



**A14 Cambridge to Huntingdon Improvement
Scheme
Development Consent Order**

**Written Representation by
South Cambridgeshire District Council**

15 June 2015

Introduction

1. This Written Representation, in respect of the A14 Cambridge to Huntingdon Improvement Scheme (the scheme) Development Consent Order (DCO), is made in accordance with the Infrastructure Planning (Examination Procedure) Rules 2010, Rule 10. It must be read in conjunction with the Statement of Common Ground and Local Impact Report.
2. South Cambridgeshire District Council is a Tier 1 Local Authority and Statutory Consultee, and the scheme runs through the District. Highways England (the Applicant) has consulted with the Council in the pre-application stage, and has addressed many, but not all, of the issues raised by the Council in developing the Development Consent Order. The District Council is a part funder of the scheme, and strongly supports the scheme.
3. There are, however, a number of issues which the Council wishes to have considered in Examination. These primarily relate to matters of detail, local impact, and compliance with local and national policy, where the Council considers changes need to be made to address these concerns. These are addressed in this representation.
4. There are a range of issues where matters of detail are left to a detailed design process which would be undertaken after the DCO. It is important that the District Council is consulted on these matters, and its views are fully taken into account. Particular issues are identified later in this statement.

Hearings

5. If issue specific hearings are held with regard to the topics addressed in this report the Council may wish to appear.

Statement of Common Ground

6. South Cambridgeshire District Council is developing a Statement of Common Ground with Highways England. This is a fluid document and it will be updated throughout examination process.

Local Impact Report

7. The Council has produced a Local Impact Report jointly with Cambridgeshire County Council, Huntingdonshire District Council and Cambridge City Council. The impacts are not repeated in this written representation unless there are specific issues or concerns the Council would like the Applicant to address.

Adequacy of Consultation

8. The Council have submitted an Adequacy of Consultation Statement, which confirms the Council is satisfied that the Highways Agency has carried out consultation in accordance with the Statement of Community Consultation and

in accordance with the Planning Act 2008, specifically sections 42 (Duty to Consult), 47 (Duty to Consult the Local Community) and 48 (Duty to Publicise).

The Need for the A14 Cambridge to Huntingdon Scheme

9. South Cambridgeshire District Council supports the A14 Cambridge to Huntingdon Improvement scheme in principle.
10. The Council would like to highlight the importance of addressing improvements to the A14 as soon as possible.
11. The A14 is of national, regional and local importance and provides vital links from the east coast ports to the rest of the country. The A14 is a key route for local and regional commuter, business and freight traffic and, like some other major routes, has high traffic flows and congestion, particularly around Cambridge, and high levels of accidents. The stretch between Huntingdon and Cambridge acts as a bottleneck, where national and local traffic mixes resulting in congestion at peak times. It is important that these issues are addressed to support the continued success of the economy of the Cambridge area.
12. A14 Cambridge to Huntingdon improvements are included in Cambridgeshire County Council's Local Transport Plan 3 (refreshed 2014), and in the Transport Strategy for Cambridge and South Cambridgeshire (which forms part of the LTP). The Cambridgeshire Long Term Transport Strategy recognises that the A14 Cambridge to Huntingdon Scheme is a critical intervention to support development.
13. The need for improvements to the A14 was established in Regional Planning Guidance in 2000, which resulted in the Cambridge to Huntingdon Multi-Modal Study (CHUMMS). The A14 scheme was included in the Cambridgeshire Structure Plan 2003, along with a programme of development to locate growth in sustainable locations. This was reflected in the South Cambridgeshire Local Development Framework (adopted between 2006 and 2010), which focused development according to a sequence starting with Cambridge, then edge of Cambridge (where compatible with green belt purposes), a new town (Northstowe), and the remainder in the more sustainable villages.
14. The District Council is now producing a Local Plan (reviewing and replacing most of the Local Development Framework) which was submitted to the Secretary of State for adoption in 2014, and is currently undergoing Examination. This continues the development sequence, allocating a limited amount of development in and on the edge of Cambridge where compatible with the purposes of the Green Belt, further new settlements at Waterbeach and Bourn Airfield, and additional development at Cambourne (Cambourne West). These will be supported by improvements to transport infrastructure, in particular to support public transport cycling and walking, including measures being delivered through the Greater Cambridge City Deal.
15. The South Cambridgeshire Submission Local Plan seeks to deliver 19,000 homes and 22,000 jobs between 2011 and 2031. The A14 scheme provides a critical element of infrastructure needed to unlock and support growth. The

Cambridge and South Cambridgeshire Infrastructure Delivery Study, part of the local plan evidence base, identifies the A14 as a critical element of infrastructure to enable growth.

