

Statement by Huntingdonshire District Council
15th June 2015



Examination of application by Highways England
for an Order granting Development Consent for
the A14 Cambridge to Huntingdon Improvement
Scheme

Examination Statement by Huntingdonshire
District Council - Responses to Examining
Authority's First Round of Written Questions

Author:	Dave Bass (Hunts DC)
Question Reference:	Q1.1.1
Question:	Has agreement over the establishment of the baseline for the air quality assessment been reached with CCC, HDC and SCDC? If so, please give the relevant reference. If not, why not?
Response:	The method of baseline assessment can be found in Chapter 8 section 8.2.9 to 8.2.13. HDC is satisfied that this is the correct approach for determining baseline assessments.

Author:	Dave Bass (Hunts DC)
Question Reference:	Q1.1.3
Question:	
<p>The methodology for the assessment of air quality effects is set out in the ES at 8.2.21ff. Para. 8.2.68 states that the overall approach and methodology to assess air quality effects was agreed with the local authorities. What was agreed and with which local authorities? Please provide details.</p>	
Response:	
<p>This is what was sent by HDC environmental health.</p> <p>“Please find Environmental Health's response to the draft A14 Environmental Statement regarding air quality.</p> <p>The Environmental Protection Team has assessed the draft Environmental Information Assessment for air quality and has the following comments.</p> <p>The approach undertaken to assess the impacts of air quality are acceptable. We support the comparison of a “do nothing scheme” and a “do something scheme” against national air quality targets.</p> <p>It is noted that the modelling toolkits used for the assessment were ADMS and DMRB. These modelling toolkits are appropriate for the purpose and so are reassured that if the correct information was inputted then the results will be accurate.</p> <p>It is noted and supported that the applicant used monitoring data undertaken by Huntingdonshire District Council as well as their own data. It is considered that using information supplied by Huntingdonshire District Council within the model will have improved accuracy due to a better rate of data capture. Although it is recognised that the non HDC monitoring was using 2014 whereas HDC’s monitoring was using 2013 figures which is the reason for the reduced data capture.</p> <p>It was also noted a supported that background air quality levels released by Defra have been used which are recommended unless extension background monitoring has been undertaken.</p> <p>It was noted and considered acceptable to use 2014 traffic figures for the baseline of the survey. It was also noted and agreed that the future assessments incorporated known major developments, like Alconbury Weald, as it is felt that future predictions of traffic are likely to be more realistic.</p> <p>The Environmental Protection Team welcomes that the assessment used four different meteorological stations to verify the model as it shows that verification has been thorough and the results should be accurate.</p> <p>It is noted and welcomed that the study area included areas where there are already known issues around air quality caused by the existing A14 (known as Air Quality Management Areas) and assessments have been undertaken on the schemes potential impact on these areas.</p> <p>The information shown on Figure 8.10 Predicted magnitude of change of pollutant concentrations shows that out of the areas modelled in Huntingdonshire the majority will have an improved air quality. There are noted some areas that whose air quality is predicted to decrease. However, this department does not expect the air quality to deteriorate to the level where any new Air Quality Management Area will need to be created due to the scheme. It is noted that in all the current Air Quality Management Areas affected by the current A14 it is predicted that there will be an improvement in the air quality. It is unknown at the moment if that improvement will result in any of the Air Quality Management Areas being revoked but even if it doesn’t, assuming the scheme predictions on air quality are accurate, the scheme will result in better air quality for more of Huntingdonshire's residents.”</p>	

Author:	Dave Bass (Hunts DC)
Question Reference:	Q1.1.5
Question:	Please explain when, how and where air quality would be monitored or why no monitoring is proposed with particular reference to NOx, NO2, CO, PM10 and PM2.5.
Response:	<p>This question should be directed to the applicant.</p> <p>The local authority has a duty to investigate air pollution levels in their district in accordance with the local air quality management regime. If levels of relevant pollutants are determined above set limits then the local authority shall declare an Air Quality Management Area and develop an action plan with the aim to reduce pollutants to below levels. Currently HDC has 34 NO2 diffusion tubes located around the district and one NO2 automatic monitor, one PM10 automatic monitor and one PM2.5 automatic monitor. At present HDC is not expecting to increase our automatic monitors due financial and technical restrictions.</p>

