



## **LATE SCOPING CONSULTATION RESPONSES**

Consultation bodies have 28 days to respond with any comments, stating either the information that they consider should be included in the ES or that they do not have any comments.

Any responses received after the deadline are not considered within the scoping opinion but are forwarded to the applicant for consideration in accordance with the policy set out in Advice Note 7: Environmental Impact Assessment, Screening and Scoping.

The following EIA scoping consultation responses were received after the consultation deadline specified under legislation and therefore did not form part of the Secretary of State's scoping opinion.

Date: 29 April 2014



**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 :-

Ian Weitzel  
Vice-chair Parish Council of Offord Cluny and Offord Darcy

[REDACTED]

Landline [REDACTED]  
Mobile [REDACTED]

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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?



## Development Management

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Chicksands, Shefford  
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PINS RECEIVED

14 MAY 2014



Ms H Nelson  
Planning Inspectorate  
3/18 Eagle Wing  
Temple Quay House  
2 The Square  
Temple Quay, Bristol  
BS1 6PN

**Contact** Lauren Westley  
**Direct Dial** 0300 300 4705  
**Email** [planning@centralbedfordshire.gov.uk](mailto:planning@centralbedfordshire.gov.uk)  
**Your Ref** TR010018  
**Date** 12 May 2014

Dear Sir/Madam,

**Application No:** CB/14/01126/OAC  
**Location:** Huntingdon Southern Bypass  
**Proposal:** Other Authority Consultation: with regard to Scoping consultation on an application by the Highways Agency for an order granting development for the A14 Cambridge to Huntingdonshire Improvement Scheme.

I refer to your letter of 24 March 2014 regarding the planning application as shown above and would confirm that Central Bedfordshire Council raises no objection to the proposed development.

Yours faithfully,

  
Trevor Saunders  
Assistant Director of Planning



South Cambridgeshire Hall  
Cambourne Business Park  
Cambourne  
Cambridge  
CB23 6EA



The Planning Inspectorate,  
3/18 Eagle Wing  
Temple Quay House,  
2 The Square  
Bristol, BS1 6PN

Our Ref:

6 June 2014

Contact: Jonathan Dixon

Direct dial: 01954 713194

Direct email: jonathan.dixon@scambs.gov.uk

Dear Sir / Madam

**Application by Highways Agency for an Order Granting Development Consent for the A14 Cambridge-Huntingdon Scheme. Scoping Consultation TR010018**

Further to my letter of 17 April 2014, setting out the Council's initial comments on the Environmental Impact Assessment Scoping Report, I hereby enclose further detailed comments at Appendix 1.

These comments have been sent to the Highways Agency as part of the Council's formal response to the current public consultation on the A14 Cambridge to Huntingdon Improvement Scheme.

Please can you confirm receipt of these comments.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Jo Mills'.

Jo Mills  
Director of Planning & New Communities

### **Application by Highways Agency for an Order Granting Development Consent for the A14 Cambridge-Huntingdon Scheme. Scoping Consultation TR010018**

#### **Comments previously sent on 17 April 2014**

- Improvements to the A14 are necessary in order to deliver the local growth agenda, protect village amenity, and improve journey times and road safety for the travelling public. In section 4, the role of the A14 in enabling growth and supporting economic development could be further explored and emphasised.
- Paragraph 6.1.4 refers to traffic modelling including Northstowe Phase 1 development has been including in the current baseline traffic data. A high growth traffic forecast has been run to take account of the full scale of development at Northstowe and Alconbury. The scheme should consider the impacts of subsequent phases of Northstowe as well as phase 1, and support their coordinated delivery. Phase 2 is being considered through the planning application process now, and is anticipated to have planning permission around the end of 2015.
- Other emerging development sites, such as those at Bourn Airfield, Cambourne West and Waterbeach are at a much earlier planning stage and have therefore not been included in this high growth forecast. Although the proposed new developments in the Submission Local Plan do not have the status of Northstowe, it is important that sensitivity testing is carried out, to ensure it will not prejudice the delivery of the emerging development strategy to 2031 in terms of a detailed design that is adaptable to future developments.
- Figure 2 shows the planned Northstowe development, but it is not include other major sites included in adopted development plans, such as the Developments between Huntingdon Road and Histon Road on the edge of Cambridge, and the North West Cambridge University site.
- The policy review in a number of Chapters should also consider the South Cambridgeshire Proposed Submission Local Plan as Submitted in March 2014, submitted to the Secretary of State in March 2014. It is referenced in some chapters of the EIA scoping, but not others.
- Section 8 on Landscape should also refer to Cambridge and South Cambridgeshire Inner Green Belt Study 2012. The Landscape chapter should also consider the South Cambridgeshire Landscape Supplementary Planning Document, and the District Design Guide. The EIA needs to recognise the qualities of Cambridge. The scoping defines general landscape character as low, but this is a sensitive landscape on the edge of a city with a Green Belt, designated specifically to protect its historic character and setting. The scheme needs to consider the wider impacts on Cambridge and the setting of the historic city.
- Paragraph 8.3.6 refers to TPOs along the route particularly in Huntingdonshire. There are also a number of TPO's along the route in South Cambridgeshire, particularly between Girton and Swavesey, which should also be referenced.

- In Section 11 on Materials, opportunities should be explored to reuse materials from major development sites in the area, such as Northstowe, Waterbeach and Bourn Airfield new settlements.
- The restoration of borrow pits should be fully explored, for their biodiversity value, and amenity value for local communities where appropriate. Long-term use and management of these sites should be identified. Regard should be had to the Cambridgeshire Green Infrastructure Strategy.
- Paragraph 12.2.3 should refer to the new scheme, rather than the Ellington to Fen Ditton Scheme.
- The list of sensitive receptors at paragraph 12.4.6 does not appear comprehensive. It does not mention many residential areas along the route. It does not include the Blackwell Gypsy and Traveller site to the north of the A14 on the edge of Cambridge. Noise impacts should be assessed and appropriately mitigated. The HA should liaise with the district council to ensure receptors are appropriately identified and mitigated.
- Support for section 13 exploring potential legacy benefits of the scheme for non-motorised users. The scheme, and in particular the local road, offers an opportunity to link a number of existing communities, and link to planned new communities in the area. The impact on routes severed previously by the original A14 should also be explored.
- Opportunities to reduce flood risk elsewhere as a result of the scheme should be explored and taken. The Council manages a network of Award Drains, a number of which may be affected by the scheme. The HA should continue to liaise with the Council's Drainage Manager.
- Health Impact Assessment should be included in the EIA. The HA should liaise with the Council's public health specialist.

The Highways Agency is requested to continue to work closely with the Council on detailed design affecting local environmental issues such as noise, lighting, air quality, ecology, heritage, and landscape impact as the scheme progresses. The Highways Agency is urged to fully consider impacts on existing communities, and planned developments along the route, and work with the Council to determine appropriate mitigation measures, including to mitigate impacts during the construction phase.

*Further advice can be obtained from Jon Dixon, Principal Planning Policy Officer – Planning and New Communities - Telephone No: 01954 713194 or email [Jonathan.Dixon@scambs.gov.uk](mailto:Jonathan.Dixon@scambs.gov.uk)*

## **Further comments to supplement comments sent on 17 April 2014**

### **General Comment on EIA Scoping Report (ESR) & Preliminary Environmental Information Report (PEIR)**

There are some concerning discrepancies or ambiguities between these two documents which may result in some inconsistencies / deficiencies in the application process, which should be avoided.

The differences in the two reports may be attributable to the need to use the most appropriate language including technical level for various target audiences. The PEIR appears to be mainly non-technical to give the public a general understanding of the key issues while the ES scoping

report is intended to be more detailed covering technical assessment methodologies and criteria.

EIA is a systematic process to identify, predict and evaluate the environmental effects of a proposed project. Any ES should be presented in a coordinated and understandable format for public scrutiny. It should be readable, readily understandable and accessible reflecting the assessment that has been carried out giving due weight to significant environmental effects.

The primary issue is to identify any potential significant effects / impacts on the environment and their particular nature or degree / extent by virtue of factors such as the projects nature, size or location. We have concentrated on the content of the EIA / ES scoping report, as the EIA is a statutory process required for the proposed scheme in accordance with the EIA regulations. However we have highlighted any interrelationships and discrepancies with the PEIR.

### **Health Impacts Assessment (HIA)**

Section 1.5 of the PEIR confirms that the assessment of the proposed scheme will include consideration of impacts to human health which will be reported as part of the submission for the DCO application. This is welcomed.

Whilst there may be no statutory requirement to provide an HIA, the Council's Local Development Framework (LDF) Policy DP/1 Sustainable Development requires a HIA to be submitted with major developments. Due regard should be given to the Health Impact Assessment Supplementary Planning Document (HIA SPD) adopted March 2011, when preparing HIA: <http://www.scambs.gov.uk/content/health-impact-assessment-spd>.

