

From: Ian Weitzel [REDACTED]
Sent: 25 April 2014 16:48
To: Environmental Services
Subject: Parish Council of Offord Cluny and Offord Darcy response to the proposed EIA for the A14
Attachments: Response to Proposed EIA.docx

Sir

Attached the response of the Parish Council of Offord Cluny and Offord Darcy to the document *A14 Cambridge to Huntingdon Improvement Environmental Impact Assessment Scoping Report*

I apologise for missing the due date – it required considerable time to study it properly.

Any queries, please contact myself :-

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Vice-chair Parish Council of Offord Cluny and Offord Darcy

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Response to the Highways Agency Publication - A14 Cambridge to Huntingdon Improvement Environmental Impact Assessment Scoping Report

Given the size of this document and the relatively short timeframe in which to submit a response, and given that it is largely a compendium of proposed actions rather than the resultant conclusion of those actions, we have limited our response to those directly impacting on our parish.

That is not to say that we are not concerned with many other aspects of the proposed route of the A14, but consider them to be out of the scope of this response.

Perhaps the most pertinent issue, is that, if after all these Environmental Impact Assessments have been completed and it is found that there is an aspect that is considered unacceptable, be it air quality, noise or whatever – will this cause the project to be abandoned? We suspect not – rather as in the proposed Heathrow expansion, we will find that bar will be lowered rather than the performance raised. So in the first place we would like some assurance that adherence to European standards for environmental impacts will be maintained throughout.

1. Section 6 – Air Quality. Why are the Offords – likely to be affected adversely by increased air pollution - excluded from being an AQMA? Why has no analysis of our current levels of air pollution been done. Indeed the only places where this has been done seem to be those that will benefit by having the A14 routed away from them. There is a concern that, given the topography, particulates will drift down the hill from the A14 and affect the Offords. Why therefore does this not even appear as part of the proposed air quality study.
2. Section 8 – Landscape. Probably the most contentious issue.
 - This part of the Ouse valley has been proposed as an Area of Outstanding Natural Beauty. The A14 will destroy it – there is no “mitigation” that can do otherwise. It ought to be specifically included in para 8.4.3
 - Para 8.5.7 – although barely mentioned in any of the HA’s documentation, the proposed bridge over the railway line will require a clearance of 11 metres to avoid the overhead power lines. As well as having an effect on the landscape that no “mitigation” can overcome, the height of the traffic will also have a major bearing on noise, light and pollution transmission. Yet we can see no reference made to this factor being taken into account in any part of this document. We would like some assurance that the studies being proposed will take account of the height of the bridge in their various “models”.
 - Para 8.5.9 – key word here appears to be “sensitive”. The potential planting of “woodland” and the like, would appear to offer “mitigation” but we would like to have in the report – specifically - how long it would take for these trees to grow sufficiently to act effectively as a noise and visual barrier. Also who is responsible for their ongoing care and maintenance ? Many of those trees planted alongside the new dualled part of the A428 some five years ago have since died, most have barely grown during the period. Any proposal for arboreal mitigation must include a guarantee of ongoing maintenance by the HA.

- The key point, which appears not to feature within this section of the EIA is the view from the top of Offord Hill. It is this view that is the reason for the AONB proposal, looking down and across the Ouse Valley. It is this view that will be destroyed by the new A14 route. So this EIA should provide mitigation measures for protecting this – something that no amount of “woodland” will achieve.

3. Section 12 – Noise.

- As in the above paragraph, we would want the height of the proposed bridge over the railway to be taken into account when modelling noise transmission. Also what action the HA proposes (and guarantees) to take, should the actual noise level (rather than the level their “model” predicts) exceed European Directive standards. A major factor, mentioned in the proposal, is that at present the Offords are exceptionally quiet, with baseline noise levels of 45 to 50dB.
- There appears to be no account taken of the potential increase in noise in other parts of the Offords – not just those at the north end of Offord Cluny. The proposed route of the A14 would indicate that there would be both noise and visual impact on dwellings on the eastern side of both Offord Cluny and Offord Darcy and we feel that these should be included within the study area.
- Para 12.2.4 – Low-noise road surfaces. We consider this to be something of a “red herring”. Road surfaces deteriorate over time and repair is subject to manpower and budget being available. Indeed the current rutted and potholed state of many of our major roads is testament to this. So unless the HA can unconditionally guarantee that a pristine, flawless road surface will be maintained throughout the life span of the road, we feel that any noise modelling should use a value corresponding to that of an averagely worn and deteriorated road surface.

We assume that in the interests of transparency, the detailed results of all the various studies being carried out as part of this EIA will be published and available within the public domain. Is this the case?

What is not at all clear, and what does not appear to be mentioned at all within the document, is the timescale for these studies. The Highways Agency state that their “Preferred Route” will be announced in “Summer 2014”. That is within the next three or four months at most. It would seem impossible for all the proposed studies to have been completed by that time. The obvious conclusion to which to jump is that the HA are taking no account at all of this Environmental Impact Assessment when making this decision. It is a mere box-ticking exercise to smooth their path to a decision taking many years ago. So how can they convince we stakeholders otherwise?

As a corollary to this, we have concerns about the objectivity of those involved with the production of this EIA. Many of them will be consultants and third parties reliant on income from contracts awarded to them by the HA and other government and quasi-government organisations. What assurance can we have that these are truly independent and free from bias?