16. The A14 improvements are particularly important to the completion of Northstowe, a new town five miles northwest of Cambridge which will deliver up to 10,000 new homes. Delivery of Northstowe is dependent on sufficient capacity being available in the A14 corridor between Bar Hill and Cambridge. Highways England has confirmed that the first 1,500 homes can be developed prior to the A14 improvements, but future phases are reliant on completion of the scheme.
17. The Cambridge area is home to the Cambridge Cluster, with particularly high concentrations of high technology and biotechnology firms, many with links to the University. Major employment growth is occurring on the northern and western fringes of the city, in the station area and on the Cambridge Biomedical Campus around Addenbrooke's Hospital. In late 2014 Astra-Zeneca announced that it would be locating its global headquarters in Cambridge at the Biomedical Campus. Delivery of infrastructure is of particular importance to the business community, and improvements to the A14 are important to local businesses and stakeholders. For many businesses in the Cambridge area the A14 is the single most important transport scheme and the main symbol of the infrastructure deficit the area faces¹.
18. Improvements to the A14 are necessary in order to deliver the local growth agenda, and improve journey times and road safety for the travelling public. The A14 between Cambridge and Huntingdon is a vital route of international, national, regional, and local importance, and needs to be improved urgently. The Highways England 'Case for the Scheme', which accompanies the DCO, is supported. In addition, the update to the Statement of Case - review of conformity with the National Policy Statement for National Networks (HE/A14/EX/21) identification of the need for the scheme is also supported.

¹ Cambridge Cluster at 50 Study – SQW on Behalf of EEDA and Partners 2010 paragraph C3.13

The Applicant's Proposals for the Route

19. The District Council considers that the proposed new Trunk Road, supported by slip roads and connector roads, are on an acceptable route.
20. The route has been the subject of considerable public consultation and study, and consideration of appropriate alternatives. The Council supports the rejection of alternative route alignment options, in particular the use of the A428 / A1198.
21. South Cambridgeshire District Council supports the inclusion of a Local Access Road. It is an important feature to enable local people and service vehicles (such as refuse lorries) to safely and conveniently access properties within villages in South Cambridgeshire when the mainline A14 has fewer junctions. It will also improve traffic flow on the mainline A14. Bus stops are proposed to be moved from their current location on the A14 mainline to the Local Access Road enabling safer access for local residents.
22. The Council previously commented that HE should consider additional movements at the Girton Interchange (A428 to/from A14 in the Huntingdon direction and A428 to/from M11), and if not part of this scheme the Route Based Strategy for the A428 should be brought forward urgently. HE advised these would be matters for an A428 Route Based Strategy, and not part of this A14 scheme. Highways England state that they continue to review the operation of the trunk road network through its route-based strategy studies and will target future improvements where need is greatest. Upgrades to the A428 Caxton to A1, and an A428 'Expressway' scheme are included in the DFT Road Investment Strategy 2014. This should be used as an opportunity to explore and address these issues.
23. The Council supports provision of west facing slips at the A1198 junction. The traffic modelling indicates that inclusion of the slip roads draws traffic away from more minor village routes.

Provision for Non-Motorised Users

24. The Council supports provision of a non-motorised user route (suitable for pedestrians, cyclists and equestrians) alongside the Local Access Road. This route offers a legacy opportunity to promote non-motorised transport modes, supporting the local authorities in promoting a shift away from the car. Levels of cycling are already higher than the national average in the Cambridge area and this should be reflected in the route's design. It will address missing links in the area, particularly between Cambridge and Bar Hill. In response to previous consultations the Council highlighted the importance of this route, and the need for high quality provision.
25. It is important that this route should be built to the highest quality with a wide, segregated cycling path following desire lines and connecting with existing and planned routes. It should be finished with a high quality surface. The Council would like to be consulted during the process of detailed design.
26. The NMU route should include solar studs to encourage use at all times. Similar measures have been used on the route adjoining the Cambridgeshire Guided Busway.
27. The Council notes that Environmental Statement (summarised at Box 15.1) includes a commitment that the proposed new NMU facility alongside the local access road between Fenstanton and Girton would be provided to current best practice standards providing a clear width of 3m between Fenstanton and Dry Drayton. Between Dry Drayton and A1307 Huntingdon Road, Cambridge, the width would be 4m, as requested by Cambridgeshire County Council, to allow for potential increased use in this length. There would also be a verge between the edge of the NMU facility to provide separation from the running lane of the carriageway.
28. This approach is supported, however the Council has a number of concerns that are still to be addressed through detailed design.
29. The NMU Route passes to the rear of the Swavesey Travelodge on the east-bound side of the mainline A14. Such a diversion may result in cyclists leaving the NMU route and re-joining after, which could create safety issues and inconvenience. The Council has received verbal confirmation from the Applicant that this alignment has been amended to allow the route to pass in front of the Travelodge. However, the Council would like to see an amendment to the DCO documentation to reflect this change.
30. Arrangements for crossing the Oakington Road roundabout are also unclear, as General Arrangement Regulation 5 (2) (o) Sheet 18 of 24 shows a break in the route, where as for other junctions crossing arrangements are shown. This should be clarified.