Paragraph 2.10 of the HIA SPD under 'Relationship to other assessments (Environmental Impact Assessment)' acknowledges that: *"For those development proposals that are already required to submit an Environmental Impact Assessment (EIA) it may make sense to integrate health impacts into the EIA rather than duplicate the assessments as the methodology is very similar and there is a large overlap in the evidence gathered and used in both assessments. The Council's preferred approach is for Health Impact Assessments to be integrated with other similar assessments to ensure the HIA is wide ranging and has adequately examined all the potential health impacts of a development. It also makes it easier to cross reference the impacts helping to ensure the HIA is comprehensive"*.

The EIA should at the very least acknowledge that the EIA and HIA are both inextricably linked and that the ES will assist with and provide useful information for any HIA that needs to be undertaken.

It should also be noted that a range of stakeholders are currently responsible for health. The Primary Care Trust has not existed for the last 12 months, and has been replaced by the following:

- Cambridgeshire and Peterborough Clinical Commissioning Group
- CATCH – the local Clinical Commissioning Group
- NHS Property services
- Public Health, which is now part of Cambridgeshire County Council, and
- NHS England
- Cambridgeshire Travel for Work Partnership

All of the above need to be consulted as major stakeholders.

*Further advice can be obtained from Iain Green, Environmental Health Officer - Public Health Specialist, Health & Environmental Services - Telephone No: 01954 713209 or email [iain.green@scambs.gov.uk](mailto:iain.green@scambs.gov.uk)*

## **Chapter 2: Characteristics of the Development**

### **2.4 Earthworks Design**

Paragraph 2.4.2 refers to potential alternative local sources of fill being investigated. This should include consideration of opportunities provided by developments in the area, such as Northstowe.

### **Artificial Lighting Impact**

This chapter should reference the South Cambridgeshire District Design Guide Supplementary Planning Document adopted March 2010 <https://www.scambs.gov.uk/content/district-design-guide-spd>.

Section 2.7 Lighting and Signs, states that the lighting design is currently being developed and therefore the actual extent of new lighting is not yet confirmed. However, the lighting design would aim to minimise light pollution which can cause sky glow, glare and light trespass. The impact of lighting would be assessed in relation to potential effects upon landscape (visual) as well as fauna / wildlife species (refer to Chapters 8: Landscape and 9: Nature Conservation for further details). There is reference to the inclusion of measures to minimise the impacts of lighting on bats and other wildlife, including the use of directional lighting and reducing light levels.

This is noted but the impact of artificial lighting on humans and living conditions should also be undertaken. There will be potential impact during the operational and construction phases.

Lighting impact is an important consideration and is likely to be most relevant when there is a potential to have an adverse impact on a considerable number of sensitive receptors in close proximity to lighted section of the A14 and in particular any existing and proposed residential properties at Orchard Park.

SCDC Environmental Health consider the impact of artificial light on residential premises as it can affect health and quality of life and can be determined a statutory nuisance.

Poorly designed, controlled and distributed artificial light can result in adverse impacts to the surrounding environment. Obtrusive light impacts can include:

- **Sky glow:** the upward spill of light into the sky, which can cause a glowing effect. This is often seen above cities when viewed from a dark area.
- **Light spill:** the unwanted spillage of light onto adjacent areas, which may affect sensitive receptors, particularly residential properties and ecological sites.
- **Glare:** the uncomfortable brightness of the light source against a dark background, which dazzles the observer. This may cause nuisance to residents and a hazard to road users.
- **Light trespass:** the spilling of light beyond the boundary of a property, which may cause nuisance to others.

To comply with EIA regulations an assessment should be undertaken that considers the existing baseline artificial lighting conditions and the potential impacts during site preparation, construction and operation in relation to surrounding sensitive receptors including local residents, the night time amenity including sky glow, sensitive landscape and ecological features, road users and pedestrians and consideration of mitigation measures.

It should be noted that the NPPF encourages good design and recommends that planning policies and decisions should limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.

South Cambridgeshire Development Control Policies DPD (July 2007)

<https://www.scambs.gov.uk/content/development-control-policies-dpd> also includes specific policies on lighting – Policy DP/3 Development Criteria and Policy NE/14 Lighting Proposals.

Instead of having the impact of artificial lighting in various separate chapters such as Landscape & Visual Impact, Ecology, Nature Conservation and something separate for human impact, a dedicated impact separate topic chapter on artificial lighting for all receptors should be included in the ES and cross referenced to relevant topics as necessary.

An artificial lighting impact assessment should be carried out in accordance with current government / industry standards or best practice guidance on undertaking environmental assessment of lighting and similar, such as:

- *Guidance on undertaking environmental lighting impact assessments (PLG04: 2013)* by the Institute of Lighting Professionals (IPL). The aim of this document is to outline good practice in lighting design and provide practical guidance on production and assessment of lighting impacts within new developments.
- *Guidance notes for the reduction of obtrusive light (GN01: 2011)* produced by the ILP. GN01:2011 is the piece of guidance most commonly referred to in government policies, scoping opinions and condition clauses. Consideration of existing baseline environmental lighting zones in the area and any impacts on these. It provides a list of lighting dos and don'ts, as well as design guidance limits to ascertain the acceptability of obtrusive light levels at night.
- *Guide on the limitation of the effects of obtrusive light from outdoor lighting installations (CIE 150)* and *Guidelines for minimising sky glow (CIE 126)* produced by the International Commission on Illumination (CIE). These documents provide guidelines for assessing the impacts of outdoor lighting.
- *Guide to limiting obtrusive light* by the Chartered Institution of Building Services Engineers. This document contains guidance for planners and lighting designers regarding limiting obtrusive light and improving quality.
- *Clean Neighbourhoods and Environment Act 2005*
- *Code of practice for the design of road lighting Part 1: Lighting of roads and public amenity areas (BS 5489-1:2013)*
- *Bats and Lighting in the UK*. This guidance from the ILP and the Bat Conservation Trust is intended to raise awareness of the impact of lighting on bats and suggests mitigation for various scenarios.
- *Guidelines for Landscape and Visual Impact Assessment, 3rd Edition (GLVIA3 – April 2013)* by Landscape Institute and the Institute of Environmental Management and Assessment (IEMA).
- *A Review of the Impact of Artificial Light on Invertebrates: March 2011* produced by Buglife – The Invertebrate Conservation Trust.

Please note that SCDC Environmental Health only consider in detail the effects of artificial lighting on humans such as residential receptors. These comments do not consider in detail potential impacts / effects on other environs / receptors such as businesses, landscape / visual, ecological (fauna behaviour & breeding), drivers on public highway or secured by design

requirements or other interested organisations such as Astronomy Organisations (sky glow). These effects are considered in comments on the other topic chapters.

*Further advice can be obtained from Greg Kearney, Environmental Health Officer, Health & Environmental Services - Telephone No: 01954 713145 or email [greg.kearney@scambs.gov.uk](mailto:greg.kearney@scambs.gov.uk)*

#### **Chapter 4: Location of Development**

Improvements to the A14 are necessary in order to deliver the local growth agenda, protect village amenity, and improve journey times and road safety for the travelling public. In section 4, the role of the A14 in enabling growth and supporting economic development could be further explored and emphasised.

*Further advice can be obtained from Jon Dixon, Principal Planning Policy Officer – Planning and New Communities - Telephone No: 01954 713194 or email [Jonathan.Dixon@scambs.gov.uk](mailto:Jonathan.Dixon@scambs.gov.uk)*

#### **Chapter 6: Air Quality**

This section should reference the South Cambridgeshire District Design Guide Supplementary Planning Document adopted March 2010 <https://www.scambs.gov.uk/content/district-design-guide-spd>.

The level of the submitted scoping report on Air Quality is satisfactory and the level of monitoring and assessment methodology for the development is noted.

However, contrary to the submission in section 6.2.2 of the report, the council has been experiencing both daily and annual mean exceedances along the A14 corridor i.e. Impington since 2009 and we are not in agreement with the report statement on this section. This was pointed out previously.

Considering the predicted effect of the development for the A14 corridor, a robust mitigation scheme for this area is expected in the course of the development. We have previously suggested an extra monitoring location for PM10 emission for Impington but this does not appear to have been addressed.

Item 6.5 (Proposed Scope of Assessment) and 6.6.5 (model verification) of the submitted scoping report is noted.

Post modelling validation should be undertaken. Details of the specific location, distance and height of the proposed noise barrier around the Impington air quality monitoring site (located to the west of Histon Junction near Woodhouse Farm, Cambridge Road, Impington, CB3 9NX - OS 543735, 261625) is requested as this may affect the position of our monitoring station in the area.

The Highways Agency should make arrangements for post scheme completion / implementation monitoring of local air quality in partnership with the Local Authorities. In addition, the Highways Agency should provide for the suitable relocation of air quality monitoring equipment where current locations are no longer suitable due to implementation of the scheme.