Author:	Dave Bass (Hunts DC)
Question Reference:	Q1.1.8
Question:	Please explain how the assessment of air quality has taken into account the proximity of the proposed road scheme to sensitive receptors including housing and schools and the mitigation measures proposed during the operational phase in such locations? Where and how would these measures be secured?
Response:	This is a question that should be directed to the applicant.

Author:	Dave Bass (Hunts DC)
Question Reference:	Q1.1.14
Question:	Have the results of the air quality assessment been agreed with Interested Parties and if so, by whom and if not, why not?
Response:	This is not a question that HDC can answer and should be directed to the applicant.

Author:	Dave Bass (Hunts DC)
Question Reference:	Q1.1.15
Question:	
<p>What effect, if any, does the Supreme Court judgment on the Air Quality Directive (R (on the application of ClientEarth) (Appellant) v Secretary of State for the Environment, Food and Rural Affairs (Respondent) Judgment Given on 29 April 2015) have on the proposed scheme? In responding, please make reference to the National Networks NPS.</p>	
Response:	
<p>No there is change to the scheme. From a pure air quality reason the current A14 is the main source of pollutants that are responsible for 3 Air Quality Management Areas which has approximately X domestic properties in. The UK has a duty to investigate and implement action plans to reduce the pollutants. The proposed A14 will remove a lot of traffic from the current route (which is sometimes as close as 20 metres from houses). This split of traffic will result in the reduction of vehicles and therefore pollutants, hopefully to a level that will result in the revocation of the three AQMA's.</p> <p>The Supreme Court judgment on the Air Quality Directive essentially forces the government to prepare new air quality plans by 31 December 2015.</p> <p>The National Networks NPS has an objective of "Networks which support the delivery of environmental goals and the move to a low carbon economy."</p> <p>As stated above HDC considers that the proposed scheme will reduce AQ in areas that are exceeding, hopefully to below threshold levels, and the ES doesn't predict any exceedences of AQ standards as a result of the proposed road.</p>	

Author:	Dave Bass (Hunts DC)
Question Reference:	Q1.1.16
Question:	With the existing NO2 annual mean objective in Cambridge already being exceeded (ES8.8.3) how would the proposed scheme improve this position?
Response:	This is not a question that HDC can answer.

Author:	Dave Bass (Hunts DC)
Question Reference:	Q1.1.17
Question:	
Dust from construction is identified as a significant effect which could be mitigated through best practice measures implemented via the Code of Construction Practice. If best practice measures are not followed by contractors or prove to be ineffective, what further action can be taken by local authorities to control these effects?	
Response:	
Local authorities have a duty to investigate complaints of Statutory Nuisance under Section 79. Environmental Protection Act 1990. If the local authority determines that a Statutory Nuisance is occurring then they have duty to serve an abatement notice requiring the perpetrator to abate the nuisance. It should be noted that statutory nuisance has a defence of best practicable means so if they are using best practice and are still causing problems then the local authority has no powers to intervene.	

Author:	Stuart Bell (Hunts DC)
Question Reference:	Q1.7.8
Question:	
Table 16.14 of the ES summarises the effect of the proposed scheme on community severance. To what extent have local authorities and Parish Councils been involved in such an assessment and are they in agreement with the applicant over the effects of the proposal? If not, why not?	
Response:	
<p>As a Tier 1 stakeholder, we have been fully involved with the issues and considerations relating to community severance at officer and Member briefing level leading up to the submission of the DCO.</p> <p>We are in agreement with the applicant over the effects of the proposal in this regard, except relating to the proposed Right of Way to be created between Brampton and Brampton Wood & Brampton Hut services. While the principle is agreed, the Council is not content that the detail of achieving the route has been fully assessed alongside the A14 and crossing the A1 in that the route will be fit for purpose and physically useable, especially in terms of equestrian useage.</p>	