Other NMU routes

31. South Cambridgeshire District Council supports the NMU provision in general, including efforts to maintain existing routes and reinstate routes previously severed by the original A14. In particular the Council supports the provision of two new bridges for NMU at the Swavesey and Bar Hill junctions.
32. It is noted that following earlier stages of consultation, connections between NMU Routes, existing routes, or routes planned in association with new developments have been improved. The creation of new NMU links and improved connections between settlements complies with local objectives to encourage sustainable travel, with associated climate change and health benefits, in accordance with the Local Transport Plan, Development Plans and Green Infrastructure Strategy. In particular the Council also supports links to the cycle route on Huntingdon Road, and the planned crossing point in the vicinity of the North West Cambridge.
33. The Council also previously queried the surfacing of Girton route (Bridleway 6). It is noted that HE have confirmed this is proposed to be a compacted loose material surface.
34. The Council also previously raised concerns regarding NMU routes between Foot Path Girton 5 and Foot Path Girton 4 on the A1307 Huntingdon Road near Girton. HE has confirmed that a toucan crossing facility would be provided at this crossing point to cater for the NMU movements. Additionally, Cambridgeshire County Council proposes to convert Foot Path Girton 5 and Foot Path Girton 4: to bridleways to link to the wider facilities being provided north and west of Girton interchange as part of the scheme. A shared use link would also be provided on the east side of A1307 to link the toucan crossing to Foot Path Girton 5 (to become a bridleway). These measures are supported.
35. The Council is seeking further clarification from Highways England in relation to NMU provision at the Bar Hill junction; specifically in relation to the refuge island to enable safe crossing of the Local Access Road and the proposed alignment of the NMU link from the bridge across the A14 mainline to the B1050.

Policy Context and Planned Development

36. The Local Impact Report includes an assessment of the scheme against plans and strategies, including documents which make up the South Cambridgeshire Development Plan.
37. Significant development is planned in the Cambridge area. As detailed earlier, the A14 Cambridge to Huntingdon Scheme is an important infrastructure project to enable development to take place. The scheme needs to take account of and be coordinated with growth.
38. It is noted that transport modelling undertaken takes account of planned growth, including sites identified in the emerging South Cambridgeshire Local Plan.

Northstowe New Town

39. The Council supports the A14 improvements in facilitating and accommodating the planned new town of Northstowe. Highways England has confirmed that the A14 scheme limit (red line boundary) coincides with that for the development area for Northstowe. Improvements to the Bar Hill junction will accommodate Phases 1 and 2 of the Northstowe development (50% of the overall build), as well as providing for future capacity expansion as necessary for the complete build-out. This is described as passive provision, providing an oversized bridge that will enable future upgrade to accommodate Phase 3. This approach is supported.
40. Highways England have indicated that the Local Access Road and junction layouts have also been designed to enable future widening of the dual carriageway B1050 should such improvements be needed in the future.
41. The Council requests detailed modelling data for the Bar Hill junction, including AM and PM peak vehicle link flows by direction for the High Growth Scenario that includes Northstowe Phase 3, as the tables provided to date give the Ratio of Flow to Capacity only. The Council also request a copy of the future design of Bar Hill junction with the High Growth Scenario for all of Northstowe, including details of the junctions with the Local Access Road. The Ratios of Flow to Capacity in Table 5 of the TN059 technical note are lower for some links in the High Growth Scenario suggesting that there is a revised design that has been modelled - the Council would like to see the associated flows, junction designs and model results.

Working with developers

42. The Council seeks a commitment from Highways England to work with developers through the detailed design and delivery of the A14 improvement scheme. Whilst it is evidenced that Highways England has already worked with

the Northstowe developers, the same is expected in relation to other planned developments along the route.

43. The site between Huntingdon Road and Histon Road on the north western fringe of Cambridge (known as Darwin Green) adjoins the A14 scheme. The South Cambridgeshire Adopted Site Specific Policies DPD and the Submission Local Plan envisage that the development will provide mitigation in the form of landscaped bunds, as opposed to noise attenuation fencing. The latest housing trajectory anticipates the first housing completions in 2018. Coordination is needed to ensure mitigation is not duplicated, or which would undermine delivery of the policy.

Environmental Impacts of the Proposed Scheme

Landscape Impacts

44. In principle the Council supports the scheme and the proposals to include extensive landscape mitigation and landscape legacy areas of benefit to the local population.

Landscape mitigation / planting

45. The landscape elements proposed to achieve landscape mitigation (for example woodland, scrub, grassland, trees and hedges) are also accepted. However the Council has some concerns as to how these landscape elements are employed in some situations and would like to be involved in discussions relating to the final layouts at the detailed design stage. Detailed landscape proposals should be developed in consultation with the Council, therefore the Requirement (at Schedule 2 Part 1 section 6 of the DCO) is supported.
46. The most noticeable landscape impacts will be from the new landforms and structures associated with the new road. These will be prominent features in the generally flat and open landscape. Landscape proposals intended to integrate these features and mitigate against adverse landscape and visual effects will need careful detail design which responds to the individual situation and requirements of each site. The following principles should apply:
- Adopt the best examples of local landscape pattern (e.g. north of Madingley – layering hedges with large hedgerow trees, shelter belts and small woodlands) and apply these to the interchange and crossing structures. Take the opportunity to use additional available areas of land within the red-line to achieve this e.g. south of Swavesey Junction bridge, south of Robins Lane bridge.
 - Where appropriate, use landscape forms which do not follow the form of the structures (hedges, shelterbelts etc.) and link these to existing landscape features where possible e.g. south of Robins Lane bridge.
 - Significant tree or tree in hedgerow planting close to roads through which the landscape can be seen – to provide a layered effect and some natural forms in close views.
 - Significant planting on the upstream of gantries (where possible) so that they are seen in conjunction with or set against significant natural forms. This planting will also screen the rear of the gantries from the downstream traffic.
 - Along with the proposed headlight fence, introducing hedge planting in strips between the Local Access Road and the new A14 to separate carriageways e.g. south of Buckinghamway Business Park.