*Further advice can be obtained from Kenny Abere, Scientific Officer (Air Quality), Health & Environmental Services - Telephone No: 01954 713070 or email [kenny.abere@scambs.gov.uk](mailto:kenny.abere@scambs.gov.uk)*

#### **Chapter 7: Cultural Heritage**

## **Policy and Plan Context**

This section should refer to the Listed Buildings (July 2009) (<https://www.scambs.gov.uk/content/listed-buildings-spd>), Development Affecting Conservation Areas (January 2009) (<https://www.scambs.gov.uk/content/development-affecting-conservation-areas-spd>), and South Cambridgeshire District Design Guide (March 2010) (<https://www.scambs.gov.uk/content/district-design-guide-spd>) Supplementary Planning Documents.

It should also refer to the National Planning Practice Guidance & British Standard BS 7913:2013 Guide to the conservation of historic buildings.

There a number of historic milestones structures along the route, some of which are listed. These should be subject to heritage assessment. They should be protected during the construction process.

7.1.4 It is unclear why policy CE/19 from the Cambridge East Area Action Plan is referenced as this relates to Built Heritage within the Area Action Plan boundary.

7.1.5 It is unclear why policy CE/15 from the Cambridge East Area Action Plan is referenced as this relates to Linking Cambridge East to its surroundings, not Conservation Areas.

This section should refer to policies in the South Cambridgeshire Proposed Submission Local Plan as Submitted in March 2014 <https://www.scambs.gov.uk/localplan>

*Further advice can be obtained from Judith Shepherd, Conservation Consultant – Planning and New Communities - Telephone No: 01954 713310 or email [Judith.shepherd@scambs.gov.uk](mailto:Judith.shepherd@scambs.gov.uk)*

## **Chapter 8: Landscape**

### **8.2 Policy and Plan Content**

This section should refer to the Landscape and New Developments (March 2010) (<https://www.scambs.gov.uk/content/landscape-new-developments-spd>) and the South Cambridgeshire District Design Guide (March 2010) (<https://www.scambs.gov.uk/content/district-design-guide-spd>) Supplementary Planning Documents and the Cambridge and South Cambridgeshire Inner Green Belt Study 2012 <https://www.scambs.gov.uk/content/evidence-base-and-supporting-studies>.

A14 crossings over the East Coast Railway Line and River Ouse will have a significant impact on the landscape, in an area where the landscape is special (A group from neighbouring parishes along the Great Ouse has bid for it to be designated an Area of Outstanding Natural Beauty - June 2013). There are no details of the structure designs, but these should be high quality.

#### **Sheet 10**

Query the need for 1m and 2m high bunds? These will create a green chasm similar to the A428 where the driver has no perception of where they are, yet vehicles will still be visible from outside.

#### **Sheets 13 & 15 & 21**

There appear to be errors on the maps – should there be planting in the areas shown as white between the A14 and Local Access Road? If not, what treatment will these areas have?

Who will be responsible for the management of the landscaped areas between the carriageways and Local Access Road?

#### Sheet 15

Which lanes are being widened asymmetrically? Is the road closer to the Buckingham Business Park than at present? – there is no retained vegetation on the north side and the road erodes the existing bund. There appears to be no space to put any extra vegetation in. We would like a more detailed plan showing the existing and new routes. Where is the Bus Stop?

The Highways Agency should properly mitigate areas of existing unused tarmac i.e. remove tarmac before adding vegetation, and not simply add grass over the top.

#### Sheet 16

The Highways Agency should review the NMU route which diverts behind the Travelodge services. Cyclists are unlikely to use this route and continue on the road instead, particularly if the route is unlit and there are tall fences to the rear of the properties which would mean no overlooking of the route.

Has noise mitigation been considered for the Cambridge Services to the south of the road? – trees / bund?

#### Sheet 17

The Highways Agency should review the NMU route – it is circuitous and involves too many gradients – cyclists are unlikely to use this route and continue on the road instead.

There are approved plans for the Dominos site where the proposed 'potential replacement special category land' infringes on the approved built footprint of the development.

#### Sheet 18

Area of mitigation alongside Oakington Brook - what is it mitigating? Land for an Ecology Mitigation Area at Hackers Fruit Farm has an application pending for Garden Centre, access, car parking and provision of WW1 living museum. Proposed plans do indicate A14 improvements but the proposal may overlap the Ecology Mitigation Area.

#### Sheet 19

Borrow pit 5 – needs treatment along the south eastern edge to mitigate impacts whilst it is in operation – very open landscape.

#### Sheet 21

There appear to be errors on the map – there should be planting in the areas shown as white within the middle of the Girton junction.

Girton College - the area of 'potential replacement special category land' infringes on approved plans for football and rugby pitches although on the landscaping rather than the pitches themselves.

#### Sheet 23

A cross-section map showing the position of the old and new road alignments is requested.

Orchard Park – we need to understand the noise barrier treatment. We have concerns about possible reflected noise on Histon and Impington. The gantry (west of 33+500) is at the end of the boulevard running north – south through Orchard Park and will therefore be particularly visible and detract from the masterplan objectives of the Orchard Park development – can it be moved slightly either way? A drain along the edge of Orchard Park is not shown on the map.

## Sheet 24

Blackwells Travellers Site – further detail is needed to understand the treatment and mitigation measures for the site. This should include noise mitigation, and provide safety protection for the site.

Will the track alongside the travellers site be used for construction purposes? If so, it will be necessary to mitigate impacts.

The Blackwell Traveller Site is managed by South Cambridgeshire District Council. Contact: *Debbie Barrett, Traveller Site Team Leader - Telephone No: 01954 713346 or email [Debbie.Barrett@scams.gov.uk](mailto:Debbie.Barrett@scams.gov.uk)*

### General Landscape Points

- 1) Adjacent development proposals need to be considered - whether currently being built, having current planning permission, or in the design stage - so that the various schemes work well together with the A14 proposals.
- 2) The A14 drainage strategy and proposals need to be checked against existing and proposed drainage schemes, some of which relate to major developments which will be using the same drainage systems and may already be planning amendments to existing systems. (see also comments on Chapter 15)
- 3) Generally the landscape design should focus on making sure that the landscape proposals for the A14 scheme reflect the best examples of the local Cambridgeshire landscape, and the landscape settings of local villages towns and cities. The design should enhance good views to and from the scheme where possible and avoid just trying to hide or screen the development. Important views should be recognised and noted on the drawings at this stage.
- 4) The cumulative impacts of road widening and new carriageways, and the views between, should be reduced or limited wherever possible by allowing sufficient space between to allow a suitable green screen.
- 5) Noise attenuation structures and barriers should be co-ordinated with those proposed (or possible) on neighbouring developments. The design quality and type of required barriers in sensitive locations should be considered at this stage, and the scheme adjusted if necessary, rather than waiting until the detail design stage, when design options may be limited.
- 6) The designers of the scheme should explore opportunities for off-site planting and mitigation where these locations will offer the best opportunities for reducing adverse landscape and visual impacts. Important off-site locations for planting or other mitigation works should be recognised and noted on the drawings at this stage.
- 7) Several very large landscape mitigation areas are proposed, several of which are proposed as informal recreation spaces. For these features to work, good, logical (and obvious) public access is needed, together with robust long-term management proposals.
- 8) As a general principle, areas of new tree planting should be 'feathered-in' to avoid clumping. Opportunities should be taken to broaden the flora and fauna with appropriate species, including flowers where appropriate, to replace lost verges.

- 9) It is not clear if the scheme has considered the Tree Preservation Orders (TPO) that will be affected? There are some more TPO than shown on the maps, particularly in the Bar Hill area (see enclosed map):

TPO REF 14/67 – Woodland west of Bar Hill (Lolworth PC) around Lolworth Spring / Grange Cottage

TPO REF 2/72 Groups of Elm and Pine east of Bar Hill

TPO REF 28/03/SC – 2 Oaks Girton PC on Madingley Road

TPO REF 01/56 9 Oaks Girton PC Madingley Road

TPO REF 19/03/SC (North of Girton Junction) 8 Oaks plus individuals to north Girton PC

Possibly TPO REF 24/03/SC Pine, Ash, Beech, Oak etc. at Girton Grange

- 10) More detail is needed for this scheme in a number of areas:

- A clear general plan, at a reasonable scale, showing the existing road layout compared with that proposed.
- A vegetation plan showing where important trees, tree groups, hedges and scrub or other significant planting are to be removed, and the proposals for areas of replacement planting.
- Reasoning for the locations of the various 'Replacement of Special Category Land' areas, along with a brief description of what 'Special Category Land' is to be replaced.
- Reasoning for the locations of the various 'Landscape Mitigation Areas', along with a brief description of what landscape mitigation they are intended to provide.
- A general statement on the design principals behind drainage features – lakes ponds, wet meadows, ditches, streams etc. and associated infrastructure– particularly where the public will have access. These features should not be seen in terms of just engineering.
- More detail is needed for the end use of the Borrow Pits, and how they will be managed and used, both during construction and in the long term. Typical cross-sections showing expected water levels and slope grades would be useful. (see also comments at chapter 11)
- A statement of the expected phasing of large scale work areas, and how landscape and visual effects, and mitigation of any adverse effects, will be handled during both the construction phase and the long term
- Larger scale cross-sections should be provided to explain how the new carriageways will appear in relation to significant existing landscape features or other development, and how any adverse landscape and visual effects will be minimised.