Author:	Stuart Bell (Hunts DC)
Question Reference:	Q1.8.1
Question:	Discussions have taken place with CCC, HDC and SCDC about the developments to be included in the cumulative impact assessment. Was agreement reached on what is a reasonably foreseeable development and what are the developments that have been taken into account in the cumulative assessment? If agreement has not been reached, what are those areas of disagreement?
Response:	Within Huntingdonshire, all the developments contained within the Draft Hunts Local Plan to 2036 (Working towards proposed submission/publication) have been agreed with the Applicant. However, this does not include the now specifically proposed development site at RAF Wyton due to the timescales involved in the preparation of the Applicant's Traffic Model preceding the inclusion of this site. However it is understood that the Applicant's Traffic Model does include the overall required cumulative number of homes and jobs profile for the Local Plan to 2036 across Huntingdonshire (including RAF Wyton). Full details can be found at - http://www.huntingdonshire.gov.uk/Planning/Planning%20Policy/Pages/LocalPlanto2036.aspx

Author:	Chris Thompson (Hunts DC)
Question Reference:	Q1.8.3
Question:	
<p>The ES indicates that the urbanisation of the landscape character through the interaction of noise, lighting and visual intrusion from new infrastructure would be a major cumulative effect. Para 18.72 indicates that mitigation to reduce the cumulative effect on landscape character could not be identified and the mitigation for each effect would not fully mitigate the overall impacts. Has the mitigation of cumulative impacts been discussed with local authorities and Parish councils and if so what was the outcome. If this has not been discussed, why not?</p>	
Response:	
<p>Mitigation of cumulative effects such as urbanisation within a single large scale infrastructure scheme has been discussed at “Environmental Forum” meetings where specialists from H2A, Jacobs and the relevant public authorities have all been present. Although the cumulative effects arise from a combination of impacts across different topic areas [eg landscape/visual, noise, lighting, and one could add air quality as well], the main discussions have been at the level of each individual topic. Proposed mitigation has also been discussed at this level too – and although mitigation often has an effect beyond that particular topic [eg the visual impact of acoustic barriers] it is most practical to deal with impacts on a topic by topic basis. At the broader level of cumulative impacts generated by combination of the A14 scheme with other similar and large scale developments [eg mixed residential and employment proposals at Bearscroft Farm, Godmanchester and RAF Brampton] the issue of cumulative effects has been discussed at these forums , but mostly at the level of logistics and design implications rather than a considered and structured impact assessment exercise.</p>	

Author:	Chris Thompson (Hunts DC)
Question Reference:	Q1.9.2
Question:	<p>The vertical and horizontal limits of deviation provide a degree of flexibility for construction but also have the potential for differences in landscape and visual impacts. IPs have raised their concerns about this potential for differing impacts. How is the applicant addressing this issue?</p>
Response:	<p>This is chiefly for the applicant to answer. However HDC are generally satisfied that the horizontal and vertical limits have been set to achieve maximum beneficial environmental impact and minimum adverse environmental impact. Vertical limits are relatively constrained at the online sections of the scheme, and on those sections resulting from the removal of the viaduct over the ECML in Huntingdon. It is on the 20km length of the Huntingdon southern bypass that the decisions about the vertical limits of the scheme will be most significant. Major areas of embankment and cutting, large scale earthworks at new junctions, and the Ouse Valley crossing will all have adverse landscape and visual impacts on the mainly agricultural and rural character of the route. Environmental bunds and mitigation planting will help reduce – but not remove – these impacts. There are still detailed issues which HDC has not accepted, and these will be listed in a Joint Local Impact Report produced by the affected planning authorities.</p>

