

## The Parish Council of Offord Cluny and Offord Darcy

### The A14 Cambridge to Huntingdon Improvement Scheme

Submission to the Planning Inspectorate (DCO Registration ID 10030393).

#### Summary

**We continue to assert that regarding the proposed Huntingdon Southern Bypass, the whole exercise is misguided and unnecessary. That by upgrading the A14 to modern A-road standards, with proper slip roads for entry and exit and the provision of a hard shoulder, by dualling the A428 between St Neots and Caxton and improving the A428/A1 link at the Black Cat roundabout, there will be a greater improvement in traffic movement in the area as a whole, at much lower cost. The fact that according to HE (Consultation Report 5.1 p64) the new A14 will not have hard shoulders either, would seem to indicate that the entire scheme at a cost of £1.5bn will not actually solve the root cause of the current problem!**

This suggestion, which has also been made by a number of other stakeholders, has been consistently ignored by Highways England throughout this entire process, and indeed throughout the previous A14 ("CHUMMS") proposal dating from around 2003. Mike Evans, representing Highways England was being somewhat disingenuous when he asserted at the Planning Inspectorate Preliminary Meeting that he was unaware that such a proposal existed.

Delays on the current A14 between Huntingdon and Cambridge are mainly due to breakdowns, accidents and the weight of rush-hour traffic trying to get into Cambridge at the Girton interchange. The impact of breakdowns is exacerbated by the lack of a hard shoulder, making it impossible to pull offending vehicles off the main carriageway in a timely manner. Accidents are for the most part relatively minor (Highways England's own statistics). They could be reduced by designing proper entry and exit slip roads for the junctions along its course and closing the badly designed and poorly sited laybys used as lorry parks along the route. The presence of a hard shoulder would minimise delays consequent to such accidents. The proposed redesign of the Girton interchange should help to keep traffic flowing by properly separating that traffic that wishes to enter Cambridge and that which wishes to continue along the A14 towards Newmarket.

Additionally much of the weight of rush-hour traffic for this section of the A14 can be relieved by dualling the A428 between St Neots and Caxton Gibbet and thus providing an alternative route for local traffic. It is in any case rather anomalous that this relatively short stretch of road should remain single lane when the rest of it has been dualled all the way between Cambridge and the M1. Include the addition of a proper link to the M1 that bypasses the "Black Cat" roundabout at Barford and the shape of a properly "joined up" road system starts to emerge.

So our opinion remains that this is an equally effective solution to this problem, and achievable at a fraction of the cost of the HE proposal.

## Introduction

This document follows on from the original submissions by the Parish Council to Highways England (HE) – Highways Agency as it was then. The first was in October 2013, responding to the “informal” consultation regarding the proposed Cambridge to Huntingdon Improvement Scheme. Subsequent to this, Highways England made some modifications to the original proposal, published in the document “A14 Cambridge to Huntingdon Improvement Scheme April 2014” and embarked upon a series of public exhibitions to further inform the public of the scheme. One such was held at Offord Village Hall on Tuesday 15<sup>th</sup> April 2014, attended by all of the current Parish Council. We must stress that none of these modifications apply to the road as it traverses the Ouse Valley in the vicinity of the Offords.

The second submission was made responding to this consultation in June 2014. It was little different from its predecessor, reflecting the lack of any change in the stance of HE regarding its proposed routing and infrastructure as it crosses the Ouse valley adjacent to the Offords. Indeed the two major differences that have since been made would indicate that the situation with regard to the Offords is now rather worse than previously indicated :-

- The proposed bridge over the railway will need to be twelve metres high. This makes all the proposals for “screening”, “mitigation” etc worthless in practice – a fact admitted by HE representatives present at the public exhibition. It also raises concerns about greater spread of noise, atmospheric pollution and impact of vehicle headlights from this elevation.
- In order to satisfy Environment Agency concerns about flood risk, the original raised banking supporting the road as it traverses the distance between the river Ouse and the railway bridge has been replaced by a number of steel and concrete spans. Not only is this a visual blight, the construction makes impossible the planting of any trees or any other vegetative mitigation. Even HE have had to acknowledge the fact by providing a photographic representation of this part of the route as it would be “in fifteen years time” which shows a completely unchanged landscape !

HE have provided very little information about the route other than maps with “plan views” – and most of those lacking detail of junction design and hedged with caveats regarding the precision of the measurements of the distances displayed. In this age of computer graphics etc this is not good enough. We are entitled to be shown 3D graphic illustrations of the elevations and visual impact of all these proposals and the precise point at which the route will traverse the Ouse Valley. There should be markers, such as posts or flags along this part of the route that physically indicate the position of the road. Not just the line of centre but the extremities of the boundaries that the entire six lanes plus peripheral structures will occupy.