*Further advice can be obtained from David Hamilton, Landscape Design Officer – Planning and New Communities - Telephone No: 01954 713415 or email [david.hamilton@scambs.gov.uk](mailto:david.hamilton@scambs.gov.uk)*

## **Chapter 9: Nature Conservation**

This section should refer to policies in the Development Control Policies DPD (July 2007) (<https://www.scambs.gov.uk/content/development-control-policies-dpd>) and South Cambridgeshire Proposed Submission Local Plan as Submitted in March 2014 (<https://www.scambs.gov.uk/localplan>), and the Biodiversity (July 2009) (<https://www.scambs.gov.uk/content/biodiversity-spd>) and the South Cambridgeshire District Design Guide (March 2010) (<https://www.scambs.gov.uk/content/district-design-guide-spd>) Supplementary Planning Documents.

General principles relating to the scheme's delivery:

The biodiversity value of much of the proposed scheme area has been compromised by intensive agriculture. However, there are some areas of existing valuable habitat that could potentially be affected by the proposed scheme. There are also species of significant nature conservation importance, including protected species, which could be affected by the proposed scheme. Impacts would potentially include the actual loss of habitat and fragmentation of habitat, disturbance to wildlife from noise and lighting and animal mortalities from collision with traffic. The ongoing EIA work proposed for the scheme will help identify ways to mitigate the potential impacts through sensitive design and management during the construction and operation phases. Sensitive landscaping and scheme design may help to improve local biodiversity in the longer term.

Potential impacts of the scheme:

- 1) Habitat loss – directly attributable to the change of land use that the scheme will require. A clear balance sheet of habitat loss versus gain should be provided so that the overall scheme impact can be clearly evaluated with regard to the major habitat types affected (i.e. grassland, ponds, woodland scrub etc.).
- 2) Habitat damage – downstream aquatic habitats have the potential to be impacted by pollution from fuel and chemical spills, and from sediment run-off. Indirect impacts may include sensitivity to elevated levels of airborne dust. Best practice construction techniques should be able to reduce such impacts to an acceptable level.
- 3) Disturbance – construction can impact directly upon sensitive species such as badgers or breeding birds. This temporary impact could be mitigated by advance works such as the removal of nesting habitat in advance of the bird breeding season.
- 4) Severance – this is considered to be a key impact based on the Jan 2014 assessment and will be dealt with in more detail in a mitigation strategy. Severance impact would be permanent. However the planting of trees and hedgerows may contribute towards new east to west wildlife corridors.
- 5) Species mortality during construction – less mobile species, or animals that are young or hibernating are likely to be those most vulnerable. The instigation of species specific mitigation strategies (such as common lizard translocation) should aid mitigation of this issue.
- 6) Species mortality (vehicle collision) - animals that are at particular risk include barn owl, due to the manner in which they hunt, and bats, badgers and otters, as a result of severance of their wildlife corridors. Design features such as guide fence and tall hedgerows should be considered as final designs are taken forward.

- 7) Disturbance from road lighting – impacts from lighting are most likely to be upon bats. Direct impact may be had if existing roosts are illuminated, or be indirect where previous dark feeding areas become isolated due to light pollution. The impact of lighting is likely to be unavoidable in many instances due to the operational needs to A14.

Potential mitigation and designing for nature conservation enhancement:

Based on the January 2014 assessment it is thought that through mitigation and compensatory habitat creation there would be a minimal overall effect on wildlife and, in some cases, there could be a benefit in terms of habitat creation along the new road corridor. The following guiding principles have been developed specifically for the scheme:

- Maintain key north-south habitat and wildlife dispersal corridors across the scheme corridor as far as is practicable, using bridges, culverts and structural planting (in conjunction with appropriate fencing and sensitive lighting to maximise effectiveness) within the design.
- Seek opportunities to maximise east-west habitat connectivity along both sides of the proposed scheme with new landscaping using native, locally appropriate species.
- Aim for no net loss of valued semi-natural habitats.
- Seek to minimise culverting of watercourses and, where unavoidable, design culverts according to current best practice design.
- If realigning watercourses, incorporate river restoration techniques to provide benefits for habitat and species.
- Aim to avoid direct or indirect impacts on sites designated for nature conservation, as the first principle of mitigation, with further mitigation or compensation as a last resort.
- Seek to increase habitat for key species that are limited by low availability of suitable habitat / connectivity e.g. barn owl or great crested newt.
- Adjust to account for evolving design, including drainage, borrow pits, compounds and storage areas.
- Account for new ecological receptors as further surveys and survey analysis develops.
- Adjust landscape, visual, noise and drainage mitigation where practicable to broaden habitat opportunities and biodiversity without compromising other mitigation provision.
- Seek opportunities to provide new habitat linkage to existing habitat features and designated sites, including possible off-site treatments by agreement.
- Identify broad areas beyond the proposed scheme boundary where lasting benefits might be achieved through additional land take and/or working with partners.

*Further advice can be obtained from Rob Mungovan, Ecology Officer – Planning and New Communities - Telephone No: 01954 713402 or email [rob.mungovan@scambs.gov.uk](mailto:rob.mungovan@scambs.gov.uk)*

## **Chapter 10: Geology and Soils (Contaminated Land)**

This section should refer to policies in the Development Control Policies DPD (July 2007) <https://www.scambs.gov.uk/content/development-control-policies-dpd> and South Cambridgeshire Proposed Submission Local Plan as Submitted in March 2014 <https://www.scambs.gov.uk/localplan>, and the South Cambridgeshire District Design Guide Supplementary Planning Document (adopted March 2010) <https://www.scambs.gov.uk/content/district-design-guide-spd>.

The Geology and Contaminated Land sections of the scoping report generally seem quite thorough.

In line with legislation and guidance on the management of contaminated land, assessment of risks (i.e. 'impacts and/or 'effects') to potential receptors from contamination will be undertaken

by developing a conceptual site model (CSM) identifying potential sources of contamination, receptors of contamination and pathways from source to receptor.

It is proposed that specialists will be engaged to undertake Unexploded Ordnance (UXO) surveys and Asbestos surveys. Any UXO survey should follow the good practice principles of the UXO risk management process detailed in the Construction Industry Research and Information Association (CIRIA) publication guide C681 titled “*Unexploded Ordnance: A Guide for the Construction Industry (London), 2009*”

The need for intrusive investigation has been highlighted due to lack of available site investigation data and the approach for identifying sources, pathways and receptors to enable risk assessment to be conducted appears satisfactory.

## **History of the Site and Surrounding Area – Potentially Contaminative Sites**

The Scoping Report identified that the areas most likely to represent potential significant effects to human health / environment are the Buckden, Conington and Milton landfills and the military areas to the east of the site to the north of the existing A14. These require further information.

### **Chapter 11: Materials**

There is no reference to mitigating the impacts of borrow pits. Every effort should be made to restore the Boxworth borrow pit to agricultural use in the first instance. It is noted that work on the measures for restoration of borrow pits is continuing.

*Further advice can be obtained from Claire Sproats, Scientific Officer (Contaminated Land), Health & Environmental Services - Telephone No: 01954 713444 or email [claire.sproats@scambs.gov.uk](mailto:claire.sproats@scambs.gov.uk)*

### **Chapter 12: Noise & Vibration**

This section should refer to policies in the Development Control Policies DPD (July 2007) <https://www.scambs.gov.uk/content/development-control-policies-dpd> and South Cambridgeshire Proposed Submission Local Plan as Submitted in March 2014 <https://www.scambs.gov.uk/localplan>, and the South Cambridgeshire District Design Guide Supplementary Planning Document adopted March 2010 <https://www.scambs.gov.uk/content/district-design-guide-spd>.

## **Key Points**

It is agreed that noise and vibration associated with the construction and long term operation of the proposed improvement scheme has the potential to give rise to significant adverse impacts / effects on the health, well-being and quality of life of receptors and in particular residential premises.

### **12.1 Introduction & Topic Definition**

It is recommended that a more informative definition of traffic noise is provided. Noise can be defined as unwanted sound. In this case, A14 traffic noise typically arises from a fairly constant steady stream of traffic, with the main noise sources being the engine, exhaust and transmission systems of vehicles and the interaction of tyres with the road surface. The level and character of noise can vary depending on the traffic volume, speed and composition (proportion of heavy vehicles), the road gradient, surface characteristics and weather conditions including wind direction and speed. It should also be acknowledged that noise can have

significant adverse impacts on the health and quality of life of people in their homes, their gardens and also outside in recreation areas.

