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Sent: 15 June 2015 12:27

To: A14 Cambridge to Huntingdon

Cc: 'A14CambridgeHuntingdon@highways.gsi.gov.uk'; Paul Bridson; Holly Trotman (holly.trotman@royalmail.com); Tony (tony.haines@royalmail.com); Paul Tregear (ptregear@pfapl.com)

Subject: A14 Cambridge to Huntingdon Improvements - Written representation to the Examination by Royal Mail Group Ltd (Deadline 2) IP registration 10031143

Dear PINs Case Team,

Please find attached Royal Mail's written representation to the Examination, together with supporting summary report from PFA Consulting. Please can you confirm receipt of this written representation by today's deadline. The applicant has been copied.

Thanks.

Dan



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Proposed A14 Cambridge to Huntingdon Improvement Scheme

Written representation to the Examination by Royal
Mail Group Ltd (Deadline 2)

PINS IP registration 10031143

15 June 2015

Introduction

As a statutory consultee and registered Interested Party, Royal Mail Group Ltd (Royal Mail) wishes to register an objection to the Development Consent Order (DCO) application by Highways England for the proposed A14 Cambridge to Huntingdon Improvement Scheme.

Royal Mail briefly sets out its position below and requests that the Examination has due regard to the content of this written representation.

Royal Mail is concerned that its future ability to provide an efficient mail sorting and delivery service to the public in accordance with its statutory obligations may be adversely affected during the construction of the proposed A14 Cambridge to Huntingdon Improvement Scheme.

Included in this brief document are:

- details of relevant Royal Mail operational information, and
- a summary of Royal Mail's current position on the proposal.

A summary report from Royal Mail's highway advisor (PFA Consulting) is attached in support of this written representation.

Operational information

Royal Mail is responsible for providing efficient mail sorting and delivery nationally. As a Universal Service Provider under the Postal Services Act 2011, Royal Mail has a statutory duty to deliver mail to every residential and business address in the country as well as collecting mail from all Post Offices and post boxes six days a week.

Royal Mail's postal sorting and delivery operations rely heavily on road communications. Royal Mail's ability to provide efficient mail collection, sorting

and delivery to the public is sensitive to changes in the capacity of the highway network.

Royal Mail is a major road user nationally. Disruption to the highway network and traffic delays can have direct consequences on Royal Mail's operations, to meet the Universal Service Obligation and comply with the regulatory regime for postal services thereby presenting a significant risk to Royal Mail's business.

In exercising its statutory duties, Royal Mail uses the A14 on a daily basis. The A14 is widely used by Royal Mail primarily to convey mails around its network. Particularly, for this section of the A14, the relevance is around movement of mail to and from Peterborough Mail Centre from Cambridge and the surrounding conurbation. Affected areas would also be Ely, Newmarket, Saffron Walden, Haverhill, St Ives and St Neots. However, importance of A14 as trunk road from the south of the country to the midlands and north should not be dismissed. This section of the A14 has hundreds of Royal Mail vehicles passing through on a normal day.

There are a number of Royal Mail operational facilities within relatively close proximity to the affected section of the A14. These Royal Mail operational properties, which would have the highest risk of experiencing disruption to mail distribution activities, are as follows:

- Cambridge Delivery Office, Royal Mail House, Cambridge CB1 7QQ
- Cambridge Parcel Force Local Delivery Office, Unit 15-18 Henley Road Cambridge CB1 3EZ
- Huntingdon Delivery Office, Penfold Court, Huntingdon PE29 7AB
- Peterborough Mail Centre

In addition, mails flowing from southern Regional Distribution Centres may be impacted through potential for delays.

Peterborough Mail Centre sorts all inward mails for the PE and CB postcode areas. The biggest affected delivery office would be Cambridge which sees around 15 separate vehicles (Primarily articulated) moving between Cambridge and Peterborough Mail Centre on a daily basis and roughly 100 vehicle trips over a typical week. Just within Cambridge Delivery Office, roughly 750,000 mail pieces are moved and delivered on a typical week. Other affected delivery offices would be Cambridge rural SPDO's, Ely, Newmarket, Saffron Walden, Haverhill, St Ives and St Neots and these account for roughly 1.7 million mail pieces on a typical week. Therefore, total potential impact is over of 2.5 million items of mail per week spread over at least 300 separate vehicle trips.