Loss of vegetation

47. The Council is concerned that there will be a loss of mature vegetation, including some trees with Tree Preservation Order status. The impacts of this loss of landscaping will not only be during the construction phase but also some permanent loss. Whilst the proposed landscaping mitigation will help to restore the landscape fabric in the longer-term, the area around Lolworth and Grange Farm, on the northern periphery of Menzies Golf Club at Bar Hill, and part of the group of TPO on the edge of Girton College grounds will be lost. The Council would like to explore whether a reduction of the impact on TPO trees at the Menzies Golf Club could be explored, through measures such as the realignment of the ditch alongside the mainline A14.
48. The landscape character of some areas will also be altered due to the loss of existing vegetation, including near Swavesey junction, at Bar Hill, Menzies Golf Club, Bar Hill, Girton interchange, along the Cambridge Northern Bypass and around the borrow pits.

Histon Junction to Milton Junction

49. This area will suffer from extensive vegetation loss, and the landscape will be further degraded by extensive noise barriers, retaining walls and steep engineered slopes. The Council would like to see further landscape treatments proposed including planting to the retaining wall adjacent to Orchard Park.

Landscape impacts of noise barriers

50. Significant stretches of the new road will be contained by noise barriers, particularly along the Cambridge Northern Bypass and on towards Bar Hill, where barriers will replace areas of planting removed during road widening. This can result in a very harsh edge to the carriageway, block views to the wider landscape and create a negative driver experience.
51. Therefore it is important that the design of noise barriers is carefully considered and varied to minimise their landscape / townscape impact and suitably reflect their location. The Council would like to be included in discussions and decisions concerning detailed design of noise barriers. Detailed noise barrier proposals should be secured through the requirements / conditions of the DCO.

Non-motorised user route (NMU)

52. The Council welcomes the proposed NMU route alongside the Local Access Road north of the A14. However there are concerns that there is no separation between the NMU and the carriageway, particularly if this route is intended for use by horses. We would propose a hedge to separate the NMU from the road. There would appear to be space within the red line land to achieve this separation for the majority of the NMUs length.

Artificial Lighting

53. The Council is concerned that there has been no assessment of the impacts of artificial lighting on humans and living conditions. The impact of artificial light on residential premises can affect health and quality of life and can be determined a statutory nuisance.
54. 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, and consideration of mitigation measures as necessary.
55. 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.
56. The impact of lighting on landscape (visual) and flora and fauna has been considered and mitigation and measures are to be included to minimise the impacts of lighting on bats and other wildlife, including the use of directional lighting and reducing light levels.
57. Whilst post development operational lighting such as street and sign illumination will be regulated and determined by highways legislation, there is a potential negative impact on residential premises from light pollution both during the operational and construction phases from inappropriately selected and positioned highway lighting and security lighting from compound and storage areas.
58. An assessment of the impact of artificial lighting on people and their living conditions should be undertaken as it can affect health and the quality of life. As highway lighting is not technically on a premises it is unlikely to be considered a statutory nuisance.
59. Therefore as minimum there should be a commitment to ensure that an operational artificial lighting will be installed having due regard to and in accordance with national and industry best practice guidance and standards including the Institute of Lighting Professional (ILP) Guidance Notes for Reduction of Obtrusive Light GN01:2011. This should be secured through the imposition of a requirement / condition.
60. Construction related lighting impacts should be considered within the CEMP with a Requirement, as follows:
61. Installation of any operational highway artificial lighting shall not commence until details of the highway lighting, including an assessment of lighting impact on residential premises and a scheme for the management and mitigation of

artificial light levels and emissions has been submitted to and approved by SCDC.

62. The approved scheme for the management and mitigation of artificial light levels and emissions must be implemented and maintained during the operation of the development.

Cultural Heritage

The setting of Lolworth Church (Grade II* Listed)

63. The Environmental Statement currently evaluates the magnitude of construction and residual impacts of the A14 on All Saints Church scheme as Minor, and the Significance of the resulting effects as slight adverse.
64. This underplays the significance somewhat as the impacts on a High value asset with Minor or Moderate magnitude level of impacts will result in a Moderate adverse significance of effect.
65. The approach to Lolworth and All Saints Church will be significantly changed. Approaches and views to the village from the northern local access road will be elevated via a new bridge over the A14 and will be dominated by the new raised embankment, bridge and lighting, and a series of new signage gantries.
66. A landscape mitigation scheme will be required to reduce the adverse impacts on the Church and its setting.
67. The current landscape proposals are linked closely to the proposed road network and embankments and could better respond to take existing landscape character, landform and views.
68. Landscape proposals should consider the existing views to and from Lolworth and the 'parkland' landscape to the east of the village.
69. Proposals should integrate the new embankments by linking to existing landscape patterns, disguise and integrate the embankments and new roads, lessen the impacts of signage and lighting and take advantage of available land within the red line land (e.g. soil storage areas) to mitigate the adverse effects.

Listed milestones

70. South Cambridgeshire District Council is assured by statements in the ES that appropriate surveying and assessment will be undertaken of the Listed milestones along the A14 mainline, and that these will be reinstated appropriately close to their original location.

