Map key areas for grassland, wetland and woodland creation across the county (HOM published in March 2019 - contact Cambridgeshire and Peterborough Biodiversity Partnership for details). We welcome the commitment that the "design includes comprehensive landscaping and biodiversity measures that will help to connect habitats on either side of the new dual carriageway and guide animals safely under, over or away from the area is home the road" and expect this to include green bridges at key locations across the scheme, such as Black Cat, River Great Ouse and Eltisley/Croxton.
57. The ecological assessment will need to consider impacts on all statutory designated sites, non-statutory designated sites, protected species, priority species and habitats and Cambridgeshire and Peterborough Additional Species of Interest (see cpbiodiversity.org.uk for S41 & CPASI list for the county). Of particular concern is the impact on Eversden and Wimpole Woods SAC (Barbastelle bats), Croxton Park County Wildlife Site (CWS), River Great Ouse (CWS) and impact on breeding / wintering birds located within close proximity to the route. The mitigation hierarchy must be applied, with the scheme designed to avoid adverse impact. Serious consideration must be given to the cumulative impact of transport schemes and other development (either complete, in progress or in early planning stages) that will result in significant loss of habitat across the county and severe severance of the landscape resulting in reduction in resilience of species to move across the county.
58. Consideration of long-term management of the scheme and any legacy projects must be considered at an early stage to ensure long-term biodiversity mitigation / enhancement will be delivered.

Air Quality

59. *Commentary to be added.*

CO₂ emissions

60. The assessment of the impacts of the proposals on CO₂ emissions is of necessity informed by the assessment of changes in vehicle mileage that will occur as a result of the project. The Authorities are therefore not in a position to comment on the impacts of the scheme on climate change at this time, as transport modelling information is required to inform this assessment.

Noise and vibration

61. *Commentary to be added.*

Landscaping – Red Line boundary and space for mitigation

62. Experience with the A14 Cambridge to Huntingdon scheme has shown that a tightly drawn red line for the application can leave very little scope for landscaping works in mitigation of the scheme. The Authorities are concerned to ensure that this mistake is not repeated with the A428 Project.

Construction impacts

63. *Commentary to be added.*

Construction traffic and traffic management

64. Any exceptional movements of traffic during the construction or operation phase must be considered in association with CCC to agree a deterioration of the asset contribution for CCC assets on diversion routes and routes where there is displaced local traffic, as permitted under The Highways Act 1980. To preserve assets and future liabilities to local authority funds, commuted sums or actual works could be considered under agreement. The modelling may give us a clue to the second part of this request.

Construction impacts on local communities

65. *Commentary to be added.*

Public Health impacts

66. The Preliminary Environmental Information Report Volume 1: Report contains the main detail on the possible impacts on Population and Health. The methodology proposed is consistent with good practice and the topics to be assessed are welcomed, namely:

- Access to healthcare services and other social infrastructure.
- Access to open space and nature.
- Air quality, noise and neighbourhood amenity.

- Accessibility and active travel.
 - Access to work and training.
 - Social cohesion and neighbourhoods.
 - Climate change.
67. The application would benefit from a full health impact assessment as requested at the EIA Scoping Stage which should have formed the basis of the “Population and Health” section of the PEIR.
 68. The PEIR should have scoped into the assessment, the risk of suicide during both during the construction and operational phases, and Road Traffic Collisions both during the construction and operational phases.
 69. Section 12.3.9 of the PEIR has failed to include the Cambridge University Hospital Foundation Trust (Addenbrooke’s / CUH) in the list of community assets, whilst it may be within the direct vicinity of the A428 Addenbrooke’s is a regional Trauma centre and therefore takes trauma patients from a wide catchment area including the rest of East Anglia, therefore disruption, albeit short term, during construction is likely to have an adverse effect on visitors to the hospital and emergency services.
 70. As requested at the EIA scoping stage the applicant should have considered if the assessment of “impacts on any feeder PROWs between destinations, within 1km of the DCO site boundary” is appropriate considering that it is recommended to include walking and cycling as part of active travel to work and therefore distances travelled by NMU greater than 1km are not unusual, therefore consideration should be given to extend the boundary to 5km, or consideration given to identifying relevant employment and leisure destination within 5 km of the DCO boundary.
 71. The human health section (12.3.28 – 12.3.29) has taken a narrow baseline on which to base any potential positive or adverse effects on health. The Cambridgeshire Transport and Health Joint Strategic Needs Assessment contains a wider group of domains which could have been used to provide a more detailed baseline of the health of the local population likely to be affected by the A428 upgrade.