Delivery Offices (DOs) typically generate four different categories of traffic:

1. Strategic delivery/collection of mail (principally via the motorway system and A roads).
2. Local delivery/collection by van (via all road types).
3. Employee trips (via all road types).
4. Public trips (via all road types).

Summary of Royal Mail's current position on the A14 Cambridge to Huntingdon Improvement Scheme

Royal Mail fully supports the principle of the proposed A14 Cambridge to Huntingdon Improvement Scheme, which is expected to be of benefit to all users of this road once complete. However, Royal Mail is concerned about the potential for disruption to its mail collection, transport and delivery during the estimated four year construction period of the A14 Cambridge to Huntingdon Improvement Scheme. Any such disruption on the A14, or the surrounding highway network, could affect Royal Mail's future ability to provide an efficient mail sorting and delivery service to the public in accordance with its statutory obligations. Clearly, this presents a risk to Royal Mail's business.

Royal Mail has commissioned advice from its highway advisor (PFA Consulting) on the potential impact during construction of the A14 Cambridge to Huntingdon Improvement Scheme on Royal Mail operations (see attached PFA Consulting summary report dated April 2015).

As will be noted, PFA Consulting concludes that the construction of the A14 Improvements will inevitably lead to periods of increased congestion, causing delays and longer journey times than currently experienced.

PFA Consulting has also commented that whilst Highways England has programmed detailed consultation with local residents, local businesses and Parish Councils, insufficient attention has been given to instigate consultation with major road users and hauliers such as Royal Mail.

In line with the recommendations from PFA Consulting, in order to address the identified risk that the A14 Cambridge to Huntingdon Improvement Scheme presents to its business, Royal Mail requests that Highways England's Community Engagement Strategy should be revised to include major A14 users to ensure that adequate consultations occur.

Royal Mail requests that these consultations should cover traffic management proposals and ensure the provision of advance information on programmed construction activities to enable Royal Mail to instigate contingency measures, if required.

To conclude, until such a time as it can be shown that either Royal Mail operations will not be adversely affected by the construction of the A14 Cambridge to Huntingdon Improvement Scheme, or the construction impact on Royal Mail's operations can be fully mitigated through appropriate consultation and traffic management measures, then Royal Mail's objection will be maintained.

Royal Mail reserves the right to alter its position or make further representations in due course once the requested information has been received and an opinion provided by its consultants on whether it satisfactorily addresses Royal Mail's concerns.

Royal Mail trusts that these brief representations will be taken into account by the Examination in determining Highways England's DCO application.

Should any queries or information requests arise then please contact Paul Bridson of Royal Mail (paul.bridson@royalmail.com) in the first instance.

FINAL 15 June 2015

PROPOSED A14 CAMBRIDGE TO HUNTINGDON IMPROVEMENT SCHEME - HIGHWAYS ENGLAND

REVIEW OF POTENTIAL IMPACT OF CONSTRUCTION ON ROYAL MAIL OPERATIONS

1. Introduction

1.1. Highways England (formerly the Highways Agency) has submitted to the National Infrastructure Planning Unit (NIPU) of the Planning Inspectorate an application for a Development Consent for the A14 Cambridge to Huntingdon Improvement Scheme. This £1.5 billion major highway upgrade includes:

- a new bypass to the south of Huntingdon;
- widening part of the existing A14 between Swavesey and Girton;
- widening part of the A14 Cambridge Northern Bypass;
- widening a section of the A1 between Brampton and Alconbury; and
- demolition of the A14 viaduct in Huntingdon.