Ecology

71. The Council supports the approach Highways England has taken in utilising 'avoidance of impact' as the first principal of mitigation. However, some impact is inevitable with a major new road scheme but the ES makes reference to there being an overall net gain in habitat creation; if this is permanent rather than temporary this should benefit wildlife and is supported in principle.
72. However, the Council has concerns over the permanence of some of the mitigation areas, for example at borrow pits which are temporary and where there is no commitment for longer term management beyond 5 years. The Council considers this should be over a period of 15 years rather than 5 years to enable habitats and species to become properly established. The Council sees the borrow pits as an essential element in securing a positive legacy, which needs a commitment from the Applicant to deliver over the longer term. The Council would like to be involved at detailed design of ecology mitigation areas, particularly at borrow pits.

Noise and Vibration

Noise conditions

73. The Council recognises and supports that many properties along existing A14 will experience a significant improvement in noise, particularly on the mainline route where it is detrunked near Huntingdon.
74. Overall the proposed scheme will result in a greater net beneficial improvement in the general noise climate and operational traffic noise impacts associated with the A14 when compared with conditions that could occur without the scheme (natural growth), both in the short and long term.
75. In SCDC the majority of residential dwellings within the noise impact assessment study area (which is approximately a distance of 600 metres from and around the scheme) are predicted to experience small increases in noise levels following completion of the scheme. These changes are unlikely to be noticed by most residents and in the short term year (opening year of 2020) these are considered negligible to minor impacts and in the long term (a future year of 2035) the impact is considered negligible.
76. Those properties closest to the existing A14 and which are currently worst affected by traffic noise (designated 'Important Areas' under noise action planning regulations) will experience major to moderate beneficial decreases in noise in the short and long term respectively. This includes residential properties at Hill Farm Cottages, Swavesey; Rhadegund Farm Cottages, Lolworth; Hackers Fruit Farm, Crouchfield Villas and Westdene, Dry Drayton; Catch Hall Farm Cottages, Grange Farm Cottages Elm Grange, Girton Grange and Girton Road, Girton; approximately 20 to 50 properties in Weavers Field and Vincent's Close Girton, Lone Tree Avenue, Impington and Blackwells

Caravan Site. These reductions in noise are achieved by the implementation of noise mitigation measures such as reduced / lower noise road surfacing and a combination of earth bunds and acoustic barriers / fences.

77. However a small number of these worst affect residential properties situated close to the scheme would still be exposed to relatively high levels of residual noise and would also qualify for addition noise insulation measures under the Government's noise insulation scheme regulations. Noise insulation combined with mitigation integrated into the scheme should avoid any significant adverse impact on health and quality of life which is consistent with government noise policy.
78. However, the Council is concerned that some properties will continue to experience residual high levels of noise and other properties may be affected, particularly during construction, which should be appropriately mitigated.
79. It is the Council's view that the magnitude of noise increases and the number of people adversely affected has been minimised by noise mitigation integrated into the scheme, in line with the aim of government noise policy to minimise as far as sustainable adverse impact on health and quality of life. Mitigation measures designed into the scheme to reduce noise impacts during operation include careful design of the alignment and cuttings, the use of reduced / lower noise road surfacing, landscaped earthworks and installation of environmental noise fence barriers at a number of locations.
80. However the location of environmental noise fence barriers both new and replacement as proposed are only indicative. Therefore their detailed design including the final location, length, height and technical details such as acoustic performance specifications in order to optimise mitigation should be secured and approved by SCDC through the requirements / conditions of the DCO.
81. It is likely that any construction effects should be mitigated effectively by the implementation of a robust Code of Construction Practice (CoCP) and proposed Local Environmental Management Plans (LEMPs).
82. However, the noise section of the submitted draft CoCP is unacceptable. There is concern that the significance of impact noise and vibration noise levels used in the CoCP to assess the impact of, and to control noise impact from, the Borrow Pits is not stringent enough. Whilst the extraction of material from borrow pits is indirectly related to construction of the scheme they are effectively a separate minerals and waste activity for which Planning Policy Guidance operational noise limits are lower than for traditional construction noise. As some of the borrow pits are large and close to rural villages where A14 traffic noise is less of an impact the construction impact approach taken in the CoCP should not be applicable to such pits and a greater level of control is justified.

83. Construction noise mitigation measures should include the use of appropriate work practices including best available techniques to reduce noise and vibration impacts, environmental monitoring, and control of working hours.
84. It is recommended that a requirement / condition is imposed requiring the CEMPs and LEMPs to be submitted for approval by SCDC and should include measures to address and monitor construction noise, vibration and other nuisances and to require adherence to set working hours for weekdays and Saturdays and night-time working.

Post-scheme noise monitoring

85. South Cambridgeshire District Council recommends that appropriate monitoring of noise and vibration should be undertaken post implementation of the A14 Improvement scheme. This is necessary and standard practice to ensure that the modelled noise levels are achieved and ensure that there are no unexpected and unacceptable adverse impacts which require further mitigation consideration.