### **Policy and Plan Context - Relevant Legislative, Policies and Plans**

The key policies and standards detailed all appear to be mainly legislative or national / industry standards, best practice and guidance.

It would be helpful if, for each of the referenced documents, some summary commentary could be provided on their respective scope, purpose and status.

For example instead of just referencing the Design Manual for Roads and Bridges, Volume 11 Environmental Assessment, Section 3 Environmental Assessment Techniques Part 7, HD 213/11 – Revision 1, Noise and Vibration, November 2011 or as superseded (DMRB - HD 213/11 Volume 11, Section 3, Part 7, Revision 1) this section or the introduction should state that the assessment of noise and vibration will be in accordance with DMRB - HD 213/11 Volume 11, Section 3, Part 7, Revision 1. The actual status (i.e. whether it is government endorsed / policy?) and purpose of this document / assessment should be explained, including the fact that it recommends use of 'Calculation of Road Traffic Noise' (CRTN) to predict and model noise impact.

Operational noise, with respect to human receptors, should be assessed using the principles of the relevant British Standards and other guidance. In particular, for road schemes, the guidance set out in DMRB - HD 213/11 Volume 11, Section 3, Part 7, Revision 1 should be followed. This Section should also be read in conjunction with DMRB, Volume 11, Sections 1 and 2, which set out the overall framework for the environmental assessment process.

With regard to WebTAG - *TAG UNIT A3, Environmental Impact Appraisal, January 2014, Department for Transport, Transport Analysis Guidance (TAG)* the relationship and distinctions between environmental impact appraisal (set out in TAG manual) and environmental impact assessment (DMRB assessment) should be fully explained. It is assumed the TAG noise assessment will be explained within any ES noise chapter and included as an appendix or referenced if part of an overall transport appraisal as part of any DCO final submission.

There should be specific reference to other national and/or local plan policies relating to noise. DMRB - HD 213/11 recommends that any noise constraints arising from Local or National Plans should also be identified. Therefore the following should also be referenced, included and considered:

- National Planning Policy Framework (NPPF) March 2012
- Draft National Policy Statement for National Networks (NN NPS) (December 2013) for 'nationally significant infrastructure projects' (NSIPs) - relevant noise sections

Guidance states that in making decisions on nationally significant road and rail projects, the Secretary of State must have regard to any matter that is important and relevant to the Secretary of State's decision. This will include the draft NN NPS.

- Cambridgeshire Local Transport Plan 2011 – 2026, Policies and Strategy (adopted in March 2011)
- Local Development Framework, Development Control Policies Development Plan Document, Adopted July 2007 – Policies NE/15 Noise Pollution and DP/6 Construction Methods

- South Cambridgeshire Proposed Submission Local Plan as Submitted in March 2014  
<https://www.scambs.gov.uk/localplan> - policy SC/11 Noise pollution

The following publications should also be considered:

- World Health Organisation (WHO) 'GUIDELINES FOR COMMUNITY NOISE', 1999 & 'NIGHT NOISE GUIDELINES FOR EUROPE', 2009
- Healthy Transport = Healthy Lives, British Medical Association, July 2012
- Creating Growth, Cutting Carbon- Making Sustainable Local Transport Happen, Department for Transport, Jan 2011

## Study Area

The study area for noise and vibration assessment is to be defined in accordance with the guidance provided in DMRB - HD 213/11. There is reference to 600m buffers around certain roads within 1km of new scheme subject to change of more than 1dB(A). This is acceptable but in addition a 50m buffer around all other 'affected roads' (subject to change of more than 1dB) beyond 1 km from the scheme boundary may also need to be considered and it is assumed that a DMRB detailed noise assessment will be undertaken.

## Receptors

The identification of noise sensitive receptors is important and due consideration should be given to the relative sensitivities of receptors as part of any significance of impact assessment.

The reference to the European Noise Directive and current DEFRA noise action planning is welcomed.

The importance of considering noise impact in land use planning is further reflected in the requirements of the Environmental Noise (England) Regulations 2006 and DEFRA's "Noise Policy Statement for England", March 2010 and reference should be made to these documents.

It is noted that under current Noise Action Plans for Major Roads (outside first round agglomerations) strategic noise mapping carried out and as required by the Env Noise Regulations 2006, various sections along the current A14 and noise study area of the proposed scheme are identified as First Priority Locations (FPLs) and/or Important Areas (IAs) for prioritisation for noise reduction measures under noise action planning.

The Noise Action Plan aims to promote good health and good quality of life. In doing so it aims to identify "Important Areas" within England where the competent Authority should look, where feasible, to reduce noise levels. "Important Areas" are defined as being areas that "with respect to noise from major roads will be where 1% of the population that are affected by the highest noise levels from major roads". In addition, those locations where the noise levels exceeds 76 dB LA10,18hr shall be investigated as a priority ("First Priority Locations" noise hot spots).

Defra's Noise Action Planning Support Tool identifies these locations, which should be fully referenced (various reference numbers), but it is important to note that the areas identified may not be comprehensive / conclusive.

It is noted that some of the current FPLs and/or IAs under noise action planning will be addressed by the proposed scheme alignment and that any overlap between proposed noise mitigation of the scheme and FPLs in response to noise action planning, will be coordinated at detailed design stages. This is welcomed.

This is particularly important for the current A14 Junction 31 to 32 Pinch Point Scheme which is due for completion early 2015. It is noted that sections of this current scheme may include environmental noise barriers as detailed in the overall A14 scheme plans. We would like to see details about how the final locations and design specifications of such barriers will be agreed with the local authority and timing of implementation. The HA are also encouraged to engage and collaborate with the developers of land to the south of this stretch of the A14 (NIAB / Darwin Green 2 & 3). The Local Plan seeks environmental noise attenuation in the form of landscaped earth mounds / bunds rather than noise barrier fencing. The drainage pond at Woodhouse Farm specifically for the A14 could affect the implementation of the NIAB / Darwin Green scheme. The HA should coordinate with the Council and the developers to deliver the best solution for this area in terms of noise mitigation and drainage.

The commitment to implement noise mitigation measures resulting in the avoidance / reduction of noise in the first instance and/or noise improvements is an important opportunity to minimise the adverse impact of any potential future traffic noise associated with the A14 scheme.

The scheme should avoid the creation of new FPLs or IAs on the HA network, on any new local roads or de-trunked roads for which Cambridgeshire County Council will be considered the noise maker responsible for any noise action planning to reduce traffic noise, as appropriate.

NPPF National Planning Guidance on Noise under the section *What factors influence whether noise could be a concern*, states that: *“Where relevant, Noise Action Plans, and, in particular the Important Areas identified through the process associated with the Environmental Noise Directive and corresponding regulations should be taken into account.”*

The Action Plans for agglomerations include provisions that aim to protect existing quiet areas from an increase in noise. This may include relatively quiet spaces that have already been designated as Local Green Spaces and/or Protected Village Amenity Areas. The existence of any such spaces should be identified and considered as part of the assessment. The tranquility maps for the area published by the Campaign to Protect Rural England (CPRE) should also be referenced and considered as necessary.

## **12.2 Previous Studies and Baseline Information**

These are noted. We generally agree that the baseline noise data presented in Atkins' Noise Chapter of the 2009 ES for the previous Ellington to Fen Ditton scheme is likely to remain reasonably valid on the basis of the traffic count data since the time of those surveys.

However, it is understood that additional baseline monitoring will be undertaken to acquire further data to update, strengthen, build on and where necessary, confirm the earlier data and ensure it remains representative. Such noise monitoring is very important as the data is likely to be used to validate the outcome of any noise modelling process. This will be analysed in order to identify the likely impacts on the noise environment.

The effects of weather can have a great influence on prevailing noise levels, particularly those at some distance from a noise source. Particular care should be taken to ensure a reasonable amount of data is obtained under the wind and weather conditions specified in CRTN.

Any actual updated / validation of baseline / background noise surveys including duration and choice of selected representative noise monitoring locations throughout the study area and elsewhere should be fully agreed with SCDC's Health & Environmental Services in advance.

## **12.3 Value of the Environmental Resources and Receptors**

Examples of noise sensitive receptors are given but the purpose / requirements of this section have not been met - the actual sensitivity of receptors has not been addressed. Additional information is required under this section heading.

Other DMRB documents consider this area of 'value' attribution and DMRB Volume 11 Environmental Assessment, Section 2 Environmental Impact Assessment, Part 5, HA 205/08, ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL EFFECTS states that '*The significance of the effect is formulated as a function of the receptor or resource environmental value (or sensitivity) and the magnitude of project impact (change)*' and sets out the approach to determining significance of environmental effects and recommends consideration of the following:

- Assigning environmental value.
- Assigning magnitude of impact.
- Assigning significance.
- Cumulative effects.