Author:	Chris Thompson (Hunts DC)
Question Reference:	Q1.9.3
Question:	
<p>In crossing the North Flowing Ouse Valley Floodplain (ES para 10.5.18) the proposed scheme would have a large adverse effect in year 1, while in year 15 there would still be a moderate adverse effect.</p> <p>How has this effect been balanced against other environmental effects and is there potential for further mitigation?</p>	
Response:	
<p>The adverse effects of the Ouse Valley crossing stem mainly from 2 things –</p> <p>[i] a new, large and visually prominent man made structure to be used by heavy traffic, and sited in a predominantly attractive, natural, quiet, unspoilt and rural location and</p> <p>[ii] the alignment of the new road, embankments and crossing being directly counter to the topography and character of the broad river valley.</p> <p>Both of these factors will result in significant adverse impacts on landscape character and views.</p> <p>The balancing of these impacts against other environmental effects associated with the overall scheme is a matter for professional judgment and recommendation, and ultimately political decision. If there is to be a Huntingdon southern bypass then there must be an Ouse Valley crossing.</p> <p>Mitigation for [i] above is mainly by screen planting, helping to integrate new landform into a natural setting. For [ii], mitigation of landscape effects resulting from cross valley embankments and viaduct closing off views of the broad river corridor would best be achieved by allowing users of the corridor to still experience and view as much of the broad, open nature of the landscape as possible. Originally the design was for the embankments to run almost right up to the river edges, producing a narrow visual bottleneck for those travelling north or south along the river corridor, but the latest design has the viaduct structures – with the inclusion of one short length of embankment - extending further east over the East Coast Main Line.</p> <p>Although this amendment was not done for “landscape / visual” reasons it will have beneficial effects on landscape character and result in greater visual connection and permeability between areas of the valley north and south of the new road.</p> <p>Further mitigation would best be achieved by having a well-designed and graceful structure so that the visual impact of the viaduct and its dominance in the natural valley landscape was kept to a minimum.</p>	

Author:	Stuart Bell (Hunts DC)
Question Reference:	Q1.9.4
Question:	
<p>The eastern part of Mill Common which is a landscape of high sensitivity (ES para 10.5.32) would be subject to major adverse impacts in both year 1 and year 15. Please explain the justification for the proposed new link road given such landscape sensitivity. How could the urbanising effect of the new link road be limited?</p>	
Response:	
<p>As a Tier 1 stakeholder, we have been fully involved in the consideration of this element of the scheme. Indeed, in partnership with the County Council, we jointly requested that the proposed layout at Mill Common be changed pre-DCO submission from the proposed roundabout to the layout submitted as part of the DCO. The primary reason for this request was given the high sensitivity of this location and also its heritage status.</p> <p>Both Council's continue to negotiate with the Applicant in order to achieve a further improved layout with even less physical impact on Mill Common itself. This is covered in our Statements of Common Ground and the Hunts DC Written Representation.</p> <p>However, Hunts DC continues to support the principle of the Mill Common Link, subject to the resolution of the final design, in order to achieve a satisfactory local road network within Huntingdon Town Centre, particularly in terms of removing westbound traffic into Huntingdon (from Cambridge) from having to travel through Godmanchester, as at present, and any necessity to cross the historic Town Bridge. This link is an integral part of that aim and vital to improve the historic setting of Godmanchester that is blighted by current traffic flows. Hunts DC is encouraged by the Applicant's agreement to incorporate specific design elements into the scheme to mitigate any urbanising effect i.e. the use of heritage fencing to enclose Mill Common utilising the same form of enclosure elsewhere on the Common, the grading of the landscape between the proposed link and the Common itself, together with substantive tree planting to enhance the current setting.</p>	