Orchard Park noise barrier

86. The Council is seeking clarification from Highways England as to whether there is a need for the existing noise barrier at Orchard Park to be improved or replaced. The DCO submission shows the existing noise barrier will be retained (Figure 14.7). However, the draft scheme (2014) showed (Sheet 22) that the noise barrier would be replaced.
87. The existing noise barrier was put up at the time of development at Orchard Park and was only ever meant to be a temporary structure. The current barrier may not be fit for purpose and discussions have been held with Highways England about its possible replacement. Orchard Park Design Guide Supplementary Planning Document 2011 (paragraph 2.3) notes the policy objective to seek the upgrading of the noise barrier.
88. There are also ongoing discussions with Highways England on some technical issues associated with noise assessment (as recorded in the Statement of Common Ground). It is envisaged that agreement and clarification will be reached on the majority of these matters and common ground can be agreed. However the Council reserves the right to raise any additional concerns and issues in relation to these items when additional information is provided.

Air Quality

89. Within South Cambridgeshire an Air Quality Management Area (AQMA) has been declared between Bar Hill and Milton along the A14. The AQMA has been declared because a combination of air quality modelling and monitoring shows that the air pollutants Nitrogen Dioxide (NO₂) and Particulate Matter (PM₁₀) are likely to exceed health based national air quality objective values. A joint Air

Quality Action Plan (AQAP) was developed by Cambridge City Council, Huntingdonshire District Council and South Cambridgeshire District Council which has the long term aim of reducing concentrations of air pollutants in the district to within statutory the limits. It looked at how to improve air quality up to 2015 in order to meet national air quality objectives, setting priority actions for each district, and focuses on reducing PM₁₀ and NO₂ concentrations along the A14 and within each district.

90. The specific actions related to the A14 and improving air quality are:
- Widening of the A14 carriageway between Fen Drayton and Histon
 - Re-alignment of the A14 and the construction of a local road between the M11 and Bar Hill junctions during the A14 Improvement Scheme
91. The scheme includes proposals that seek to meet the objectives set out in the plan.

Post-scheme air quality monitoring

92. South Cambridgeshire District Council supports the proposals to undertake Post Implementation Monitoring. This is essential and necessary to ensure that the modelled air quality levels for the pollutants of concern, as predicted by the applicant, is achieved and there are no unexpected and unacceptable adverse impacts which require further mitigation to be considered.
93. The Council requests confirmation that the Post Implementation Air Quality Monitoring Strategy will be agreed with officers following consultation and this should be secured by imposition of a condition / requirement.
94. An appropriate baseline for future air quality monitoring of PM₁₀ and NO₂ pollutants at Impington should be agreed with the Council. The Council will only be in the position to provide such baseline prior to the commencement of the post-monitoring work when a full monitoring year of data will be available. Whilst it is acknowledged that this may be the subject to further discussions and agreement, the figure will however be based on the complete period of monitoring between January – December for whichever year the Council agree to set this for.

Impington monitoring station

95. The Council has Air Quality Monitoring Equipment in a number of locations on the A14. The existing monitoring site at Impington will need to be relocated as a result of the scheme. In the Consultation Report, Highways England has confirmed that the potential need to relocate the Impington monitor will be discussed with the local authority. This is acknowledged, and supported. However, as this is due to implementation of the scheme, The Council should be reimbursed for reasonable costs associated with this move, and agreement is sought to this effect.

Flooding and Drainage

Drains maintenance

96. The District Council is concerned that a 5m maintenance strip should be retained along Award Drains, and appropriate access provided. 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. The Council notes at paragraph 3.9.5 of the ES that there appears to be provision for maintenance access to the drains – the Council seek confirmation and further detail as this access is necessary to enable the Council to discharge its statutory duties. The Council would like to be consulted at detailed design as this matter will need to be approved by the District Council.
97. It is noted that the ES leaves a number of measures that would be refined as part of detailed design. The District Council should be consulted during this process.

Flooding

98. It is acknowledged that the applicant has developed flood mitigation measures that appropriately address the impacts of the scheme. However, opportunities to reduce existing flood risk have not been taken.
99. In a planning context, the National Planning Policy Framework seeks to use opportunities offered by new development to reduce the causes and impacts of flooding (NPPF paragraph 100). Paragraph 5.115 of the National Policy Statement for National Networks also advises that opportunities should be taken to lower flood risk. There are a number of settlements along the A14 route which have existing flooding issues (e.g. Girton, Bar Hill, and Histon and Impington). The proposals do not take opportunities to mitigate existing risks as part of a positive legacy of the scheme, and where amendments could be made to the scheme to provide additional mitigation at minimal cost. Such measures should be addressed through the detailed design, in coordination with the Local Authorities. This approach is supported by the County Council as the Lead Local Flood Management Authority.
100. The Council is concerned that any culvert on all tributaries off Oakington and Longstanton Brooks which run under the A14 must not be altered in diameter. Many of these culverts near to Bar Hill currently create a throttle to flow. These may have contributed to flooding in Bar Hill as current upstream storage in Bar Hill is insufficient to store the water; currently it provides an estimated 1 in 50 year event capacity. Replacing or enlarging this culvert is likely to cause downstream flooding in Oakington as the downstream watercourse is unable to take the increased flow. The Council supports the retention of this culvert in consequence. The Applicant is proposing to construct over the existing storage pond at the Bar Hill junction with the A14, and is therefore proposing to alter the existing drainage regime. The Council requests the Applicant to provide

additional measures to mitigate the existing flooding in Bar Hill as a contribution to a positive legacy for the scheme.