1.2. A diagrammatic representation of the scheme (from the HE's website) is included as **Figure 1**.

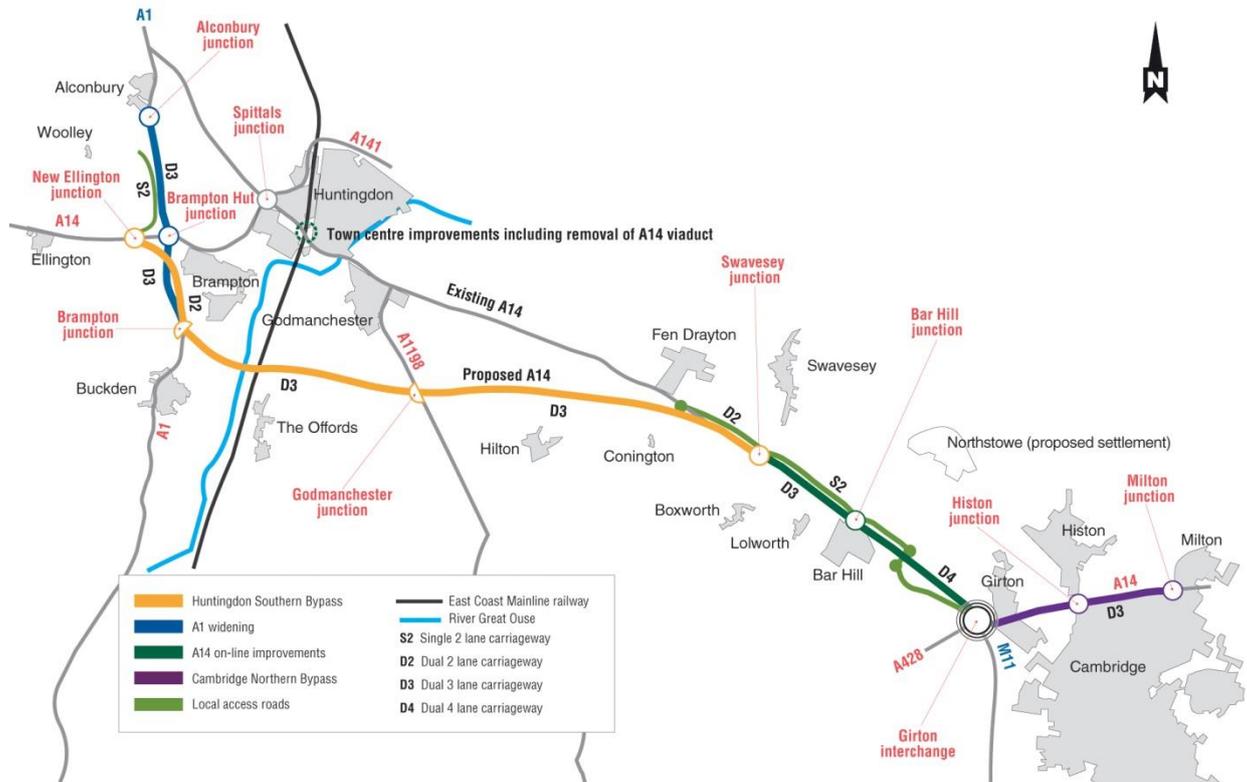


Figure 1 – Diagrammatic Representation of Scheme

(Source: Highways England website)

1.3. This Note provides a summary of the results of a review of key traffic and construction documents produced by Highways England (HE) and submitted as part of the application. The principal documents reviewed included:

- 6.1 Environmental Statement - Non-Technical Summary;
 - 7.2 Transport Assessment;
 - Environmental Statement – Appendix 3.2 Construction Information;
 - Environmental Statement – Appendix 20.2 Code of Construction Practice;
- (Note: all documents dated December 2014)

1.4. It is noted that a total of 425 documents under the title of “Environmental Statement” together with 320 “Drawings” have been posted on the NIPU’s website by HE.

1.5. PFA Consulting, highway and transport consultant, has undertaken the review on behalf of Royal Mail to identify whether the construction of the proposed scheme is likely to have a serious impact on the transport operations of Royal Mail.

2. Brief Outline of Improvement Scheme

2.1. The A14 trunk road provides an east-west strategic route which links the Midlands with East Anglia. It begins near Rugby, where it connects with the M1 and M6 motorways, and continues east for approximately 209 km (130 miles) to Felixstowe. The A14 is part of the Trans-European Transport Network designated by the European Union.

2.2. The A14 between Cambridge and Huntingdon connects the A1(M) motorway with the M11 motorway serving London and the south-east.

2.3. Between Cambridge and Huntingdon the existing A14 has insufficient capacity for current or future traffic levels. At its southern end the A14 currently carries in excess of 90,000 vehicles a day while the dual 2 lane section north of the Bar Hill junction carries in excess of 72,000 vehicles per day with up to 25% HGVs. The capacity of, in particular the dual 2 lane section, is often exceeded and road users regularly experience congestion, long delays and unpredictable journey times.