Cultural Heritage Impacts

Archaeology

72. Highways England’s non-technical summary of the Preliminary Environmental Information Report (PEIR) briefly indicates in Existing Conditions (baseline data) on page 9 that below ground and built aspects of the historic environment exist within historic landscapes. It also mentions, with some ambiguity, that archaeological excavations will occur in some locations “to identify the extent and survival of remains”.
73. It is unclear if these excavations are to assist with the evaluation of the route or as part of a mitigation strategy as the language is vague. If the latter is intended, then the objectives of these excavations should acknowledge the need to conserve the significance of the archaeological resource in detailed investigation programme that

will include significant large scale excavations, public engagement, research, analysis, publication and presentation in a variety of formats. The wording of this phrase, however, suggests an aim to evaluate the scheme rather than to describe the intention to provide a coherent, effective mitigation strategy that will enable the change to the historic environment to be suitably managed.

74. The scale of the impact on the extensive archaeological resource is not mentioned and this might provoke negative comments from the public at large, particularly from local people who may be knowledgeable about their local archaeology and history. While this construction impact can be appropriately mitigated, as recently evinced by the A14 archaeology programme, it would benefit the A428 team to acknowledge the scale of impact and considerable time that will be needed in advance of the construction programme to conduct the necessary excavations. Instead, “Other forms of mitigation are currently being considered....” that include landscape screening of the road to preserve the landscape settings of historic buildings without acknowledging that such mitigation will have an archaeological impact.
75. Overall, more emphasis has been given to indicating what could be done to protect the built heritage and historic landscape setting rather than to setting out the positive measures that can be designed to ensure that the extensive, non-designated archaeological settlement and funerary remains that will be negatively impacted by the scheme will be suitably preserved for posterity in a coherent, imaginative archaeological mitigation design and legacy programme.
76. The summary headlines given in the table on page 22 wholly ignores the impact in the scheme on the known extensive archaeological resource in the Construction column and it is too soon to properly predict what may follow from the evaluation and excavation to determine whether or not management of an archaeological resource might be required in the future. We object to the highlighted statement below.
77. The Cultural Heritage section (Chapter 6) of the PEIR outlines work done and currently being undertaken to acquire a baseline of known historic environment evidence, including archaeological and built environment assets mostly non-designated, historic landscapes and Conservation Areas, and some registered Parks and Gardens and Listed Buildings. Twelve scheduled monuments are also described.
78. A large part of the cultural heritage resource include non-designated remains and the severity of the construction impacts have been ranked according to the strictures of the Design Manual for Roads and Bridges. No mitigation design is yet available – it is too soon for this to be formulated.
79. Paragraph 6.4.27 describes operational effects on the recorded or unrecorded archaeological resource as not being envisaged. It is an unqualified statement that could have been improved by saying why this might be the case, for example:
 - because large landscape scale excavations will be needed to mitigate construction impacts, or
 - to refer to this aspect covered in 6.5.3, under Standard Mitigation Measures.

80. Currently lacking is a high level commitment to a public engagement strategy for archaeology during the course of construction and what plans might be in formulation to display the archaeological evidence and curate a publically accessible archaeological archive.
81. County Council officers have been working in partnership with colleagues from Central Bedfordshire and Bedford Borough Council Historic Environment Teams and constructively with AECOM and Highways England to consider how best to design and conduct an archaeological mitigation strategy for this scheme that provides value for money, is fit for purpose and is innovative and engaging for local residents who will be affected during the development of the scheme.
82. This work is ongoing, but is not well reflected by the PEIR.

Listed building and monuments

83. *Commentary to be added from districts.*

Mitigation and Legacy

84. The Authorities would welcome the establishment of a Legacy Fund by Highways England to allow issues that emerge after the DCO process to be addressed by Highways England in discussion with the Authorities and local communities impacted by the scheme and the construction activities.

Ongoing work with Highways England through the scheme development and delivery programme

85. The Authorities look forward to working with Highways England to answer the questions raised above and ensure that the applications for a Development Consent Order addresses local concerns and can be supported by the Authorities in detail as well as in principle.
86. We very much welcome the commitment by Highways England to enter into a Planning Performance Agreement with Cambridgeshire County Council, and wish to see the same commitment to a PPA between Highways England and Huntingdonshire and South Cambridgeshire District Councils.