

Mr Mark Williams (10030711) and representing Buckden Marina Residents Association (10030713) and registered residents -- Comments on Highways Engand Written Representation

1. As required by the Planning Inspectorate timetable deadline of 7 Jul 2015, these comments are made about the first Written Representation by Highways England, which has, disappointingly, not addressed any of the significant points made in our earlier submissions of relevant interest and our Written Representation, including the independent noise report also submitted. Specifically, our comments are:

2. TR010018- DCOA response to question 1.10.1 (report 10, Noise and Vibration) states that all appropriate residential receptors have been included. They have not - the sensitive residential receptors at Buckden Marina should have been included, particularly due to the inconsistent and inaccurate measurement of L3 noise data as stated in the external noise reported commissioned by Buckden residents association and submitted to the Inspectorate. The baseline L3 data is unrepresentative and inaccurate; further attended measurements need to be undertaken.

3. Report HE-A14-EX-21 – Designation of the National Policy Statement for National Networks– Update to the case for the Scheme 4.16 states ‘ When considering significant cumulative effects, any environmental statement should provide information on how the effects of the applicant's proposal would combine and interact with the effects of other development (including projects for which consent has been granted’. This issue was highlighted in our earlier submissions due to the various national and other proposed infrastructure projects which will impact on Buckden Marina in the near future. These effects, singly and cumulatively, have still not been acknowledged or assessed to date. 4.16 also states ‘Any such information may assist the Secretary of State in reaching decisions on proposals and on mitigation measures that may be required.’ Due to this, and other items detailed in our independent noise report, sufficient design and mitigation has not been considered, with particular emphasis on the approaches to and bridge crossing of the River Great Ouse and the East Coast railway line. Furthermore, no reference has been made to the significant changes in sound source and characteristics arising from this section of the A14 upgrade scheme, as also stated in our earlier submissions and independent noise report.

4. 4.82 states ‘The applicant should identify measures to avoid, reduce or compensate for adverse health impacts as appropriate’. Due to the analytical data presented in the Buckden Marina residents written representation regarding the inaccuracy of L3 noise measurement, proper consideration of this has not been accorded to the residents of Buckden Marina.

5. Appendix 18.1 of the Environmental Statement (document ref 6.3) sets out the potential effects on human health of the proposed scheme. This section goes on to state ‘increase in areas alongside new or improved sections of the A14 but would remain within EU limits. Overall the scheme would reduce

noise in the vicinity of residential properties. Noise levels would increase for some communities although these effects would be mitigated by identified measures including, low-noise road surfacing, landscaped earthworks and the use of noise barriers where appropriate. This has not been met with regard to Buckden Marina, as there no mitigations proposed and there are properties whose land lies within the scheme boundary. Thus, the proposed scheme will have an adverse effect on Buckden Marina residential properties, which has not been fully or properly assessed by Highways England. Sufficient evidence was provided to the examiners to justify the inclusion of Buckden Marina properties; L3 data must be re-measured and Bucken Marina placed within the assessment zone for noise due to the significance of the proposed scheme, and noise mitigation measures must be included in the design.

6. TAG M1, modelling principles section 2.3.4 states 'There is a risk that the model may not be realistic or sensible due to the error around the model parameters used, or limitations in the extent to which the model can represent human behaviour. Therefore, before using any mathematical model, it is essential to check that it produces credible outputs consistent with observed behaviour. This is usually done by running the model for the **base year** (either the current year or a recent year), and: comparing its outputs with independent data (**validation**).' Therefore we request - once more - that noise data is collected from Buckden Marina from representative locations, with which we are more than happy to assist. LT and ST measurements can then be crossed reference against the noise model and be re-validated in accordance with the above statement. Moreover, and of particular importance is that Highways England have still not published, as has been requested, their noise modelling parameters, inputs and a copy of their traffic model. Furthermore, no reference has been given as to the input of heights, soft and hard ground etc to demonstrate how local acoustic effects, which are very relevant to Buckden Marina, have been modelled.

**7. HE/A14/EX/36, June 2015 secton, Noise and Vibration 19.** 'As there are no residential or other properties within range of the proposed route that would justify the construction of noise barriers or noise bunds no noise mitigation measures are proposed for the scheme across the North Flowing Ouse Valley Floodplain'. We find this statement to be both inaccurate and highly misleading for the reasons set out above. The scheme boundary line goes through the property of several Buckden Marina residents and is highly likely to include more when the noise impacts are fully and properly modelled. This document goes on in Section 99. 'The proposed alignment of the A14 crosses the Ouse Valley at this point for a combination of reasons: To minimise impacts on the floodplain of the river Ouse; To minimise impact on the County Wildlife Site (CWS) at Buckden Gravel Pits; To avoid Brampton, Buckden, Offord Cluny and Godmanchester; and, To avoid Buckden landfill site and Buckden Marina. The proposed route has avoided Bucken Marina but its proximity has significant noise and visual impacts, as we have set out previously, and of which Highways England have taken no account.

The foregoing summarises our issues with Highways England's written representation and noise model update. The changes in connection with

traffic flow rates, speeds etc are acknowledged. However, we do not agree that Buckden Marina has been suitably or properly assessed and the factors set out in our previous submissions and these comments stand. It is most disappointing that Highways England have not yet acknowledged or addressed any of them.

Yours Sincerely,

Mark Williams