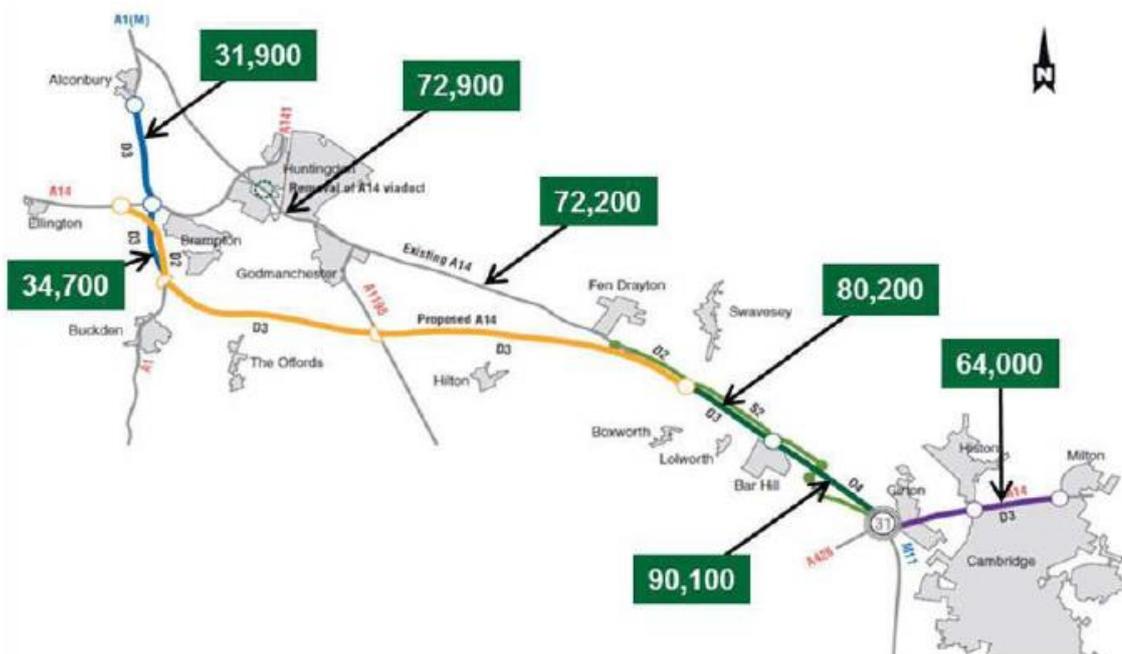


Figure 2 – Existing (2014) Daily Traffic Flows

(Source: A14 Improvement Scheme Transport Assessment)

- 2.4. Traffic demand in the East of England region is forecast to increase by 26% from 2020 to 2035. Apart from this regional traffic growth the local area of Cambridge and Huntingdon is planned to accommodate significant new development over the next twenty years. This new development includes major housing sites at Northstowe and at Alconbury Weald.
- 2.5. The scheme Transport Assessment includes the results of modelling which has predicted daily and peak hour traffic flows assuming 'without' and 'with' construction of the A14 Improvement. **Figure 3** reproduces the comparison of daily traffic flows 'without' and 'with' the scheme in years 2020 and 2035.