## Huntingdon Viaduct

One of the drivers for this particular solution is the supposed “need” to remove the viaduct upon which the A14 runs as it traverses Huntingdon Station. This has been predicated by requirement for replacement as it nears the end of its life and which has also been supported by Huntingdonshire District Council (HDC) who appear to have an agenda to create a new shopping facility where the viaduct now stands. We would make three points here :-

- Looking at the current route proposed by HE it is clear that whilst the viaduct over the station has been removed, there is another less than a mile away that traverses the river and which is being retained as part of the scheme in order to allow local traffic to access the points East via the “old” A14. This viaduct was built at the same time, in the same vernacular and using the same materials as that adjacent to the station. So we would ask “With two identical structures why does HE consider one to be good for another thirty years, yet not the other? “
- Highways England’s own website states that, in the aftermath of remedial work and additional reinforcing the viaduct is expected to be viable “for the foreseeable future”. We would take that as meaning “for at least as long as the life of the proposed A14” – 30 years.
- Many other stakeholders are also questioning the reasoning behind the removal of this viaduct especially with regard to contingency planning in the event of an accident blocking the proposed bypass. So what suggestions does HE have for re-routing traffic when (not “if”) this eventuality comes to pass?
- Many residents of Huntingdon – although not, it would appear, Huntingdon District Council, are concerned at the amount of recreational land (Mill Common and Views Common) that would be taken and the number of mature trees that would need to be felled in order to route local traffic within Huntingdon that would previously have been on the A14 viaduct.

## The Offords

A criticism of the visual aids provided for the exhibition is that almost all were “plan views” that indicated the route but not the visual impact thereof. For the Offords, this is a critical omission, especially when it came to light that the height of the bridge over the railway was going to be twelve metres (one presumes that is from the ground to the underside of the bridge), rather than the previously announced seven metres. Once again HE have been less than frank about this – it did not appear anywhere on the documentation provided at the consultation stage and only came to light when a direct question was asked of HE staff at the exhibition held at Offord Village Hall.

Indeed HE were still being evasive in this regard some months later, judging by the quote from Mike Evans printed in the Hunts Post of the week of May 11<sup>th</sup> 2014 :-

*Mr Evans said the height of the road near Hilton would be 2m above existing levels while the viaduct over the East Coast Mainline and the River Great Ouse would be as low as possible, but in keeping with the height restrictions of Network Rail and the Environment Agency.*

Such obfuscatory statements do little to diminish our perception that the Offords and other adversely affected villages will not have any serious consideration given to their plight.

For the Offords it is quite clear that no amount of mitigation will hide the bridge over the railway from view – a fact admitted by HE representatives at the public exhibition - and the additional height will cause issues with the spread of atmospheric pollutants, with noise and with light pollution from vehicle headlights. Perusing the “Environmental Impact Assessment” document published by HE gives little confidence that the proposed “models” that will be used to predict these impacts are actually taking the height factor into account. We would like HE and its agencies to be upfront and honest with us about all aspects of the effect of the road as it crosses the Ouse Valley adjacent to the Offords – calling a bunch of twigs in plastic coils a “woodland” rather insults our intelligence.

A further issue is the B1043, the road that runs north from Offord Cluny to Godmanchester. HE’s proposal is to create a new road to the west of the existing, in order to avoid having to close it during construction. Concerns have been expressed that the new road appears to be very straight and will encourage traffic to reach dangerous speeds in either direction, in particular that coming down the hill from Godmanchester towards Offord Cluny. The HE response in their document “Consultation Report 5.1” :-

The proposed new section of B1043 over the A14 would not be dissimilar to the existing road which already has straight sections. The road would also rise as it passes over the A14 which would encourage slower speed.

Which is typical of so many of the responses within this document. Just batting away the issue with no evidence or scientific backing. Our concerns remain. The straight part of the existing road is shorter than the proposed replacement and finishes in a series of bends that gives traffic going too fast a margin of error in which to slow down. The proposed road comes straight down into Offord Cluny in a straight line from the top of Offord Hill. Moreover the proposed “rise as it passes over the A14” can only mean that the descent into Offord Cluny is steeper, which will surely increase rather than diminish the speed of traffic entering the village.

As the new B1043 will be designed to go over the new A14, it would seem that this road itself will be contributing to the visual blight. Once again, the lack of any elevation views of the route are making it impossible to gauge the impact of this element.

A further major concern regarding the B1043 has come to light after further study of the proposed A14 route as a whole. Traffic heading north up the A1 will not be able to turn right onto the proposed A14 and head eastwards towards Cambridge, Newmarket and the East Coast ports such as Harwich. Much of this traffic is coming from the M1 along the now much-improved A421. This is also true for local traffic wishing to get from the St Neots region, south of the Offords on the B1043, towards Cambridge.

An obvious alternative route for either traffic flow is to take the B1043 from the St Neots end and head northwards through the Offords and towards the new east bound road towards Fen Ditton and thence to the eastbound A14. The reply from HE on their Consultation Document 5.1 p244 :-

Traffic flows between the A1 south of Brampton interchange and the A14 Huntingdon Southern Bypass are expected to be low as most long-distance trips starting or finishing in this area would use the A428 to travel between the A1 and A14.