101. The Council would like confirmation that there are no additional connections which would add to the flow into the Covell's Drain Watercourse near Fen Drayton. At approximate chainage 20,500 near to the bifurcation of the old and new roads, the road-side drainage appears to connect directly to Covell's drain. If suitable attenuation is not put in place the additional flow will increase the flood risk in the Fen Drayton / Swavesey areas.
102. A balancing pond is proposed to the east of the Histon junction with an access track which links to the Mere Way. The Council is seeking clarification from Highways England as to whether this access will be gated, to ensure no public access.

Materials / Minerals and Waste

103. Whilst Cambridgeshire County Council is the Minerals and Waste authority the Council has concerns about the operation and after use of the borrow pits.

Borrow pits

104. South Cambridgeshire District Council supports the inclusion of borrow pits within the A14 improvement scheme and accepts that these broadly align with the Cambridgeshire Minerals and Waste Plan. The use of borrow pits should substantially reduce the need to import materials from much longer distances.

Reuse of materials

105. The Council notes and supports the commitment from Highways England (in ES paragraph 13.5.6) to reuse suitable materials from development sites, including from Northstowe, wherever possible. This will reduce the volume of materials needing to be brought in from further afield.

Importing Materials

106. The Applicant should investigate the potential use of the Chesterton rail sidings on the northern edge of Cambridge to supply aggregate that cannot be sourced locally, including the possibility of providing a temporary access directly to the A14. At the same time, however, consideration needs to be given to local amenity impacts, including any implications of night-time operation.

Operation of borrow pits

107. The Council has concerns that the borrow pits will have associated environmental impacts during their operation which need to be carefully assessed and mitigated. The assessment undertaken by Highways England does not adequately address noise and amenity impacts. Cambridgeshire

County Council, as the Minerals and Waste Authority address this in further details in their Written Representations.

Restoration of borrow pits

108. The Council welcomes the proposals to restore the Borrow Pit areas 5 and 6. However we have concerns that it may not be possible to return the majority of these areas to productive agriculture as proposed (loss of substrate and change in drainage patterns at Borrow Pit 5 and layout, gradients and water table issues at Borrow Pit 6) and that both areas will make only limited contributions to the landscape or amenity legacy.
109. The proposals to design the restoration at borrow pit 6 to make it unattractive to birds should also be re-assessed, given the number of existing large water bodies closer to Cambridge Airport.
110. Further information is needed to satisfy the Council that these very large spaces will work well and contribute to agriculture, amenity and the landscape legacy. Conditions will be requested by the Council to cover detailed restoration proposals within the Borrow pit areas.

Aftercare of borrow pits

111. The Council has concerns about after use and care of borrow pits. Highways England only propose a 5 year programme of after care. This is considered an insufficient length of time to enable landscaping and/or ecology to establish. As a result, the Council seeks a 15 year aftercare plan from the completion of the scheme. This is a standard condition applied by the District Council on planning applications.

Transport Assessment

112. The Council is taking advice from Cambridgeshire County Council, as the local highway authority, on traffic modelling issues. South Cambridgeshire District Council agrees that the traffic model takes into consideration planned development within adopted and emerging Development Plans.
113. Ongoing discussions are taking place between Cambridgeshire County Council and Highways England to resolve issues with the traffic model. SCDC may also make further comment when additional work is completed.

Cumulative Impacts

114. The Council highlighted at earlier stages the need to consider cumulative impacts, and it notes the findings of Chapter 18 of the Environmental Statement. However, there are a number of inconsistencies in this chapter which need to be addressed. In particular, not all planned development sites

along the route are addressed, despite their acknowledgement in other parts of the ES, including Darwin Green 2 and Cambridge Northern Fringe East.

115. Errors are also present in Fig 2.2 (sheets 5 & 6 of 7) which incorrectly shows a number of existing and planned development sites in the Green Belt.

Legacy

116. The Council has concerns about the apparent lack of detail in relation to legacy of the scheme, particularly in terms of long term ownership, maintenance and replacement of infrastructure.

117. For example, in relation to borrow pits, not only are the proposals for the restoration of the borrow pits vague, the proposed 5 year maintenance period is not long enough for landscaping to establish itself. In addition, there are no mechanisms in place for the longer-term ownership and maintenance beyond the 5 year period.

Requirements / Processes

Procedural issue – Schedule 2 Requirements

118. The Council is concerned about the way the Part 1 Requirements are drafted. The requirements, as drafted, are not sufficiently detailed. Each of the Requirements needs to require the necessary works to be carried out in accordance with formally approved plans / documents. They should also be clear precisely which plan, drawing and/or document is being approved. For example, the detailed design will encompass a number of plans and drawings for each of the individual elements of the scheme and the Code of Construction Practice (submitted in Appendix 20.2 of the Environmental Statement) may be amended prior to approval. Therefore it is important that the precise reference number / title and date of each are clearly recorded.

Schedule 2 Requirement 6 – landscaping

119. The Council has concerns regarding the proposed aftercare and management of the landscape. Highways England have specified a 5 year programme of after care for the landscaped areas.