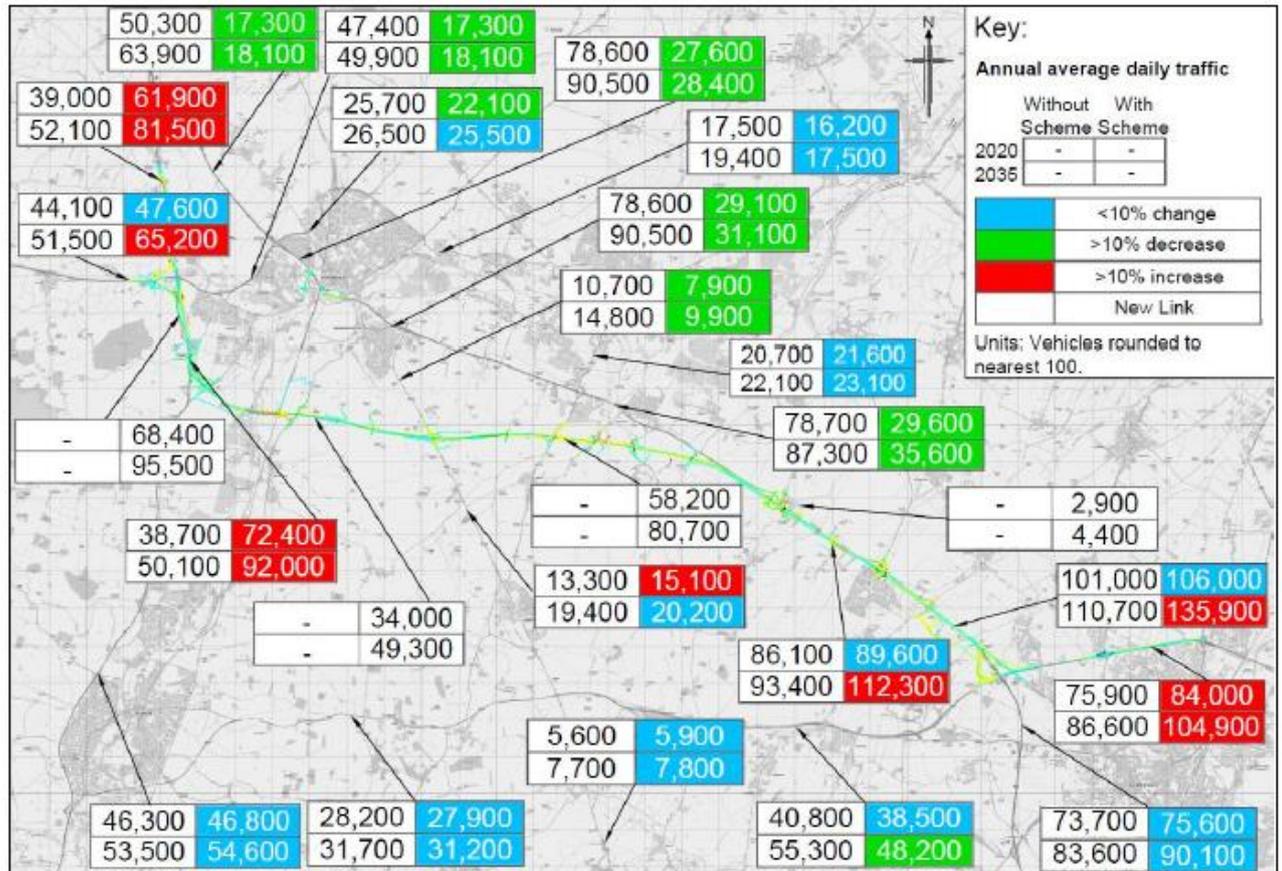


Figure 3 – Opening Year (2020) and Forecast Year (2035) Daily Traffic Flows Without and With Scheme

(Source: A14 Improvement Scheme Transport Assessment)

- 2.6. Broadly, the scheme can be split into six sections:
- Widening of the A1 from dual 2 lane to dual 3 lane carriageway between Alconbury and Brampton Hut;
 - A new 3 lane dual carriageway road west of the existing A1 between Brampton Hut and the Brampton Interchange. The existing A1 would become the Huntingdon Southern Bypass and then continue eastwards as a new 3 lane dual carriageway road to cross the Ouse Valley and East Coast Mainline Railway;
 - The new Huntingdon Southern Bypass would continue eastwards as a 3 lane dual carriageway to the Swavesey Junction which would provide a connection to the downgraded existing A14;
 - The existing A14 would be widened to dual 3 lanes carriageways between Swavesey and Bar Hill and 4 lanes between Bar Hill and Girton;

- A section of the existing A14 between the Histon junction and the Milton junction would be widened from dual 2 lanes to 3 lanes carriageways; and
- The existing A14 would be downgraded to a County road between Swavesey and Brampton Hut and the Huntingdon railway viaduct would be demolished with the Brampton Road rail overbridge remaining as the crossing of the mainline railway.

3. Construction Information

3.1. Construction is programmed to commence in 2016 and should be completed by 2020. The table below indicates the construction periods for each of the main sections of the scheme.

Table 3.1 - Proposed Construction Programme

Scheme Section	Start	Completion
A1 Alconbury to Brampton Hut	2016	2017
A1/A14 Brampton hut to ECML	2017	2019
A14 ECML to Swavesey	2017	2019
A14 Swavesey to Girton	2016	2019
A14 Cambridge Northern Bypass	2018	2019
Huntingdon Viaduct Demolition	2020	2021

3.2. The HE has submitted extensive details of the impacts of construction as part of the Environmental Statement. The impacts have been assessed on a 'worst case' basis referred to as the 'Rochdale Envelope'.