This blithe assertion completely ignores (or is unaware of) the reality of this single-lane section of the A428 which is already at a standstill in the morning and evening rush hours and will only get worse when the current housing development at Love's Farm and the proposed developments at Loves Farm East and Wintringham Park are completed.

## **The Landscape**

Cambridgeshire is a County that really does not have much in the way of spectacular scenery. Most of it is just "quite nice" at best. Yet the view from the top of Offord Hill, looking across the Ouse Valley can take your breath away. It is this proposed despoilment by a six-lane motorway that is at the heart of our objections. A savage, hideous scar across the landscape in either direction as far as the eye can see. This is not how road building should be in this day and age.

And it is not just we Offord residents who feel this way. The Great Ouse Working Group – a body with no connection to the Offords - are in the process of applying to have this part of the Great Ouse Valley designated as an Area of Outstanding Natural Beauty. This is an amenity for all that will be destroyed by this road.

None of the proposed "mitigation" measures will have any significant beneficial effect on this part of the route – the only way to minimise the impact of the road at this point would be to locate it underground.

The route also involves the loss of a great deal of high quality agricultural land and by cutting through existing farms may well result in them becoming financially unviable. Little regard appears to have been paid to this possibility.

And to what end? So that drivers can get to Cambridge ten minutes faster? This is too high a price to pay. Literally and metaphorically.

## **Environmental Impact Assessment**

Much is made of the proposed "Environmental Impact Assessment" (EIA) of the route as a whole – an imposing 300 page document detailing all the many investigations being planned with regard to noise, pollution, visual impact etc. 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. Many of them appeared not to be completed at the time of the Preliminary meeting of the Planning Inspectorate and consequently when they are published, will leave insufficient time for any response within the timescale of the examination of the DCO. The obvious conclusion to which to jump is that HE have taken no account at all of the Environmental Impact Assessment in their planning process. 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 HE and other government and quasi-government organisations. What assurance can we have that these are truly independent and free from bias?

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 HE’s documentation, the proposed bridge over the railway line will require a clearance of 12 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 HE.
  - 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 HE 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 HE 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.

### Et Cetera

We would repeat most of the other issues mentioned in the Parish Council’s original response over which many other stakeholders have expressed concerns.

1. The impact of ten lanes of motorway adjacent to Brampton – now with the additional burden of having major materials extraction performed in a “Borrow Pit” located nearby.
2. The visual impact on Hilton and Conington.
3. The lack of any “joined up thinking” regarding linking traffic from the M1, northbound A1 and eastbound A14. It would appear that traffic moving north on the A1 will have to go past the junction with the A14, do a U-turn at the next junction and travel back to the A14 junction if it wishes to travel eastbound towards Cambridge. This cannot be sensible. Alternatively, along with traffic arriving from the M1 at the “Black Cat” roundabout it will still have to access the A428 via a very congested, badly designed entry point followed by a stretch of single-carriageway as far as Caxton Gibbet. The many shortcomings of this part of the A428 are major contributors to congestion on the A14 yet HE has consistently shown no interest in remedying them.
4. The lack of any contingency plans when (not “if”) the bypass is closed due to an accident. This situation will be severely exacerbated should the existing viaduct over the station be removed. And note once more that the proposed road **has no hard shoulder** and therefore will be prone to the same risk of closure by relatively minor incidents and take a similar length of time to clear as the current A14.

5. The removal of a considerable part of Huntingdon's green leisure spaces, Mill Common and Views Common. Not to mention the legal "grey area" regarding the land's status as being held in trust for the people of Huntingdon.
6. The fact that by its very existence the new A14 will facilitate new developments along its route, will encourage workers in Cambridge to move further afield to take advantage of cheaper property prices etc etc until the levels of congestion increase such that average journey times increase back to today's levels.

In short it would appear that the benefits of this development, such as they might be, will be enjoyed by those from outside the Cambridgeshire region and the drawbacks will be suffered by the local residents. Deeply ironic when it is we whose Local Authorities are being told to contribute towards the cost.

In addition to the bypass, HE also plans to improve the junctions at Girton, Histon and Milton. This appears to us to be an eminently sensible strategy – because it actually addresses the root cause of much of the congestion. Traffic heading towards Cambridge has to negotiate the over-complicated junction at Girton and maybe the junctions at Histon and Milton where long tailbacks block the inside lane of a dual carriageway already merging with faster moving traffic from the Eastbound A428.

If similar sensible measures were applied to the existing A14, then most of the issues regarding congestion caused by accidents and breakdowns would also be addressed. A "hard shoulder" to enable offending vehicles to be swiftly removed from the carriageways, properly designed slip roads rather than right-angle junctions, to allow traffic to enter and exit the road safely and the removal of lay-bys (or "lorry-stops" as they have become) in order to reduce the number of accidents involving lorries. Provide a proper rest area for lorry drivers to compensate.

All this could be achieved at a fraction of the cost, both monetary and human, of Highways England's proposed solution for improving the A14 Cambridge to Huntingdon route.

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10<sup>th</sup> June 2015

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