Consideration should be given to other chapters for example 14: Community and Private Assets which considers that high sensitivity should relate to residential or commercial buildings and land used regularly by the local community (e.g. schools, community halls, playing fields) and community land that attracts users nationally (e.g. national parks); Low sensitivity will refer to derelict or unoccupied buildings, and occasionally used open space (e.g. informal areas of open space for which alternatives are available).

Alternatively, there could be cross referencing to Chapter 5: Approach to Assessment, which refers to the fact that significance is derived through consideration of the sensitivity of a receptor (sometimes referred to as its value or importance) and use of significant of impact matrices.

It is acknowledged that it may not be possible to assess every topic impact in this way but justification for deviation from the standard approach proposed should be provided.

## **12.4 Potential Effects**

### **Construction Effects**

All off-site construction impacts both direct and indirect should be considered. For example it has been suggested that certain aggregate types not readily available in the area will be imported by rail to Chesterton aggregates railheads and then transported by vehicles along local roads to the scheme as required. There are residential premises close to the railhead and local road network in this area so any impact of these indirect activities in these areas should be assessed.

The impact of borrow pits workings and any construction storage areas, compounds and transshipment sites should be considered as construction related noise / vibration impacts.

A definition of what timescales are to be considered 'temporary' should also be provided.

### **Operational Effects**

The actual operational effects should be explained further in terms of traffic noise description and potential impact on human health and quality of life.

The various noise sensitive receptors identified as likely to experience an increase, little or no change and/or reduction in road traffic noise once the proposed scheme is operational are noted. However, the Council would like to understand why other residential receptors previously

identified in the 2009 ES Atkins Noise Chapter have not been included. For example in the Atkins report those experiencing an increase in noise of 3dB (A) or more included the village of Conington, Friesland Farm, Hill Farm, Noon Folly Farm, Hazelwell Farm, New Close Farm near Hatton's Road and Orchard Park. What about the Ouse Valley?

## **12.5 Proposed Scope of Assessment & 12.6 Proposed Assessment Methodology**

### **Construction**

The use of BS 5228 - Code of Construction Practice for noise and vibration on construction and open sites, Part 1: Noise & 2: Vibration, 2009 to assess any construction related noise / vibration impacts is acceptable.

Paragraph 12.6.4 refers to '*construction noise impacts*' and then refers to BS 5228 – Part 2 which concerns vibration. This is probably a typo error and should refer to vibration.

BS 5228-2: 2009 provides guidance on the human response to vibration and Table 12.1 reproduced from BS6472 - *Guide to the evaluation of human exposure to vibration in buildings, 2008*, details the vibration levels that will be used to assess the potential effects of construction vibration. This is acceptable.

However, assessment should also be undertaken for potential vibration impacts on building structures. For building structure response, BS 5228-2: 2009 reproduces the advice given in BS 7385-2, *Evaluation and measurement for vibration in buildings – Part 2: Guide to damage levels from ground-borne vibration*, which gives guidance on vibration levels which could potentially result in building damage. The response of a building to ground-borne vibration is affected by the type of foundation, underlying ground conditions, the building construction and the state of repair of the building that could be affected. Table B.2 Transient vibration guide values for cosmetic damage detailed in BS 5228-2:2009 should be reproduced and used.

All direct and indirect construction noise / vibration should be assessed. The use of Chesterton aggregates railhead to import certain aggregate types and transport by local roads, any borrow pit works and any construction storage areas and compounds should be included.

Noise and vibration monitoring should be undertaken during the period of construction to ensure that acceptable levels prevail. A noise and vibration monitoring scheme should be agreed in advance with SCDC's Environmental Health Department. Any agreed schedule for noise and vibration monitoring and established noise and vibration limits should be contained within the Construction Environmental Management Plan that is proposed.

### **Operational Traffic Noise**

The use of DMRB - HD 213/11 Volume 11, Section 3, Part 7, Revision 1 Noise and Vibration, November 2011 to assess operational road traffic noise impacts is acceptable. A full '*detailed*' type assessment as referred to in this DMRB document should be undertaken for the entire study area.

It is noted that a three-dimensional digital noise model of the study area will be constructed. The model will include terrain data, ground cover types, road links as well as buildings and other structures that might screen or reflect noise. The traffic data sets used in the model will be those projected with and without the proposed scheme both in the opening year, and the future assessment year i.e. the year of maximum projected traffic flow within 15 years of opening. It is understood that the opening year and future year assessments are likely to be 2020 and 2035 respectively.

In addition to the normal requirements to show noise and nuisance impacts in the form of various reporting table approach as described in DMRB, the noise findings for each assessment scenarios should also be shown in the form of detailed noise contour maps of the noise study area. Such an approach was undertaken in the 2009 Akins ES Noise Chapter 9 as associated figures / plans and were extremely informative and helpful. A similar approach should be adopted for the current scheme. The following table (recreated from the A14 Improvement Ellington to Fen Ditton Environmental Statement Scoping Report, June 2008) lists the content of the noise map figures / data that should be presented or otherwise agreed. It is understood that the 'future design year' normally 15 years after opening is likely to be taken as 2035 to coincide with likely available traffic forecast data.

### Noise Contour and Noise Change Maps

Year	Scenario	Map Content	Contour interval
2014 (Base year)	Existing Road network	Traffic Noise Contours	BS 7445-2: 1991 Table 1 covering the range 45 to 85dB where possible
Opening year (2020)	Do Minimum		
	Do Something / With Scheme		
Future Design year (2035)	Do Minimum		
	Do Something / With Scheme		
Opening year (2020)	Do Minimum v Do Something / With Scheme		
Future Design year (2035)	Do Minimum v Do Something / With Scheme		
Opening year do minimum v design year do minimum	Do Minimum		
Opening year do minimum v design year with scheme	Do Minimum v with scheme		

The assessments may also need to consider on- and off-line scheme improvements.

DMRB summary reporting tables often include the total number noise sensitive residential premises within the detailed study area along the entire scheme route, which would effectively be an aggregate of all premises in Huntingdon DC and SCDC.

Additional summary of changes tables, or similar, for each respective postcode area, district and/or parish should be provided, as a detailed breakdown at a more local district / parish level would better inform local residents and members at a district level.

### Night Time Assessment

It is stated that assessment of noise impacts in the night time period will be undertaken where required in accordance with the criteria set out in DMRB. It is noted that DMRB HD 213/11 states that due to the increasing use of strategic networks by long distance goods traffic during night time hours and the potential to increase the level of noise and the perception of nuisance at night, a night time noise assessment should now be considered as part of the assessment

process. For the A14, with a high proportion of HGVs, such an assessment should be undertaken and reported.

However, as DMRB appears to recommend the use of predicted calculation methods and/or assumptions any night time impact assessment should be supplemented by actual baseline night time noise monitoring.

### **Assessment Height**

The actual height at which noise calculations, predictions and impact assessments will be carried out should be agreed with the relevant local authorities. DMRB is not clear on this and states in A1.19 (iii) that: *The noise levels calculated should be façade levels unless the sensitive receptor is an open space. For open spaces, free-field levels should be calculated. All levels should be calculated in LA10, 18h at a default height of 1.5m above ground level. For dwellings with a first floor, the noise level should be calculated at 4m above ground level. Further advice should be sought from the Overseeing Organisation where dwellings of over three habitable floors are within the area where noise calculations are to be undertaken.*

As the majority of houses along the route are two storey or greater then 4m may be the most suitable height to use. However, if residential properties have large gardens used for rest and relation then prediction in gardens may be necessary. Depending on local circumstances the assessment height may need to vary. The actual assessment height needs to be agreed with the local authority.

### **Noise Cumulative Impacts**

In terms of cumulative noise impact assessment it is stated that committed developments in the area of the proposed scheme will be included in the definition of the traffic data 'do something' scenario.

The approach to cumulative impact assessment is paramount and our additional comments regarding Chapter 16: Cumulative Effects and Impact Interactions of the ES scoping report, as detailed below, should be considered.

### **Mitigation Noise Trigger Threshold / Significance of Impact Assessment**

It is stated that the initial indicator or threshold triggering the need to consider mitigation will be a change of 3dB (A) or more, although other criteria / factors and professional judgement considerations will be used to refine the identification of significant effects and mitigation, as appropriate.

In addition to the detailed impact assessment requirements of DMRB, impact significance criteria for changes in road traffic noise at sensitive receptors are proposed as detailed in Table 12.4 *Assessment of magnitude and potential significance of effect*. They will be used alongside the DMRB magnitude criteria for comparison.

This approach is entirely acceptable and welcomed.