3.3. A 'Code of Construction Practice' has been prepared which the appointed contractors who will construct the scheme will have to adhere to. This includes a range of requirements, for example normal hours of working will be restricted to:

- 08:00 – 18:00 Monday – Friday
- 08:00 – 16:00 Saturday
- In addition one hour 'start-up' and 'close-down' either side of the core hours.

3.4. As regards traffic management during construction the general aim would be to maintain during construction the existing number of lanes on each section of carriageway with any lane closures being during off-peak periods. If necessary narrow lanes and temporary speed limits will be introduced. The HE has also stated that for occasional exceptional works there will be a requirement for night time or 24 hour closures, e.g. bridge beam installations, when diversionary routes will be necessary.

3.5. The principal contractor on each construction section of the scheme will be responsible for producing detailed traffic management proposals which would only be confirmed after consultation with the HE, Police and local authorities. The HE states that regular traffic management meetings would be held with stakeholders and the local community but the Code of Construction Practice does not specify that consultations/liaison will be held with major road users such as Royal Mail.

3.6. The Code of Construction Practice also identifies that the HE will prepare a Community Engagement Strategy, but this appears to be primarily aimed at ensuring local residents, businesses and parish councils are kept informed of key construction stages when they will be provided with at least 2 weeks' notice of specific works. An enquiries and complaints procedure will also be established.

4. PFA Consulting Comments

- 4.1. The construction of the A14 Improvement scheme over at least a four year period will inevitably cause increased congestion, delay and increased journey times for all road users. However, without the improvements it is evident that the existing A14 between Cambridge and Huntingdon will experience worsening traffic conditions than currently exist and for longer time periods. This would lead to drivers seeking alternatively routes, in itself leading to increasing congestion and delay on such routes.
- 4.2. The HE has produced and provided extensive technical documentation justifying the scheme. Significant mitigation measures are proposed to minimise the environmental impacts which will result from construction and operation of the major highway upgrades.
- 4.3. Although significant construction information and the Code of Construction Practice have been produced it is our opinion that insufficient attention has currently been given to instigate consultation with major road users of the A14, such as Royal Mail.
- 4.4. Rightly, detailed consideration and consultation is programmed for local residents, local businesses and parish councils but it is PFA Consulting's view that the procedures proposed should be extended to include major road haulers, such as Royal Mail. The HE has set out the mechanisms and procedures that they intend to operate with other stakeholders and these could be easily extended to include road haulers (including Royal Mail) who will be directly affected by the construction works and whose business operations will be impacted.
- 4.5. At the very least effective consultation and early notification of works (*in our view two weeks notification is insufficient*) would allow Royal Mail to plan ahead and if required instigate contingency measures. For example, Royal Mail may wish to consider if alternative route options were available to their drivers or hours of haulage may need to be altered.

5. Conclusions and Recommendations

Conclusions

- 5.1. The existing A14 between Cambridge and Huntingdon frequently operates over capacity during long periods of the day and with anticipated traffic growth and major proposed development in the local area this situation will only become worse leading to traffic diverting to alternative routes and which will result in increasing congestion and delay on such routes.
- 5.2. Once opened the A14 Cambridge to Huntingdon Improvement scheme will remove traffic congestion and delay allowing improved connections between the major strategic routes in the sub-region.
- 5.3. Construction of the proposed scheme is programmed to commence in 2016 and take about four years to complete. Construction will be phased and will be in six distinct sections.
- 5.4. Hours of working will be generally restricted with lane closures operating outside peak periods. However, inevitably construction of the scheme will lead to periods of likely increased congestion, delays and longer journey times than currently experienced.

Recommendations

- 5.5. It is PFA Consulting's opinion that Royal Mail should broadly support the construction and implementation of the proposed scheme as submitted by the HE.
- 5.6. Royal Mail should request that the Community Engagement Strategy should include major A14 road users, such as Royal Mail to ensure that frequent and regular consultations occur during the construction period. The consultations should include the provision of traffic management proposals and information on programmed construction activities well in advance of such work occurring allowing Royal Mail to instigate contingency measures if appropriate.

- 5.7. Royal Mail may wish to consider investigating alternative routes for their drivers during the construction period or, if feasible, altering transport working times.