Author:	Chris Thompson (Hunts DC)
Question Reference:	Q1.9.5
Question:	<p>The methodology for the assessment of landscape and visual effects is set out in the ES para 10.2 while para 10.2.9 states that the methodology for the LVIA was not questioned by local planning authority officers. Can the local authorities confirm they are in agreement with the LVIA methodology including the locations of viewpoints and photomontages?</p>
Response:	<p>The general methodology of the LVIA was accepted by HDC, and implications of several of its elements were raised out at an early stage in the consultation process. Locations of viewpoints and montages were agreed with the local authorities. Additional viewpoints were included at the request of HDC.</p>

Author:	Dave Bass (Hunts DC)
Question Reference:	Q1.10.1
Question:	Does the assessment of noise effects in ES chapter 14 consider all appropriate residential receptors along the route, taking account of individual dwellings and communities?
Response:	HDC is unaware of any residential receptors along the route that have not been assessed.

Author:	Dave Bass (Hunts DC)
Question Reference:	Q1.10.2
Question:	Was the baseline data for the noise assessment agreed with local authorities? Please identify any matters where agreement was not reached and explain why.
Response:	Baseline data locations were agreed during Tier 1 Stakeholder meetings and we have no areas of non-agreements.

Author:	Dave Bass (Hunts DC)
Question Reference:	Q1.10.3
Question:	Significant impacts from noise and vibration during construction are predicted to impact on both residential and non-residential receptors. How would site specific noise controls be agreed with the local authorities?
Response:	<p>This should be directed to the applicant. However, it is understood that Section 61 Notices under the Control of Pollution Act will be sought. The applicant is required to submit how they intend on controlling noise and the LA has the power to specify conditions they believe will required to ensure limited disruption.</p>

Author:	Dave Bass (Hunts DC)
Question Reference:	Q1.10.5
Question:	The magnitude and duration of significant vibration effects is proposed to be included in the final Local Environmental Management Plan (LEMP) following engagement with owners and operators. Without this assessment, how have the likely significant effects from vibration been assessed?
Response:	This should be directed to the applicant.

Author:	Dave Bass (Hunts DC)
Question Reference:	Q1.10.6
Question:	Paragraph 14.2.91 of the ES notes that given the infrequent, irregular and short duration of maintenance work, this phase of the proposed development is unlikely to give rise to significant noise or vibration effects. What is the basis of this conclusion? How would any short term significant effects be mitigated?
Response:	This should be directed to the applicant.

Author:	Dave bass (Hunts DC)
Question Reference:	Q1.10.7
Question:	Paragraph 13.2.1 in Appendix 20.2 of the ES states that a noise and vibration management plan would be prepared as part of the main contractor's Construction Environmental Management Plan (CEMP). Can the applicant provide a draft of the CEMP, its relationship to the LEMP and confirm how these documents would be secured.
Response:	This should be directed to the applicant.

Author:	Dave Bass (Hunts DC)
Question Reference:	Q.1.10.8
Question:	Noise mitigation during the operational phase of the scheme is proposed through various means, as described in Table 14.21 of the ES. How would the installation of noise barriers be secured through the draft DCO?
Response:	This should be directed to the applicant

Author:	Dave Bass (Hunts DC)
Question Reference:	Q1.10.9
Question:	Paragraph 18.1.4 of the ES indicates that the traffic model which underpins the noise assessment has been agreed with the local planning authorities. Can the local authorities confirm that this is correct?
Response:	<p>Current noise assessment work has been based on the overall traffic modelling undertaken. It is understood that further validation on the local highway network is currently being undertaken by the Applicant as requested by the County Council. While this is not currently expected to alter any current noise assessments with Huntingdonshire, this will be analysed further if required when this latest work is completed.</p>

Author:	Dave Bass (Hunts DC)
Question Reference:	Q1.10.10
Question:	Paragraph 14.1.31 of the ES describes the consultation with local authorities regarding the approach to noise and vibration assessment, including the need to measure night time noise and suggested baseline noise measurement locations. Are these suggestions being taken on board?
Response:	Assessment of the ES has shown that the approach to noise and vibration has been done in accordance with relevant standards.