However, consideration may also need to be given to potential unacceptable absolute noise levels irrespective of whether there is no 3dB (A) increase. For guidance on the onset of adverse effects, reference could be made to the current WHO document entitled 'Community Noise' (WHO, 1999) or similar. This document does not contain recommendations, but provides guideline values based on the precautionary principle. The WHO document states that *'To protect the majority of people from being seriously annoyed during the daytime, the outdoor sound level from steady, continuous noise should not exceed 55dB LAeq on balconies, terraces*

*and in outdoor living areas. To protect the majority of people from being moderately annoyed during the daytime, the outdoor sound level should not exceed 50dB LAeq. Where it is practical and feasible, the lower outdoor sound level should be considered the maximum desirable sound level for new development’.*

The WHO refers to a daytime time base of 16 hours (LAeq(16hr)), and CRTN predictions are in terms of LA10(18hr). To translate the WHO LAeq(16hr) to LA10(18hr), a correction of approximately +2dB is therefore required, with a further +2.5dB necessary to translate into façade levels. This translation applied to 50dB LAeq,16hr gives an equivalent threshold façade level of 54.5dB LA10(18hr).

In summary, taking into account the WHO and DMRB guidance, mitigation should be considered where the significance of impact at a receptor is assessed as Moderate adverse or worse as detailed in Table 12.4 (a +3 dB (A) or greater noise increase) and where the predicted façade level exceeds 54.5dB LA10(18hr).

However, the approach should be agreed in advance with the local authorities.

It is noted that noise prediction beyond approximately 300m may be inaccurate and the proposed mitigation threshold triggers may only be applicable to receptors within 300m in accordance with DMRB guidance.

### **Road Traffic Vibration: Ground-borne & Airborne**

The approach proposed is agreeable.

### **Uncertainty and Validity of the Assessment Process**

The ES scoping report offers no comments on the consideration of any uncertainties, assumptions and limitations. Any special limitations or technical difficulties that are encountered in the course of this assessment should be reported. As all noise modelling studies are dependent on computer modelled traffic data and on a number of assumptions these should be explained in detail.

### **Noise Mitigation Measures**

There is no reference or mention at all of potential mitigation measures that could be considered to avoid or reduce any significant adverse noise effects / impacts. This also appears to be the case for most of the topic chapters.

EIA guidance recommends as a minimum that an indication of likely mitigation measures that could be considered and implemented should be included, even if they are indicative and/or just general industry best practice.

The Planning Inspectorate’s National Infrastructure Advice Note Seven: *‘Environmental Impact Assessment: Screening, Scoping and Preliminary Environmental Information, July 2013, Version 4’* also offers guidance on what information should be provided with a scoping request and it states that *‘any mitigation proposed and predicted residual impacts’* should be included.

Table 1.1: *Location of Information* within this Report in the Introduction states next to mitigation that *“An outline of possible mitigation will be provided under the heading of ‘Potential Effects’ in each of the environmental topic chapters (Chapters 6 – 15). A brief outline on what residual effects are envisaged is included in the same sections”*. This is not the case.

It is noted that the PEIR details potential measures to mitigate noise impacts during construction and operation.

Examples of design and mitigation techniques that may influence noise and vibration impacts as described in DMRB documentation should be included.

The final locations including the length, height and acoustic performance design specifications of barriers should be agreed with the local authority. It should be noted that existing noise barrier schemes along the A14 have caused concern in local communities about reflected noise in reverberant locations, for example at Histon and Impington. Careful consideration should be given to any such acoustic effect and reference should be made to relevant standards including BS.EN 14388: 2005 – Road Traffic Noise Reducing Devices: Specifications which covers acoustic, non-acoustic and long term performance. It should be possible at the detailed design stage to consider where practicable, additional novel barrier top edge finishes, such as cantilevering the upper part of the barrier towards the road. This may provide some additional noise protection and in particular where there may be receptors higher than 4m.

Where mitigation is considered, it is necessary that it complies with acceptable standards in terms of traffic, safety, environmental and economic issues. Examples that could preclude the use of mitigation are disproportionate cost compared to noise reduction achieved, unreasonableness and unacceptable visual impact.

The HA are urged to fully consider impacts on existing communities and planned developments along the route, and work with the Council to consider opportunities to avoid or reduce environmental noise effects at source, and to enable the most effective mitigation of those adverse effects that cannot be avoided, including the mitigation of direct and indirect impacts during the construction phase.

For most road network schemes, the relevant Noise Insulation Regulations may apply. An indication of the likely eligibility for such compensation should also be included in the ES.

### **Monitoring and evaluation**

Section 6.1 of DMRB - HD 213/11 Volume 11, Section 3, Part 7, Revision 1 states that although there is currently no general requirement for noise and vibration monitoring following the completion of a road project, the Overseeing Organisation's supply chain should check whether any monitoring requirements have been written into the design specification. This may be required if an objective of the road project is to reduce noise.

Reducing noise impact is clearly an objective and to allay public concerns, post completion / implementation noise monitoring should be considered and the findings reported to local authorities.

*Further advice can be obtained from Greg Kearney, Environmental Health Officer, Health & Environmental Services - Telephone No: 01954 713145 or email [greg.kearney@scams.gov.uk](mailto:greg.kearney@scams.gov.uk)*

### **Chapter 13: All Travellers**

This section should refer to policies in the Development Control Policies DPD (July 2007) <https://www.scams.gov.uk/content/development-control-policies-dpd> and South Cambridgeshire Proposed Submission Local Plan as Submitted in March 2014 <https://www.scams.gov.uk/localplan>.

Along the A14 SCDC refuse vehicles have to access certain properties that are in close proximity. Provision for the safety of refuse vehicles should be considered.

Rest areas and lay-bys should be sufficient and convenient.

*Further advice can be obtained from Jon Dixon, Principal Planning Policy Officer – Planning and New Communities - Telephone No: 01954 713194 or email [Jonathan.Dixon@scambs.gov.uk](mailto:Jonathan.Dixon@scambs.gov.uk)*

#### **Chapter 14: Community and Private Assets**

Paragraph 14.1.4 Refers to the Submission Local Development Framework, which should refer to the South Cambridgeshire Proposed Submission Local Plan as Submitted in March 2014 <https://www.scambs.gov.uk/localplan>. It should also refer to the adopted Local Development Framework <https://www.scambs.gov.uk/content/local-development-framework>.

Paragraph 14.2.17 refers to Local Plans and planning application site proposals within the study area will be used to establish the baseline in the ES. As highlighted in other comments this has not been addressed consistently by the Scoping Report or the PEIR.

*Further advice can be obtained from Jon Dixon, Principal Planning Policy Officer – Planning and New Communities - Telephone No: 01954 713194 or email [Jonathan.Dixon@scambs.gov.uk](mailto:Jonathan.Dixon@scambs.gov.uk)*

#### **Chapter 15: Road Drainage and Water Environment**

This section should refer to the South Cambridgeshire District Design Guide Supplementary Planning Document adopted March 2010 <https://www.scambs.gov.uk/content/district-design-guide-spd>.

Pat Matthews, Drainage Manager, Health & Environmental Services has already provided detailed comments by an email dated the 22/04/2014. For completeness the email stated the following (with reference to attached SCDC award drain location plans):

*Enclosed are marked copies of the relevant 'General Arrangement' sheets showing the location of the statutory Award Drains and associated numbers in the South Cambs area along the proposed A14 route. The following general points will be relevant:*

- 1. The Council's Land Drainage Byelaws require a 5 metre maintenance access strip along all the award drains so that mechanised maintenance works may be undertaken. Please ensure the access strip is available at all times in the future.*
- 2. Access to the land through which the award drains flow will also be required at all locations.*
- 3. Outfall headwalls to the award drains should be constructed within the existing 'bank profile'. This will avoid any interruption to the flow in the watercourse and comply with S23 Land Drainage Act requirements (regulated by Cambridgeshire County Council – flood and water management section).*
- 4. The Highways Agency should give serious consideration to S32 Land Drainage Act regarding any 'variation of Awards'. Previously, the client and designers (WS Atkins) took the view that a formal application for a variation would be sought in order to avoid the potential for a public enquiry with associated delay. See para 1.7 minutes meeting at Menzies Hotel 27 June 2013.*

It is also recommended that self-cleansing V-type roadside / central reservation drainage channels (similar to that along the A428) be provided along the scheme.

Further advice can be obtained from Pat Matthews, Drainage Manager, Health & Environmental Services - Telephone No: 01954 713472 or email [pat.matthews@Scambbs.gov.uk](mailto:pat.matthews@Scambbs.gov.uk)

## **Chapter 16: Cumulative Effects and Impact Interactions**

The approach proposed for the assessment of cumulative effects is not clear and is ambiguous.

There appears to be conflict with the approach proposed in the Preliminary Environmental Information Report (PEIR). The Scoping Report (SR) in chapter 16 refers to a two-staged approach but then details a three staged approach commencing paragraph 16.2.1. The PEIR refers only to a two-staged approach. It is concerning that the two approaches are not consistent and complementary in their purpose, for such an important aspect of impact assessment.