120. This is considered an insufficient length of time to enable new landscape and habitats to establish and become robust. As a result, the Council seeks a 15 year aftercare plan from the completion of the scheme. This is a standard condition applied by the District Council on planning applications.

121. The Council would require the applicant's landscape proposals to include an agreed aftercare and management strategy to cover the entire fifteen year maintenance period.

122. The aftercare and management strategy should state the long term vision for the landscape and describe the relevant landscape operations to achieve this through landscape restoration, maintenance and management throughout the entire aftercare and management period.

Schedule 2 Requirement 10 - borrow pits

123. The Council is concerned that there is insufficient detail in Requirement 10 concerning borrow pits and would request that the Requirement ensure detailed plans are formally approved. The Applicant should be required to develop proposals for each borrow pit in consultation with the local authorities. It is important that the restoration plan includes a requirement for a minimum of 15 years after care where it proposes landscaping and/or habitat creation.

Missing Requirement for ecology

124. The Council is concerned that there is no requirement to ensure that adequate pre-construction surveying of habitats is undertaken to establish whether important ecological species are present on directly affected land or nearby

land which could be indirectly impacted. It is important that if important species are found or indication that they may be present, that adequate protection is afforded to them and such are agreed with the local authority before works are permitted.

Procedural issue – detailed design

125. Whilst South Cambridgeshire District Council is supportive in principle of the A14 improvement scheme, it does have a number of concerns regarding matters of detail which are left to a detailed design stage. The Council has concerns about the procedure for agreeing such matters which relate to the detailed design of the scheme, but which are not covered within the scope of the DCO documentation.
126. Implementation of landscape is addressed by a specific sign-off process (Schedule 2 Requirements, Part 1 paragraph 6). Other detailed design matters are not addressed.
127. Environmental Statement paragraphs 6.10.8 to 6.10.10 advise that mitigation will be secured by way of requirements in the DCO, and in parallel the Highways Agency will place a contractual responsibility on detailed design and construction contractors to comply with the DCO requirements. Discharge of these requirements would be by consent from the Secretary of State, generally following consultation with the relevant planning or environmental authority.
128. The Environmental Statement (ES) makes reference to a number of important issues being resolved at the detailed design stage. For example, with regard to noise barriers, the ES shows an indicative location for where noise barriers will be positioned and what length and height they will be. It does not, however, specify the style or materials of the barriers.
129. The DCO does detail the process for agreeing detailed design matters and the involvement of the Local Authority in Table 20.1. There are a number of areas however the LPA wish to be consulted where there is no reference.

Procedural issue - Code of Construction Practice & Local Environmental Management Plans

130. The Council is concerned that it would have no involvement in formal agreement of Code of Construction Practice (CoCP) or the Local Environmental Management Plans (LEMP) produced by contractors.
131. These are important documents controlling the construction of the scheme in order to ensure adequate measures are in place to mitigate potential impacts on residents. The CoCP outlines the control measures and standards to be implemented throughout the construction and the detail of how the contractors will operate at the local level will be included in the LEMPs. The Council would therefore like to be involved in agreeing the content of the CoCP and LEMPs.

Common law nuisance and statutory nuisance

132. The Council notes that the Infrastructure Planning Regulations require that the issue of potential common law nuisance and statutory nuisance must be considered and duly addressed including any proposals by the applicant to mitigate or limit them. This is because the Planning Act 2008 provides a general defence to action in respect of statutory nuisance.
133. The application is accompanied by a statement relating to statutory nuisance which identifies those matters defined in section 79(1) of the Environmental Protection Act 1990 which might be applicable and proposals for mitigating or limiting them.
134. It concluded that the only statutory nuisance matters that could potentially arise as a consequence of the scheme, either at construction or during operation, are artificial light, dust, steam, smell or other effluvia and noise emitted from a premises or noise emitted from or caused by a vehicle, machinery or equipment in a street.
135. Potential noise nuisance would be limited to construction activities or vehicles, plant and machinery only as general road traffic noise is specifically exempted as a statutory nuisance. Highway or street lights are not specifically exempt, but because of their location they are unlikely to qualify as a statutory nuisance, as generally they are not found on 'premises'.
136. It is the council's view that all these potential risks of statutory nuisance related to construction can be either controlled or mitigated under the proposed CEMP that should be imposed via a requirement within the Order. Highways England has also indicated that they may apply for certain control consents in respect of construction noise from the local authorities under the Control of Pollution Act 1974.
137. Operational artificial lighting should also be approved by the imposition of a requirement.

Contaminated land and groundwater

138. It is recommended that a requirement / condition is imposed to ensure a robust mechanism and process is in place for dealing with any contaminated land and groundwater that may be encountered and discovered during the construction works. This should include the submission of a Risk Assessment (for approval) with any report of contamination and consultation with the relevant planning authority and EA as to its subsequent treatment. It should preclude further work in the vicinity of the contamination until any necessary remediation has been carried out.

Conclusion

139. South Cambridgeshire District Council supports the A14 Cambridge to Huntingdon Scheme.
140. Whilst a number of issues have been raised in this written statement, they are capable of being appropriately addressed.
141. Discussions are continuing with Highways England to resolve some of the matters raised and progress will be recorded within the Statement of Common Ground.