### **16.2 Proposed Assessment Methodology**

Paragraph 16.2.4 of the SR states that “*professional judgement will then be used to identify whether potential cumulative impacts may occur across the topics and also across other reasonably foreseeable developments. A development will be considered reasonably foreseeable if:*

- *it is a transport project due to be implemented in a reasonable timeframe, for example as part of a planned programme of works; or*
- *a planning application has been submitted for determination and that planning permission has either been granted or is pending a decision.*

*Land allocations on their own will not be considered, as there is no certainty that developers will come forward with projects, and the nature and timing of such projects and their impacts cannot be known. Furthermore, the cumulative effects of land allocations would have been assessed as part of strategic environmental assessments associated with the relevant development plans.”*

This approach appears to be inconsistent with the PEIR which in section 12.3 refers to the preliminary review of the relevant Local Development Plans and a list of major development sites within 5km of the January 2014 scheme have been identified, including the following:

- Orchard Park - a mixed use development including up to 900 dwellings.
- Land between Huntingdon Road and Histon Road - largely residential development of 1,000 dwellings and associated facilities. (also known as Darwin Green 1)
- Cambridge Northern Fringe East and land surrounding the proposed Cambridge Science Park Station - a mixed-use development primarily for employment purposes.
- Northstowe new town with a target capacity of 10,000 dwellings (aiming for at least 4,800 dwellings by 2016) and associated employment, services, facilities and infrastructure.
- Cambridge East is an area safeguarded for longer term development beyond 2031. It is anticipated that land north of Newmarket Road will deliver approximately 1,200 dwellings and land north of Cherry Hinton will deliver approximately 110.
- Land North of Waterbeach is a new town of 8,000 to 9,000 dwellings and associated uses proposed on the former Waterbeach Barracks and land to the east and north.
- Bourn Airfield is land south of the A428 based on Bourn Airfield which is allocated for the development of a new village of approximately 3,500 dwellings.
- Huntingdon West is envisaged as a vibrant part of the town enjoyed by residents, workers and visitors by 2026 in the Huntingdon West Area Action Plan (Adopted 2011).

This list of developments are at various stages in the planning process with some in the emerging local plan, some in the adopted local plan, some with planning permission granted, and some live planning applications under consideration. Other similar developments have not been mentioned, for example Cambridge Science Park Railway Station with planning permission, North West Cambridge – planning permission and earthworks already commenced and Cambourne West.

However it is noted that paragraph 12.4.3 of the PEIR states that the traffic model which would be used to inform the EIA, particularly for the assessment of air quality and noise, is likely to take into account projected traffic growth from planned development. Therefore, the cumulative effect of developments is likely to be taken into account in those topic assessments in the EIA. It is also stated that where significant cumulative effects, beyond those identified as residual effects from the proposed scheme in isolation, are identified, additional mitigation measures would be recommended but such mitigation measures proposed at this stage may be beyond the control of the Highways Agency.

It is noted that the Planning Inspectorate's guidance on cumulative impact as set out in National Infrastructure Advice Note 9: Rochdale Envelope is as follows: *The potential cumulative impacts with other major developments will also need to be carefully identified such that the likely significant impacts can be shown to have been identified and assessed against the baseline position (which would include built and operational development). In assessing cumulative impacts, other major development should be identified through consultation with the local planning authorities and other relevant authorities on the basis of those that are:*

- *under construction;*
- *permitted application(s), but not yet implemented;*
- *submitted application(s) not yet determined;*
- *projects on the Planning Inspectorate's Programme of Projects;*
- *identified in the relevant Development Plan (and emerging Development Plans - with appropriate weight being given as they move closer to adoption) recognising that much information on any relevant proposals will be limited; and*
- *identified in other plans and programmes (as appropriate) which set the framework for future development consents/approvals, where such development is reasonably likely to come forward.*

There are clear inconsistencies in the two proposed approaches detailed and this should be avoided. It is important to take account of Local Plan allocations. Their deliverability has been tested as this forms a key part of the Local Plan process. The actual approach to be taken for cumulative impact effects should be clarified and fully agreed with SDC.

### **Impact Interactions / interrelationship in combination**

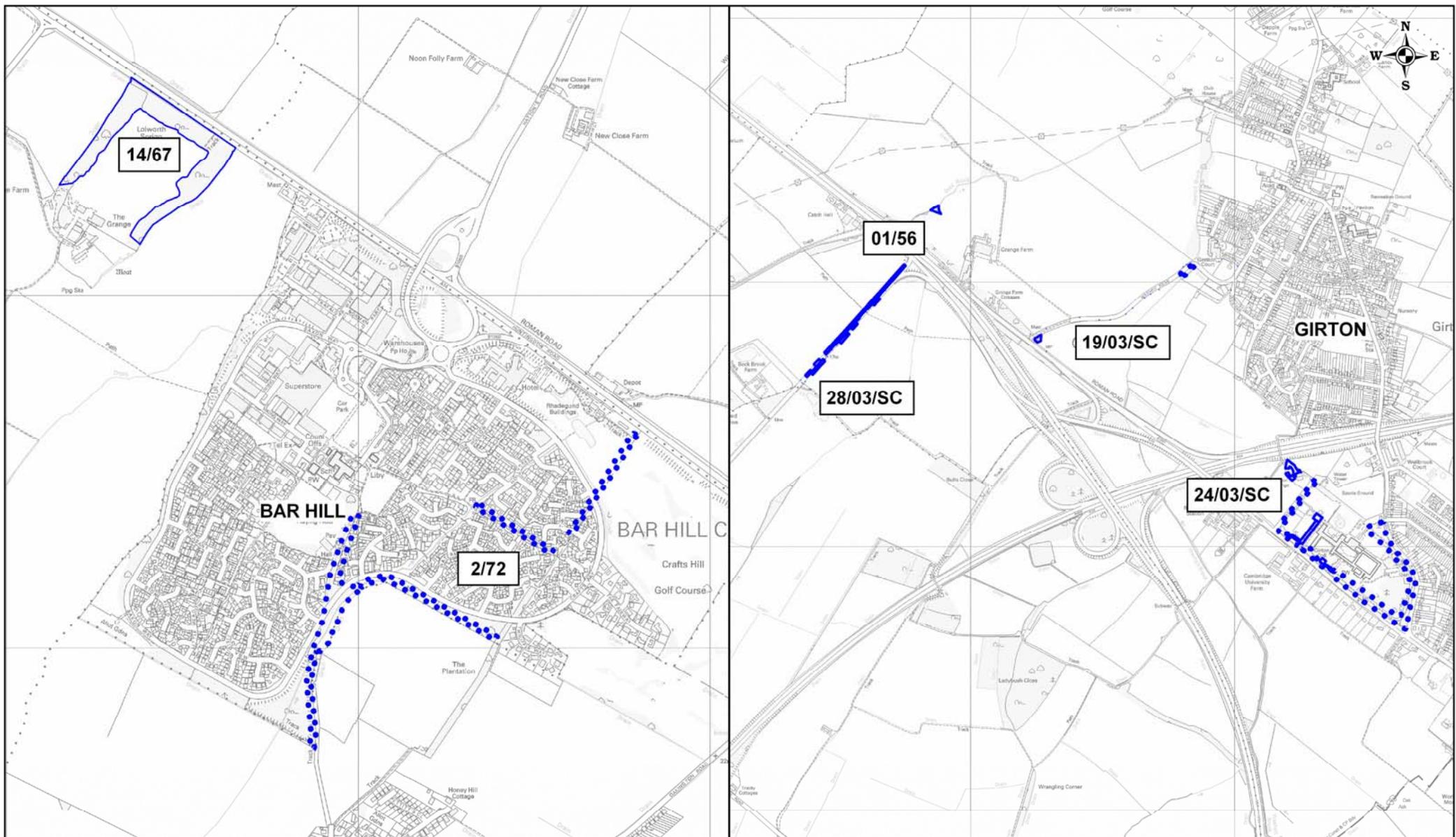
Table 5.2: Consideration of Topics in the EIA Scoping Exercise states that Chapter 16 describes how the interrelationship between environmental factors will be assessed as well as cumulative effects. However Chapter 16 does not mention inter-relationships at all.

The inter-relationship between environmental aspects of the proposed development should be assessed and careful consideration should be given by the developer to explain how inter-relationships have been assessed in order to address the environmental impacts of the proposal as a whole and not in isolation.

For example the provision of noise barriers may have landscape impacts and concerns about reflected noise may limit barrier design choice as they may need to be absorptive. If human receptors are exposed to poor air quality and adverse noise, then mitigation should be

prioritised for such receptors. Sometimes initiatives aimed at reducing the impact of one are beneficial as well for the other but sometimes they may instead be detrimental. Often the two issues are tackled without considering the reciprocal impacts. What are the potential synergies and/or conflicts?

*Further advice can be obtained from Jon Dixon, Principal Planning Policy Officer – Planning and New Communities - Telephone No: 01954 713194 or email [Jonathan.Dixon@scams.gov.uk](mailto:Jonathan.Dixon@scams.gov.uk)*



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Produced by:	Michael Sexton
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# A14: Tree Preservation Orders

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